



NRHP E-Blasts

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

April 2023

Debating District Boundaries

District boundaries have long been a topic of much interest when it comes to the National Register of Historic Places. Nominations submitted in the early years of the program did not always clearly describe boundaries or they provide imprecise limits, which can be frustrating for someone wanting to know if their property is in a listed district or not. This is additionally problematic for Section 106 and historic tax credit processes for the same reasons. More recently, “jigsaw” boundaries, *i.e.*, those that cut in-and-out of blocks in residential and commercial areas, have been much discussed among NPS National Register reviewers and State Historic Preservation Office staff.

National Register Bulletin 21: Defining Boundaries for National Register Properties (the *Boundaries Bulletin*) states at page 2:

Areas that have lost integrity because of changes in cultural features or setting should be excluded when they are at the periphery of the eligible resources. When such areas are small and surrounded by eligible resources, they may not be excluded, but are included as noncontributing resources of the property.

The term “surrounded by” typically refers to “donut holes,” which are not allowed and are further discussed in the boxed text on page 2 of the *Boundaries Bulletin*. However, care should be taken to ensure that boundaries do not cut-in and-out of an area to the extent that the selected district reflects a false sense of place. For example, a district boundary could exclude non-contributing resources in the middle of blocks or only include one building in a block. This jigsaw approach may result in a higher percentage of contributing properties in the resource count, but the impact of those resources on integrity will still apply when considering the visual continuity of the district. It is preferable to take the boundary to the end of a block or to an alley unless there is a good reason not to do so, such as a clear visual distinction in building stock or development trend, such as residential to commercial or late 19th century to post-modern styles. Generally speaking, a few more non-contributing properties will not jeopardize significance.

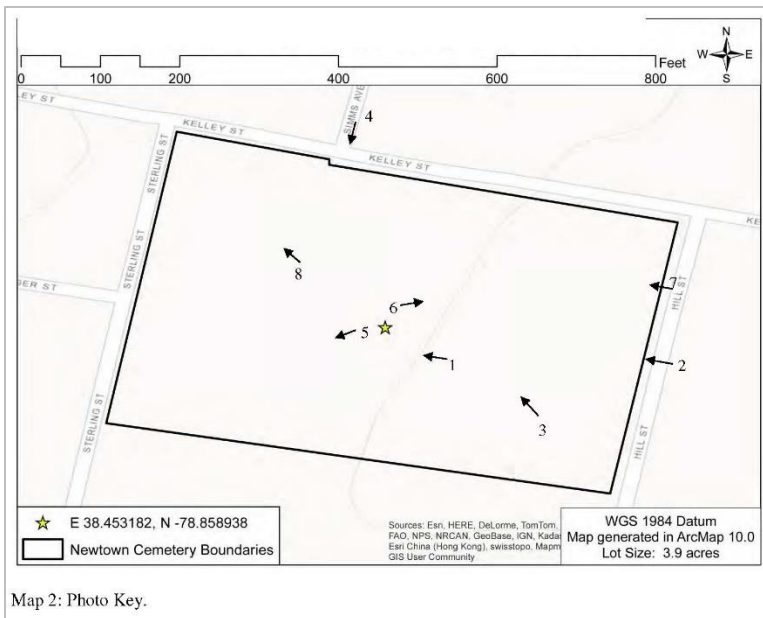
The *Boundaries Bulletin* provides images of jigsaw district boundaries as illustrative examples of boundary selections at pages 13 and 14. While this approach may have been considered a best practice over 25 years ago when this bulletin was published, boundaries of this nature do not always age well. For example, districts whose



Plato (left) and Aristotle (right) discuss contributing and non-contributing buildings. From “The School of Athens”, painting by Raphael Sanzio da Urbino (1509-1511).

contexts are bounded by the fifty-year guideline often require boundary increases if extending the period of significance, as the once-excluded properties have “aged-in” and have been evaluated as contributing to the district’s significance. The entire district may need re-evaluation if adding an area of significance or extending the period of significance. Doing so through the “Additional Documentation” process—addressed in the April 2023 issue of the *Best Practices Review*—is typically a more streamlined process, as a boundary increase requires owner notification. Finally, boundaries that cut between buildings that share party walls could result in complications when it comes to owner notifications, tax credits, and Section 106 consultations.

Providing Boundary Justifications



Boundaries of the Newtown Cemetery, a historically African American cemetery situated northeast from the downtown area of the City of Harrisonburg, Virginia, listed in the National Register of Historic Places on February 17, 2015 (NR Ref. No. 15000014).

owner objections at page 3: “Owner objections may affect the listing of the entire property, but not the identification of the boundaries.”

Nevertheless, there may be practical reasons why nominating the full historic boundary may not be possible. For example, lack of owner permission to access portions of a property may prevent evaluating resources within that area. A proper boundary justification would explain this, noting any good faith efforts to acquire access, and that future study may result in an increase should access be granted. It is important that a boundary justification stand on its own and explain why the nominated boundary adequately reflects the area, level, and period of significance.

- Remember that a boundary *justification* in Section 10 is not simply a version of the verbal boundary *description*. As described at page 5 of the *Boundaries Bulletin*, “[p]rovide a concise *explanation of the reasons for selecting the boundaries*, based on the property’s historic significance and integrity.” (Emphasis added.) Explain why the boundary best reflects the significance and integrity of a property and explain the methodology used for its selection. If the nomination uses the historic boundary, the justification may be brief, *e.g.*, “The National Register boundary is the same as the historic boundary during the period of significance.” If, however, only some of the properties within the historic boundary are nominated, further

Current ownership or legal boundaries may be logical justifications for a boundary if it does not conflict with the historic boundary during the period of significance. Page 3 of the *Boundaries Bulletin* states, “Current Legal Boundaries: Use the legal boundaries of a property as recorded in the current tax map or plat accompanying the deed *when these boundaries encompass the eligible resources and are consistent with the historical significance and remaining integrity.*” (Emphasis added.)

While excluding parts of the historic boundary may be justifiable if there is a loss of integrity or association, sometimes a nomination will state boundaries were selected in consideration of project costs or out of concern over potential owner objection. But neither are acceptable reasons for a boundary justification. The *Boundaries Bulletin* specifically addresses

explanation is needed. The *Boundaries Bulletin* provides several examples, one of which is from the Plumbush nomination from Putman County, New York, at page 11: “Historically, Plumbush was part of a 65-acre farm owned by Robert Parker Parrott. Over time, much of the property was subdivided and sold off. Extensive modern infill on the original farm acreage has destroyed the historical integrity and setting of the larger farm. The 9.3-acre nominated property is all that remains of the original farm associated with the house.”

- Did you know that a map can serve as the boundary description in Section 10 if it meets certain standards? A sketch map is required for districts and complex nominations and it can replace the need for a written boundary description entirely. This is briefly discussed at page 6 of the *Boundaries Bulletin*:

A map drawn to a scale of at least 1 inch to 200 feet may be used in place of a verbal description. When using a map in place of a verbal description, note under the verbal boundary description that the boundaries are indicated on the accompanying map. The map must be clear and accurate. Be sure the map clearly indicates the boundaries of the property in relationship to standing structures or buildings, natural features, or cultural features. Include a drawn scale and north arrow on the map.

A best practice is to include maps as figures on continuation pages. *National Register Bulletin 16A: How to Complete the National Register Registration Form* includes additional guidance on mapping; see “Guidelines for Sketch Maps” at page 62.

Works of A Master: A Review of Criterion C

Criterion C: Design/Construction has several sub-areas, each of which must be fully supported in a nomination. For example, a property may be significant because it embodies distinctive characteristics of a type, period, or method of construction; it possesses high artistic value; it represents a significant and distinguishable entity whose components may lack individual distinction; and/or it represents the work of a master designer or craftsman. Each area requires its own context and, depending on the situation, comparisons when making a case for significance. Applying “work of a master” to a property is one of the more commonly misunderstood subareas of Criterion C.

A nomination citing Criterion C for the work of a master must first make the case that the individual is indeed considered a “master”—or expert—in their field. This may require a discussion of similar experts during the timeframe. From there, the nominated property must be assessed in relation to the expert’s overall portfolio. This requires a comparison to other properties by that person and/or a discussion of the impact of that property’s design on other projects. It is not enough to be an example of a master designer’s or craftsman’s work; the property must be a *significant* example of their work.



Fallingwater, Fayette County, Pennsylvania, one of Frank Lloyd Wright's most well-known designs, was listed July 23, 1974. Source: Fallingwater nomination (NR Ref. No 74001781).

As stated in *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, at page 20:

A master is a figure of generally recognized greatness in a field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The property must express a particular phase in the development of the master's career, an aspect of [their] work, or a particular idea or theme in [their] craft.

A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect. For example, not every building designed by Frank Lloyd Wright is eligible under this portion of Criterion C, although it might meet other portions of the Criterion, for instance as a representative of the Prairie style of architecture.

Sometimes nominations unintentionally suggest a “work of a master” significance when that is not the objective of the document. For example, a property may be nominated as a significant local example of a certain architectural style, but if the nomination includes several pages of biographical information on the architect, the justification for significance is muddled. Adding qualifiers to style descriptions can likewise cause confusion. Take, for example, the statement, “The Smith property is a significant example of Colonial Revival architecture by renowned architect Jon Doe.” Is Jon Doe the reason for the property’s significance or is the property significant for its Colonial Revival style? If it is the latter, it would be better to say the property is a significant local example of the style. While it may be appropriate to briefly discuss the architect as part of the property’s history, excessive focus on them may confuse the reason for the property’s significance, which may cause delays during the review process while reviewers seek clarification. For this reason, it is important to clearly explain the specific justification under Criterion C: Design/Construction and ensure that it is the primary focus of the nomination. If additional context on a particular designer or craftsman is necessary, explain why that is but reiterate the justification for eligibility.

Reminder to Send Photos

A reminder that photos for nominations submitted to the National Register from April 10, 2020, through September 15, 2022, are now being accepted without the count limitations imposed during that time period. The new Cultural Resources Submission Portal (CRSP, or “crisp”) has no file size or photograph restrictions. Several states have already started sending their backlog of photos and any other materials not submitted from April 2020 through September 2022. The National Register is naming these materials “FPAN” for Final Pandemic files. These materials can be submitted through CRSP—please remember to include FPAN in the subject line—or via express mail. Several State Historic Preservation Offices—including Arkansas, California, Georgia, Indiana, Minnesota, Missouri, Rhode Island, South Dakota, Tennessee, and West Virginia—have already sent their backlog of photos. For more information on CRSP, check the National Register website at [CRSP - National Register of Historic Places \(U.S. National Park Service\) \(nps.gov\)](https://www.nps.gov/crsp).

Better Coordination Through Better Cover Letters

From time to time, the National Register program will recognize in its E-Blasts best practices by partners. In this issue, we recognize the Vermont State Historic Preservation Office’s development of a multipurpose cover letter.

An accurate and thorough cover (or transmittal) letter accompanying a National Register action—be it a nomination, boundary change, removal, or other request—better supports National Register staff in preparing the proper language for the Federal Register notification of pending actions, as required by 36 C.F.R. Part 60.

The Vermont State Historic Preservation Office has created a cover letter form that is clear, effective, and efficient. Not only does it provide information on National Register actions—including notification and CLG statuses—but it also includes check boxes for recording the property's association with tax credits and NPS grant funding. These pieces of information will assist the National Register in coordinating information with other NPS preservation assistance programs.



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(phone) 802-828-3540

Agency of Commerce and
Community Development

February 9, 2023

Joy Beasley
Keeper of the National Register
National Park Service
National Register Program
1849 C Street, NW (Mail Stop 7228)
Washington, DC 20240

Re: **Nomination to the National Register of Historic Places for Property in Vermont**

Dear Ms. Beasley:

This submittal contains a true and correct copy of the nomination for the St. Albans Historic District (2022 AD & BC) located in the city of St. Albans, VT, to the National Register of Historic Places.

Notification

The property owner(s), Chief Elected Official and Regional Planning Commission were notified of the proposed nomination on August 19, 2022.

- ☐ No objections to the nomination were submitted to the Division during the public comment period.
- ☒ An objection to the nomination was submitted to the Division during the public comment period. A copy of the objection is attached.
- ☐ A letter of support for the nomination was submitted to the Division during the public comment period. A copy of the letter is attached.

Certified Local Government

- ☐ The property being nominated is not located in a CLG community.
- ☒ The property being nominated is located in a CLG community, and a copy of the local commission's review is attached.

Rehabilitation Investment Tax Credits

- ☒ This property is not utilizing the Rehabilitation Investment Tax Credits.
- ☐ This property is being rehabilitated using the Rehabilitation Investment Tax Credits. A copy of the Part I – Evaluation of Significance form is attached.

NPS Grant-Funded Submissions

- ☒ Not funded with a NPS grant
- ☐ Underrepresented Communities Grant
- ☐ African American Civil Rights Grant
- ☐ History of Equal Rights Grant
- ☐ Tribal Heritage Grant
- ☐ Paul Bruhn Historic Revitalization Grant
- ☐ Disaster Recovery Grant

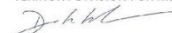
State Review Board

The Vermont Advisory Council on Historic Preservation reviewed the draft nomination materials at its meeting on October 20, 2022. The Council voted that the property meets the National Register Criteria for Evaluation under Criteria A and C and recommends that the State Historic Preservation Officer approve the nomination.

If you have any questions concerning this nomination, please do not hesitate to contact me at (802) 585-8246 or devin.colman@vermont.gov.

Sincerely,

VERMONT DIVISION FOR HISTORIC PRESERVATION


Devin A. Colman
State Architectural Historian

