



## NRHP E-Blasts

*Electronic blasts from the National Register of Historic Places, sharing news and information with the Historic Preservation Community*

July 2022

### TCP Bulletin Reissuance Update

The National Register is actively working to update and reissue *National Register Bulletin 38: Traditional Cultural Properties*. A draft has been completed and is under internal review. A draft for tribal consultation, and partner and public engagement, is expected to be released by early fall, kicking off a 16-month schedule for consultation, external engagement, and document development.

The TCP Bulletin was developed to provide guidance on nominating properties considered to have traditional cultural significance for inclusion in the National Register. First issued in 1990, the TCP Bulletin's target audience was Federal agencies, State Historic Preservation Officers, Certified Local Governments, tribal leadership, and cultural resource professionals.

Here's a brief timeline of the development and reissuance of the TCP Bulletin.

**1990: Release.** The TCP Bulletin was developed in response to 1980 amendments to the National Historic Preservation Act and the Secretary of the Interior's subsequent direction to supplement existing National Register guidance. The TCP Bulletin formalized the term "Traditional Cultural Property"; however, the National Register has included places of traditional cultural significance since its inception, with listings such as Bear Butte, South Dakota (1973) and Medicine Bluffs, Oklahoma (1974).

**1992: 1st Revision.** To address concerns that properties of importance to Tribes or Native Hawaiian Organizations were being excluded from listing by virtue of the fact that religious properties are not typically eligible for listing in the National Register (*see* 36 C.F.R § 60.4 "Criteria considerations"), the National Historic Preservation Act (NHPA) was amended to ensure that that religious or cultural properties of importance to Tribes/NHOs may indeed be listed if they meet the criteria for listing.

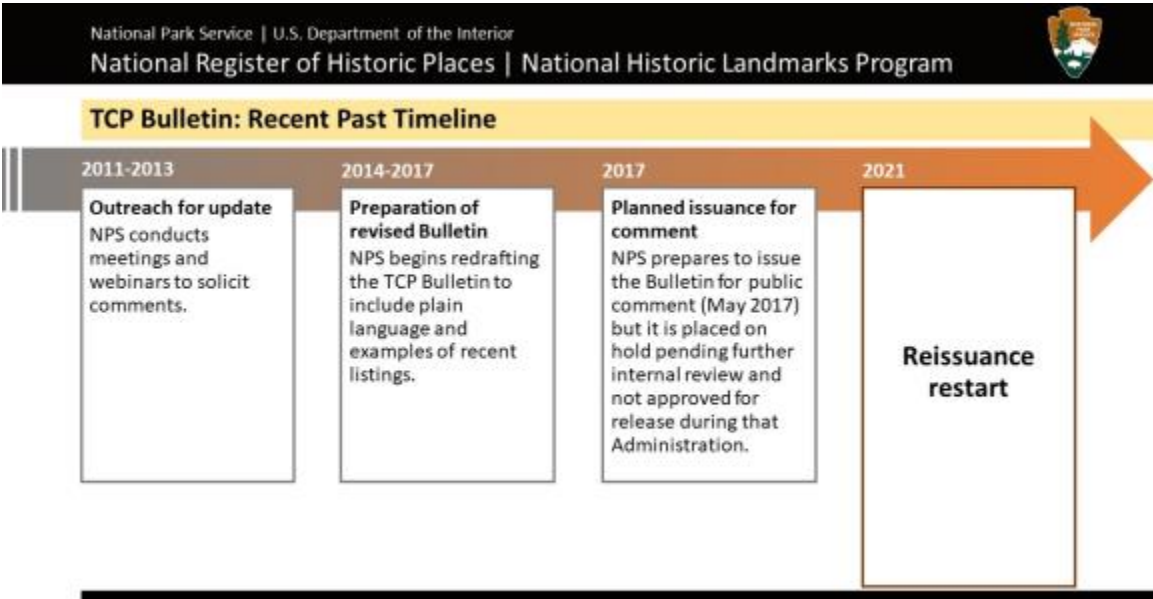
**1998: 2nd Revision.** The TCP Bulletin was revised in 1998 at the request of the preservation community to provide clarity that TCPs are not a new property type nor an additional level of significance.

**2011-2013: Update Initiative.** In response to ever-increasing requests for additional assistance on TCP identification and evaluation from State and Tribal Historic Preservation Offices, Federal agencies, and cultural resource professionals, NPS held "listening sessions" around the country to gather comments. NPS

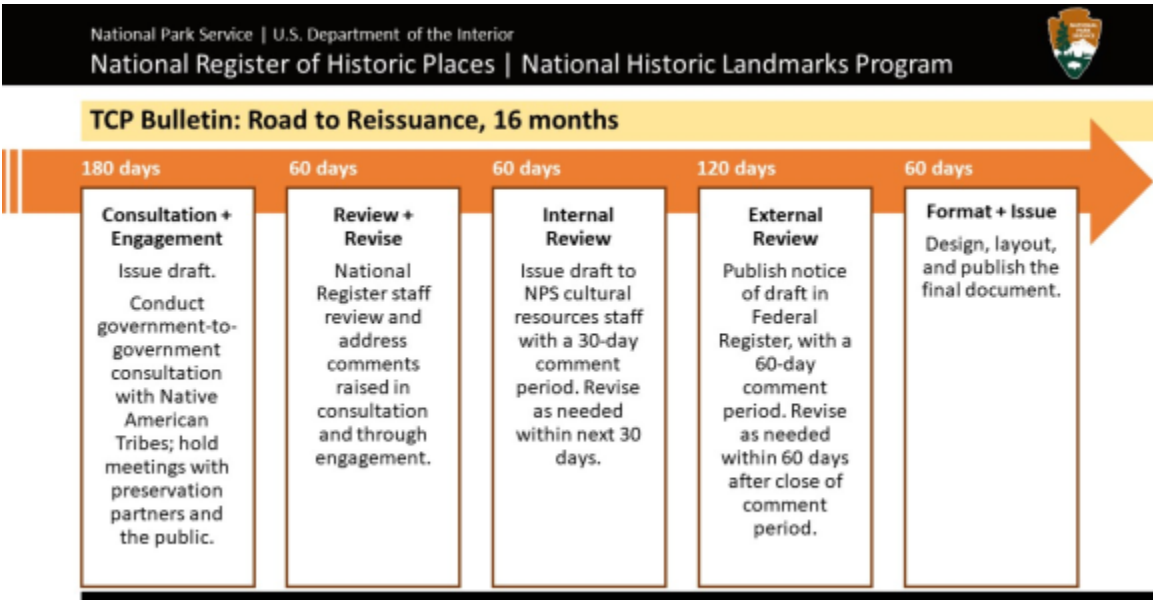
hosted webinars and participated in conferences, teleconferences, and/or meetings with national and regional historic preservation organizations, federally recognized Tribes, Native Hawai’ian Organizations, SHPOs, federal agencies, and the general public. More than 100 written comments were received; most asked for clarification on just what is eligible and just how the Section 106 process applies to TCPs.

**2014-2017: Draft Prepared.** NPS developed a revised draft that simplifies the language and includes additional examples and case studies. There is no change from the 1998 TCP Bulletin in the definition of a TCP or how one is identified, documented, and evaluated. Concurrently, the Advisory Council on Historic Preservation (ACHP) developed a separate document that addresses Federal preservation planning for TCPs, with a focus on the Section 106 process. In mid-2017, the update initiative was halted.

**2022: Reboot of Revision and Reissuance Process.** NPS has further revised the 2017 draft to include additional examples and images. This draft is expected to be released by Fall 2022 for tribal consultation, and partner and public engagement.



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## Derogatory names

The National Register Program is taking a look at historic properties with names that include the derogatory word “sq \_\_\_\_.” In November 2021, Secretary of the Interior Deborah Haaland formally established a [process](#) to review and replace this word where it is used for the nation’s geographic features, such as “Sq \_\_\_\_ Bluff” in Oregon and “Sq \_\_\_\_ Valley Spring” in California. The recently-established Derogatory Geographic Names Task Force has purview over the names of [664 geographic features](#) with the word “sq \_\_\_\_” in the name. These features are located on federal, state, tribal, county, local, or private land but the decisions of the task force are binding only on federal departments and agencies. This process does not include National Register listed properties and the National Register Program does not anticipate taking any action at this time on listed properties with the word “sq \_\_\_\_” in the property name.

With respect to future listings, the program is considering developing new guidance to address this issue. National Register guidance has long advised that a place’s historic name is preferred for listing because it continues to be meaningful regardless of changes in ownership or use and most often relates to the reasons the property is eligible for National Register listing. (*See National Register Bulletin 15: How to Complete the National Register Registration Form*, p. 8.) However, there may be place names for yet-to-be-listed properties that contain this, or other, hurtful words that should not be perpetuated through listing. Before any policy decision is made, the Program will engage with preservation partners on the issue.

## Work Continues on National Register Data Validation Project

The April *E-Blasts* contained a summary of the NPS Preservation Assistance Programs’ virtual “Open House” with NCSHPO members and updates from the National Register and National Historic Landmarks program. The following is a brief update on one of the ongoing National Register program initiatives focusing on diversity and the National Register.

With assistance of a part-time contractor, in March the National Register program commenced a year-long project to systematically gather baseline data to inform ongoing conversations regarding strategies for increasing the diversity and representation of the nation’s past in the properties listed in the National Register of Historic Places. This data validation project involves evaluating a sample of legacy nominations for listed properties drawn from all states and territories to identify potential additional areas of significance related to Ethnic Heritage and identity groupings such as LGBTQ History, Women’s History, and Disability History.

The project’s goal is two-fold: (1) to identify potential additional area(s) of significance, if applicable, for a sample of properties already listed in the National Register and (2) to broadly assess the level of effort required to sufficiently support the potential additional area(s) of significance identified for each nomination in the sample (*e.g.*, supported as written, minor additional information needed, or major rewrite needed). Please note that this is an information gathering exercise and we are not changing the existing documentation in any way.

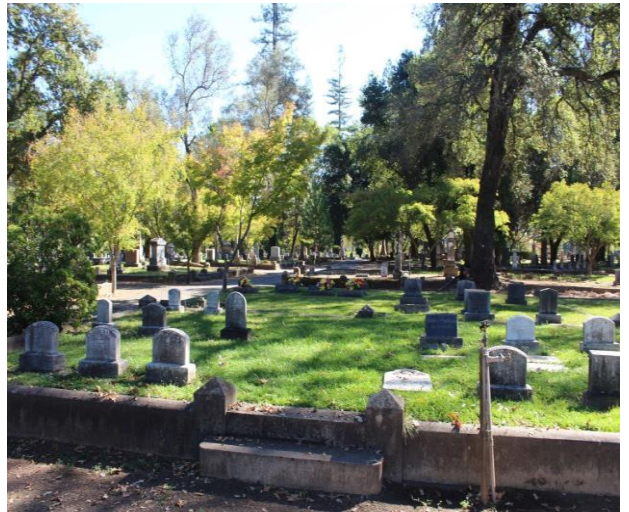
The program will not have data to report out until the first quarter of next calendar year but wanted to provide a bit more information on the effort and note that the contractor—a former SHPO National Register reviewer, so a subject matter expert—is making excellent progress. To date he has reviewed and assessed nearly 1,900 nominations.

## Classification of Cemeteries: Site vs. District

Answers regarding the classification of cemeteries can be found in *National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places* at [National Register Bulletin 41 \(nps.gov\)](https://www.nps.gov/nr/bulletins/41/). The following is taken from the bulletin (page 30).

A single or compound burial of limited scope, such as trailside graves or small family plots, would be classified appropriately as a "site," as would a cemetery nominated as a significant or "contributing" feature within a larger historic district, such as a village or company town.

A complex burial site, such as a cemetery encompassing a multitude of burials, developed landscape features, and buildings, is a "district." Its component parts are enumerated and described, and those which contribute to the significance of the nominated area are distinguished from non-historic features which are unrelated to the period of significance. Individual monumental tombs may be classified as "structures," and grave markers having artistic merit or cultural significance may be counted as significant "objects." The overall landscape design—including roadways, ponds, and plantings—may be counted as a "site" within the district if the design is a significant feature. Because the term "burial place" is broadly interpreted to encompass individual buildings, such as crematory and mausoleum facilities, the category of "building" would be an appropriate classification when such buildings are nominated individually or when counting the number of contributing features in a cemetery district.



*Photo of St. Helena Public Cemetery, Napa County, CA, by Kara Brunzell, courtesy of the CA SHPO.*