



MEMORANDUM

DATE: January 3, 2023
TO: Historic Landmarks Committee Members
FROM: Heather Richards, Community Development Director
SUBJECT: Public Testimony for HL 6-22, HL 7-22, HL 8-22, and DDR 2-22, Gwendolyn Hotel
(Received after December 28, 2022)

Historic Landmarks Committee Members,

Following is the public testimony that has been received for the three Certificates of Approval for Demolition for the historic resources at 609, 611, and 619 NE Third Street, and the Certificate of Approval for New Construction for the Gwendolyn Hotel project since December 28, 2022.

Public Testimony:

- Nathan Coopridner, 01.03.23
- Carol Paddock, 01.03.23
- Daniel Kizer, 01.03.23
- Michael Kofford, 01.03.23
- Ernie Munch, 01.03.23

Memo: Public Testimony
Gwendolyn Hotel applications HL- 6-22, HL-7-22, HL 8-22, and DDR 2-22
Date: Tuesday, January 3rd, 2023
By: Nathan Coopridner

Dear Historic Landmark Committee:

This testimony is based upon my experience going through the same design review process two times, as well as my brief review of some of the public records from other downtown McMinnville design review projects that were available. As an architect who has designed two of the buildings being discussed as precedents in the district, the Atticus Hotel and the KAOS Building, I would like to provide testimony regarding the updated Staff Report Findings regarding section 17.59.050.B.1:

“Buildings should have massing and configuration similar to adjacent or nearby historic buildings on the same block. Buildings situated at street corners or intersections should be, or appear to be, two-story in height.”

This is a very important guideline which, to my knowledge, has always been adhered to in the design and approval process for new construction and additions subject to design review. It is a very specific requirement to relate any new construction to the immediate surrounding historic context on the same block. All new buildings and additions are required to adhere to this guideline.

There is a very important distinction between this application and the First Federal building: At First Federal there are no existing historic building on the same block. At this location, there are five existing historic buildings on the same block, and two would remain if all the three demolitions are approved.

What is the resulting precedent of past decisions by the HLC regarding this provision of the ordinance related to building massing and configuration? Each block, context and design is unique, but here is my attempt at summarizing the design review projects I am aware of as they relate to the criterion:

Atticus Hotel DDW 1-17:

The building massing (footprint shape & size, parapet height, number of stories, fenestration patterns) is similar to the Hotel Elberton, which is a nearby historic building on the same block. The building massing could not also meet the second part of the criterion (appear to be two-story in height) as that would have been contradictory to how the first section of the criterion was met.

Precedent: A corner building massing and configuration similar to a historic corner building on the same block. The highest parapet is no taller than an existing historic corner building parapet on the same block.

EXHIBIT 1: Atticus Hotel shown with existing historic corner buildings on the same block:



KAOS Building DDW 1-12:

The building massing consists of a primary two-story stucco building mass with similar height, footprint shape & size, parapet height, number of stories, and fenestration patterns as the O'Dell Building, which is a nearby corner historic building on the same block. A third story appears as a minor and subordinate building mass, much smaller than the primary mass, and set back 28' from the 3rd Street property line, to reduce its visual impact, ensuring that the third-story is subordinate and secondary to the primary 2-story, historically scaled building mass.

Precedent: A two-story building massing and configuration on the corner, which is similar to a historic corner building on the same block, was allowed to have one additional story set 28' back from 3rd Street, because it was determined that the massing and configuration was similar to and compatible with the adjacent and nearby historic buildings on the same block. The overall building height facing 3rd Street is approximately 8' higher than the tallest historic building parapet on the same block.

Here is an excerpt from the Staff Report for the KAOS Building: *"While the setback is proposed to create an outdoor dining plaza, further reasons for this setback are...to not detract physically from the historically significant Bennett Building to the west."*

Exhibit 2:

KAOS Building Massing & Configuration: Similar to existing historic corner building on the same block:



620 NE 3rd, HL 6-18:

Precedent: A second story was allowed to be added on top of an existing one story historic building. The addition is set back 20' from 3rd Street, and is limited in size and scale in relationship to the existing historic building. The resulting overall building height of 27'-6" is not higher than other historic buildings on the same block.

Exhibit 3:

620 NE 3rd Building Massing & Configuration: Similar to existing historic building on the same block:



618 NE 3rd, DDR 2-19:

Precedent: A two story building was allowed to be built at a similar massing and configuration as the neighboring existing historic building on the same block.

Exhibit 4:

618 NE 3rd Building Massing & Configuration: Similar to existing historic building on the same block:



631 NE 1st, DDR 1-21:

Precedent: A two-story building with a partial 3rd floor was allowed on a block with existing historic homes of 2 ½ to 3 stories. The approved building appears to be no taller than the tallest existing historic building on the same block.

Exhibit 5:

631 NE 1st Building Massing & Configuration: Similar to existing historic buildings on the same block:



300 NE 3rd, DDR 10-18:

Precedent: An existing historic corner building, which appears to be 2-stories facing 3rd Street, was allowed to be expanded at the same building height. The addition is 3-stories, and has a similar mass, height and configuration as the existing historic building being added on to.

Exhibit 6:

300 NE 3rd Building Massing & Configuration: Addition is similar to the existing historic corner building on the same block:



These precedents are most relevant to the current application because they all involve projects that have at least one existing historic building located somewhere on the same block. In each of these examples, the design and narratives provided explain how the building design relates to at least one of the block's existing historic building's massing and configuration. The guideline has always been used to evaluate the proposed building or addition in comparison to an existing historic building on the same block when there is one. The narratives for these projects describe how the buildings proposed relate to the existing historic buildings on the same block.

There are three examples I am aware of which did not have existing historic buildings anywhere on the same block, but these precedents are less relevant to the application under review, which is on a block that will contain at least 2 existing historic buildings. Nonetheless, I'll include a brief description of these three examples:

First Federal Building DDR 4-19:

Precedent: Where there is no existing historic building **on the entire block** (defined by 4 streets), a 3 story building massing was allowed on this corner of 3rd and Baker Street.

The Staff Report explained: *"The massing and configuration of the building is similar to other buildings in the downtown area, as it is a three-story building with a flat roofline and façade articulation throughout the longer expanses of building façade."*

Exhibit 7:

First Federal Building Massing & Configuration: Similar to 3 story existing historic corner building in the historic district (there are no existing historic building on the same block).



1025 NE 1st, DDR 1-19:

Precedent: Where there is no existing historic building **on the entire block** (defined by 4 streets), a 2 story building massing was allowed, extending from the corner of 1st and Johnson to the corner of 1st and Kirby.

Exhibit 8:

1025 NE 1st Building Massing & Configuration: 2 story corner building massing (no existing historic building on the same block):



813 NE 2nd Street (Head Start), DDS 1-10:

Precedent: Applicant acknowledged that there are no existing historic buildings on the same block, bounded by three streets and the train tracks. The applicant explained that the building massing, scale and configuration was designed to blend with adjacent buildings which are not historic.

Exhibit 9:

Head Start Massing & Configuration: Similar to non-historic existing buildings on the same block.



To interpret “On the same block” to mean “On the same side of the block” would be inconsistent with every previous design review precedent I have seen. It is important to be consistent in the interpretation of the meaning of the guideline. We see the use of the word “block” in the downtown historic district’s nomination document: *“The district covers portions of 15 blocks and encompasses 15.2 acres.”*

Of course relating to adjacent buildings on the same street frontage is the right thing to do. But this guideline is specifically written as *“on the same block”*, and has been considered in this way in every example I have come across. I have not come across any example of a design which did not propose a massing similar to an existing historic building on the same block when one exists.

To approve a 6 story building massing, when two 1-story historic buildings exist on the same block would be completely unprecedented and not equivalent to the past applications which have adhered to the guideline as it is written. That the guideline contains two parts which can at times be contradictory to fulfill simultaneously does not mean that the guideline can be or has been disregarded. It is the responsibility of the applicant to meet the guideline as it is written and explain how the building does so, or they have the option to go through the waiver process to demonstrate how the proposed design meets or exceeds a building designed to the specific requirement of the guideline.

Regarding “Should” vs. “Shall” / i.e. “Guideline” vs. “Standard”:

Guidelines and Standards are both given the opportunity to be waived as part of the design review process. (See 17.59.030.D: Waiver Process). There have been many past examples of both Guidelines and Standards going through the waiver request process, and all waivers have been required to meet all of the review criteria for a waiver request. Not all waiver requests are granted, but they are all carefully evaluated according to the relevant criteria. This is a very important and a very well preceded part of the design review approval process, and it is important for the applicant to demonstrate *“that the proposed design satisfies or exceeds the downtown design goals and objectives of this ordinance.”* (17.59.030 Review Process, D. Waiver Process). The HLC greatly benefits from this waiver process because it helps ensure a consistent decision making process with the best confidence that all applicable review criteria have been met.

I believe that past precedent establishes that the committee can find that the proposed replacement building does not meet the design guideline 17.59.050.B.1, because the proposed design does not have a massing and configuration similar to adjacent or nearby historic buildings on the same block. AND ALSO does not appear to be two-story in height. The narrative and design do not address the clear requirements of this guideline, when all past projects have. A six or five-story building is not similar to a one, a two, a three, or even a four-story building, as can clearly be seen in the applicant’s proposed south elevation 1/A3.01, which gives you a good idea how the building will appear from directly across 3rd Street. The setback 6th story achieves a building massing viewed from 3rd Street that appears similar to a 5-story building. The other setbacks of 10’ and under, which place multiple story masonry building masses on top of smaller masonry building masses is unprecedented in the district, and does not effectively reduce the scale, the massing and the visual impact of the proposed building. A decision by the committee should apply the criterion in the same way that they have for other projects, matching established precedent. What is unprecedented is a proposal for a building 5 stories taller than the existing historic buildings on the same block, and two stories taller than the tallest historic building in the district.

The applicant has also not shown what historic building in all of McMinnville the proposed building has a massing similar to. Its highest visible parapet is 2 stories taller than the tallest historic building in the district. Its highest visible parapet is approximately 20’ taller than the parapet on the tallest historic building in the district, and this upper parapet height is very likely to increase due to the potential need to screen rooftop mechanical equipment which is not currently shown in the design. The proposed footprint is approximately 3 times the size of the tallest historic building in the district. Even if you accept that these are successfully designed to appear as three-faux buildings, each of the faux-building’s

massing do not relate to anything but each other. This large disruption of the historic fabric will result in the further 'orphaning' of the remaining historic buildings to the east from the rest of the district's historic building fabric. A design which follows the guidelines and standards will do a better job of maintaining and reinforcing the continuity of the historic fabric and the main street qualities which currently exist. Scale is a very important quality of any historic urban environment. It is my opinion that The Downtown Design Standards and Guidelines do not allow this building as designed unless the applicant can show that all waiver criteria are met, or unless you ignore section 17.59.050.B.1 which regulates building massing.

There is no precedent for approving a proposed building mass that is this far out of scale with the existing historic buildings on the same block.

The precedent set at the KAOS Building (which incidentally is on the same block and can be seen in some of the applicant's drawings) is a two-story building massing, with a 3rd story setback 28' from 3rd Street for a rooftop dining patio, and an overall building height of 39' facing 3rd Street. The proposed building is a five-story masonry building massing with a 6th story setback approximately 25' to 50' from 3rd Street for a rooftop patio and an overall building height of approximately 74' facing 3rd Street. This is **a 3-story and approximately 35' building height increase compared to previous new construction approved for this block**. This is a double of the building height previously approved for this block.

The elevation provided along 6 blocks of 3rd Street and the Height Study provided do not illustrate how the proposed building fits into its context, because the proposed building is not included in these exhibits. It would be very helpful if it was so that you could see just how much more massive this building is than anything surrounding it or on the same block, or even in the district as a whole. The offsets do not effectively reduce the building mass and also do not relate to other historic building massing. Nowhere are three 6-story or 5-story buildings sandwiched together in such a way. This massing is unprecedented in the district, and is not similar to any building or combination of buildings, new or historic, on the same block or in the district.

Exhibit 10:

PROPOSED BUILDING WITHIN CONTEXT OF HISTORIC 3rd STREET:

Proposed building elevation shown in overall context of the historic 3rd Street corridor

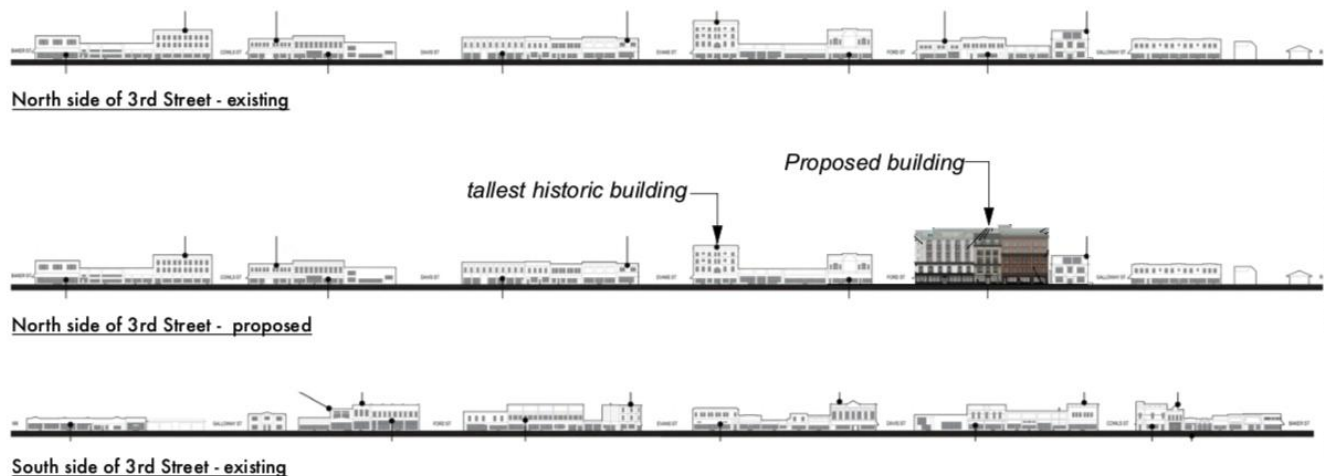


Exhibit 11:

COMPARISON TO OTHER NEW CONSTRUCTION IN THE DISTRICT:

17.59.050.B.1:

BUILDINGS SHOULD HAVE MASSING AND CONFIGURATION SIMILAR TO ADJACENT OR NEARBY HISTORIC BUILDINGS ON THE SAME BLOCK

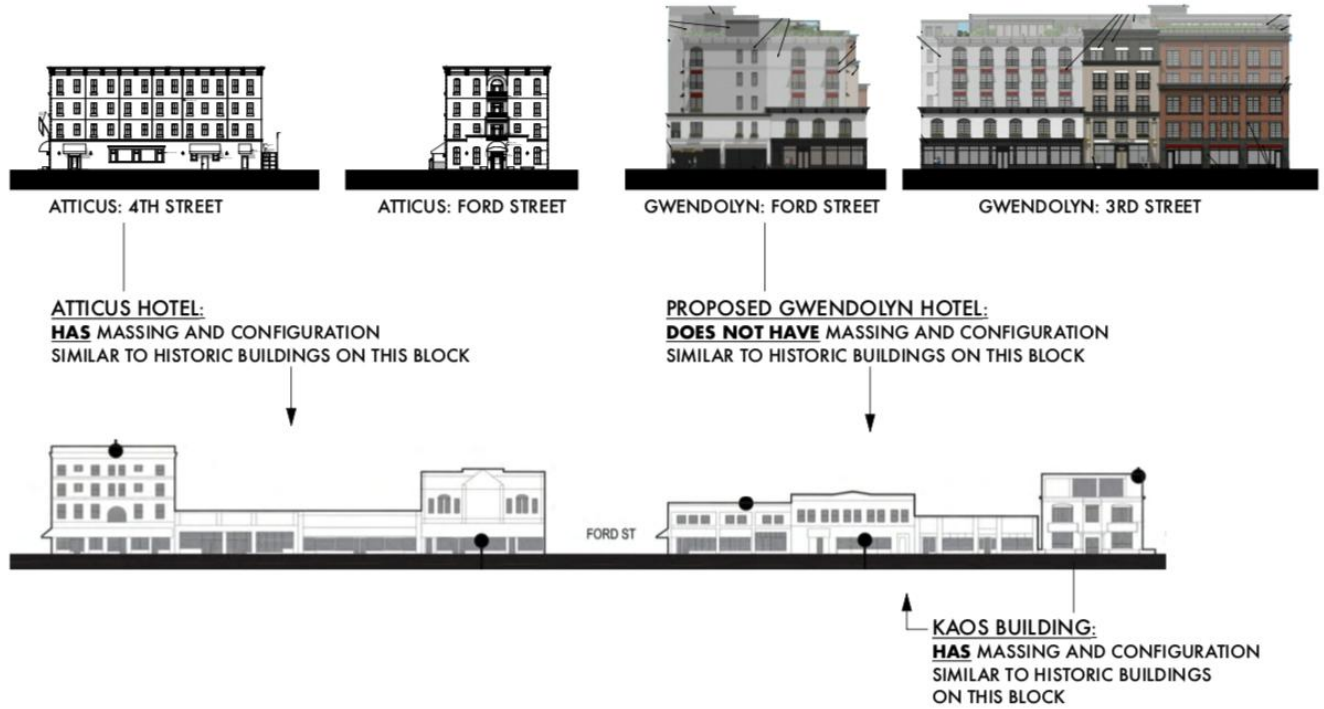
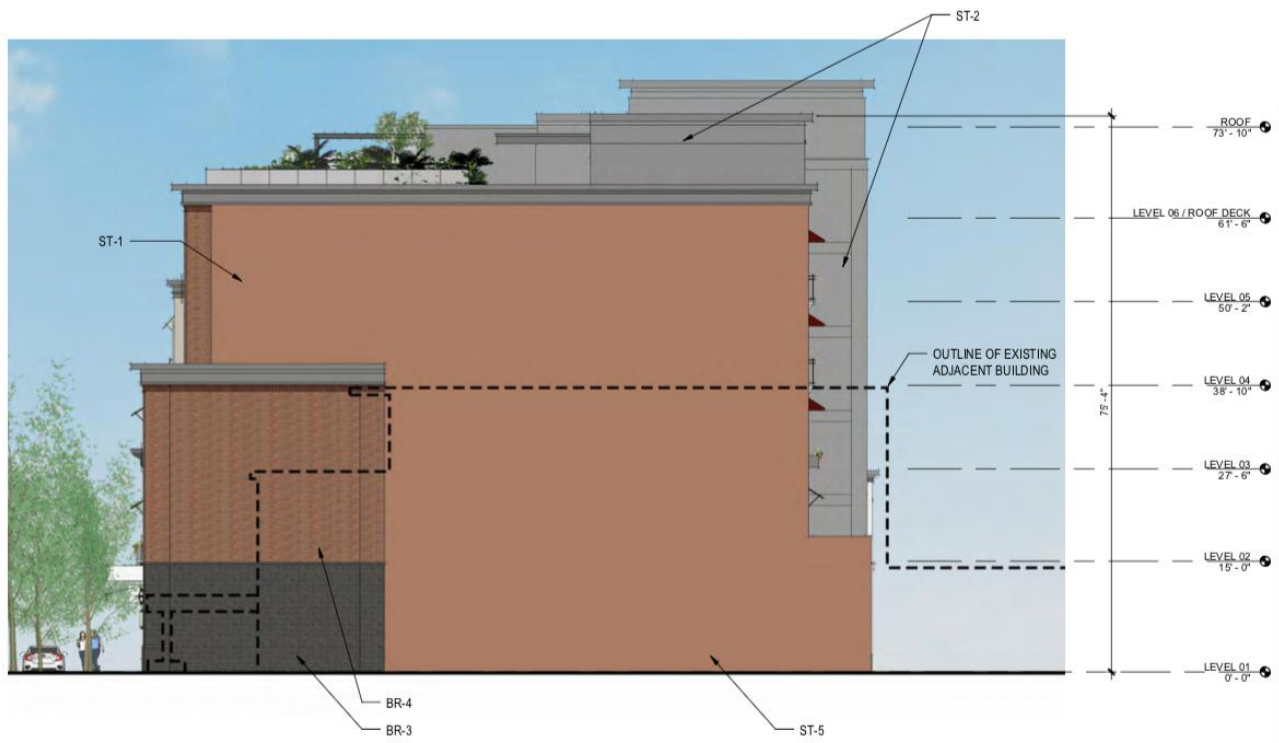


Exhibit 12:

This elevation does a good job of illustrating the mass and scale of the building currently proposed, alongside the building previously approved for this block (The KAOS Building) shown dashed, which was carefully designed to relate to the existing historic buildings on the same block. From this view it is easy to imagine the visual impact from the sidewalk on the opposite side of the street.



2 EAST - ELEVATION
A3.02 SCALE: 3/32" = 1'-0"

I am confident that the current applicant, as well as past and future design review applicants, will all be very grateful for a consistent application and enforcement of the Downtown Design Standards and Guidelines.

Sincerely,
Nathan Coopridier, Architect
McMinnville Native, Portland Resident

Members of the McMinnville Historic Landmarks Committee:

Thank you for all the time you're putting into this.

The most recent staff report says their recommendation to approve demolition was based on past HLC demolition decisions. But you are not required to follow previous HLC demolition precedence in making your decision. Indeed, that kind of thinking would bind the committee in a way which would not allow reflection, reinterpretation, and growth in understanding of the ways in which history plays out in structures, communities, and cultures.

The entirety of the history of the three buildings is not known, and will not be known, without an unbiased assessment (and will never be known if demolished). You have seen how the applicants downplay their historical significance. And it's not their job to provide that; we understand they represent their side. So, the city should equitably seek to counterbalance the other side, at this point through consideration of community submissions—not just from the passions of interested people, but particularly through the expertise of professionals with peripheral knowledge of the buildings. You have a remarkable wealth of those in your submissions.

The staff report further advises, "...the HLC can choose to deny the applications with the same general findings by identifying which factors led to the HLC decision of denial." In other words, without changing the findings, you may approve demolition or deny it by simply saying why. The applicants also mention this avenue in their Dec. 15 letter, albeit through omission:

The above provision requires local governments to consider a number of factors when deciding whether to allow demolition of structures that are located within National Historic Districts. However, the obligation of the City is to consider these factors; the applicant is not required to prove that one or all of them are "met" as would be the case with a mandatory criterion begging a "yes or no" question. *Frankton Neighborhood Association v. Hood River County*, 25 Or

The Historic Landmarks Committee ("HLC") can find (1) that these factors have all been considered with respect to the three buildings proposed for demolition and (2) consideration of these factors supports the Applicant's demolition proposal for each building, which are addressed separately, below.

The applicants contend that the demolition criteria need not be satisfied, but merely considered. Any or all criteria could fail, yet you might still approve demolition; or any or all might be met, yet you could still deny demolition, so long as the criteria were "considered." (The applicants do not mention that last option, which would be (3), in their instructions to you.)

You can be sure, if a decision to demolish is based on precedent, the HLC will be petitioned in the future to do the same on all the new precedents this project brings.

Several dense documents have been submitted by the applicants and developed by the city over the past holiday month, making review unwieldy. I'm afraid I cannot get into those details in this short time. The following are from notes I made in November, which are still relevant.

Historic Integrity

The applicants claim historical integrity of the properties has been compromised, however, those changes generally precede the National Historic District designation. In other words, the structures were accepted as historic in their current condition. Are the applicants claiming significant historic degradation since their designation? No.

The stuccoed façade is mentioned as an example. The stucco may have, in fact, protected the brick. It may have been a maintenance innovation, or simply a preference. Regardless, applicants acknowledge it happened before 1983. Is it removable? It seems to be a simple process to find out: One who knows what they're doing simply chips and checks.

Significance

The applicants further claim the buildings aren't very significant. I'll admit, they may not be the most exciting blocks on the street. But their attractiveness is not the singular relevant point. (If you haven't, go take a look at the brickwork on the cornice—it *is* pretty gorgeous.) That buildings have changed over the years is not necessarily a drawback to their historic character. Change often reflects the effect of historic forces, ranging from economic to behavioral, from fad & fancy to labor & building materials supply, from political climate to gender roles...

A 100-year-old building frozen in its original configuration and materials is likely a museum. Our downtown historic buildings, and likely all of your homes and mine, are working buildings and have changed over time in response to maintenance, growth, changes of use, changes in customer habits...and that's a good thing to see represented. In our lifetimes, think of how these cultural waves have influenced and changed building design:

- Smoking balconies, exterior smoking areas away from circulation, improved HVAC systems...
- Childcare: enclosed kitchens now open up to larger spaces so parents can better monitor their children; public restrooms have enlarged to accommodate changing stations including in men's restrooms.
- The Americans with Disabilities Act: ramps, wider hallways, hand grips, wheelchair maneuvering spaces, specified enlarged parking and aisles, and accessible design code from inception, rather than retrofitted.
- Security: Entry stations with metal detectors, conveyor screenings, room for lines of people.
- Banks: drive-thru banking, offices in reception area.
- Materials (such a broad category): innovations, manufacturing advances, low-maintenance, energy efficiency...
- We can begin to imagine the changes that will be brought from emerging social and health issues:
 - LBGTQ: We are on the forefront of another design revolution wherein restrooms will become more straightforward.
 - The influence of the COVID-19 pandemic: check-in stations at entries, schools, more room for spaced lines, hands-free functions... Research into our behavior over the last

three years will tell us how to design so buildings can be more responsive to health emergencies.

History itself will determine which changes will be transitory and which will transform buildings for the long-term. Do, and will, these changes lessen the historic nature of a building? I argue they are actually representative of history—they reflect a range of history contemporaneous with the life of a building and provide lessons not taught by a museum building frozen in time.

MAC-Town 2032

The applicants lean heavily on MAC-Town 2032, Goal 6 in addressing 17.65.050(B)(6): *Whether the historic resource [the historic buildings] is a deterrent to an improvement program of substantial benefit to the City which overrides the public interest in its preservation.* But the goal states that the highest and best use is to be ensured by evaluating historical districts and designations, among other criteria. A project of the type and scale of the Gwendolyn could raze a few non-historic buildings in the area and still achieve their goals and those of the 2032 plan. Removal of these historic buildings is not a necessary component. The applicants' Dec. 19 letter notes how opportune it was that the three adjacent buildings came up for sale concurrently. This causes one to wonder whether other locations were considered at all, and provides another piece in the template future developers will use to upend our historic district.

The applicants also contend in their Dec. 19 letter that main street will be more cohesive with these buildings gone and the new hotel inserted. I feel they have missed the whole point of the historic district. The Blue Moon exterior is a wonderful contribution to downtown McMinnville and it doesn't go with anything! That's the point of history. It's not about matching buildings; it's about the ways the parts have grown up with each other as they've been whittled, woven, and curated over time, setting together into a pleasant cacophony. THAT'S a historic district.

Massing

The scale of the proposed hotel is out of sync with the downtown and violates 17.59.050A.1.

Applicants maintain an 80' height limit applies, and they're under it by six feet. But we understand code requirements to be in place only when not superseded by more restrictive ones. In this case, the historic district's 17.59.050A.1 effectively limits the heights of buildings in the district. It was designed to do that. The criterion limits visual appearance at intersections to two stories. See the applicants' perspective on page 1170 of the packet of the intersection at Ford and 3rd St. and judge for yourself. You must decide if an approximately 10' setback of the upper floors at the intersection meets the criterion.

The criterion also requires new buildings to mimic adjacent massing. This comment from the applicants on page 314 of the packet, states the Gwendolyn will be 1 and 2 stories taller than the tallest adjacent buildings:

The proposed building is a bit taller than other buildings in downtown McMinnville, but not in any exaggerated way. The Gwendolyn Hotel is two stories taller than the 4-story Atticus hotel, though the sixth floor consists largely of a roof top amenity, and one floor taller than the Hotel Oregon, including the hotel's rooftop amenity. And again, the building is below the allowable height of 80'.

And see the applicants' drawings at pages 1162 and 1163 of the packet for comparisons which show how massive the hotel is to even shorter adjacent buildings across 3rd St. and Ford St.

I have included 3 pages of sun-shadow diagrams to show one visceral aspect of how downtown will change if massing of this scale is allowed. The view is from Ford St., cutting through 3rd St. looking east. The proposed Gwendolyn Hotel is on the left; I have flipped its outline to the south side, superimposed over the former Taylor-Dale hardware store to illustrate how proliferation of this scale will affect daylight. Of course, additional light will come in from the east and west as the sun rises and sets; and importantly, additional light will come in at intersections, and this is a major reason why 17.59.050A.1, preserving smaller scale at corners, should be honored. Note particularly the winter solstice when the proposed Gwendolyn Hotel will be in shadow on its south face reducing reflection down onto the street. (Solar time is shown in the diagrams—a convention whereby noon is highest in the sky.)

Questions

I would ask the applicants: What can you do to ensure your reasoning for demolition does not infect the entire downtown? Other developers will downplay their buildings' historical significance, bemoan the cost of maintenance and upgrades, and speak to how much more prosperity new projects will bring. How is it that the Gwendolyn project merits demolition and the remainder of our historic downtown remains safe? Will any of them commit to joining us and helping us develop code which protects the historic district and differentiates this project from all the other projects that that ARE watching this proceeding? Because, frankly, I don't see the difference. Can they commit to any community involvement beyond economic?

I would ask the HLC: If demolition is approved, how do we protect the historic district? What teeth does our city code really have?

Suggested Additional Conditions of Approval:

- Provide a consultant to join the city in its re-evaluation of demolition criteria.
- Provide a packet to document the resource:
 - Photos, as already mentioned in the staff report;
 - An as-is set of drawings of the structures: plans, elevations, sections, etc., and anything else which speaks to its place in history, i.e. (not limited to) original adjacent street layout, likely plumbing, utilities, & communications layout (telephone, telegraph, pneumatic tube, etc.);
 - Thorough search for historic photos and drawings;
 - Be guided by an historic preservationist.
- Re #11—the market study: Ability for public to review C-of-A submissions.
- I did a quick search of “asbestos” and “lead” in the staff report. Lead was mentioned a few times in relation to groundwater, not paint, and asbestos was not mentioned at all. Asbestos is commonly found, safely encapsulated, in stucco of the period. Should there be a C-of-A for how these items are handled?

- Older building materials are often in demand due to their size, strength, appearance, rarity, etc. In keeping with the city’s sustainability goals, any demolition should instead be considered “deconstruction and salvage” and utilize an experienced or *certified deconstruction contractor* so that as much material as possible is reused and kept out of the waste stream. The following are results from an Oregon CCB license search for the words “deconstruction” and “salvage.” These are companies with one or both of those words in their name; there are likely additional companies with other names which do the same work.

| | License # | Name | License Status | Address |
|------------------------|-----------|---|----------------|--|
| Choose | 219906 | A7 CONSTRUCTION AND DECONSTRUCTION SERVICES LLC | Active | 453 SE HOGAN RD GRESHAM OR 97080 |
| Choose | 213160 | GOOD WOOD DECONSTRUCTION AND SALVAGE LLC | Active | 6326 NE 8TH AVE PORTLAND OR 97211 |
| Choose | 221268 | GREEN DECONSTRUCTION SERVICES | Active | 8823 NORTH HARBORGATE ST PORTLAND OR 97203 |
| Choose | 229683 | LIONS DECONSTRUCTION LLC | Active | PO BOX 16875 PORTLAND OR 97292 |
| Choose | 173875 | LOVETT DECONSTRUCTION INC | Active | 2522 SE 16TH AVE PORTLAND OR 97202 |
| Choose | 231095 | MODECONSTRUCTION | Active | 16080 AIRLIE RD MONMOUTH OR 97361 |
| Choose | 187484 | H & S CONSTRUCTION RAILROAD & SALVAGE | Active | 3588 CARNES RD ROSEBURG OR 97471 |
| Choose | 225789 | HISTORICAL SALVAGE AND DESIGN LLC | Active | PO BOX 1087 NORTH PLAINS OR 97133 |
| Choose | 231622 | WAPATO SALVAGE CONSTRUCTION | Active | 6485 NW SAINT HELENS RD PORTLAND OR 97210 |

Thank you for your continued work on this important application. It has exposed weaknesses in our code (“should” vs. “shall,” etc.) I think the future of our downtown is in your hands.



Carol Paddock
McMinnville, Oregon

Summer Solstice, June 21

Sun angle source: Mechanical and Electrical Systems for Buildings, 7th Edition



Solar noon, greatest light of year

Hardware building shadow
Hotel-type building shadow



Solar 8am and 4pm

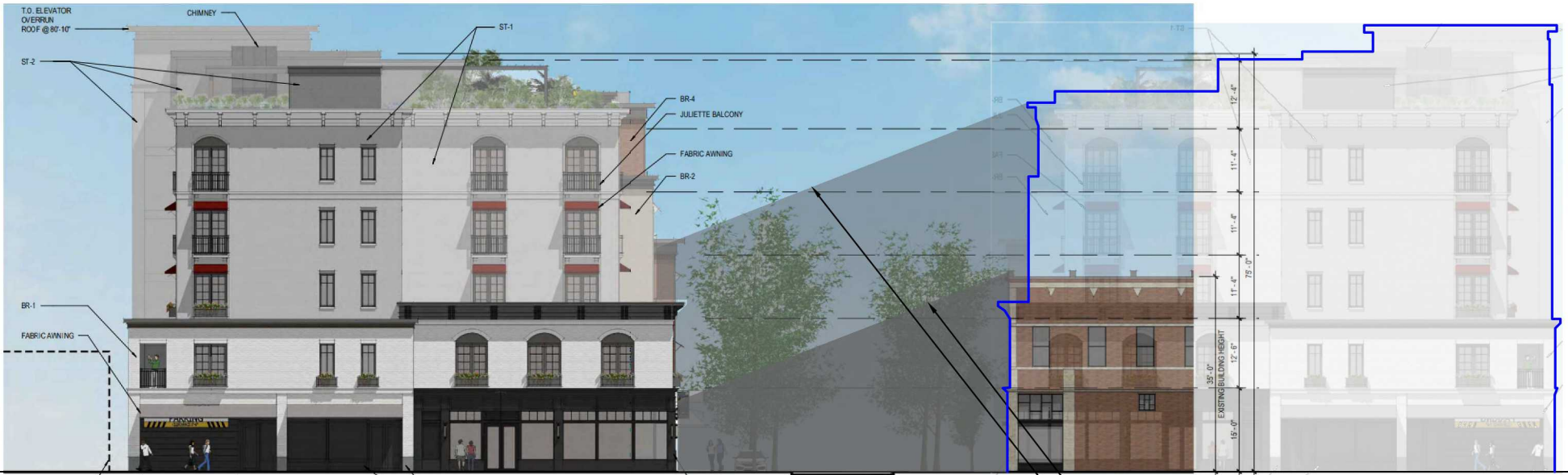
Hardware building shadow
Hotel-type building shadow

Equinoxes, March 21 and September 21



Solar noon, best light of the day

Hardware building shadow
Hotel-type building shadow



Solar 8am and 4pm

Hardware building shadow
Hotel-type building shadow

Winter Solstice, December 21



Solar noon, best light of the day

Sun angle source: Mechanical and Electrical Systems for Buildings, 7th Edition

- Hardware building shadow
- Hotel-type building shadow



Solar 8am and 4pm, darkest daylight of year

- Hardware building shadow
- Hotel-type building shadow

From: [Daniel Kiser](#)
To: [Heather Richards](#)
Subject: Comment on Gwendolyn Hotel
Date: Tuesday, January 3, 2023 4:17:23 PM

This message originated outside of the City of McMinnville.

Dear Heather,

I would like to make further comments on the proposed Gwendolyn Hotel.

Demolition of Historic Buildings

- Structural Issues: Applicant's Economic Report (Nov 4, 2022) is full of hyperbole, claiming that keeping the buildings in their current use "would pose a life safety hazard." However, in keeping with the 3rd Party Contractor Assessment (Nov 4, 2022), applicant admits in section 1 of the OTAK Approvability Memorandums (Nov 4, 2022) that they are "not requesting demolition due to significant structural issues or imminent public safety hazards." The buildings' current structural issues are not unique and are commonly addressed when buildings of their age are restored. Many of the buildings' issues, such as 2nd floor water damage from a clogged roof drain at 611 Third Street, stem from deferred maintenance. Allowing demolition of neglected historic buildings for potential gain is a perverse incentive for not taking care of them.

- Economic Feasibility: Applicant claims that the economic and physical condition of the properties make a preservation project unfeasible. However, their evidence only suggests that a hotel project is unfeasible for preserving and incorporating the buildings. There are myriad other uses possible besides a hotel. In reference to the MAC-Town 2032 Plan, is a hotel the only "highest and best use" for these buildings?

- Architectural Integrity: While the building facades have been altered over time, this process has revealed numerous historical photos that show that restoring the upper stories of these buildings to their original character would greatly enhance the block. The small scale of these buildings undeniably contributes to the intangible small town charm of Third Street—intimate, familiar, and human scaled.

Proposed Building

- Management: IHG Hotels & Resorts announced on Dec 5, 2022 that they signed a deal with Hugh Development to operate the Gwendolyn Hotel under their new luxury "Vignette Collection." IHG owns 17+ hotel brands, including Holiday Inn and Crowne Plaza. The Gwendolyn is a harbinger of corporate exploitation of our beloved Third Street. We better hope the Gwendolyn's business model is successful or IHG could easily change it into a Holiday Inn.

- Building size and context elevations: In supplemental findings DDR 2-22 (Dec 19, 2022),

applicant addresses concerns that the building is too large, but only talks in terms of building height, not building mass. On A0.01 of revised arch plans, applicant shows existing buildings in context of other Third Street building elevations. Applicant does not show proposed building in context of other buildings because it would show how grossly out of scale the proposed building is (6 stories along 3/4 of a block).

- East elevation: Proposed building has no windows on the east elevation (2-A3.02). 6 stories of blank façade will tower over buildings next door. Applicant shows perspective views from the north, west, and south, but not the east. This implies the applicant is hiding an unflattering view as most out-of-town visitors approach Third Street from the east. Applicant needs to show a street perspective on Third Street from the east and on Galloway from the northeast.

- Sight lines: Applicant's demonstration that the building appears to be 2 stories from the corner sidewalk below (A6.04) is laughable. Perspectives demonstrate the building reads as 5 stories from across the street.

- Parking: The proposed underground parking is not required and is a gesture of goodwill towards the city, but you can expect it to be value engineered out, or eliminated, when the project budget is finalized before construction.

Conclusion

Retention of these historic buildings is in the best interest of the majority of citizens and outweighs potential financial hardship for its owner. Many people do not approve of this project, but feel they can't speak out because the owners, the Bladine family, are well connected in the community. If the economic benefit of an international corporate chain hotel outweighs the historic small town charm of Third Street, then McMinnville risks losing the secret sauce that attracts visitors and locals to it in the first place.

Thanks,
Daniel Kiser

From: [Michael Kofford](#)
To: [Heather Richards](#)
Subject: Public testimony
Date: Tuesday, January 3, 2023 4:55:58 PM

This message originated outside of the City of McMinnville.

Heather,

Please accept my comments below.

Thank you,

Mike

January 3, 2023

Dear Historic Landmarks Committee Members,

Although I was born and raised in the McMinnville community, I have lived in, worked in, and spent significant time in several tourist destinations across the country. Experience has taught me that the new build is more than likely already greenlighted, as the pressure from investors must be overwhelming. I must admit the three historic buildings in question are not exactly jewels of the community, but they still add to the former smalltown vibe so important to what makes McMinnville, McMinnville. I have seen fundamental change sweep through other communities such as Scottsdale, Arizona, Sisters, Oregon, and many others without full consideration on how those changes might impact a cohesive sense of place and belonging.

I graduated from Mac High in the early 80's, and from what I recall, most residents at that time identified McMinnville as,

“A great place to raise kids.”

A not-so-secret formula that attracted thousands more people from around the country without much thought to their impact on local social mores. I always tried to be welcoming, but there seems to be a different attitude coming with many of the newer arrivals who are no longer content with being part of this wonderful community but wish to exercise every possible economic angle.

I recall twenty years ago when my apartment on Tamarack had been purchased by an investor from California. He immediately cut back on garbage and repair services

for increased profits. Everyone got angry and was prepared to move out. We were treated like a business acquisition rather than good people living actual lives in the community. I met this new owner only once, but all he was interested in was staring at the Coastal Range muttering about where a new mall might go, or condos. I felt sorry for him honestly.

It was a few months later I found myself at a coffee shop downtown sitting next to four other recent arrivals from Orange County. I heard them raving about the city, so I took the opportunity to speak with them. I wanted to know,

“What was it about McMinnville that made it so irresistible?”

They tolerated my intrusion, and to my surprise, engaged my question.

“We adore the pastoral landscape, the light traffic, and especially the quaint downtown.”

I thought the conversation had ended there until they decided to add to their previous answer.

“Now if only the city would get a Macy’s and add a Starbucks near my home,” they giggled to each other, almost as if they didn’t expect a local capable of understanding. I looked at them with a sincere earnestness.

“If you push that kind of development here ladies, you will only create the exact circumstances you left behind when you moved.”

When my stepfather was still alive, he moved back into our community with my mother in the nineties. Because he had been a car designer for over forty years (Ford, Chrysler) in Michigan, he often invited past colleagues from around the globe to come enjoy our local community. I remember one guest in particular, a man from France who travelled all the way from Paris to stay with us. He appreciated the area for its charm, and left us with a few words of wisdom before he left.

“Never change that wonderful downtown, because quaintness is like an old growth forest, once you cut it down, it will take a hundred years to get it back.”

I’m sure the folks associated with the Gwendolyn Hotel are well intentioned, but I’ve lived in too many communities where once resort culture got a foothold, it fundamentally changed the character of why everyone moved there in the first place.

There was a very poignant NPR show on a couple of weeks ago. The director of a group trying to create a 250-mile trail system near the Columbia River Gorge by The Dalles commented on her future vision for Oregon.

“Once we have everything in place, we’ll create a Tuscan-like hiking experience where everyone can go “Wiking.” Wiking meaning drinking wine while hiking.

Well, Oregon isn’t Tuscany, no matter how many Tuscan influenced tasting rooms you build. Nor am I excited about the prospect for becoming a Wine Disneyland when

there are so many issues with which we must contend. Homelessness, violence, teen apathy, and mass fires all continue to be major challenges.

I am wondering if you have discussed any alternatives involving the sites as they are. Has anyone consulted with local schools concerning the historical sites? Imagine high schoolers interning with local professionals and non-profits to develop a museum site, outline a marketing plan, and help with the design of displays. While boomers love to pile on millennials or Gen Z, we have to fess up to the fact that we just haven't been as influential as we might have been mentoring upcoming generations. Here's our chance. Such an endeavor may not only give meaning to our sense of place, it is a positive project focusing energy away from negative community behaviors.

There is an old saying that we often treat as cute or trite today, and that is, "money isn't everything." I'd suggest there is another side of that coin. Community is everything, a strong sense of place is everything, family is everything, and livability is everything." Please consider our future carefully.

With loving affection for our city,

Michael Kofford

From: [Ernie Munch](#)
To: [Heather Richards](#)
Subject: RE: Gwendolyn Hotel
Date: Tuesday, January 3, 2023 5:24:48 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

This message originated outside of the City of McMinnville.

Yes, just the two attachments. I could not make the 5PM deadline for the letter.

I plan to cover the relevance of the documents in testimony, forwarding a digital copy and distributing printed copies at the meeting.

Let me know if that is a problem. E

Thank you,

Ernie Munch, Architect
Member

MAP Architecture

Ernie Munch • Architecture • Urban Planning, LLC

111 SW Oak Street • Suite 300 • Portland OR 97204

Ernie@MAP-archplan.com

503.936.1062 | cell

503.227.3660 | office

From: Heather Richards <Heather.Richards@mcminnvilleoregon.gov>

Sent: Tuesday, January 3, 2023 5:18 PM

To: Ernie Munch <Ernie@MAP-archplan.com>

Subject: RE: Gwendolyn Hotel

Are these the right attachments. I did not see a letter to accompany them – was that intentional?

Have a great day!

Heather



Heather Richards

Community Development Director

503-474-5107 (phone)

971-287-8322 (cell)

www.mcminnvilleoregon.gov

From: Ernie Munch <Ernie@MAP-archplan.com>

Sent: Tuesday, January 3, 2023 5:10 PM

To: Heather Richards <Heather.Richards@mcminnvilleoregon.gov>

Subject: Re: Gwendolyn Hotel

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From: Heather Richards <Heather.Richards@mcminnvilleoregon.gov>

Sent: Tuesday, January 3, 2023 5:08:57 PM

To: Ernie Munch <Ernie@MAP-archplan.com>

Subject: RE: Gwendolyn Hotel

I received two emails with attachments:

1. **National Register Criteria**

Gwendolyn Hotel



Ernie Munch <Ernie@MAP-archplan.com>
To: Heather Richards

☺ Reply Reply All Forward 📧 ⋮

Tue 1/3/2023 5:01 PM

📧 We sent you safe versions of your files
Outlook item

📄 National Register Criteria.pdf
15 MB

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

This message originated outside of the City of McMinnville.

Ernie Munch, Architect
Member
MAP Architecture
Ernie Munch • Architecture • Urban Planning, LLC
[111 SW Oak Street • Suite 300 • Portland OR 97204](http://111.SW.Oak.Street.Suite.300.Portland.OR.97204)
Ernie@MAP-archplan.com
503.936.1062 | cell
503.227.3660 | office

And the following:

Gwendolyn Hotel



Ernie Munch <Ernie@MAP-archplan.com>
To: Heather Richards

☺ Reply Reply All Forward 📧 ⋮

Tue 1/3/2023 5:01 PM

📧 We sent you safe versions of your files
Outlook item

📄 Part 2 Sec of Interior's Standards for treatment-guidelines Reconstruction-Restoration.tiff
13 MB

Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

This message originated outside of the City of McMinnville.

Ernie Munch, Architect
Member
MAP Architecture
Ernie Munch • Architecture • Urban Planning, LLC
[111 SW Oak Street • Suite 300 • Portland OR 97204](http://111.SW.Oak.Street.Suite.300.Portland.OR.97204)
Ernie@MAP-archplan.com
503.936.1062 | cell
503.227.3660 | office

Have a great day!

Heather



Heather Richards
Community Development Director
503-474-5107 (phone)
971-287-8322 (cell)
www.mcminnvilleoregon.gov

From: Ernie Munch <Ernie@MAP-archplan.com>

Sent: Tuesday, January 3, 2023 5:03 PM
To: Heather Richards <Heather.Richards@mcminnvilleoregon.gov>
Subject: FW: Gwendolyn Hotel

This message originated outside of the City of McMinnville.

Heather, My original email did not send.

Thank you,

Ernie Munch, Architect
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Ernie Munch • Architecture • Urban Planning, LLC
111 SW Oak Street • Suite 300 • Portland OR 97204
Ernie@MAP-archplan.com
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503.227.3660 | office

From: Ernie Munch
Sent: Tuesday, January 3, 2023 4:54 PM
To: Heather Richards <Heather.Richards@mcminnvilleoregon.gov>
Subject: Gwendolyn Hotel

Heather, please include these attachments in the record for the Gwendolyn Hotel proposal,

I will elaborate on their relevance during testimony on Thursday.

Thank you,

Ernie Munch, Architect
Member
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Ernie Munch • Architecture • Urban Planning, LLC
111 SW Oak Street • Suite 300 • Portland OR 97204
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503.936.1062 | cell
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NATIONAL REGISTER BULLETIN

Technical information on the the National Register of Historic Places:
survey, evaluation, registration, and preservation of cultural resources



U.S. Department of the Interior
National Park Service
Cultural Resources
National Register, History and Education

How to Apply the National Register Criteria for Evaluation



The mission of the Department of the Interior is to protect and provide access to our Nation's natural and cultural heritage and honor our trust responsibilities to tribes.

The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.

This material is partially based upon work conducted under a cooperative agreement with the National Conference of State Historic Preservation Officers and the U.S. Department of the Interior.

Date of publication: 1990; revised 1991, 1995, 1997. Revised for Internet 1995.

Cover

(Top Left) Criterion B - Frederick Douglass Home, Washington, D.C. From 1877-1899, this was the home of Frederick Douglass, the former slave who rose to become a prominent author, abolitionist, editor, orator, and diplomat. (Walter Smalling, Jr.)

(Top Right) Criterion D - Francis Canyon Ruin, Blanco vicinity, Rio Arriba County, New Mexico. A fortified village site composed of 40 masonry-walled rooms arranged in a cluster of four house blocks. Constructed ca. 1716-1742 for protection against raiding Utes and Comanches, the site has information potential related to Navajo, Pueblo, and Spanish cultures. (Jon Samuelson)

(Bottom Left) Criterion C - Bridge in Cherrytree Township, Venago County, Pennsylvania. Built in 1882, this Pratt through truss bridge is significant for engineering as a well preserved example of a type of bridge frequently used in northwestern Pennsylvania in the late 19th century. (Pennsylvania Department of Transportation)

(Bottom Right) Criterion A - Main Street/Market Square Historic District, Houston, Harris County, Texas. Until well into the 20th century this district marked the bounds of public and business life in Houston. Constructed between the 1870s and 1920s, the district includes Houston's municipal and county buildings, and served as the city's wholesale, retail, and financial center. (Paul Hester)

PREFACE

Preserving historic properties as important reflections of our American heritage became a national policy through passage of the Antiquities Act of 1906, the Historic Sites Act of 1935, and the National Historic Preservation Act of 1966, as amended. The Historic Sites Act authorized the Secretary of the Interior to identify and recognize properties of national significance (National Historic Landmarks) in United States history and archeology. The National Historic Preservation Act of 1966 authorized the Secretary to expand this recognition to properties of local and State significance in American history, architecture, archeology, engineering, and culture, and worthy of preservation. The National Register of Historic Places is the official list of these recognized properties, and is maintained and expanded by the National Park Service on behalf of the Secretary of the Interior.¹

The National Register of Historic Places documents the appearance and importance of districts, sites, buildings, structures, and objects signifi-

cant in our prehistory and history. These properties represent the major patterns of our shared local, State, and national experience. To guide the selection of properties included in the National Register, the National Park Service has developed the National Register Criteria for Evaluation. These criteria are standards by which every property that is nominated to the National Register is judged. In addition, the National Park Service has developed criteria for the recognition of nationally significant properties, which are designated National Historic Landmarks and prehistoric and historic units of the National Park System. Both these sets of criteria were developed to be consistent with the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, which are uniform, national standards for preservation activities.²

This publication explains how the National Park Service applies these criteria in evaluating the wide range of properties that may be significant in local, State, and national history.

It should be used by anyone who must decide if a particular property qualifies for the National Register of Historic Places.

Listing properties in the National Register is an important step in a nationwide preservation process. The responsibility for the identification, initial evaluation, nomination, and treatment of historic resources lies with private individuals, State historic preservation offices, and Federal preservation offices, local governments, and Indian tribes. The final evaluation and listing of properties in the National Register is the responsibility of the Keeper of the National Register.

This bulletin was prepared by staff of the National Register Branch, Interagency Resources Division, National Park Service, with the assistance of the History Division. It was originally issued in draft form in 1982. The draft was revised into final form by Patrick W. Andrus, Historian, National Register, and edited by Rebecca H. Shrimpton, Consulting Historian.

Beth L. Savage, National Register and Sarah Dillard Pope, National Register, NCSHPO coordinated the latest revision of this bulletin. Antionette J. Lee, Tanya Gossett, and Kira Badamo coordinated earlier revisions.

¹Properties listed in the National Register receive limited Federal protection and certain benefits. For more information concerning the effects of listing, and how the National Register may be used by the general public and Certified Local Governments, as well as by local, State, and Federal agencies, and for copies of National Register Bulletins, contact the National Park Service, National Register, 1849 C Street, NW, NC400, Washington, D.C., 20240. Information may also be obtained by visiting the National Register Web site at www.cr.nps.gov/nr or by contacting any of the historic preservation offices in the States and territories.

²The *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* are found in the *Federal Register*, Vol. 48, No. 190 (Thursday, September 29, 1983). A copy can be obtained by writing the National Park Service, Heritage Preservation Services (at the address above).

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I. INTRODUCTION

The National Register is the nation's inventory of historic places and the national repository of documentation on the variety of historic property types, significance, abundance, condition, ownership, needs, and other information. It is the beginning of a national census of historic properties. The National Register Criteria for Evaluation define the scope of the National Register of Historic Places; they identify the range of resources and kinds of significance that will qualify properties for listing in the National Register. The Criteria are written broadly to recognize the wide variety of historic properties associated with our prehistory and history.

Decisions concerning the significance, historic integrity, documentation, and treatment of properties can be made reliably only when the resource is evaluated within its historic context. The historic context serves as the framework within which the National Register Criteria are applied to specific properties or property types. (See *Part V* for a brief discussion of

historic contexts. Detailed guidance for developing and applying historic contexts is contained in *National Register Bulletin: How to Complete the National Register Registration Form* and *National Register Bulletin: How to Complete the National Register Multiple Property Documentation Form*.)

The guidelines provided here are intended to help you understand the National Park Service's use of the Criteria for Evaluation, historic contexts, integrity, and Criteria Considerations, and how they apply to properties under consideration for listing in the National Register. Examples are provided throughout, illustrating specific circumstances in which properties are and are not eligible for the National Register. This bulletin should be used by anyone who is:

- Preparing to nominate a property to the National Register,
- Seeking a determination of a property's eligibility,
- Evaluating the comparable significance of a property to those listed in the National Register, or

- Expecting to nominate a property as a National Historic Landmark in addition to nominating it to the National Register.

This bulletin also contains a summary of the National Historic Landmarks Criteria for Evaluation (see *Part IX*). National Historic Landmarks are those districts, sites, buildings, structures, and objects designated by the Secretary of the Interior as possessing national significance in American history, architecture, archeology, engineering, and culture. Although National Register documentation includes a recommendation about whether a property is significant at the local, State, or national level, the only official designation of national significance is as a result of National Historic Landmark designation by the Secretary of the Interior, National Monument designation by the President of the United States, or establishment as a unit of the National Park System by Congress. These properties are automatically listed in the National Register.

II. THE NATIONAL REGISTER CRITERIA FOR EVALUATION

CRITERIA FOR EVALUATION:³

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

CRITERIA CONSIDERATIONS:

Ordinarily cemeteries, birthplaces, or 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, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties *will qualify* if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- a. A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- b. A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

- c. A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life; or
- d. A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- e. A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- g. A property achieving significance within the past 50 years if it is of exceptional importance.

³The Criteria for Evaluation are found in the *Code of Federal Regulations, Title 36, Part 60*, and are reprinted here in full.

III. HOW TO USE THIS BULLETIN TO EVALUATE A PROPERTY

For a property to qualify for the National Register it must meet one of the National Register Criteria for Evaluation by:

- **Being associated with an important historic context** *and*
- **Retaining historic integrity of those features necessary to convey its significance.**

Information about the property based on physical examination and documentary research is necessary to evaluate a property's eligibility for the National Register. Evaluation of a property is most efficiently made when following this sequence:

1. Categorize the property (Part IV). A property must be classified as

a district, site, building, structure, or object for inclusion in the National Register.

2. **Determine which prehistoric or historic context(s) the property represents** (Part V). A property must possess significance in American history, architecture, archeology, engineering, or culture when evaluated within the historic context of a relevant geographic area.
3. Determine whether the property is significant under the National Register Criteria (Part VI). This is done by identifying the links to important events or persons, design or construction features, or information potential that make the property important.

4. Determine if the property represents a type usually excluded from the National Register (Part VII). If so, determine if it meets any of the Criteria Considerations.

5. Determine whether the property retains integrity (Part VIII). Evaluate the aspects of location, design, setting, workmanship, materials, feeling, and association that the property must retain to convey its historic significance.

If, after completing these steps, the property appears to qualify for the National Register, the next step is to prepare a written nomination. (Refer to *National Register Bulletin: How to Complete the National Register Registration Form.*)

IV. HOW TO DEFINE CATEGORIES OF HISTORIC PROPERTIES

The National Register of Historic Places includes significant properties, classified as buildings, sites, districts, structures, or objects. It is not used to list intangible values, except in so far as they are associated with or reflected by historic properties. The National Register does not list cultural events, or skilled or talented individuals, as is done in some countries. Rather, the National Register is oriented to recognizing physically concrete properties that are relatively fixed in location.

For purposes of National Register nominations, small groups of properties are listed under a single category, using the primary resource. For example, a city hall and fountain would be categorized by the city hall (building), a farmhouse with two outbuildings would be categorized by the farmhouse (building), and a city park with a gazebo would be categorized by the park (site). Properties with large acreage or a number of resources are usually considered districts. Common sense and reason should dictate the selection of categories.

BUILDING

A building, such as a house, barn, church, hotel, or similar construction, is created principally to shelter any form of human activity. "Building" may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn.

Buildings eligible for the National Register must include all of their basic structural elements. Parts of buildings, such as interiors, facades, or wings, are not eligible independent of the rest of the existing building. The

whole building must be considered, and its significant features must be identified.

If a building has lost any of its basic structural elements, it is usually considered a "ruin" and is categorized as a site.

Examples of buildings include:

*administration building
carriage house
church
city or town hall
courthouse
detached kitchen, barn, and privy
dormitory
fort
garage
hotel
house
library
mill building
office building
post office
school
social hall
shed
stable
store
theater
train station*

STRUCTURE

The term "structure" is used to distinguish from buildings those functional constructions made usually for purposes other than creating human shelter.

Structures nominated to the National Register must include all of the extant basic structural elements. Parts of structures can not be considered eligible if the whole structure remains. For example, a truss bridge is composed of the metal or wooden truss, the abutments, and supporting

piers, all of which, if extant, must be included when considering the property for eligibility.

If a structure has lost its historic configuration or pattern of organization through deterioration or demolition, it is usually considered a "ruin" and is categorized as a site.

Examples of structures include:

*aircraft
apiary
automobile
bandstand
boats and ships
bridge
cairn
canal
carousel
corncrib
dam
earthwork
fence
gazebo
grain elevator
highway
irrigation system
kiln
lighthouse
railroad grade
silo
trolley car
tunnel
windmill*

OBJECT

The term “object” is used to distinguish from buildings and structures those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment.

Small objects not designed for a specific location are normally not eligible. Such works include transportable sculpture, furniture, and other decorative arts that, unlike a fixed outdoor sculpture, do not possess association with a specific place.

Objects should be in a setting appropriate to their significant historic use, roles, or character. Objects relocated to a museum are inappropriate for listing in the National Register.

Examples of objects include:

*boundary marker
fountain
milepost
monument
sculpture
statuary*

SITE

A site is 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 possesses historic, cultural, or archeological value regardless of the value of any existing structure.

A site can possess associative significance or information potential or both, and can be significant under any or all of the four criteria. A site need not be marked by physical remains if it is the location of a prehistoric or historic event or pattern of events and if no buildings, structures, or objects marked it at the time of the events. However, when the location of a prehistoric or historic event cannot be conclusively determined because no other cultural materials were present or survive, documentation must be carefully evaluated to determine whether the traditionally recognized or identified site is accurate.

A site may be a natural landmark strongly associated with significant prehistoric or historic events or patterns of events, if the significance of the natural feature is well documented through scholarly research. Generally, though, the National Register excludes from the definition of “site” natural waterways or bodies of water that served as determinants in the location of communities or were significant in the locality’s subsequent economic development. While they may have been “avenues of exploration,” the features most appropriate to document this significance are the properties built in association with the waterways.

Examples of sites include:

*battlefield
campsite
cemeteries significant for information potential or historic association
ceremonial site
designed landscape
habitation site
natural feature (such as a rock formation) having cultural significance
petroglyph
rock carving
rock shelter
ruins of a building or structure
shipwreck
trail
village site*

DISTRICT

A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.

CONCENTRATION, LINKAGE, & CONTINUITY OF FEATURES

A district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources. The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties. For example, a district can reflect one principal activity, such as a mill or a ranch, or it can encompass several interrelated activities, such as an area that includes industrial, residential, or

commercial buildings, sites, structures, or objects. A district can also be a grouping of archeological sites related primarily by their common components; these types of districts often will not visually represent a specific historic environment.

SIGNIFICANCE

A district must be significant, as well as being an identifiable entity. It must be important for historical, architectural, archeological, engineering, or cultural values. Therefore, districts that are significant will usually meet the last portion of Criterion C plus Criterion A, Criterion B, other portions of Criterion C, or Criterion D.

TYPES OF FEATURES

A district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district’s historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.

A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district’s integrity. In archeological districts, the primary factor to be considered is the effect of any disturbances on the information potential of the district as a whole.

GEOGRAPHICAL BOUNDARIES

A district must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects, or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management, or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district.

DISCONTIGUOUS DISTRICTS

A district is usually a single geographic area of contiguous historic properties; however, a district can also be composed of two or more definable significant areas separated by nonsignificant areas. A discontinuous district is most appropriate where:

- Elements are spatially discrete;
- Space between the elements is not related to the significance of the district; and
- Visual continuity is not a factor in the significance.

In addition, a canal can be treated as a discontinuous district when the system consists of man-made sections of canal interspersed with sections of river navigation. For scattered archeological properties, a discontinuous district is appropriate when the deposits are related to each other through cultural affiliation, period of use, or site type.

It is not appropriate to use the discontinuous district format to include an isolated resource or small group of resources which were once connected to the district, but have since been separated either through demolition or new construction. For example, do not use the discontinuous district format to nominate individual buildings of a downtown commercial district that have become isolated through demolition.

Examples of districts include:

business districts

canal systems

groups of habitation sites

college campuses

estates and farms with large acreage/

numerous properties

industrial complexes

irrigation systems

residential areas

rural villages

transportation networks

rural historic districts



Ordeman-Shaw Historic District, Montgomery, Montgomery County, Alabama. Historic districts derive their identity from the interrelationship of their resources. Part of the defining characteristics of this 19th century residential district in Montgomery, Alabama, is found in the rhythmic pattern of the rows of decorative porches. (Frank L. Thiermonge, III)

V. HOW TO EVALUATE A PROPERTY WITHIN ITS HISTORIC CONTEXT

UNDERSTANDING HISTORIC CONTEXTS

To qualify for the National Register, a property must be significant; that is, it must represent a significant part of the history, architecture, archeology, engineering, or culture of an area, and it must have the characteristics that make it a good representative of properties associated with that aspect of the past. This section explains how to evaluate a property within its historic context.

The significance of a historic property can be judged and explained only when it is evaluated within its historic context. Historic contexts are those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear. Historians, architectural historians, folklorists, archeologists, and anthropologists use different words to describe this phenomena such as trend, pattern, theme, or cultural affiliation, but ultimately the concept is the same.

The concept of historic context is not a new one; it has been fundamental to the study of history since the 18th century and, arguably, earlier than that. Its core premise is that resources, properties, or happenings in history do not occur in a vacuum but rather are part of larger trends or patterns.

In order to decide whether a property is significant within its historic context, the following five things must be determined:

- The facet of prehistory or history of the local area, State, or the nation that the property represents;
- Whether that facet of prehistory or history is significant;
- Whether it is a type of property that has relevance and importance in illustrating the historic context;
- How the property illustrates that history; and finally
- Whether the property possesses the physical features necessary to convey the aspect of prehistory or history with which it is associated.

These five steps are discussed in detail below. If the property being evaluated does represent an important aspect of the area's history or prehistory *and* possesses the requisite quality of integrity, then it qualifies for the National Register.

HOW TO EVALUATE A PROPERTY WITHIN ITS HISTORIC CONTEXT

Identify what the property represents: the theme(s), geographical limits, and chronological period that provide a perspective from which to evaluate the property's significance.

Historic contexts are historical patterns that can be identified through consideration of the history of the property and the history of the surrounding area. Historic contexts may have already been defined in your area by the State historic preservation office, Federal agencies, or local governments. In accordance with the National Register Criteria, the historic context may relate to one of the following:

- An event, a series of events or activities, or patterns of an area's development (Criterion A);
- Association with the life of an important person (Criterion B);
- A building form, architectural style, engineering technique, or artistic values, based on a stage of physical development, or the use of a material or method of construction that shaped the historic identity of an area (Criterion C); or
- A research topic (Criterion D).

⁴ For a complete discussion of historic contexts, see *National Register Bulletin: Guidelines for Completing National Register of Historic Places Registration Forms*.

Determine how the theme of the context is significant in the history of the local area, the State, or the nation.

A theme is a means of organizing properties into coherent patterns based on elements such as environment, social/ethnic groups, transportation networks, technology, or political developments that have influenced the development of an area during one or more periods of prehistory or history. A theme is considered significant if it can be demonstrated, through scholarly research, to be important in American history. Many significant themes can be found in the following list of Areas of Significance used by the National Register.

AREAS OF SIGNIFICANCE

Agriculture
Architecture
Archeology
 Prehistoric
 Historic—Aboriginal
 Historic—Non-Aboriginal
Art
Commerce
Communications
Community Planning and Development
Conservation
Economics
Education
Engineering
Entertainment/Recreation
Ethnic Heritage
 Asian
 Black
 European
 Hispanic
 Native American
 Pacific Islander
 Other
Exploration/Settlement
Health/Medicine
Industry
Invention
Landscape Architecture
Law
Literature
Maritime History
Military
Performing Arts
Philosophy
Politics/Government
Religion
Science
Social History
Transportation
Other

Determine what the property type is and whether it is important in illustrating the historic context.

A context may be represented by a variety of important property types. For example, the context of “Civil War Military Activity in Northern Virginia” might be represented by such properties as: a group of mid-19th century fortification structures; an open field where a battle occurred; a knoll from which a general directed troop movements; a sunken transport ship; the residences or public buildings that served as company headquarters; a railroad bridge that served as a focal point for a battle; and earthworks exhibiting particular construction techniques.

Because a historic context for a community can be based on a distinct period of development, it might include numerous property types. For example, the context “Era of Industrialization in Grand Bay, Michigan, 1875 - 1900” could be represented by important property types as diverse as sawmills, paper mill sites, salt refining plants, flour mills, grain elevators, furniture factories, workers housing, commercial buildings, social halls, schools, churches, and transportation facilities.

A historic context can also be based on a single important type of property. The context “Development of County Government in Georgia, 1777 - 1861” might be represented solely by courthouses. Similarly, “Bridge Construction in Pittsburgh, 1870 - 1920” would probably only have one property type.

Determine how the property represents the context through specific historic associations, architectural or engineering values, or information potential (the Criteria for Evaluation).

For example, the context of county government expansion is represented under Criterion A by historic districts or buildings that reflect population growth, development patterns, the role of government in that society, and political events in the history of the State, as well as the impact of county government on the physical development of county seats. Under Criterion C, the context is represented by properties whose architectural treatments reflect their governmental functions, both practically and symbolically. (See *Part VI: How to Identify the Type of Significance of a Property.*)

Determine what physical features the property must possess in order for it to reflect the significance of the historic context.

These physical features can be determined after identifying the following:

- Which types of properties are associated with the historic context,
- The ways in which properties can represent the theme, and
- The applicable aspects of integrity.

Properties that have the defined characteristics are eligible for listing. (See *Part VIII: How to Evaluate the Integrity of a Property.*)

PROPERTIES SIGNIFICANT WITHIN MORE THAN ONE HISTORIC CONTEXT

A specific property can be significant within one or more historic contexts, and, if possible, all of these should be identified. For example, a public building constructed in the 1830s that is related to the historic context of Civil War campaigns in the area might also be related to the theme of political developments in the community during the 1880s. A property is only required, however, to be documented as significant in one context.

COMPARING RELATED PROPERTIES

Properties listed in the National Register must possess significance when evaluated in the perspective of their historic context. Once the historic context is established and the property type is determined, it is not necessary to evaluate the property in question against other properties if:

- It is the sole example of a property type that is important in illustrating the historic context or
- It clearly possesses the defined characteristics required to strongly represent the context.

If these two conditions do not apply, then the property will have to be evaluated against other examples of the property type to determine its eligibility. The geographic level (local, State, or national) at which this evaluation is made is the same as the level of the historic context. (See *Part V: How to Evaluate a Property Within Its Historic Context.*)

LOCAL, STATE, AND NATIONAL HISTORIC CONTEXTS

Historic contexts are found at a variety of geographical levels or scales. The geographic scale selected may relate to a pattern of historical development, a political division, or a cultural area. Regardless of the scale, the historic context establishes the framework from which decisions about the significance of related properties can be made.

LOCAL HISTORIC CONTEXTS

A local historic context represents an aspect of the history of a town, city, county, cultural area, or region, or any portions thereof. It is defined by the importance of the property, not necessarily the physical location of the property. For instance, if a property is of a type found throughout a State, or its boundaries extend over two States, but its importance relates only to a particular county, the property would be considered of local significance.

The level of context of archeological sites significant for their information potential depends on the scope of the applicable research design. For example, a Late Mississippian village site may yield information in a research design concerning one settlement system on a regional scale, while in another research design it may reveal information of local importance concerning a single group's stone tool manufacturing techniques or house forms. It is a question of how the available information potential is likely to be used.

STATE HISTORIC CONTEXTS

Properties are evaluated in a State context when they represent an aspect of the history of the State as a whole (or American Samoa, the District of Columbia, the Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, or the Virgin Islands). These properties do not necessarily have to belong to property types

found throughout the entire State: they can be located in only a portion of the State's present political boundary. It is the property's historic context that must be important statewide. For example, the "cotton belt" extends through only a portion of Georgia, yet its historical development in the antebellum period affected the entire State. These State historic contexts may have associated properties that are statewide or locally significant representations. A cotton gin in a small town might be a locally significant representation of this context, while one of the largest cotton producing plantations might be of State significance.

A property whose historic associations or information potential appears to extend beyond a single local area might be significant at the State level. A property can be significant to more than one community or local area, however, without having achieved State significance.

A property that overlaps several State boundaries can possibly be significant to the State or local history of each of the States. Such a property is not necessarily of national significance, however, nor is it necessarily significant to all of the States in which it is located.

Prehistoric sites are not often considered to have "State" significance, per se, largely because States are relatively recent political entities and usually do not correspond closely to Native American political territories or cultural areas. Numerous sites, however, may be of significance to a large region that might geographically encompass parts of one, or usually several, States. Prehistoric resources that might be of State significance include regional sites that provide a diagnostic assemblage of artifacts for a particular cultural group or time period or that provide chronological control (specific dates or relative order in time) for a series of cultural groups.

NATIONAL HISTORIC CONTEXTS

Properties are evaluated in a national context when they represent an aspect of the history of the United States and its territories as a whole. These national historic contexts may have associated properties that are locally or statewide significant representations, as well as those of national significance.

Properties designated as nationally significant and listed in the National Register are the prehistoric and historic units of the National Park System and those properties that have been designated National Historic Landmarks. The National Historic Landmark criteria are the standards for nationally significant properties; they are found in the *Code of Federal*

Regulations, Title 36, Part 65 and are summarized in this bulletin in *Part IX: Summary of National Historic Landmarks Criteria for Evaluation*.

A property with national significance helps us understand the history of the nation by illustrating the nationwide impact of events or persons associated with the property, its architectural type or style, or information potential. It must be of exceptional value in representing or illustrating an important theme in the history of the nation.

Nationally significant properties do not necessarily have to belong to a property type found throughout the entire country: they can be located in only a portion of the present political boundaries. It is their historic context that must be important nationwide. For example, the American Civil War

was fought in only a portion of the United States, yet its impact was nationwide. The site of a small military skirmish might be a locally significant representation of this national context, while the capture of the State's largest city might be a statewide significant representation of the national context.

When evaluating properties at the national level for designation as a National Historic Landmark, please refer to the National Historic Landmarks outline, *History and Prehistory in the National Park System and the National Historic Landmarks Program 1987*. (For more information about the National Historic Landmarks program, please write to the Department of the Interior, National Park Service, National Historic Landmarks, 1849 C Street, NW, NC400, Washington, DC 20240.)

VI. HOW TO IDENTIFY THE TYPE OF SIGNIFICANCE OF A PROPERTY

INTRODUCTION

When evaluated within its historic context, a property must be shown to be significant for *one or more of the four Criteria for Evaluation - A, B, C, or D* (listed earlier in *Part II*). The Criteria describe how properties are significant for their association with important events or persons, for their importance in design or construction, or for their information potential.

The basis for judging a property's significance and, ultimately, its eligibility under the Criteria is *historic context*. The use of historic context allows a property to be properly evaluated in a nearly infinite number of capacities. For instance, Criterion C: Design/Construction can accommodate properties representing construction types that are unusual or widely practiced, that are innovative or traditional, that are "high style" or vernacular, that are the work of a famous architect or an unknown master craftsman. *The key to determining whether the characteristics or associations of a particular property are significant is to consider the property within its historic context.*

After identifying the relevant historic context(s) with which the property is associated, the four Criteria are applied to the property. Within the scope of the historic context, the National Register Criteria define the kind of significance that the properties represent.

For example, within the context of "19th Century Gunpowder Production in the Brandywine Valley," Criterion A would apply to those properties associated with important events in the founding and development of the industry. Criterion B would apply to those properties associated with persons who are significant in the founding of the industry or associated with important inventions related to gunpowder manufacturing. Criterion C would apply to those buildings, structures, or objects whose architectural form or style reflect important design qualities integral to the industry. And Criterion D would apply to properties that can convey information important in our understanding of this industrial process. If a property qualifies under more than one of the Criteria, its significance under each should be considered, if possible, in order to identify all aspects of its historical value.

NATIONAL REGISTER CRITERIA FOR EVALUATION*

The National Register Criteria recognize different types of values embodied in districts, sites, buildings, structures, and objects. These values fall into the following categories:

Associative value (Criteria A and B): Properties significant for their association or linkage to events (Criterion A) or persons (Criterion B) important in the past.

Design or Construction value (Criterion C): Properties significant as representatives of the manmade expression of culture or technology.

Information value (Criterion D): Properties significant for their ability to yield important information about prehistory or history.

*For a complete listing of the Criteria for Evaluation, refer to Part II of this bulletin.

CRITERION A: EVENT

Properties can be eligible for the National Register if they are associated with events that have made a significant contribution to the broad patterns of our history.

UNDERSTANDING CRITERION A: EVENT

To be considered for listing under Criterion A, a property must be associated with one or more events important in the defined historic context. Criterion A recognizes properties associated with single events, such as the founding of a town, or with a pattern of events, repeated activities, or historic trends, such as the gradual rise of a port city's prominence in trade and commerce. The event or trends, however, must clearly be important within the associated context: settlement, in the case of the town, or development of a maritime economy, in the case of the port city. Moreover, the property must have an important association with the event or historic trends, and it must retain historic integrity. (See *Part V: How to Evaluate a Property Within its Historic Context.*)

Several steps are involved in determining whether a property is significant for its associative values:

- Determine the nature and origin of the property,
- Identify the historic context with which it is associated, and
- Evaluate the property's history to determine whether it is associated with the historic context in any important way.

APPLYING CRITERION A: EVENT

TYPES OF EVENTS

A property can be associated with either (or both) of two types of events:

- A specific event marking an important moment in American prehistory or history and
- A pattern of events or a historic trend that made a significant contribution to the development of a community, a State, or the nation.

Refer to the sidebar on the right for a list of specific examples.

ASSOCIATION OF THE PROPERTY WITH THE EVENTS

The property you are evaluating must be documented, through accepted means of historical or archeological research (including oral history), to have existed at the time of the event or pattern of events *and* to have been associated with those events. A property is *not* eligible if its associations are speculative. For archeological sites, well reasoned inferences drawn from data recovered at the site can be used to establish the association between the site and the events.

SIGNIFICANCE OF THE ASSOCIATION

Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well. For example, a building historically in commercial use must be shown to have been significant in commercial history.

EXAMPLES OF PROPERTIES ASSOCIATED WITH EVENTS

Properties associated with specific events:

- *The site of a battle.*
- *The building in which an important invention was developed.*
- *A factory district where a significant strike occurred.*
- *An archeological site at which a major new aspect of prehistory was discovered, such as the first evidence of man and extinct Pleistocene animals being contemporaneous.*
- *A site where an important facet of European exploration occurred.*

Properties associated with a pattern of events:

- *A trail associated with western migration.*
- *A railroad station that served as the focus of a community's transportation system and commerce.*
- *A mill district reflecting the importance of textile manufacturing during a given period.*
- *A building used by an important local social organization.*
- *A site where prehistoric Native Americans annually gathered for seasonally available resources and for social interaction.*
- *A downtown district representing a town's growth as the commercial focus of the surrounding agricultural area.*

TRADITIONAL CULTURAL VALUES

Traditional cultural significance is derived from the role a property plays in a community's historically rooted beliefs, customs, and practices. Properties may have significance under Criterion A if they are associated with events, or series of events, significant to the cultural traditions of a community.⁵

Eligible

- A hilltop associated in oral historical accounts with the founding of an Indian tribe or society is eligible.
- A rural community can be eligible whose organization, buildings, or patterns of land use reflect the cultural traditions valued by its long-term residents.
- An urban neighborhood can be eligible as the traditional home of a particular cultural group and as a reflection of its beliefs and practices.

Not Eligible

- A site viewed as sacred by a recently established utopian or religious community does not have traditional cultural value and is not eligible.



Criterion A - The Old Brulay Plantation, Brownsville vicinity, Cameron county, Texas. Historically significant for its association with the development of agriculture in southeast Texas, this complex of 10 brick buildings was constructed by George N. Brulay, a French immigrant who introduced commercial sugar production and irrigation to the Rio Grande Valley. (Photo by Texas Historical Commission).

⁵For more information, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

CRITERION B: PERSON

Properties may be eligible for the National Register if they are associated with the lives of persons significant in our past.

UNDERSTANDING CRITERION B: PERSON⁶

Criterion B applies to properties associated with individuals whose specific contributions to history can be identified and documented. Persons "significant in our past" refers to individuals whose activities are demonstrably important within a local, State, or national historic context. The criterion is generally restricted to those properties that illustrate (rather than commemorate) a person's important achievements. (The policy regarding commemorative properties, birthplaces, and graves is explained further in *Part VIII: How to Apply the Criteria Considerations*.)

Several steps are involved in determining whether a property is significant for its associative values under Criterion B. First, determine the importance of the individual. Second, ascertain the length and nature of his/her association with the property under study and identify the other properties associated with the individual. Third, consider the property under Criterion B, as outlined below.

EXAMPLES OF PROPERTIES ASSOCIATED WITH PERSONS

Properties associated with a Significant Person:

- *The home of an important merchant or labor leader.*
- *The studio of a significant artist.*
- *The business headquarters of an important industrialist.*



Criterion B - The William Whitney House, Hinsdale, DuPage County, Illinois. This building is locally significant for its historical association with William Whitney, the founder of the town of Hinsdale, Illinois. Whitney, a citizen of New York State, moved to Illinois, established the town, and while living here between 1870 and 1879 was a prominent local businessman and politician. (Photo by Frederick C. Cue).

⁶For further information on properties eligible under Criterion B, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Properties Associated with Significant Persons*.

APPLYING CRITERION B: PERSON

SIGNIFICANCE OF THE INDIVIDUAL

The persons associated with the property must be *individually* significant within a historic context. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group.

Eligible

- The residence of a doctor, a mayor, or a merchant is eligible under Criterion B if the person was significant in the field of medicine, politics, or commerce, respectively.

Not Eligible

- A property is not eligible under Criterion B if it is associated with an individual about whom no scholarly judgement can be made because either research has not revealed specific information about the person's activities and their impact, or there is insufficient perspective to determine whether those activities or contributions were historically important.

ASSOCIATION WITH THE PROPERTY

Properties eligible under Criterion B are usually those associated with a person's *productive* life, reflecting the time period when he or she achieved significance. In some instances this may be the person's home; in other cases, a person's business, office, laboratory, or studio may best represent his or her contribution. Properties that pre- or post-date an individual's significant accomplishments are usually not eligible. (See *Comparison to Related Properties*, below, for exceptions to this rule.)

The individual's association with the property must be documented by accepted methods of historical or archeological research, including written or oral history. Speculative associations are not acceptable. For archeological sites, well reasoned inferences drawn from data recovered at the site are acceptable.

COMPARISON TO RELATED PROPERTIES

Each property associated with an important individual should be compared to other associated properties to identify those that best represent the person's historic contributions. The best representatives usually are properties associated with the person's adult or *productive* life. Properties associated with an individual's formative or later years may also qualify if it can be demonstrated that the person's activities during this period were historically significant or if no properties from the person's productive years survives. Length of association is an important factor when assessing several properties with similar associations.

A community or State may contain several properties eligible for associations with the same important person, if each represents a different aspect of the person's productive life. A property can also be eligible if it has brief but consequential associations with an important individual. (Such associations are often related to specific events that occurred at the property and, therefore, it may also be eligible under Criterion A.)

ASSOCIATION WITH GROUPS

For properties associated with several community leaders or with a prominent family, it is necessary to identify specific individuals and to explain their significant accomplishments.

Eligible

- A residential district in which a large number of prominent or influential merchants, professionals, civic leaders, politicians, etc., lived will be eligible under Criterion B if the significance of one or more specific individual residents is explicitly justified.
- A building that served as the seat of an important family is eligible under Criterion B if the significant accomplishments of one or more individual family members is explicitly justified.

Not Eligible

- A residential district in which a large number of influential persons lived is not eligible under Criterion B if the accomplishments of a specific individual(s) cannot be documented. If the significance of the district rests in the cumulative importance of prominent residents, however, then the district might still be eligible under Criterion A. Eligibility, in this case, would be based on the broad pattern of community development, through which the neighborhood evolved into the primary residential area for this class of citizens.
- A building that served as the seat of an important family will not be eligible under Criterion B if the significant accomplishments of individual family members cannot be documented. In cases where a succession of family members have lived in a house and collectively have had a demonstrably significant impact on the community, as a family, the house is more likely to be significant under Criterion A for association with a pattern of events.

ASSOCIATION WITH LIVING PERSONS

Properties associated with living persons are usually not eligible for inclusion in the National Register. Sufficient time must have elapsed to assess both the person's field of endeavor and his/her contribution to that field. Generally, the person's active participation in the endeavor must be finished for this historic perspective to emerge. (See Criteria Considerations C and G in *Part VII: How to Apply the Criteria Considerations*.)

ASSOCIATION WITH ARCHITECTS/ARTISANS

Architects, artisans, artists, and engineers are often represented by their works, which are eligible under Criterion C. Their homes and studios, however, can be eligible for consideration under Criterion B, because these usually are the properties with which they are most personally associated.

NATIVE AMERICAN SITES

The known major villages of individual Native Americans who were important during the contact period or later can qualify under Criterion B. As with all Criterion B properties, the individual associated with the property must have made some specific important contribution to history. Examples include sites significantly associated with Chief Joseph and Geronimo.⁷

⁷ For more information, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

CRITERION C: DESIGN/CONSTRUCTION

Properties may be eligible for the National Register if they embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.



Richland Plantation, East Feliciana Parish, Louisiana. Properties can qualify under Criterion C as examples of high style architecture. Built in the 1830s, Richland is a fine example of a Federal style residence with a Greek Revival style portico. (Photo by Dave Gleason).

UNDERSTANDING CRITERION C: DESIGN/ CONSTRUCTION

This criterion applies to properties significant for their physical design or construction, including such elements as architecture, landscape architecture, engineering, and artwork. To be eligible under Criterion C, a property must meet *at least one* of the following requirements:

- Embody distinctive characteristics of a type, period, or method of construction.
- Represent the work of a master.
- Possess high artistic value.

- Represent a significant and distinguishable entity whose components may lack individual distinction.

The first requirement, that properties “embody the distinctive characteristics of a type, period, or method of construction,” refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history.

“The work of a master” refers to the technical or aesthetic achievements of an architect or craftsman. “High artistic values” concerns the expression of aesthetic ideals or preferences and applies to aesthetic achievement.

Resources “that represent a significant and distinguishable entity whose components may lack individual distinction” are called “districts.” In the Criteria for Evaluation (as published in the *Code of Federal Regulations* and reprinted here in Part II), districts are

defined within the context of Criterion C. Districts, however, can be considered for eligibility under all the Criteria, individually or in any combination, as is appropriate. For this reason, the full discussion of districts is contained in *Part IV: How to Define Categories of Historic Properties*. Throughout the bulletin, however, districts are mentioned within the context of a specific subject, such as an individual Criterion.



Grant Family House, Saco vicinity, York County, Maine. Properties possessing high artistic value meet Criterion C through the expression of aesthetic ideals or preferences. The Grant Family House, a modest Federal style residence, is significant for its remarkably well-preserved stenciled wall decorative treatment in the entry hall and parlor. Painted by an unknown artist ca. 1825, this is a fine example of 19th century New England regional artistic expression. (Photo by Kirk F. Mohney).

EXAMPLES OF PROPERTIES ASSOCIATED WITH DESIGN/ CONSTRUCTION

Properties associated with design and construction:

- A house or commercial building representing a significant style of architecture.
- A designed park or garden associated with a particular landscape design philosophy.
- A movie theater embodying high artistic value in its decorative features.
- A bridge or dam representing technological advances.

APPLYING CRITERION C: DESIGN/ CONSTRUCTION

DISTINCTIVE CHARACTERISTICS OF TYPE, PERIOD, AND METHOD OF CONSTRUCTION

This is the portion of Criterion C under which most properties are eligible, for it encompasses all architectural styles and construction practices. To be eligible under this portion of the Criterion, a property must clearly illustrate, through "distinctive characteristics," the following:

- The pattern of features common to a particular class of resources,
- The individuality or variation of features that occurs within the class,
- The evolution of that class, or
- The transition between classes of resources.

Distinctive Characteristics: "Distinctive characteristics" are the physical features or traits that commonly recur in individual types, periods, or methods of construction. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction.

Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials. They can be general, referring to ideas of design and construction such as basic plan or form, or they can be specific, referring to precise ways of combining particular kinds of materials.

Eligible

- A building eligible under the theme of Gothic Revival architecture must have the distinctive characteristics that make up the vertical and picturesque qualities of the style, such as pointed gables, steep roof pitch, board and batten siding, and ornamental bargeboard and veranda trim.
- A late Mississippian village that illustrates the important concepts in prehistoric community design and planning will qualify.
- A designed historic landscape will qualify if it reflects a historic trend or school of theory and practice, such as the City Beautiful Movement, evidencing distinguished design, layout, and the work of skilled craftsmanship.

Not Eligible

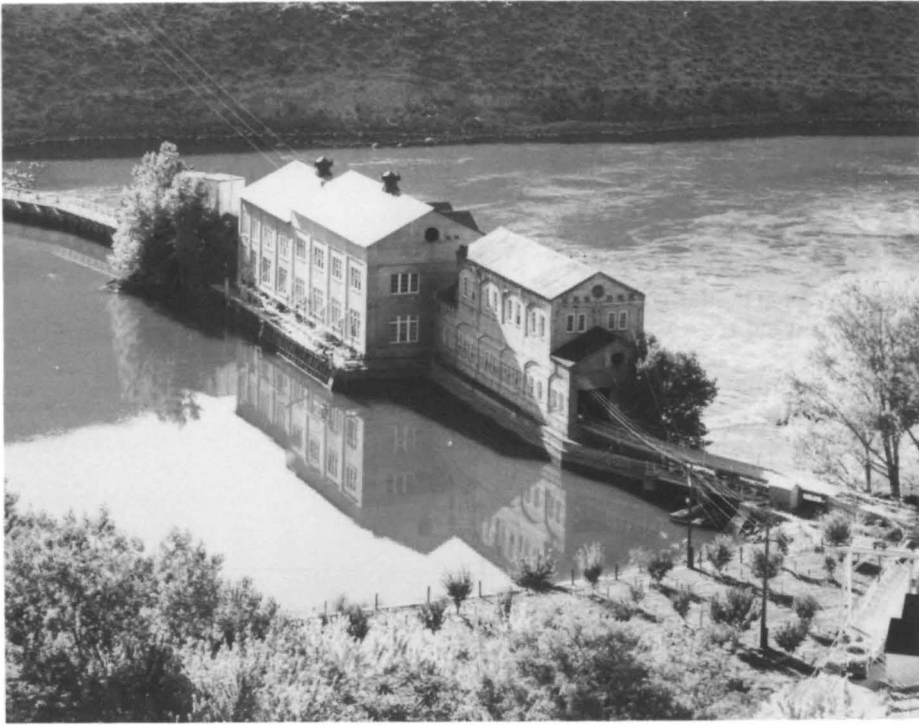
- A commercial building with some Art Deco detailing is not eligible under Criterion C if the detailing was added merely as an afterthought, rather than fully integrated with overall lines and massing typical of the Art Deco style or the transition between that and another style.
- A designed landscape that has had major changes to its historic design, vegetation, original boundary, topography/grading, architectural features, and circulation system will not qualify.

Type, Period, and Method of Construction: "Type, period, or method of construction" refers to the way certain properties are related to one another by cultural tradition or function, by dates of construction or style, or by choice or availability of materials and technology.

A structure is eligible as a specimen of its type or period of construction if it is an important example (within its context) of building practices of a particular time in history. For properties that represent the variation, evolution, or transition of construction types, it must be demonstrated that the variation, etc., was an important phase of the architectural development of the area or community in that it had an impact as evidenced by later buildings. A property is not eligible, however, simply because it has been identified as the only such property ever fabricated; it must be demonstrated to be significant as well.

Eligible

- A building that has some characteristics of the Romanesque Revival style and some characteristics of the Commercial style can qualify if it illustrates the transition of architectural design and the transition itself is considered an important architectural development.
- A Hopewellian mound, if it is an important example of mound building construction techniques, would qualify as a method or type of construction.
- A building which illustrates the early or the developing technology of particular structural systems, such as skeletal steel framing, is eligible as an example of a particular method of construction.



Swan Falls Dam and Power Plant, Murphy vicinity, Ada County, Idaho. Significant works of engineering can qualify under Criterion C. Built between 1900-1907 the Swan Falls Dam and Power Plant across the Snake River is one of the early hydroelectric plants in the State of Idaho. (Photo by H.L. Hough).



Looney House, Asheville vicinity, St. Clair County, Alabama. Examples of vernacular styles of architecture can qualify under Criterion C. Built ca. 1818, the Looney House is significant as possibly the State's oldest extant two-story dogtrot type of dwelling. The defining open center passage of the dogtrot was a regional building response to the southern climate. (Photo by Carolyn Scott).

HISTORIC ADAPTATION OF THE ORIGINAL PROPERTY

A property can be significant not only for the way it was originally constructed or crafted, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.

A district is eligible under this guideline if it illustrates the evolution of historic character of a place over a particular span of time.

Eligible

- A Native American irrigation system modified for use by Europeans could be eligible if it illustrates the technology of either or both periods of construction.
- An early 19th century farmhouse modified in the 1880s with Queen Anne style ornamentation could be significant for the modification itself, if it represented a local variation or significant trend in building construction or remodeling, was the work of a local master (see *Works of a Master* on page 20), or reflected the tastes of an important person associated with the property at the time of its alteration.
- A district encompassing the commercial development of a town between 1820 and 1910, characterized by buildings of various styles and eras, can be eligible.

WORKS OF A MASTER

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 his or her work, or a particular idea or theme in his or her 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.

The work of an unidentified craftsman is eligible if it rises above the level of workmanship of the other properties encompassed by the historic context.

PROPERTIES POSSESSING HIGH ARTISTIC VALUES

High artistic values may be expressed in many ways, including areas as diverse as community design or planning, engineering, and sculpture. A property is eligible for its high artistic values if it so fully articulates a particular concept of design that it expresses an aesthetic ideal. A property is not eligible, however, if it does not express aesthetic ideals or design concepts more fully than other properties of its type.

A Significant and Distinguishable Entity Whose Components May Lack Individual Distinction. This portion of Criterion C refers to districts. For detailed information on districts, refer to *Part IV* of this bulletin.

Eligible

- A sculpture in a town square that epitomizes the design principles of the Art Deco style is eligible.
- A building that is a classic expression of the design theories of the Craftsman Style, such as carefully detailed handwork, is eligible.
- A landscaped park that synthesizes early 20th century principles of landscape architecture and expresses an aesthetic ideal of environment can be eligible.
- Properties that are important representatives of the aesthetic values of a cultural group, such as petroglyphs and ground drawings by Native Americans, are eligible.

Not Eligible

- A sculpture in a town square that is a typical example of sculpture design during its period would not qualify for high artistic value, although it might be eligible if it were significant for other reasons.
- A building that is a modest example (within its historic context) of the Craftsman Style of architecture, or a landscaped park that is characteristic of turn of the century landscape design would not qualify for high artistic value.

CRITERION D: INFORMATION POTENTIAL

Properties may be eligible for the National Register if they have yielded, or may be likely to yield, information important in prehistory or history.

UNDERSTANDING CRITERION D: INFORMATION POTENTIAL

Certain important research questions about human history can only be answered by the actual physical material of cultural resources. Criterion D encompasses the properties that have the potential to answer, in whole or in part, those types of research questions. The most common type of property nominated under this Criterion is the archeological site (or a district comprised of archeological sites). Buildings, objects, and structures (or districts comprised of these property types), however, can also be eligible for their information potential.

Criterion D has two requirements, which must *both* be met for a property to qualify:

- The property must have, or have had, information to contribute to our understanding of human history or prehistory, and
- The information must be considered important.

Under the first of these requirements, a property is eligible if it has been used as a source of data and contains more, as yet unretrieved data. A property is also eligible if it has not yet yielded information but, through testing or research, is determined a likely source of data.

Under the second requirement, the information must be carefully evaluated within an appropriate context to determine its importance. Information is considered "important" when it is shown to have a significant bearing on a research design that addresses such areas as: 1) current

data gaps or alternative theories that challenge existing ones or 2) priority areas identified under a State or Federal agency management plan.

APPLYING CRITERION D: INFORMATION POTENTIAL

ARCHEOLOGICAL SITES

Criterion D most commonly applies to properties that contain or are likely to contain information bearing on an important archeological research question. The property must have characteristics suggesting the likelihood that it possesses configurations of artifacts, soil strata, structural remains, or other natural or cultural features that make it possible to do the following:

- Test a hypothesis or hypotheses about events, groups, or processes in the past that bear on important research questions in the social or natural sciences or the humanities; or
- Corroborate or amplify currently available information suggesting that a hypothesis is either true or false; or
- Reconstruct the sequence of archeological cultures for the purpose of identifying and explaining continuities and discontinuities in the archeological record for a particular area.

BUILDINGS, STRUCTURES, AND OBJECTS

While most often applied to archeological districts and sites, Criterion D can also apply to buildings, structures, and objects that contain important information. In order for these types of properties to be eligible under Criterion D, they themselves must be, or must have been, the principal source of the important information.

Eligible

- A building exhibiting a local variation on a standard design or construction technique can be eligible if study could yield important information, such as how local availability of materials or construction expertise affected the evolution of local building development.

Not Eligible

- The ruins of a hacienda once contained murals that have since been destroyed. Historical documentation, however, indicates that the murals were significant for their highly unusual design. The ruins can not be eligible under Criterion D for the importance of the destroyed murals if the information is contained only in the documentation.



Criterion D - Champe-Fremont 1 Archeological Site, Omaha vicinity, Douglas County, Nebraska. This archeological site, dating from ca. 1100-1450 A.D., consists of pit houses and storage pits which have the potential to yield important information concerning the subsistence patterns, religious and mortuary practices, and social organization of the prehistoric residents of eastern Nebraska. (Nebraska State Historical Society)

ASSOCIATION WITH HUMAN ACTIVITY

A property must be associated with *human activity* and be critical for understanding a site's historic environment in order to be eligible under Criterion D. A property can be linked to human activity through events, processes, institutions, design, construction, settlement, migration, ideals, beliefs, lifeways, and other facets of the development or maintenance of cultural systems.

The natural environment associated with the properties was often very different from that of the present and strongly influenced cultural development. Aspects of the environment that are pertinent to human activities should be considered when evaluating properties under Criterion D.

Natural features and paleontological (floral and faunal) sites are not usually eligible under Criterion D in and of themselves. They can be eligible, however, if they are either directly related to human activity or critical to understanding a site's historic environment. In a few cases, a natural feature or site unmarked by cultural materials, that is primarily eligible under Criterion A, may also be eligible under Criterion D, if study of the feature, or its location, setting, etc. (usually in the context of data gained from other sources), will yield important information about the event or period with which it is associated.

ESTABLISHING A HISTORIC CONTEXT

The information that a property yields, or will yield, must be evaluated within an appropriate historic context. This will entail consulting the body of information already collected from similar properties or other pertinent sources, including modern and historic written records. The researcher must be able to anticipate if and how the potential information will affect the definition of the context. The information likely to be obtained from a particular property must confirm, refute, or supplement in an important way existing information.

A property is *not* eligible if it cannot be related to a particular time period or cultural group and, as a result, lacks any historic context within which to evaluate the importance of the information to be gained.

DEVELOPING RESEARCH QUESTIONS

Having established the importance of the information that may be recovered, it is necessary to be explicit in demonstrating the connection between the important information and a specific property. One approach is to determine if specific important research questions can be answered by the data contained in the

property. Research questions can be related to property-specific issues, to broader questions about a large geographic area, or to theoretical issues independent of any particular geographic location. These questions may be derived from the academic community or from preservation programs at the local, regional, State, or national level. Research questions are usually developed as part of a "research design," which specifies not only the questions to be asked, but also the types of data needed to supply the answers, and often the techniques needed to recover the data.

Eligible

- When a site consisting of a village occupation with midden deposits, hearths, ceramics, and stratified evidence of several occupations is being evaluated, three possible research topics could be: 1) the question of whether the site occupants were indigenous to the area prior to the time of occupation or recent arrivals, 2) the investigation of the settlement-subsistence pattern of the occupants, 3) the question of whether the region was a center for the domestication of plants. Specific questions could include: A) Do the deposits show a sequential development or sudden introduction of Ceramic Type X? B) Do the dates of the occupations fit our expectations based on the current model for the reoccupation behavior of slash-and-burn agriculturalists? C) Can any genetic changes in the food plant remains be detected?

Not Eligible

- A property is not eligible if so little can be understood about it that it is not possible to determine if specific important research questions can be answered by data contained in the property.

ESTABLISHING THE PRESENCE OF ADEQUATE DATA

To support the assertion that a property has the data necessary to provide the important information, the property should be investigated with techniques sufficient to establish the presence of relevant data categories. What constitutes appropriate investigation techniques would depend upon specific circumstances including the property's location, condition, and the research questions being addressed, and could range from surface survey (or photographic survey for buildings), to the application of remote sensing techniques or intensive subsurface testing. Justification of the research potential of a property may be based on analogy to another better known property if sufficient similarities exist to establish the appropriateness of the analogy.

Eligible

- Data requirements depend on the specific research topics and questions to be addressed. To continue the example in "Developing Research Questions" above, we might want to ascertain the following with reference to questions A, B, and C: A) The site contains Ceramic Type X in one or more occupation levels and we expect to be able to document the local evaluation of the type or its intrusive nature. B) The hearths contain datable carbon deposits and are associated with more than one occupation. C) The midden deposits show good floral/faunal preservation, and we know enough about the physical evolution of food plants to interpret signs that suggest domestication.

Not Eligible

- Generally, if the applicable research design requires clearly stratified deposits, then subsurface investigation techniques must be applied. A site composed only of surface materials can not be eligible for its potential to yield information that could only be found in stratified deposits.

INTEGRITY

The assessment of integrity for properties considered for information potential depends on the data requirements of the applicable research design. A property possessing information potential does not need to recall *visually* an event, person, process, or construction technique. It is important that the significant data contained in the property remain sufficiently intact to yield the expected important information, if the appropriate study techniques are employed.

Eligible

- An irrigation system significant for the information it will yield on early engineering practices can still be eligible even though it is now filled in and no longer retains the appearance of an open canal.

Not Eligible

- A plowed archeological site contains several superimposed components that have been mixed to the extent that artifact assemblages cannot be reconstructed. The site cannot be eligible if the data requirements of the research design call for the study of artifacts specific to one component.

PARTLY EXCAVATED OR DISTURBED PROPERTIES

The current existence of appropriate physical remains must be ascertained in considering a property's ability to yield important information. Properties that have been partly excavated or otherwise disturbed and that are being considered for their potential to yield additional important information must be shown to retain that potential in their remaining portions.

Eligible

- A site that has been partially excavated but still retains substantial intact deposits (or a site in which the remaining deposits are small but contain critical information on a topic that is not well known) is eligible.

Not Eligible

- A totally collected surface site or a completely excavated buried site is not eligible since the physical remains capable of yielding important information no longer exist at the site. (See *Completely Excavated Sites*, on page 24, for exception.) Likewise, a site that has been looted or otherwise disturbed to the extent that the remaining cultural materials have lost their important depositional context (horizontal or vertical location of deposits) is not eligible.
- A reconstructed mound or other reconstructed site will generally not be considered eligible, because original cultural materials or context or both have been lost.

COMPLETELY EXCAVATED SITES

Properties that have yielded important information in the past and that no longer retain additional research potential (such as completely excavated archeological sites) must be assessed essentially as historic sites under Criterion A. Such sites must be significant for associative values related to: 1) the importance of the data gained or 2) the impact of the property's role in the history of the development of anthropology/ archeology or other relevant disciplines. Like other historic properties, the site must retain the ability to convey its association as the former repository of important information, the location of historic events, or the representative of important trends.

Eligible

- A property that has been excavated is eligible if the data recovered was of such importance that it influenced the direction of research in the discipline, as in a site that clearly established the antiquity of the human occupation of the New World. (See Criterion A in *Part VI: How to Identify the Type of Significance of a Property* and *Criteria Consideration G* in *Part VII: How to Apply the Criteria Considerations*.)

Not Eligible

- A totally excavated site that at one time yielded important information but that no longer can convey either its historic/ prehistoric utilization or significant modern investigation is not eligible.

VII. HOW TO APPLY THE CRITERIA CONSIDERATIONS

INTRODUCTION

Certain kinds of properties are not usually considered for listing in the National Register: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties achieving significance within the past fifty years. These properties *can* be eligible for listing, however, if they meet special requirements, called Criteria Considerations, in addition to meeting the regular requirements (that is, being eligible under one or more of the four Criteria and possessing integrity). *Part VII* provides guidelines for determining which properties must meet these special requirements and for applying each Criteria Consideration.

The Criteria Considerations need to be applied only to *individual* properties. Components of eligible districts do not have to meet the special requirements unless they make up the majority of the district or are the focal point of the district. These are the general steps to follow when applying the Criteria Considerations to your property:

- Before looking at the Criteria Considerations, make sure your property meets one or more of the four Criteria for Evaluation and possesses integrity.
- If it does, check the Criteria Considerations (next column) to see if

the property is of a type that is usually excluded from the National Register. The sections that follow also list specific examples of properties of each type. If your property clearly *does not* fit one of these types, then it does not need to meet any special requirements.

- If your property *does* fit one of these types, then it must meet the special requirements stipulated for that type in the Criteria Considerations.

CRITERIA CONSIDERATIONS*

Ordinarily cemeteries, birthplaces, or 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, properties primarily commemorative in nature, and properties that have achieved significance within the past fifty years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories:

- a. a religious property deriving primary significance from architectural or artistic distinction or historical importance; or

- b. a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- c. a birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life; or
- d. a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events; or
- e. a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- g. a property achieving significance within the past 50 years if it is of exceptional importance.

*The Criteria Considerations are taken from the Criteria for Evaluation, found in the *Code of Federal Regulations, Title 36, Part 60.*

CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

A religious property is eligible if it derives its primary significance from architectural or artistic distinction or historical importance.

UNDERSTANDING CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

A religious property requires justification on architectural, artistic, or historic grounds to avoid any appearance of judgment by government about the validity of any religion or belief. Historic significance for a religious property cannot be established on the merits of a religious doctrine, but rather, for architectural or artistic values or for important historic or cultural forces that the property represents. A religious property's significance under Criterion A, B, C, or D must be judged in purely secular terms. A religious group may, in some cases, be considered a cultural group whose activities are significant in areas broader than religious history.

Criteria Consideration for Religious Properties applies:

- If the resource was constructed by a religious institution.
- If the resource is presently owned by a religious institution or is used for religious purposes.
- If the resource was owned by a religious institution or used for religious purposes during its Period of Significance.
- If Religion is selected as an Area of Significance.

Examples of Properties that MUST Meet Criteria Consideration A: Religious Properties

- *A historic church where an important non-religious event occurred, such as a speech by Patrick Henry.*
- *A historic synagogue that is significant for architecture.*
- *A private residence is the site of a meeting important to religious history.*
- *A commercial block that is currently owned as an investment property by a religious institution.*
- *A historic district in which religion was either a predominant or significant function during the period of significance.*

Example of Properties that DO NOT Need to Meet Criteria Consideration A: Religious Properties

- *A residential or commercial district that currently contains a small number of churches that are not a predominant feature of the district.*
- *A town meeting hall that serves as the center of community activity and houses a wide variety of public and private meetings, including religious service. The resource is significant for architecture and politics, and the religious function is incidental.*
- *A town hall, significant for politics from 1875 to 1925, that housed religious services during the 1950s. Since the religious function occurred after the Period of Significance, the Criteria Consideration does not apply.*

APPLYING CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

ELIGIBILITY FOR HISTORIC EVENTS

A religious property can be eligible under Criterion A for any of three reasons:

- It is significant under a theme in the history of religion having secular scholarly recognition; or
- It is significant under another historical theme, such as exploration, settlement, social philanthropy, or education; or
- It is significantly associated with traditional cultural values.

RELIGIOUS HISTORY

A religious property can be eligible if it is directly associated with either a specific event or a broad pattern in the history of religion.

Eligible

- The site of a convention at which a significant denominational split occurred meets the requirements of Criteria Consideration A. Also eligible is a property that illustrates the broad impact of a religious institution on the history of a local area.

Not Eligible

- A religious property cannot be eligible simply because was the place of religious services for a community, or was the oldest structure used by a religious group in a local area.

OTHER HISTORICAL THEMES

A religious property can be eligible if it is directly associated with either a specific event or a broad pattern that is significant in another historic context. A religious property would also qualify if it were significant for its associations that illustrate the importance of a particular religious group in the social, cultural, economic, or political history of the area. Eligibility depends on the importance of the event or broad pattern and the role of the specific property.

Eligible

- A religious property can qualify for its important role as a temporary hospital during the Revolutionary War, or if its school was significant in the history of education in the community.

Not Eligible

- A religious property is not significant in the history of education in a community simply because it had occasionally served as a school.

TRADITIONAL CULTURAL VALUES

When evaluating properties associated with traditional cultures, it is important to recognize that often these cultures do not make clear distinctions between what is secular and what is sacred. Criteria Consideration A is not intended to exclude traditional cultural resources merely because they have religious uses or are considered sacred. A property or natural feature important to a traditional culture's religion and mythology is eligible if its importance has been ethnohistorically documented and if the site can be clearly defined. It is critical, however, that the activities be documented and that the associations not be so diffuse that the physical resource cannot be adequately defined.⁸

Eligible

- A specific location or natural feature that an Indian tribe believes to be its place of origin and that is adequately documented qualifies under Criteria Consideration A.

ELIGIBILITY FOR HISTORIC PERSONS

A religious property can be eligible for association with a person important in religious history, if that significance has scholarly, secular recognition or is important in other historic contexts. Individuals who would likely be considered significant are those who formed or significantly influenced an important religious institution or movement, or who were important in the social, economic, or political history of the area. Properties associated with individuals important only within the context of a single congregation and lacking importance in any other historic context would not be eligible under Criterion B.

Eligible

- A religious property strongly associated with a religious leader, such as George Whitefield or Joseph Smith, is eligible.

⁸ For more information on applying Criteria Consideration A to traditional cultural properties, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

ELIGIBILITY FOR ARCHITECTURAL OR ARTISTIC DISTINCTION

A religious property significant for its architectural design or construction should be evaluated as are other properties under Criterion C; that is, it should be evaluated within an established architectural context and, if necessary, compared to other properties of its type, period, or method of construction. (See "Comparing Related Properties" in Part V: *How to Evaluate a Property Within Its Historic Context*.)

Eligible

- A historic camp meeting district that meets the requirements of Criterion C for its significance as a type of construction is eligible.

ELIGIBILITY FOR INFORMATION POTENTIAL

A religious property, whether a district, site, building, structure, or object, is eligible if it can yield important information about the religious practices of a cultural group or other historic themes. This kind of property should be evaluated as are other properties under Criterion D, in relation to similar properties, other information sources, and existing data gaps.

Eligible

- A 19th century camp meeting site that could provide information about the length and intensity of site use during revivals of the Second Great Awakening is eligible.
- Rock cairns or medicine wheels that had a historic religious mythological function and can provide information about specific cultural beliefs are eligible.

ABILITY TO REFLECT HISTORIC ASSOCIATIONS

As with all eligible properties, religious properties must physically represent the period of time for which they are significant. For instance, a recent building that houses an older congregation cannot qualify based on the historic activities of the group because the current building does not convey the earlier history. Likewise, an older building that housed the historic activities of the congregation is eligible if it still physically represents the period of the congregation's significance. However, if an older building has been remodeled to the extent that its appearance dates from the time of the remodeling, it can only be eligible if the period of significance corresponds with the period of the alterations.

Eligible

- A church built in the 18th century and altered beyond recognition in the 19th century is eligible only if the additions are important in themselves as an example of late 19th century architecture or as a reflection of an important period of the congregation's growth.

Not Eligible

- A synagogue built in the 1920s cannot be eligible for the important activities of its congregation in the 18th and 19th centuries. It can only be eligible for significance obtained after its construction date.
- A rural 19th century frame church recently sheathed in brick is not eligible because it has lost its characteristic appearance and therefore can no longer convey its 19th century significance, either for architectural value or historic association.



Criteria Consideration A - Religious Properties. A religious property can qualify as an exception to the Criteria if it is architecturally significant. **The Church of the Navity** in Rosedale, Iberville Parish, Louisiana, qualified as a rare example in the State of a 19th century small frame Gothic Revival style chapel. (Robert Obier)

CRITERIA CONSIDERATION B: MOVED PROPERTIES

A property removed from its original or historically significant location can be eligible if it is significant primarily for architectural value or it is the surviving property most importantly associated with a historic person or event.

UNDERSTANDING CRITERIA CONSIDERATION B: MOVED PROPERTIES

The National Register criteria limit the consideration of moved properties because significance is embodied in locations and settings as well as in the properties themselves. Moving a property destroys the relationships between the property and its surroundings and destroys associations with historic events and persons. A move may also cause the loss of historic features such as landscaping, foundations, and chimneys, as well as loss of the potential for associated archeological deposits. Properties that were moved *before* their period of significance do not need to meet the special requirements of Criteria Consideration B.

One of the basic purposes of the National Register is to encourage the preservation of historic properties as living parts of their communities. In keeping with this purpose, it is not usual to list artificial groupings of buildings that have been created for purposes of interpretation, protection, or maintenance. Moving buildings to such a grouping destroys the integrity of location and setting, and can create a false sense of historic development.

APPLYING CRITERIA CONSIDERATION B: MOVED PROPERTIES

ELIGIBILITY FOR ARCHITECTURAL VALUE

A moved property significant under Criterion C must retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association.

Examples of Properties that MUST Meet Criteria Consideration B: Moved Properties

- A resource moved from one location on its original site to another location on the property, during or after its Period of Significance.
- A district in which a significant number of resources have been moved from their original location.
- A district which has one moved building that makes an especially significant contribution to the district.
- A portable resource, such as a ship or railroad car, that is relocated to a place incompatible with its original function.
- A portable resource, such as a ship or railroad car, whose importance is critically linked to its historic location or route and that is moved.

Examples of Properties that DO NOT Need to Meet Criteria Consideration B: Moved Properties

- A property that is moved prior to its Period of Significance.
- A district in which only a small percentage of typical buildings in a district are moved.
- A moved building that is part of a complex but is of less significance than the remaining (unmoved) buildings.
- A portable resource, such as a ship or railroad car, that is eligible under Criterion C and is moved within its natural setting (water, rails, etc.).
- A property that is raised or lowered on its foundations.

ELIGIBILITY FOR HISTORIC ASSOCIATIONS

A moved property significant under Criteria A or B must be demonstrated to be the surviving property most importantly associated with a particular historic event or an important aspect of a historic person's life. The phrase "most importantly associated" means that it must be the single surviving property that is most closely associated with the event or with the part of the person's life for which he or she is significant.

Eligible

- A moved building occupied by an business woman during the majority of her productive career would be eligible if the other extant properties are a house she briefly inhabited prior to her period of significance and a commercial building she owned after her retirement.

Not Eligible

- A moved building associated with the beginning of rail transportation in a community is not eligible if the original railroad station and warehouse remained intact on their original sites.

SETTING AND ENVIRONMENT

In addition to the requirements above, moved properties must still have an orientation, setting, and general environment that are comparable to those of the historic location and that are compatible with the property's significance.

Eligible

- A property significant as an example of mid-19th century rural house type can be eligible after a move, provided that it is placed on a lot that is sufficient in size and character to recall the basic qualities of the historic environment and setting, and provided that the building is sited appropriately in relation to natural and manmade surroundings.

Not Eligible

- A rural house that is moved into an urban area and a bridge that is no longer situated over a waterway are not eligible.

ASSOCIATION DEPENDENT ON THE SITE

For a property whose design values or historical associations are directly dependent on its location, any move will cause the property to lose its integrity and prevent it from conveying its significance.

Eligible

- A farm structure significant only as an example of a method of construction peculiar to the local area is still eligible if it is moved within that local area and the new setting is similar to that of the original location.

Not Eligible

- A 19th century rural residence that was designed around particular topographic features, reflecting that time period's ideals of environment, is not eligible if moved.

PROPERTIES DESIGNED TO BE MOVED

A property designed to move or a property frequently moved during its historic use must be located in a historically appropriate setting in order to qualify, retaining its integrity of setting, design, feeling, and association. Such properties include automobiles, railroad cars and engines, and ships.

Eligible

- A ship docked in a harbor, a locomotive on tracks or in a railyard, and a bridge relocated from one body of water to another are eligible.

Not Eligible

- A ship on land in a park, a bridge placed in a pasture, or a locomotive displayed in an indoor museum are not eligible.

ARTIFICIALLY CREATED GROUPINGS

An artificially created grouping of buildings, structures, or objects is not eligible unless it has achieved significance since the time of its assemblage. It cannot be considered as a reflection of the time period when the individual buildings were constructed.

Eligible

- A grouping of moved historic buildings whose creation marked the beginning of a major concern with past lifestyles can qualify as an early attempt at historic preservation and as an illustration of that generation's values.

Not Eligible

- A rural district composed of a farmhouse on its original site and a grouping of historic barns recently moved onto the property is not eligible.

PORTIONS OF PROPERTIES

A moved *portion* of a building, structure, or object is not eligible because, as a fragment of a larger resource, it has lost integrity of design, setting, materials, workmanship, and location.

CRITERIA CONSIDERATION C: BIRTHPLACES OR GRAVES

A birthplace or grave of a historical figure is eligible if the person is of outstanding importance and if there is no other appropriate site or building directly associated with his or her productive life.

UNDERSTANDING CRITERIA CONSIDERATION C: BIRTHPLACES AND GRAVES

Birthplaces and graves often attain importance as reflections of the origins of important persons or as lasting memorials to them. The lives of persons significant in our past normally are recognized by the National Register through listing of properties illustrative of or associated with that person's productive life's work. Birthplaces and graves, as properties that represent the beginning and the end of the life of distinguished individuals, may be temporally and geographically far removed from the person's significant activities, and therefore are not usually considered eligible.

Examples of Properties that MUST Meet Criteria Consideration C: Birthplaces and Graves

- *The birthplace of a significant person who lived elsewhere during his or her Period of Significance.*
- *A grave that is nominated for its association with the significant person buried in it.*
- *A grave that is nominated for information potential.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration C: Birthplaces and Graves

- *A house that was inhabited by a significant person for his or her entire lifetime.*
- *A grave located on the grounds of the house where a significant person spent his or her productive years.*

APPLYING CRITERIA CONSIDERATION C: BIRTHPLACES AND GRAVES

PERSONS OF OUTSTANDING IMPORTANCE

The phrase "a historical figure of outstanding importance" means that in order for a birthplace or grave to qualify, it cannot be simply the birthplace or grave of a person significant in our past (Criterion B). It must be the birthplace or grave of an individual who was of outstanding importance in the history of the local area, State, or nation. The birthplace or grave of an individual who was one of several people active in some aspect of the history of a community, a state, or the Nation would not be eligible.

LAST SURVIVING PROPERTY ASSOCIATED WITH A PERSON

When an geographical area strongly associated with a person of outstanding importance has lost all other properties directly associated with his or her formative years or productive life, a birthplace or grave may be eligible.

ELIGIBILITY FOR OTHER ASSOCIATIONS

A birthplace or grave can also be eligible if it is significant for reasons other than association with the productive life of the person in question. It can be eligible for significance under Criterion A for association with important events, under Criterion B for association with the productive lives of *other* important persons, or under Criterion C for architectural significance. A birthplace or grave can also be eligible in rare cases if, after the passage of time, it is significant for its commemorative value. (See Criteria Consideration F for a discussion of commemorative properties.) A birthplace or grave can also be eligible under Criterion D if it contains important information on research, e.g., demography, pathology, mortuary practices, socioeconomic status differentiation.



*Criteria Consideration C - Birthplaces. A birthplace of a historical figure is eligible if the person is of outstanding importance and there is no other appropriate site or building associated with his or her productive life. The **Walter Reed Birthplace**, Gloucester vicinity, Gloucester County, Virginia is the most appropriate remaining building associated with the life of the man who, in 1900, discovered the cause and mode of transmission of the great scourge of the tropics, yellow fever. (Virginia Historic Landmarks Commission)*

CRITERIA CONSIDERATION D: CEMETERIES

A cemetery is eligible if it derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events.

UNDERSTANDING CRITERIA CONSIDERATION D: CEMETERIES

A cemetery is a collection of graves that is marked by stones or other artifacts or that is unmarked but recognizable by features such as fencing or depressions, or through maps, or by means of testing. Cemeteries serve as a primary means of an individual's recognition of family history and as expressions of collective religious and/or ethnic identity. Because cemeteries may embody values beyond personal or family-specific emotions, the National Register criteria allow for listing of cemeteries under certain conditions.

Examples of Properties that MUST Meet Criteria Consideration D: Cemeteries

- A cemetery that is nominated individually for Criterion A, B, or C.

Examples of Properties that DO NOT Need to Meet Criteria Consideration D: Cemeteries

- A cemetery that is nominated along with its associated church, but the church is the main resource nominated.
- A cemetery that is nominated under Criterion D for information potential.
- A cemetery that is nominated as part of a district but is not the focal point of the district.

APPLYING CRITERIA CONSIDERATION D: CEMETERIES

PERSONS OF TRANSCENDENT IMPORTANCE

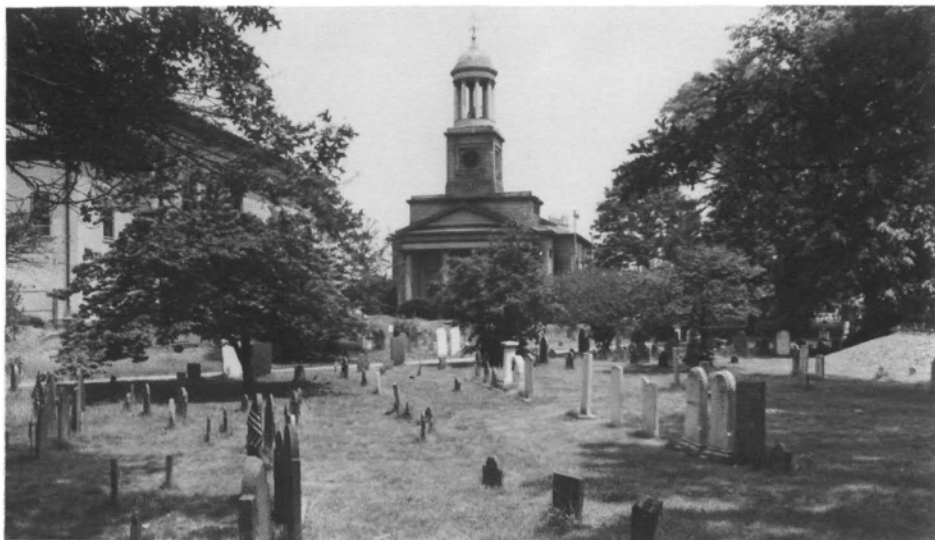
A cemetery containing the graves of persons of transcendent importance may be eligible. To be of transcendent importance the persons must have been of great eminence in their fields of endeavor or had a great impact upon the history of their community, State, or nation. (A single grave that is the burial place of an important person and is located in a larger cemetery that does not qualify under this Criteria Consideration should be treated under Criteria Consideration C: Birthplaces and Graves.)

Eligible

- A historic cemetery containing the graves of a number of persons who were exceptionally significant in determining the course of a State's political or economic history during a particular period is eligible.

Not Eligible

- A cemetery containing graves of State legislators is not eligible if they simply performed the daily business of State government and did not have an outstanding impact upon the nature and direction of the State's history.



Criteria Consideration D - Cemeteries. The Hancock Cemetery, Quincy, Norfolk County, Massachusetts meets the exception to the Criteria because it derives its primary significance from its great age (the earliest burials date from 1640) and from the distinctive design features found in its rich collection of late 17th and early 18th century funerary art. (N. Hobart Holly)

ELIGIBILITY ON THE BASIS OF AGE

Cemeteries can be eligible if they have achieved historic significance for their relative great age in a particular geographic or cultural context.

Eligible

- A cemetery dating from a community's original 1830s settlement can attain significance from its association with that very early period.

ELIGIBILITY FOR DESIGN

Cemeteries can qualify on the basis of distinctive design values. These values refer to the same design values addressed in Criterion C and can include aesthetic or technological achievement in the fields of city planning, architecture, landscape architecture, engineering, mortuary art, and sculpture. As for all other nominated properties, a cemetery must clearly express its design values and be able to convey its historic appearance.

Eligible

- A Victorian cemetery is eligible if it clearly expresses the aesthetic principles related to funerary design for that period, through such features as the overall plan, landscaping, statuary, sculpture, fencing, buildings, and grave markers.

Not Eligible

- A cemetery cannot be eligible for design values if it no longer conveys its historic appearance because of the introduction of new grave markers.

ELIGIBILITY FOR ASSOCIATION WITH EVENTS

Cemeteries may be associated with historic events including specific important events or general events that illustrate broad patterns.

Eligible

- A cemetery associated with an important Civil War battle is eligible.
- A cemetery associated with the settlement of an area by an ethnic or cultural group is eligible if the movement of the group into the area had an important impact, if other properties associated with that group are rare, and if few documentary sources have survived to provide information about the group's history.

Not Eligible

- A cemetery associated with a battle in the Civil War does not qualify if the battle was not important in the history of the war.
- A cemetery associated with an area's settlement by an ethnic or cultural group is not eligible if the impact of the group on the area cannot be established, if other extant historic properties better convey association with the group, or if the information that the cemetery can impart is available in documentary sources.

ELIGIBILITY FOR INFORMATION POTENTIAL

Cemeteries, both historic and prehistoric, can be eligible if they have the potential to yield important information. The information must be important within a specific context and the potential to yield information must be demonstrated.

A cemetery can qualify if it has potential to yield important information provided that the information it contains is not available in extant documentary evidence.

Eligible

- A cemetery associated with the settlement of a particular cultural group will qualify if it has the potential to yield important information about subjects such as demography, variations in mortuary practices, or the study of the cause of death correlated with nutrition or other variables.

INTEGRITY

Assessing the integrity of a historic cemetery entails evaluating principal design features such as plan, grave markers, and any related elements (such as fencing). Only that portion of a historic cemetery that retains its historic integrity can be eligible. If the overall integrity has been lost because of the number and size of recent grave markers, some features such as buildings, structures, or objects that retain integrity may be considered as individual properties if they are of such historic or artistic importance that they individually meet one or more of the requirements listed above.

NATIONAL CEMETERIES

National Cemeteries administered by the Veterans Administration are eligible because they have been designated by Congress as primary memorials to the military history of the United States. Those areas within a designated national cemetery that have been used or prepared for the reception of the remains of veterans and their dependents, as well as any landscaped areas that immediately surround the graves may qualify. Because these cemeteries draw their significance from the presence of the remains of military personnel who have served the country throughout

its history, the age of the cemetery is not a factor in judging eligibility, although integrity must be present.

A national cemetery or a portion of a national cemetery that has only been set aside for use in the future is not eligible.

CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

A reconstructed property is eligible when it is accurately executed in a suitable environment *and* presented in a dignified manner as part of a restoration master plan *and* when no other building or structure with the same associations has survived. All three of these requirements must be met.

UNDERSTANDING CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

“Reconstruction” is defined as the reproduction of the exact form and detail of a vanished building, structure, object, or a part thereof, as it appeared at a specific period of time. Reconstructed buildings fall into two categories: buildings wholly constructed of new materials and buildings reassembled from some historic and some new materials. Both categories of properties present problems in meeting the integrity requirements of the National Register criteria.

Examples of Properties that MUST Meet Criteria Consideration E: Reconstructed Properties

- A property in which most or all of the fabric is not original.
- A district in which an important resource or a significant number of resources are reconstructions.

Examples of Properties that DO NOT Need to Meet Criteria Consideration E: Reconstructed Properties

- A property that is remodeled or renovated and still has the majority of its original fabric.

APPLYING CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

ACCURACY OF THE RECONSTRUCTION

The phrase “accurately executed” means that the reconstruction must be based upon sound archeological, architectural, and historic data concerning the historic construction and appearance of the resource. That documentation should include both analysis of any above or below ground material and research in written and other records.

SUITABLE ENVIRONMENT

The phrase “suitable environment” refers to: 1) the physical context provided by the historic district and 2) any interpretive scheme, if the historic district is used for interpretive purposes. This means that the reconstructed property must be located at the same site as the original. It must also be situated in its original grouping of buildings, structures, and objects (as many as are extant), and that grouping must retain integrity. In addition, the reconstruction must not be misrepresented as an authentic historic property.

Eligible

- A reconstructed plantation manager’s office building is considered eligible because it is located at its historic site, grouped with the remaining historic plantation buildings and structures, and the plantation as a whole retains integrity. Interpretation of the plantation district includes an explanation that the manager’s office is not the original building, but a reconstruction.

Not Eligible

- The same reconstructed plantation manager’s office building would not qualify if it were rebuilt at a location different from that of the original building, or if the district as a whole no longer reflected the period for which it is significant, or if a misleading interpretive scheme were used for the district or for the reconstruction itself.

RESTORATION MASTER PLANS

Being presented "as part of a restoration master plan" means that: 1) a reconstructed property is an essential component in a historic district and 2) the reconstruction is part of an overall restoration plan for an entire district. "Restoration" is defined as accurately recovering the form and details of a property and its setting as it appeared at a particular period by removing later work or by replacing missing earlier work (as opposed to completely rebuilding the property). The master plan for the entire property must emphasize restoration, not reconstruction. In other words, the master plan for the entire resource would not be acceptable under this consideration if it called for reconstruction of a majority of the resource.

LAST SURVIVING PROPERTY OF A TYPE

This consideration also stipulates that a reconstruction can qualify if, in addition to the other requirements, no other building, object, or structure with the same association has survived. A reconstruction that is part of a restoration master plan is appropriate only if: 1) the property is the only one in the district with which a particular important activity or event has been historically associated or 2) no other property with the same associative values has survived.

RECONSTRUCTIONS OLDER THAN FIFTY YEARS

After the passage of fifty years, a reconstruction may attain its own significance for what it reveals about the period in which it was built, rather than the historic period it was intended to depict. On that basis, a reconstruction can possibly qualify under any of the Criteria.

Eligible

- A reconstructed plantation manager's office is eligible if the office were an important component of the plantation *and* if the reconstruction is one element in an overall plan for restoring the plantation *and* if no other building or structure with the same associations has survived.
- The reconstruction of the plantation manager's office building can be eligible only if the majority of buildings, structures, and objects that comprised the plantation are extant and are being restored. For guidance regarding restoration see the *Secretary of the Interior's Standards for Historic Preservation Projects*.

CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

A property primarily commemorative in intent can be eligible if design, age, tradition, or symbolic value has invested it with its own historical significance.

UNDERSTANDING CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

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 evidence of a later generation's assessment of the past. Their significance comes from their value as cultural expressions at the date of their creation. Therefore, a commemorative property generally must be over fifty years old and must possess significance based on its own value, not on the value of the event or person being memorialized.

Examples of Properties that MUST Meet Criteria Consideration F: Commemorative Properties

- *A property whose sole or primary function is commemorative or in which the commemorative function is of primary significance.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration F: Commemorative Properties

- *A resource that has a non-commemorative primary function or significance.*
- *A single marker that is a component of a district (whether contributing or non-contributing).*

APPLYING CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

ELIGIBILITY FOR DESIGN

A commemorative property derives its design from the aesthetic values of the period of its creation. A commemorative property, therefore, may be significant for the architectural, artistic, or other design qualities of its own period in prehistory or history.

Eligible

- A commemorative statue situated in a park or square is eligible if it expresses the aesthetics or craftsmanship of the period when it was made, meeting Criterion C.
- A late 19th century statue erected on a courthouse square to commemorate Civil War veterans would qualify if it reflects that era's shared perception of the noble character and valor of the veterans and their cause. This was commonly conveyed by portraying idealized soldiers or allegorical figures of battle, victory, or sacrifice.

ELIGIBILITY FOR AGE, TRADITION, OR SYMBOLIC VALUE

A commemorative property cannot qualify for association with the event or person it memorializes. A commemorative property may, however, acquire significance after the time of its creation through *age*, *tradition*, or *symbolic* value. This significance must be documented by accepted methods of historical research, including written or oral history, and must meet one or more of the Criteria.

Eligible

- A commemorative marker erected by a cultural group that believed the place was the site of its origins is eligible if, for subsequent generations of the group, the marker itself became the focus of traditional association with the group's historic identity.
- A building erected as a monument to an important historical figure will qualify if through the passage of time the property itself has come to symbolize the value placed upon the individual and is widely recognized as a reminder of enduring principles or contributions valued by the generation that erected the monument.
- A commemorative marker erected early in the settlement or development of an area will qualify if it is demonstrated that, because of its relative great age, the property has long been a part of the historic identity of the area.

Not Eligible

- A commemorative marker erected in the past by a cultural group at the site of an event in its history would not be eligible if the marker were significant only for association with the event, and it had not become significant itself through tradition.
- A building erected as a monument to an important historical figure would not be eligible if its only value lay in its association with the individual, and it has not come to symbolize values, ideas, or contributions valued by the generation that erected the monument.
- A commemorative marker erected to memorialize an event in the community's history would not qualify simply for its association with the event it memorialized.

INELIGIBILITY AS THE LAST REPRESENTATIVE OF AN EVENT OR PERSON

The loss of properties directly associated with a significant event or person does not strengthen the case for consideration of a commemorative property. Unlike birthplaces and graves, a commemorative property usually has no direct historic association. The commemorative property can qualify for historic association only if it is clearly significant in its own right, as stipulated above.

CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS⁹

A property achieving significance within the last fifty years is eligible if it is of exceptional importance.

UNDERSTANDING CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS

The National Register Criteria for Evaluation exclude properties that achieved significance within the last fifty years unless they are of exceptional importance. Fifty years is a general estimate of the time needed to develop historical perspective and to evaluate significance. This consideration guards against the listing of properties of passing contemporary interest and ensures that the National Register is a list of truly historic places.

Examples of Properties that MUST Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Last Fifty Years

- A property that is less than fifty years old.
- A property that continues to achieve significance into a period less than fifty years before the nomination.
- A property that has non-contiguous Periods of Significance, one of which is less than fifty years before the nomination.
- A property that is more than fifty years old and had no significance until a period less than fifty years before the nomination.

Examples of Properties that DO NOT Need to Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Last Fifty Years

- A resource whose construction began over fifty years ago, but the completion overlaps the fifty year period by a few years or less.
- A resource that is significant for its plan or design, which is over fifty years old, but the actual completion of the project overlaps the fifty year period by a few years.
- A historic district in which a few properties are newer than fifty years old, but the majority of properties and the most important Period of Significance are greater than fifty years old.

⁹ For more information on Criteria Consideration G, refer to *National Register Bulletin: Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Last Fifty Years*.

APPLYING CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE PAST FIFTY YEARS

ELIGIBILITY FOR EXCEPTIONAL IMPORTANCE

The phrase "exceptional importance" may be applied to the extraordinary importance of an event or to an entire category of resources so fragile that survivors of any age are unusual. Properties listed that had attained significance in less than fifty years include: the launch pad at Cape Canaveral from which men first traveled to the moon, the home of nationally prominent playwright Eugene O'Neill, and the Chrysler Building (New York) significant as the epitome of the "Style Moderne" architecture.

Properties less than fifty years old that qualify as exceptional because the entire category of resources is fragile include a recent example of a traditional sailing canoe in the Trust Territory of the Pacific Islands, where because of rapid deterioration of materials, no working Micronesian canoes exist that are more than twenty years old. Properties that by their nature can last more than fifty years cannot be considered exceptionally important because of the fragility of the class of resources.

The phrase "exceptional importance" does not require that the property be of national significance. It is a measure of a property's importance within the appropriate historic context, whether the scale of that context is local, State, or national.

Eligible

- The General Laundry Building in New Orleans, one of the few remaining Art Deco Style buildings in that city, was listed in the National Register when it was forty years old because of its exceptional importance as an example of that architectural style.

HISTORICAL PERSPECTIVE

A property that has achieved significance within the past fifty years can be evaluated only when sufficient historical perspective exists to determine that the property is exceptionally important. The necessary perspective can be provided by scholarly research and evaluation, and must consider both the historic context and the specific property's role in that context.

In many communities, properties such as apartment buildings built in the 1950s cannot be evaluated because there is no scholarly research available to provide an overview of the nature, role, and impact of that building type within the context of historical and architectural developments of the 1950s.

NATIONAL PARK SERVICE RUSTIC ARCHITECTURE

Properties such as structures built in a rustic style by the National Park Service during the 1930s and 1940s can be evaluated because a broad study, *National Park Service Rustic Architecture* (1977), provides the context for evaluating properties of this type and style. Specific examples were listed in the National Register prior to reaching fifty years of age when documentation concerning the individual properties established their significance within the historical and architectural context of the type and style.

VETERANS ADMINISTRATION HOSPITALS

Hospitals less than fifty years old that were constructed by the Veterans Bureau and Veterans Administration can be evaluated because the collection of forty-eight facilities built between 1920 and 1946 has been analyzed in a study prepared by the agency. The study provided a historic and architectural context for development of veteran's care within which hospitals could be evaluated. The exceptional importance of specific individual facilities constructed within the past fifty years could therefore be determined based on their role and their present integrity.

COMPARISON WITH RELATED PROPERTIES

In justifying exceptional importance, it is necessary to identify other properties within the geographical area that reflect the same significance or historic associations and to determine which properties *best* represent the historic context in question. Several properties in the area could become eligible with the passage of time, but few will qualify now as exceptionally important.

POST-WORLD WAR II PROPERTIES

Properties associated with the post-World War II era must be identified and evaluated to determine which ones in an area could be judged exceptionally important. For example, a public housing complex may be eligible as an outstanding expression of the nation's post-war urban policy. A military installation could be judged exceptionally important because of its contribution to the Cold War arms race. A church building in a Southern city may have served as the pivotal rallying point for the city's most famous civil rights protest. A post-war suburban subdivision may be the best reflection of contemporary siting and design tenets in a metropolitan area. In each case, the nomination preparer must justify the *exceptional* importance of the property relative to similar properties in the community, State, or nation.

ELIGIBILITY FOR INFORMATION POTENTIAL

A property that has achieved significance within the past fifty years can qualify under Criterion D only if it can be demonstrated that the information is of exceptional importance within the appropriate context and that the property contains data superior to or different from those obtainable from other sources, including other culturally related sites. An archeological site less than fifty years old may be eligible if the former inhabitants are so poorly documented that information about their lifeways is best obtained from examination of the material remains.

Eligible

- Data such as the rate of adoption of modern technological innovations by rural tenant farmers in the 1950s may not be obtainable through interviews with living persons but could be gained by examination of homesites.

Not Eligible

- A recent archeological site such as the remains of a Navajo sheep corral used in the 1950s would not be considered exceptionally significant for its information potential on animal husbandry if better information on the same topic is available through ethnographic studies or living informants.

HISTORIC DISTRICTS

Properties which have achieved significance within the past fifty years can be eligible for the National Register if they are an integral part of a district which qualifies for National Register listing. This is demonstrated by documenting that the property dates from within the district's defined Period of Significance and that it is associated with one or more of the district's defined Areas of Significance.

Properties less than fifty years old may be an integral part of a district when there is sufficient perspective to consider the properties as historic. This is accomplished by demonstrating that: 1) the district's Period of Significance is justified as a discrete period with a defined beginning and end, 2) the character of the district's historic resources is clearly defined and assessed, 3) specific resources in the district are demonstrated to date from that discrete era, and 4) the majority of district properties are over fifty years old. In these instances, it is not necessary to prove exceptional importance of either the district itself or the less-than-fifty-year-old properties. Exceptional importance still must be demonstrated for district where the majority of properties or the major Period of Significance is less than fifty years old, and for less-than-fifty-year-old properties which are nominated individually.

PROPERTIES MORE THAN FIFTY YEARS IN AGE, LESS THAN FIFTY YEARS IN SIGNIFICANCE

Properties that are more than fifty years old, but whose significant associations or qualities are less than fifty years old, must be treated under the fifty year consideration.

Eligible

- A building constructed early in the twentieth century (and having no architectural importance), but that was associated with an important person during the 1950s, must be evaluated under Criteria Consideration G because the Period of Significance is within the past fifty years. Such a property would qualify if the person was of exceptional importance.

REQUIREMENT TO MEET THE CRITERIA, REGARDLESS OF AGE

Properties that are less than fifty years old and are not exceptionally important will *not* automatically qualify for the National Register once they are fifty years old. In order to be listed in the National Register, all properties, regardless of age, must be demonstrated to meet the Criteria for Evaluation.

VIII. HOW TO EVALUATE THE INTEGRITY OF A PROPERTY

INTRODUCTION

Integrity is the ability of a property to convey its significance. To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance.

Historic properties either retain integrity (this is, convey their significance) or they do not. Within the concept of integrity, the National Register criteria recognizes seven aspects or qualities that, in various combinations, define integrity.

To retain historic integrity a property will always possess several, and usually most, of the aspects. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining *which* of these aspects are most important to a particular property requires knowing why, where, and when the property is significant. The following sections define the seven aspects and explain how they combine to produce integrity.

SEVEN ASPECTS OF INTEGRITY

- Location
- Design
- Setting
- Materials
- Workmanship
- Feeling
- Association

UNDERSTANDING THE ASPECTS OF INTEGRITY

LOCATION

Location is the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved. (See Criteria Consideration B in *Part VII: How to Apply the Criteria Considerations*, for the conditions under which a moved property can be eligible.)

DESIGN

Design is the combination of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property (or its significant alteration) and applies to activities as diverse as community planning, engineering, architecture, and landscape architecture. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials.

A property's design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount, and style of ornamental detailing; and arrangement and type of plantings in a designed landscape.

Design can also apply to districts, whether they are important primarily for historic association, architectural value, information potential, or a combination thereof. For districts significant primarily for historic association or architectural value, design concerns more than just the individual buildings or structures located within the boundaries. It also applies to the way in which buildings, sites, or structures are related: for example, spatial relationships between major features; visual rhythms in a streetscape or landscape plantings; the layout and materials of walkways and roads; and the relationship of other features, such as statues, water fountains, and archeological sites.

SETTING

Setting is the physical environment of a historic 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 and its relationship to surrounding features and open space.

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 concept of nature and aesthetic preferences.

The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as:

- Topographic features (a gorge or the crest of a hill);
- Vegetation;
- Simple manmade features (paths or fences); and
- Relationships between buildings and other features or open space.

These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its *surroundings*. This is particularly important for districts.

MATERIALS

Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of particular types of materials and technologies. Indigenous materials are often the focus of regional building traditions and thereby help define an area's sense of time and place.

A property must retain the key exterior materials dating from the period of its historic significance. If the property has been rehabilitated, the historic materials and significant features must have been preserved. The property must also be an actual historic resource, not a recreation; a

recent structure fabricated to look historic is not eligible. Likewise, a property whose historic features and materials have been lost and then reconstructed is usually not eligible. (See Criteria Consideration E in *Part VII: How to Apply the Criteria Considerations* for the conditions under which a reconstructed property can be eligible.)

WORKMANSHIP

Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. It is the evidence of artisans' 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 or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques.

Workmanship is important because it can furnish evidence of the technology of a craft, illustrate the aesthetic principles of a historic or prehistoric period, and reveal individual, local, regional, or national applications of both technological practices and aesthetic principles. Examples of workmanship in historic buildings include tooling, carving, painting, graining, turning, and joinery. Examples of workmanship in prehistoric contexts include Paleo-Indian clovis projectile points; Archaic period beveled adzes; Hopewellian birdstone pipes; copper earspools and worked bone pendants; and Iroquoian effigy pipes.

FEELING

Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character. For example, a rural historic district retaining original design, materials, workmanship, and setting will relate the feeling of agricultural life in the 19th century. A grouping of prehistoric petroglyphs, unmarred by graffiti and intrusions and located on its original isolated bluff, can evoke a sense of tribal spiritual life.

ASSOCIATION

Association is the direct link between an important historic event or person and a historic property. A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. For example, a Revolutionary War battlefield whose natural and manmade elements have remained intact since the 18th century will retain its quality of association with the battle.

Because feeling and association depend on individual perceptions, their retention *alone* is never sufficient to support eligibility of a property for the National Register.

ASSESSING INTEGRITY IN PROPERTIES

Integrity is based on significance: why, where, and when a property is important. Only after significance is fully established can you proceed to the issue of integrity.

The steps in assessing integrity are:

- Define the **essential physical features** that must be present for a property to represent its significance.
- Determine whether the **essential physical features are visible** enough to convey their significance.
- Determine whether the property needs to be **compared with similar properties**. And,
- Determine, based on the significance and essential physical features, **which aspects of integrity** are particularly vital to the property being nominated and if they are present.

Ultimately, the question of integrity is answered by whether or not the property retains the **identity** for which it is significant.

DEFINING THE ESSENTIAL PHYSICAL FEATURES

All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both *why* a property is significant (Applicable Criteria and Areas of Significance) and *when* it was significant (Periods of Significance). They are the features without which a property can no longer be identified as, for instance, a late 19th century dairy barn or an early 20th century commercial district.

CRITERIA A AND B

A property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s). If the property is a site (such as a treaty site) where there are no material cultural remains, the setting must be intact.

Archeological sites eligible under Criteria A and B must be in overall good condition with excellent preservation of features, artifacts, and spatial relationships to the extent that these remains are able to convey important associations with events or persons.

CRITERION C

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.

Archeological sites eligible under Criterion C must be in overall good condition with excellent preservation

of features, artifacts, and spatial relationships to the extent that these remains are able to illustrate a site type, time period, method of construction, or work of a master.

CRITERION D

For properties eligible under Criterion D, including archeological sites and standing structures studied for their information potential, less attention is given to their overall condition, than it they were being considered under Criteria A, B, or C. Archeological sites, in particular, do not exist today exactly as they were formed. There are always cultural and natural processes that alter the deposited materials and their spatial relationships.

For properties eligible under Criterion D, integrity is based upon the property's potential to yield specific data that addresses important research questions, such as those identified in the historic context documentation in the Statewide Comprehensive Preservation Plan or in the research design for projects meeting the *Secretary of the Interior's Standards for Archeological Documentation*.

INTERIORS

Some historic buildings are virtually defined by their exteriors, and their contribution to the built environment can be appreciated even if their interiors are not accessible. Examples of this would include early examples of steel-framed skyscraper construction. The great advance in American technology and engineering made by these buildings can be read from the outside. The change in American popular taste during the 19th century, from the symmetry and simplicity of architectural styles based on classical precedents, to the expressions of High Victorian styles, with their combination of textures, colors, and asymmetrical forms, is readily apparent from the exteriors of these buildings.

Other buildings "are" interiors. The Cleveland Arcade, that soaring 19th century glass-covered shopping area, can only be appreciated from the inside. Other buildings in this category would be the great covered train sheds of the 19th century.

In some cases the loss of an interior will disqualify properties from listing

in the National Register—a historic concert hall noted for the beauty of its auditorium and its fine acoustic qualities would be the type of property that if it were to lose its interior, it would lose its value as a historic resource. In other cases, the overarching significance of a property's exterior can overcome the adverse effect of the loss of an interior.

In borderline cases particular attention is paid to the significance of the property and the remaining historic features.

HISTORIC DISTRICTS

For a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. In addition, the relationships among the district's components must be substantially unchanged since the period of significance.

When evaluating the impact of intrusions upon the district's integrity, take into consideration the relative number, size, scale, design, and location of the components that do not contribute to the significance. A district is not eligible if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment.

A component of a district cannot contribute to the significance if:

- it has been substantially altered since the period of the district's significance *or*
- it does not share the historic associations of the district.

VISIBILITY OF PHYSICAL FEATURES

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction. Archeological properties are often the exception to this; by nature they usually do not require visible features to convey their significance.

NON-HISTORIC EXTERIORS

If the historic *exterior* building material is covered by non-historic material (such as modern siding), the property can still be eligible *if* the significant form, features, and detailing are not obscured. If a property's exterior is covered by a non-historic false-front or curtain wall, the property will not qualify under Criteria A, B, or C, because it does not retain the visual quality necessary to convey historic or architectural significance. Such a property also cannot be considered a contributing element in a historic district, because it does not add to the district's sense of time and place. If the false front, curtain wall, or non-historic siding is removed and the original building materials are intact, then the property's integrity can be re-evaluated.

PROPERTY CONTAINED WITHIN ANOTHER PROPERTY

Some properties contain an earlier structure that formed the nucleus for later construction. The exterior property, if not eligible in its own right, can qualify on the basis of the interior property *only if* the interior property can yield significant information about a specific construction technique or material, such as rammed earth or tabby. The interior property *cannot* be used as the basis for eligibility if it has been so altered that it no longer contains the features that could provide important information, or if the presence of important information cannot be demonstrated.

SUNKEN VESSELS

A sunken vessel can be eligible under Criterion C as embodying the distinctive characteristics of a method of construction if it is structurally intact. A *deteriorated* sunken vessel, no longer structurally intact, can be eligible under Criterion D if the remains of either the vessel or its contents is capable of yielding significant information. For further information, refer to *National Register Bulletin: Nominating Historic Vessels and Shipwrecks to the National Register of Historic Places*.

Natural Features

A natural feature that is associated with a historic event or trend, such as a rock formation that served as a trail marker during westward expansion, must retain its historic appearance, unobscured by modern construction or landfill. Otherwise it is not eligible, even though it remains intact.

COMPARING SIMILAR PROPERTIES

For some properties, comparison with similar properties should be considered during the evaluation of integrity. Such comparison may be important in deciding what physical features are essential to properties of that type. In instances where it has not been determined what physical features a property must possess in order for it to reflect the significance of a historic context, comparison with similar properties should be undertaken during the evaluation of integrity. This situation arises when scholarly work has not been done on a particular property type or when surviving examples of a property type are extremely rare. (See **Comparing Related Properties** in *Part V: How to Evaluate a Property within its Historic Context*.)

RARE EXAMPLES OF A PROPERTY TYPE

Comparative information is particularly important to consider when evaluating the integrity of a property that is a rare surviving example of its type. The property must have the essential physical features that enable it to convey its historic character or information. The rarity and poor condition, however, of other extant examples of the type may justify accepting a greater degree of alteration or fewer features, provided that enough of the property survives for it to be a significant resource.

Eligible

- A one-room schoolhouse that has had all original exterior siding replaced and a replacement roof that does not exactly replicate the original roof profile can be eligible if the other extant rare examples have received an even greater degree of alteration, such as the subdivision of the original one-room plan.

Not Eligible

- A mill site contains information on how site patterning reflects historic functional requirements, but parts of the site have been destroyed. The site is not eligible for its information potential if a comparison of other mill sites reveals more intact properties with complete information.

DETERMINING THE RELEVANT ASPECTS OF INTEGRITY

Each type of property depends on certain aspects of integrity, more than others, to express its historic significance. Determining which of the aspects is most important to a particular property requires an understanding of the property's significance and its essential physical features.

CRITERIA A AND B

A property important for association with an event, historical pattern, or person(s) ideally might retain *some* features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance, and would not be relevant if the property were a site. A basic integrity test for a property associated with an important event or person is whether a historical contemporary would recognize the property as it exists today.

For archeological sites that are eligible under Criteria A and B, the seven aspects of integrity can be applied in much the same way as they are to buildings, structures, or objects. It is important to note, however, that the site must have *demonstrated* its ability to convey its significance, as opposed to sites eligible under Criterion D where only the potential to yield information is required.

Eligible

A mid-19th century waterpowered mill important for its association with an area's industrial development is eligible if:

- it is still on its original site (**Location**), and
- the important features of its setting are intact (**Setting**), and
- it retains most of its historic materials (**Materials**), and
- it has the basic features expressive of its design and function, such as configuration, proportions, and window pattern (**Design**).

Not Eligible

A mid-19th century water-powered mill important for its association with an area's industrial development is not eligible if:

- it has been moved (**Location, Setting, Feeling, and Association**), or
- substantial amounts of new materials have been incorporated (**Materials, Workmanship, and Feeling**), or
- it no longer retains basic design features that convey its historic appearance or function (**Design, Workmanship, and Feeling**).

CRITERION C

A property significant under Criterion C must retain those physical features that characterize the type, period, or method of construction that the property represents. Retention of design, workmanship, and materials will usually be more important than location, setting, feeling, and association. Location and setting will be important, however, for those properties whose design is a reflection of their immediate environment (such as designed landscapes and bridges).

For archeological sites that are eligible under Criterion C, the seven aspects of integrity can be applied in much the same way as they are to buildings, structures, or objects. It is important to note, however, that the site must have *demonstrated* its ability to convey its significance, as opposed to sites eligible under Criterion D where only the *potential* to yield information is required.

Eligible

A 19th century wooden covered bridge, important for illustrating a construction type, is eligible if:

- the essential features of its design are intact, such as abutments, piers, roof configuration, and trusses (**Design, Workmanship, and Feeling**), and
- most of the historic materials are present (**Materials, Workmanship, and Feeling**), and
- evidence of the craft of wooden bridge technology remains, such as the form and assembly technique of the trusses (**Workmanship**).
- Since the design of a bridge relates directly to its function as a transportation crossing, it is also important that the bridge still be situated over a waterway (**Setting, Location, Feeling, and Association**).

Not Eligible

For a 19th century wooden covered bridge, important for its construction type, replacement of some materials of the flooring, siding, and roofing would not necessarily damage its integrity. Integrity would be lost, however, if:

- the abutments, piers, or trusses were substantially altered (**Design, Workmanship, and Feeling**) or
- considerable amounts of new materials were incorporated (**Materials, Workmanship, and Feeling**).
- Because environment is a strong factor in the design of this property type, the bridge would also be ineligible if it no longer stood in a place that conveyed its function as a crossing (**Setting, Location, Feeling, and Association**).

CRITERION D

For properties eligible under Criterion D, setting and feeling may not have direct bearing on the property's ability to yield important information. Evaluation of integrity probably will focus primarily on the location, design, materials, and perhaps workmanship.

Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns can be eligible if:

- floral or faunal remains are found in clear association with cultural material (**Materials** and **Association**) and
- the site exhibits stratigraphic separation of cultural components (**Location**).

Not Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns would not be eligible if:

- floral or faunal remains were so badly decomposed as to make identification impossible (**Materials**), or
- floral or faunal remains were disturbed in such a manner as to make their association with cultural remains ambiguous (**Association**), or
- the site has lost its stratigraphic context due to subsequent land alterations (**Location**).

Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period can be eligible if:

- the site contains lithic debitage, finished stone tools, hammerstones, or antler flakers (**Material** and **Design**), and
- the site contains datable material (**Association**).

Not Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period would not be eligible if:

- the site contains natural deposits of lithic materials that are impossible to distinguish from culturally modified lithic material (**Design**) or
- the site does not contain any temporal diagnostic evidence that could link the site to the Late Archaic period (**Association**).

IX. SUMMARY OF THE NATIONAL HISTORIC LANDMARKS CRITERIA FOR EVALUATION

A property being nominated to the National Register may also merit consideration for potential designation as a National Historic Landmark. Such consideration is dependent upon the stringent application of the following distinct set of criteria (found in the *Code of Federal Regulations, Title 36, Part 65*).

NATIONAL HISTORIC LANDMARKS CRITERIA

The quality of national significance is ascribed to districts, sites, buildings, structures, and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering, and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling, and association, and:

1. 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; or
2. That are associated importantly with the lives of persons nationally significant in the history of the United States; or

3. That represent some great idea or ideal of the American people; or
4. 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; or
5. 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; or
6. 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.

NATIONAL HISTORIC LANDMARK EXCLUSIONS

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 fifty years are not eligible for designation. If such properties fall within the following categories they may, nevertheless, be found to qualify:

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

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; or
5. A cemetery that derives its primary national significance from graves of persons of transcendent importance, or from an exceptionally distinctive design or an exceptionally significant event; or
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; or
7. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own national historical significance; or
8. A property achieving national significance within the past 50 years if it is of extraordinary national importance.

COMPARING THE NATIONAL HISTORIC LANDMARKS CRITERIA AND THE NATIONAL REGISTER CRITERIA

In general, the instructions for preparing a National Register nomination and the guidelines stated in this bulletin for applying the National Register Criteria also apply to Landmark nominations and the use of the Landmark criteria. While there are specific distinctions discussed below, *Parts IV and V* of this bulletin apply equally to National Register listings and Landmark nominations. That is, the categories of historic properties are defined the same way; historic con-

texts are identified similarly; and comparative evaluation is carried out on the same principles enumerated in *Part V*.

There are some differences between National Register and National Historic Landmarks Criteria. The following is an explanation of how each Landmark Criterion compares with its National Register Criteria counterpart:

CRITERION 1

This Criterion relates to National Register Criterion A. Both cover properties associated with events. The Landmark Criterion, however, requires that the events associated with the property be *outstandingly* represented by that property and that the property be related to the broad national patterns of U.S. history. Thus, the quality of the property to convey and interpret its meaning must be of a higher order and must relate to national themes rather than the narrower context of State or local themes.

CRITERION 2

This Criterion relates to National Register Criterion B. Both cover properties associated with significant people. The Landmark Criterion differs in that it specifies that the association of a person to the property in question be an important one and that the person associated with the property be of *national* significance.

CRITERION 3

This Criterion has no counterpart among the National Register Criteria. It is rarely, if ever, used alone. While not a landmark at present, the Liberty Bell is an object that might be considered under this Criterion. The application of this Criterion obviously requires the most careful scrutiny and would apply only in rare instances involving ideas and ideals of the highest order.

CRITERION 4

This Criterion relates to National Register Criterion C. Its intent is to qualify exceptionally important works of architecture or collective elements of architecture extraordinarily significant as an ensemble, such as a historic

district. Note that the language is more restrictive than that of the National Register Criterion in requiring that a candidate in architecture be "a specimen exceptionally valuable for the study of a period, style, or method of construction" rather than simply embodying distinctive characteristics of a type, period, or method of construction. With regard to historic districts, the Landmarks Criterion requires an entity that is distinctive and exceptional. Unlike National Register Criterion C, this Criterion will not qualify the works of a master, *per se*, but only such works which are exceptional or extraordinary. Artistic value is considered only in the context of history's judgement in order to avoid current conflicts of taste.

CRITERION 5

This Criterion does not have a strict counterpart among the National Register Criteria. It may seem redundant of the latter part of Landmark Criterion 4. It is meant to cover collective entities such as Greenfield Village and historic districts like New Bedford, Massachusetts, which qualify for their collective association with a nationally significant event, movement, or broad pattern of national development.

CRITERION 6

The National Register counterpart of this is Criterion D. Criterion 6 was developed specifically to recognize archeological sites. All such sites must address this Criterion. The following are the qualifications that distinguish this Criterion from its National Register counterpart: the information yielded or likely to be yielded must be 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 should be expected to yield data affecting *theories, concepts, and ideas* to a *major degree*.

The data recovered or expected to be recovered must make a major contribution to the existing corpus of information. Potentially recoverable data must be likely to revolutionize or substantially modify a major theme in history or prehistory, resolve a substantial historical or anthropological debate, or close a serious gap in a major theme of U. S. history or prehistory.

EXCLUSIONS AND EXCEPTIONS TO THE EXCLUSIONS

This section of the National Historic Landmarks Criteria has its counterpart in the National Register's "Criteria Considerations." The most abundant difference between them is the addition of the qualifiers "national," "exceptional," or "extraordinary" before the word significance. Other than this, the following are the most notable distinctions:

EXCLUSION 2

Buildings moved from their original location, qualify only if one of two conditions are met: 1) the building is nationally significant for

architecture, or 2) the persons or events with which they are associated are of *transcendent* national significance and the association is consequential.

Transcendent significance means an order of importance higher than that which would ordinarily qualify a person or event to be nationally significant. A consequential association is a relationship to a building that had an evident impact on events, rather than a connection that was incidental and passing.

EXCLUSION 3

This pertains to the site of a structure no longer standing. There is no counterpart to this exclusion in the National Register Criteria. In order for such a property to qualify for Landmark designation it must meet the second condition cited for Exclusion 2.

EXCLUSION 4

This exclusion relates to Criteria Consideration C of the National Register Criteria. The only difference is that a burial place qualifies for Landmark designation only if, in addition to other factors, the person buried is of *transcendent* national importance.

When evaluating properties at the national level for designation as a National Historic Landmark, please refer to the National Historic Landmarks outline, *History and Prehistory in the National Park System and the National Historic Landmarks Program, 1987*. (For more information about the National Historic Landmarks program, please write to Department of the Interior, National Park Service, National Historic Landmarks, 1849 C Street, NW, NC400, Washington, DC 20240.)

X. GLOSSARY

Associative Qualities - An aspect of a property's history that links it with historic events, activities, or persons.

Code of Federal Regulations - Commonly referred to as "CFR." The part containing the National Register Criteria is usually referred to as 36 CFR 60, and is available from the National Park Service.

CLG - Certified Local Government.

Culture - A group of people linked together by shared values, beliefs, and historical associations, together with the group's social institutions and physical objects necessary to the operation of the institution.

Cultural Resource - See Historic Resource.

Evaluation - Process by which the significance and integrity of a historic property are judged and eligibility for National Register listing is determined.

Historic Context - An organizing structure for interpreting history that groups information about historic properties that share a common theme, common geographical area, and a common time period. The development of historic contexts is a foundation for decisions about the planning, identification, evaluation, registration, and treatment of historic properties, based upon comparative historic significance.

Historic Integrity - The unimpaired ability of a property to convey its historical significance.

Historic Property - See Historic Resource.

Historic Resource - Building, site, district, object, or structure evaluated as historically significant.

Identification - Process through which information is gathered about historic properties.

Listing - The formal entry of a property in the National Register of Historic Places. See also, Registration.

Nomination - Official recommendation for listing a property in the National Register of Historic Places.

Property Type - A grouping of properties defined by common physical and associative attributes.

Registration - Process by which a historic property is documented and nominated or determined eligible for listing in the National Register.

Research Design - A statement of proposed identification, documentation, investigation, or other treatment of a historic property that identifies the project's goals, methods and techniques, expected results, and the relationship of the expected results to other proposed activities or treatments.

XI. LIST OF NATIONAL REGISTER BULLETINS

The Basics

How to Apply National Register Criteria for Evaluation *

Guidelines for Completing National Register of Historic Places Form

Part A: How to Complete the National Register Form *

Part B: How to Complete the National Register Multiple Property Documentation Form *

Researching a Historic Property *

Property Types

Guidelines for Evaluating and Documenting Historic **Aids to Navigation** *

Guidelines for Identifying, Evaluating and Registering **America's Historic Battlefields**

Guidelines for Evaluating and Registering Historical **Archeological Sites**

Guidelines for Evaluating and Documenting Historic **Aviation Properties**

Guidelines for Evaluating and Registering **Cemeteries and Burial Places**

How to Evaluate and Nominate **Designed Historic Landscapes** *

Guidelines for Identifying, Evaluating and Registering Historic **Mining Sites**

How to Apply National Register Criteria to **Post Offices** *

Guidelines for Evaluating and Documenting **Properties Associated with Significant Persons**

Guidelines for Evaluating and Documenting **Properties That Have Achieved Significance Within the Last Fifty Years** *

Guidelines for Evaluating and Documenting **Rural Historic Landscapes** *

Guidelines for Evaluating and Documenting **Traditional Cultural Properties** *

Nominating Historic **Vessels and Shipwrecks** to the National Register of Historic Places

Technical Assistance

Defining Boundaries for National Register Properties*

Guidelines for Local Surveys: A Basis for Preservation Planning *

How to Improve the Quality of Photographs for National Register Nominations

National Register Casebook: Examples of Documentation *

Using the UTM Grid System to Record Historic Sites

To order these publications, write to: National Register of Historic Places, National Park Service, 1849 C St., NC 400, NW, Washington, D.C. 20240, or e-mail at: nr_reference@nps.gov. Publications marked with an asterisk (*) are also available in electronic form at www.cr.nps.gov/nr.

SEE PAGES 163 FOR RESTORATION GUIDELINES AND
225 FOR RECONSTRUCTION GUIDELINES.

STANDARDS FOR RESTORATION & GUIDELINES FOR RESTORING HISTORIC BUILDINGS

Restoration

Restoration is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.



Standards for Restoration

1. A property will be used as it was historically or be given a new use that interprets the property and its restoration period.
2. Materials and features from the restoration period will be retained and preserved. The removal of materials or alteration of features, spaces and spatial relationships that characterize the period will not be undertaken.
3. Each property will be recognized as a physical record of its time, place and use. Work needed to stabilize, consolidate and conserve materials and features from the restoration period will be physically and visually compatible, identifiable upon close inspection and properly documented for future research.
4. Materials, features, spaces and finishes that characterize other historical periods will be documented prior to their alteration or removal.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize the restoration period will be preserved.
6. Deteriorated features from the restoration period will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials.
7. Replacement of missing features from the restoration period will be substantiated by documentary and physical evidence. A false sense of history will not be created by adding conjectural features, features from other properties, or by combining features that never existed together historically.
8. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
9. Archeological resources affected by a project will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
10. Designs that were never executed historically will not be constructed.

GUIDELINES FOR RESTORING HISTORIC BUILDINGS

INTRODUCTION

Restoration is the treatment that should be followed when the expressed goal of the project is to make the building appear as it did at a particular—and at its most significant—time in its history. The guidance provided by the **Standards for Restoration and Guidelines for Restoring Historic Buildings** is to first *identify* the materials and features from the *restoration period*. After these materials and features have been identified, they should be maintained, protected, repaired, and replaced, when necessary. Unlike the other treatments in which most, if not all, of the historic elements are retained, restoration will likely include the removal of features from other periods. Missing features from the *restoration period* should be *replaced*, based on physical or historic documentation, with either the same or compatible substitute materials. Only those designs that can be documented as having been built should be recreated in a restoration project.

Identify, Retain, and Preserve Materials and Features from the Restoration Period

The guidance for the treatment **Restoration** begins with recommendations to identify the form and detailing of those architectural materials and features that are significant to the *restoration period* as established by historic research and documentation. Therefore, guidance on *identifying, retaining, and preserving* features from the *restoration period* is always given first.

Protect and Maintain Materials and Features from the Restoration Period

After identifying those materials and features from the *restoration period* that must be retained in the process of **Restoration** work, then *protecting and maintaining* them are addressed. Protection generally involves the least degree of intervention and is preparatory to other work. Protection includes the maintenance of materials and features from the *restoration period* as well as ensuring that the property is protected before and during restoration work. An overall evaluation of the physical condition of the features from the *restoration period* should always begin at this level.

Repair (Stabilize, Consolidate, and Conserve) Materials and Features from the Restoration Period

Next, when the physical condition of *restoration-period* features requires additional work, repairing by *stabilizing, consolidating, and conserving* is recommended. **Restoration** guidance focuses on the preservation of those materials and features that are significant to the period. In **Restoration**, repair may include the limited replacement in kind or with a compatible substitute material of extensively deteriorated or missing components of existing *restoration-period* features when there are surviving prototypes to use as a model.

Replace Extensively Deteriorated Features from the Restoration Period

In **Restoration**, *replacing* an entire feature from the *restoration period*, such as a porch, that is too deteriorated to repair may be appropriate. Together with documentary evidence, the form and detailing of the historic feature should be used as a model for the replacement. Using the same kind of material is preferred; however, compatible substitute material may be considered. New work may be unobtrusively dated to guide future research and treatment.

Remove Existing Features from Other Historic Periods

Most buildings change over time, but in **Restoration** the goal is to depict the building as it appeared at the most significant time in its history. Thus, it may involve *removing* or altering existing historic features that do not represent the *restoration period*. Materials, features, spaces, and finishes that characterize other historical periods should be documented to guide future research and treatment prior to their alteration or removal.

Recreate Missing Features from the Restoration Period

Most **Restoration** projects involve *recreating* features that were significant to the building during the *restoration period*, such as a porch, but are now missing. Missing features to be replaced should be substantiated by documentary and physical evidence to ensure the restoration is accurate. Using the same materials to depict lost features is always the preferred approach; however, using compatible substitute material is an acceptable alternative in **Restoration** because the goal of this treatment is to replicate the *appearance* of the historic building at a particular time.

If documentary and physical evidence are not available to provide an accurate recreation of missing features, the treatment **Rehabilitation** might be a better overall approach to project work.

Code-Required Work: Accessibility and Life Safety

Sensitive solutions to meeting code requirements in a **Restoration** project are an important part of protecting the historic character of the building. Work that must be done to meet accessibility and life-safety requirements must also be assessed for its potential impact on the historic building as it is restored.

Resilience to Natural Hazards

Resilience to natural hazards should be addressed as part of a **Restoration** project. A historic building may have existing characteristics or features that help to address or minimize the impacts of natural hazards. These should always be used to best advantage when planning new adaptive treatments that have the least impact on the historic character of the building, its site, and setting.

Sustainability

Sustainability should be addressed as part of a **Restoration** project. Good preservation practice is often synonymous with sustainability. Existing energy-efficient features should be retained and repaired. New sustainability treatments should generally be limited to updating existing features and systems to have the least impact on the historic character of the building.

The topic of sustainability is addressed in detail in *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings*. Although specifically developed for the treatment **Rehabilitation**, the Sustainability Guidelines can be used to help guide the other treatments.

Restoration as a Treatment. When the property's design, architectural, or historical significance during a particular period of time outweighs the potential loss of extant materials, features, spaces, and finishes that characterize other historical periods; when there is substantial physical and documentary evidence for the work; and when contemporary alterations and additions are not planned, Restoration may be considered as a treatment. Prior to undertaking work, a particular period of time, i.e., the restoration period, should be selected and justified, and a documentation plan for Restoration developed.

MASONRY: STONE, BRICK, TERRA COTTA, CONCRETE, ADOBE, STUCCO, AND MORTAR

| RECOMMENDED | NOT RECOMMENDED |
|---|--|
| <p>Identifying, retaining and preserving masonry features from the restoration period (such as walls, brackets, railings, cornices, window and door surrounds, steps, and columns) and decorative ornament and other details, such as tooling and bonding patterns, coatings, and color.</p> | <p>Altering masonry features from the restoration period.</p> <p>Failing to document masonry features from the restoration period, which may result in their loss.</p> <p>Applying paint or other coatings (such as stucco) to restoration-period masonry features, or removing them, if such treatments cannot be documented to the restoration period.</p> <p>Changing the type of paint or coating or the color of restoration-period masonry features, unless the work can be substantiated by historical documentation.</p> |
| <p>Protecting and maintaining masonry features from the restoration period by ensuring that historic drainage features and systems that divert rainwater from masonry surfaces (such as roof overhangs, gutters, and downspouts) are intact and functioning properly.</p> | <p>Failing to identify and treat the causes of masonry deterioration, such as leaking roofs and gutters or rising damp.</p> |



[1] (a) When it was acquired by the National Trust for Historic Preservation in the 1980s, Montpelier in Montpelier Station, VA, the home of James and Dolley Madison, had been much altered and enlarged since it was first constructed. Based on historical documentation and research, Montpelier was accurately restored to its 1820s appearance when the president and his wife lived there (b). Photos: Courtesy of The Montpelier Foundation.

MASONRY: STONE, BRICK, TERRA COTTA, CONCRETE, ADOBE, STUCCO, AND MORTAR

| RECOMMENDED | NOT RECOMMENDED |
|---|--|
| Cleaning masonry only when necessary to halt deterioration or remove heavy soiling. | Cleaning masonry surfaces from the restoration period when they are not heavily soiled to create a “like-new” appearance, thereby needlessly introducing chemicals or moisture into historic materials. |
| Carrying out masonry cleaning tests when it has been determined that cleaning is appropriate. Test areas should be examined to ensure that no damage has resulted and, ideally, monitored over a sufficient period of time to allow long-range effects to be predicted. | Cleaning masonry surfaces without testing or without sufficient time for the testing results to be evaluated. |
| Cleaning soiled restoration-period masonry surfaces with the gentlest method possible, such as using low-pressure water and detergent and natural bristle or other soft-bristle brushes. | <p>Cleaning or removing paint from masonry surfaces from the restoration period using most abrasive methods (including sandblasting, other media blasting, or high-pressure water) which can damage the surface of the masonry and mortar joints.</p> <p>Using a cleaning or paint-removal method that involves water or liquid chemical solutions when there is any possibility of freezing temperatures.</p> <p>Cleaning with chemical products that will damage some types of masonry (such as using acid on limestone or marble), or failing to neutralize or rinse off chemical cleaners from masonry surfaces.</p> |
| Using biodegradable or environmentally-safe cleaning or paint-removal products. | |
| Using paint-removal methods that employ a poultice to which paint adheres, when possible, to neatly and safely remove old lead paint. | |
| Using coatings that encapsulate lead paint, when possible, where paint is not required to be removed to meet environmental regulations. | |
| Allowing only trained conservators to use abrasive or laser cleaning methods, when necessary, to clean hard-to-reach, highly-carved, or detailed decorative stone features. | |

MASONRY: STONE, BRICK, TERRA COTTA, CONCRETE, ADOBE, STUCCO, AND MORTAR

| RECOMMENDED | NOT RECOMMENDED |
|--|--|
| Removing damaged or deteriorated paint only to the next sound layer using the gentlest method possible (e.g., hand scraping) prior to repainting. | Removing paint that is firmly adhered to masonry surfaces. |
| Applying compatible paint coating systems to historically-painted, restoration-period masonry following proper surface preparation. | Failing to follow manufacturers' product and application instructions when repainting masonry features. |
| Repainting historically-painted masonry features with colors that are documented to the restoration period of the building (i.e., verifying through paint analysis). | Using paint colors on historically-painted masonry features that are not documented to the restoration period. |
| Protecting adjacent restoration-period materials when cleaning or removing paint from masonry features from the restoration period. | Failing to protect adjacent restoration-period materials when cleaning or removing paint from masonry features from the restoration period. |
| Evaluating the overall condition of masonry from the restoration period to determine whether more than protection and maintenance, such as repairs to masonry features will be necessary. | Failing to undertake adequate measures to ensure the protection of masonry features from the restoration period. |
| <i>Repairing</i> masonry features from the restoration period by patching, splicing, consolidating, or otherwise reinforcing the masonry using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing components of masonry features from the restoration period when there are surviving prototypes (such as terra-cotta brackets or stone balusters) or when the replacement can be based on physical or historic documentation. The new work should match the old in material, design, scale, color, and finish. | Removing masonry from the restoration period that could be stabilized, repaired, and conserved, or using untested consolidants and unskilled personnel, potentially causing further damage to materials. |

MASONRY: STONE, BRICK, TERRA COTTA, CONCRETE, ADOBE, STUCCO, AND MORTAR

RECOMMENDED

NOT RECOMMENDED

Repairing masonry walls and other masonry features from the restoration period by repointing the mortar joints where there is evidence of deterioration, such as disintegrating mortar, cracks in mortar joints, loose bricks, or damaged plaster.

Removing deteriorated lime mortar from the restoration period carefully by hand raking the joints to avoid damaging the masonry.

Removing restoration-period mortar that is not deteriorated from sound joints.

[2] (a) Decatur House in Washington, DC, was designed by William Henry Latrobe and constructed in 1816. (b) In the late-19th century, the façade was “modernized” by removing the limestone lintels on the first floor and replacing them with decorative sandstone lintels in the style of the period. (c) In the mid-20th century, the house was brought back to its original appearance based on historic documentation. Photos: The White House Historical Association and Decatur House, a National Trust Site.



MASONRY: STONE, BRICK, TERRA COTTA, CONCRETE, ADOBE, STUCCO, AND MORTAR

| RECOMMENDED | NOT RECOMMENDED |
|---|--|
| <p>Using power tools only on horizontal joints on restoration-period brick masonry in conjunction with hand chiseling to remove hard mortar that is deteriorated or that is a non-historic material which is causing damage to the masonry units. Mechanical tools should be used only by skilled masons in limited circumstances and generally not on short, vertical joints in brick masonry.</p> | <p>Allowing unskilled workers to use masonry saws or mechanical tools to remove deteriorated mortar from joints prior to repointing.</p> |
| <p>Duplicating historic mortar joints in strength, composition, color, and texture when repointing is necessary. In some cases, a lime-based mortar may also be considered when repointing Portland cement mortar joints because it is more flexible.</p> | <p>Repointing masonry units with mortar of high Portland cement content (unless it is the content of the mortar from the restoration period).</p> |
| <p>Duplicating restoration-period mortar joints in width and joint profile when repointing is necessary.</p> | <p>Using “surface grouting” or a “scrub” coating technique, such as a “sack rub” or “mortar washing,” to repoint exterior masonry units from the restoration period instead of traditional repointing methods.</p> <p>Changing the width or joint profile when repointing masonry from the restoration period.</p> |



[3] **Not Recommended:** Although the Dutchman stone repair has been well executed, the replacement stone is not a good color match.

MASONRY: STONE, BRICK, TERRA COTTA, CONCRETE, ADOBE, STUCCO, AND MORTAR

| RECOMMENDED | NOT RECOMMENDED |
|--|--|
| <p>Repairing stucco from the restoration period by removing the damaged material and patching with new material that duplicates the historic stucco in strength, composition, color, and texture.</p> | <p>Removing sound stucco from the restoration period or repairing with new stucco that is different in composition from the historic stucco.</p> <p>Patching stucco or concrete from the restoration period without removing the source of deterioration.</p> <p>Replacing deteriorated stucco from the restoration period with synthetic stucco, an exterior finish and insulation system (EFIS), or other non-traditional materials.</p> |
| <p>Using mud plaster or a compatible lime-plaster adobe render, when appropriate, to repair adobe from the restoration period.</p> | <p>Applying cement stucco, unless it already exists, to adobe from the restoration period.</p> |
| <p>Sealing joints in concrete from the restoration period with appropriate flexible sealants and backer rods, when necessary.</p> | <p>Repointing masonry units from the restoration period (other than concrete) with a synthetic caulking compound instead of mortar.</p> |
| <p>Cutting damaged concrete from the restoration period back to remove the source of deterioration, such as corrosion on metal reinforcement bars. The new patch must be applied carefully so that it will bond satisfactorily with and match the historic concrete.</p> | <p>Patching concrete from the restoration period without removing the source of deterioration.</p> |
| <p>Using a non-corrosive, stainless-steel anchoring system when replacing damaged stone, concrete, or terra-cotta units from the restoration period that have failed.</p> | |
| <p>Repairing masonry features from the restoration period by patching, splicing, consolidating, or otherwise reinforcing the masonry using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing components of masonry features from the restoration period when there are surviving prototypes (such as terra-cotta brackets or stone balusters) or when the replacement can be based on physical or historic documentation. The new work should match the old in material, design, scale, color, and finish.</p> | <p>Removing masonry from the restoration period that could be stabilized, repaired, and conserved, or using untested consolidants, improper repair techniques, or unskilled personnel, potentially causing further damage to materials.</p> <p>Replacing an entire masonry feature from the restoration period, such as a cornice or balustrade, when repair of the masonry and limited replacement of deteriorated or missing components are appropriate.</p> |

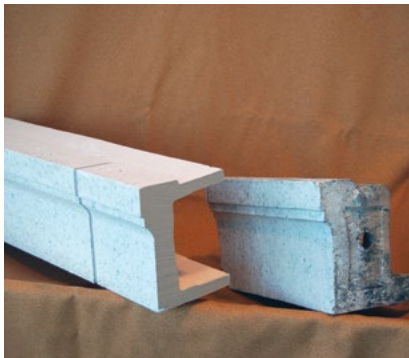
[4] (a) Over the years terra-cotta cladding had been replaced on the lower floors of this early-20th century bank building with a storefront and incompatible windows. (b) A 1936 photograph of the building provided the documentation to restore its historic appearance. (c) Glass fiber reinforced plastic (GFRP) was chosen as a substitute material, and samples were made in a variety of colors and textures to obtain the best match for the missing and damaged terra cotta. (d) This photo taken after restoration shows that the GFRP replacements successfully blend in with the original terra cotta. Photo (d): Blamonet at English Wikipedia.



(a)



(b)



(c)



(d)

MASONRY: STONE, BRICK, TERRA COTTA, CONCRETE, ADOBE, STUCCO, AND MORTAR

| RECOMMENDED | NOT RECOMMENDED |
|--|--|
| Applying non-historic surface treatments, such as water-repellent coatings, to masonry from the restoration period only after repointing and only if masonry repairs have failed to arrest water penetration problems. | Applying waterproof, water-repellent, or other coatings that are not from the restoration period (such as stucco) to masonry as a substitute for repointing and masonry repairs. |
| Applying permeable, anti-graffiti coatings to masonry from the restoration period when appropriate. | Applying water-repellent or anti-graffiti coatings that change the historic appearance of the masonry from the restoration period or that may trap moisture if the coating is not sufficiently permeable. |
| Replacing in kind an entire masonry feature from the restoration period that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature. Examples can include a large section of a wall, a cornice, balustrade, pier, or parapet. If using the same kind of material is not feasible, then a compatible substitute material may be considered. The new work may be unobtrusively dated to guide future research and treatment. | <p>Removing a masonry feature from the restoration period that is unrepairable and not replacing it, or replacing it with a new feature that does not match.</p> <p>Using a substitute material for the replacement that does not convey the same appearance of the surviving components of the masonry.</p> |
| <i>The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing historic masonry features that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing masonry features from the restoration period using all new materials.</i> | |
| Removing Existing Features from Other Historic Periods | |
| Removing masonry features from other historic periods, such as a door surround, porch, or steps. | Failing to remove a masonry feature from another period, thereby confusing the depiction of the building's appearance from the restoration period. |
| Documenting masonry features dating from other periods prior to their alteration or removal. If possible, selected examples of these features or materials should be stored for future research. | Failing to document masonry features from other historic periods that are removed from the building so that a valuable portion of the historic record is lost. |
| Recreating Missing Features from the Restoration Period | |
| Recreating a missing masonry feature that existed during the restoration period based on documentary and physical evidence; for example, duplicating a terra-cotta bracket or stone balustrade. The new work may be unobtrusively dated to guide future research and treatment. | Constructing a masonry feature that was part of the original design for the building but was never actually built, or a feature which was thought to have existed during the restoration period but which cannot be documented. |

WOOD: CLAPBOARD, WEATHERBOARD, SHINGLES, AND OTHER FUNCTIONAL AND DECORATIVE ELEMENTS

| RECOMMENDED | NOT RECOMMENDED |
|--|---|
| <p>Identifying, retaining, and preserving wood features from the restoration period (such as siding, cornices, brackets, window and door surrounds, and steps) and their paints, finishes, and colors.</p> | <p>Altering wood features from the restoration period.</p> <p>Failing to document wood features from the restoration period, which may result in their loss.</p> <p>Applying paint or other coatings to restoration-period wood features, or removing them, if such treatments cannot be documented to the restoration period.</p> <p>Changing the type of paint or coating or the color of restoration-period wood features, unless the work can be substantiated by historical documentation.</p> |
| <p>Protecting and maintaining wood features from the restoration period by ensuring that historic drainage features that divert rain-water from wood surfaces (such as roof overhangs, gutters, and downspouts) are intact and functioning properly.</p> | <p>Failing to identify and treat the causes of wood deterioration, such as faulty flashing, leaking gutters, cracks and holes in siding, deteriorated caulking in joints and seams, plant material growing too close to wood surfaces, or insect or fungal infestation.</p> |
| <p>Applying chemical preservatives or paint to wood features from the restoration period that are subject to weathering, such as exposed beam ends, outriggers, or rafter tails.</p> | <p>Using chemical preservatives that can change the appearance of wood features from the restoration period.</p> |
| <p>Implementing an integrated pest management plan to identify appropriate preventive measures to guard against insect damage, such as installing termite guards, fumigating, and treating with chemicals.</p> | |
| <p>Retaining coatings from the restoration period (such as paint) that protect the wood from moisture and ultraviolet light. Paint removal should be considered only when there is paint surface deterioration and as part of an overall maintenance program which involves repainting or applying other appropriate coatings.</p> | <p>Stripping restoration-period paint or other coatings from wood features without recoating them.</p> |
| <p>Using biodegradable or environmentally-safe cleaning or paint-removal products.</p> | |

WOOD: CLAPBOARD, WEATHERBOARD, SHINGLES, AND OTHER FUNCTIONAL AND DECORATIVE ELEMENTS

| RECOMMENDED | NOT RECOMMENDED |
|---|--|
| Using thermal devices (such as infrared heaters) carefully to remove paint, when it is so deteriorated that total removal is necessary prior to repainting. | Using a thermal device to remove paint from wood features without first checking for and removing any flammable debris behind them. Using thermal devices without limiting the amount of time the wood is exposed to heat. |
| Using paint-removal methods that employ a poultice to which paint adheres, when possible, to neatly and safely remove old lead paint. | |
| Using coatings that encapsulate lead paint, when possible, where the paint is not required to be removed to meet environmental regulations. | |
| Using chemical strippers primarily to supplement other methods such as hand scraping, hand sanding, and thermal devices. | Failing to neutralize the wood thoroughly after using chemical paint removers so that new paint may not adhere. Removing paint from detachable, restoration-period wood features by soaking them in a caustic solution which can roughen the surface, split the wood, or result in staining from residual acid leaching out through the wood. |
| Removing damaged or deteriorated paint to the next sound layer using the gentlest method possible (e.g., hand scraping and hand sanding) prior to repainting. | Using potentially-damaging paint-removal methods on restoration-period wood surfaces, such as open-flame torches, orbital sanders, abrasive methods (including sandblasting, other media blasting, or high-pressure water), or caustic paint-removers. Removing paint that is firmly adhered to wood surfaces. |
| Applying compatible paint coating systems to historically-painted wood following proper surface preparation. | Failing to follow manufacturers' product and application instructions when repainting wood features from the restoration period. |
| Repainting historically-painted wood features with colors that are documented to the restoration period of the building (i.e., verifying through paint analysis). | Using paint colors on historically-painted wood features that are not documented to the restoration period. |

WOOD: CLAPBOARD, WEATHERBOARD, SHINGLES, AND OTHER FUNCTIONAL AND DECORATIVE ELEMENTS

| RECOMMENDED | NOT RECOMMENDED |
|---|---|
| Protecting adjacent restoration-period materials when cleaning or removing paint from wood features from the restoration period. | Failing to protect adjacent restoration-period materials when cleaning or removing paint from wood features from the restoration period. |
| Evaluating the overall condition of wood features from the restoration period to determine whether more than protection and maintenance, such as repairs to wood features, will be necessary. | Failing to undertake adequate measures to ensure the protection of wood features from the restoration period. |
| Repairing wood features from the restoration period by patching, splicing, consolidating, or otherwise reinforcing the wood using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing components of features from the restoration period when there are surviving prototypes (such as brackets, molding, or sections of siding) or when the replacement can be based on physical or historic documentation. The new work should match the old in material, design, scale, color, and finish. | <p>Removing wood features from the restoration period that could be stabilized, repaired, and conserved, or using untested consolidants or unskilled personnel, potentially causing further damage to historic materials.</p> <p>Replacing an entire wood feature from the restoration period, such as a cornice or porch railing, when repair of the wood and limited replacement of deteriorated or missing components are appropriate.</p> |
| Replacing in kind an entire wood feature from the restoration period that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. Examples can include a cornice, entablature, or a balustrade. If using the same kind of material is not feasible, then a compatible substitute material may be considered. The new work may be unobtrusively dated to guide future research and treatment. | <p>Removing a wood feature from the restoration period that is unrepairable and not replacing it, or replacing it with a new feature that does not match.</p> <p>Using substitute material for the replacement that does not convey the same appearance of the surviving components of the wood feature from the restoration period or that is physically incompatible.</p> |

WOOD: CLAPBOARD, WEATHERBOARD, SHINGLES, AND OTHER FUNCTIONAL AND DECORATIVE ELEMENTS

RECOMMENDED

NOT RECOMMENDED

The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing historic masonry features that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing wood features from the restoration period using all new materials.

Removing Existing Features from Other Historic Periods

Removing wood features from other historic periods, such as a door surround, porch, or steps.

Failing to remove a wood feature from another period, thereby confusing the depiction of the building's appearance from the restoration period.

Documenting wood features dating from other periods prior to their alteration or removal. If possible, selected examples of these features or materials should be stored for future research.

Failing to document wood features from other historic periods that are removed from the building so that a valuable portion of the historic record is lost.

Recreating Missing Features from the Restoration Period

Recreating a missing wood feature that existed during the restoration period based on documentary and physical evidence; for example, duplicating a wood dormer or porch

Constructing a wood feature that was part of the original design for the building but was never actually built, or a feature which was thought to have existed during the restoration period but cannot be documented.



[5] New wood trim pieces were milled to match the few remaining historic features to replace those that were missing.

METALS: WROUGHT AND CAST IRON, STEEL, PRESSED METAL, TERNEPLATE, COPPER, ALUMINUM, AND ZINC

| RECOMMENDED | NOT RECOMMENDED |
|--|---|
| <p>Identifying, retaining, and preserving metal features from the restoration period (such as columns, capitals, pilasters, spandrel panels, or stairways) and their finishes and colors. The type of metal should be identified prior to work because each metal has its own properties and may require a different treatment.</p> | <p>Altering metal features from the restoration period.</p> <p>Failing to document metal features from the restoration period, which may result in their loss.</p> <p>Applying paint or other coatings to restoration-period metal features, or removing them, if such treatments cannot be documented to the restoration period.</p> <p>Changing the type of paint or coating or the color of restoration-period metal features, unless the work can be substantiated by historical documentation.</p> |
| <p>Protecting and maintaining metals from the restoration period from corrosion by providing proper drainage so that water does not stand on flat, horizontal surfaces or accumulate in curved decorative features.</p> | <p>Failing to identify and treat the causes of corrosion of restoration-period metal features such as moisture from leaking roofs or gutters.</p> |
| <p>Cleaning metals from the restoration period, when necessary, to remove corrosion prior to repainting or applying other appropriate protective coatings.</p> | <p>Failing to reapply coating systems after cleaning metals from the restoration period that require protection from corrosion.</p> <p>Removing the patina from restoration-period metal features. The patina may be a protective layer on some metals (such as bronze or copper) as well as a distinctive finish.</p> |
| <p>Identifying the particular type of metal from the restoration period prior to any cleaning procedure and then testing to ensure that the gentlest cleaning method possible is selected; or alternatively, determining that cleaning is inappropriate for the particular metal.</p> | <p>Using cleaning methods which alter or damage the restoration-period color, texture, and finish of the metal, or cleaning when it is inappropriate for the metal.</p> |
| <p>Using non-corrosive chemical methods to clean soft metals from the restoration period (such as lead, tinfoil, terneplate, copper, and zinc) whose finishes can be easily damaged by abrasive methods.</p> | <p>Cleaning soft metals from the restoration period (such as lead, tinfoil, terneplate, copper, and zinc) with abrasive methods (including sandblasting, other media blasting, or high-pressure water) which will damage the surface of the metal.</p> |

METALS: WROUGHT AND CAST IRON, STEEL, PRESSED METAL, TERNEPLATE, COPPER, ALUMINUM, AND ZINC

| RECOMMENDED | NOT RECOMMENDED |
|--|---|
| Using the least abrasive cleaning method on hard metals from the restoration period (such as cast iron, wrought iron, and steel) to remove paint buildup and corrosion. If hand scraping and wire brushing have proven ineffective, low-pressure abrasive methods may be used as long as they do not damage the surface. | Using high-pressure abrasive techniques without first trying gentler cleaning methods prior to cleaning cast iron, wrought iron, or steel. |
| Applying appropriate paint or other coating systems to historically-painted, restoration-period metal features after cleaning to protect them from corrosion. | Applying paint or other coatings to metals (such as copper, bronze, or stainless steel) if they were not coated during the restoration period. |
| Repainting historically-painted metal features with colors that are documented to the restoration period of the building (i.e., verifying through paint analysis). | Using paint colors on historically-painted metal features that are not documented to the restoration period of the building. |
| Applying an appropriate protective coating (such as lacquer or wax) to an architectural metal feature that was historically unpainted, such as a bronze door, that is subject to heavy use. | |
| Protecting adjacent restoration-period materials when working on metal features from the restoration period. | Failing to protect adjacent restoration-period materials when working on metal features from the restoration period. |
| Evaluating the overall condition of metals from the restoration period to determine whether more than protection and maintenance, such as repairs to metal features, will be necessary. | Failing to undertake adequate measures to ensure the protection of metal features from the restoration period. |
| Repairing metal features from the restoration period by reinforcing the metal by using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing parts of features when there are surviving prototypes (such as porch balusters, column capitals or bases, storefronts, railings, or porch cresting) or when the replacement can be based on physical or historic documentation. The new work should match the old in material, design, scale, color, and finish. | Removing metal features from the restoration period that could be stabilized, repaired, and conserved, or using improper repair techniques, or untrained personnel, potentially causing further damage to historic materials. Replacing an entire metal feature from the restoration period, such as a column or balustrade, when repair of the metal and limited replacement of deteriorated or missing components are appropriate. |



[6] Preliminary work before starting restoration revealed that the columns and the decorative shingles ornamenting the top floor of this historic building were fabricated of metal to imitate the red sandstone used elsewhere on the building.

METALS: WROUGHT AND CAST IRON, STEEL, PRESSED METAL, TERNEPLATE, COPPER, ALUMINUM, AND ZINC

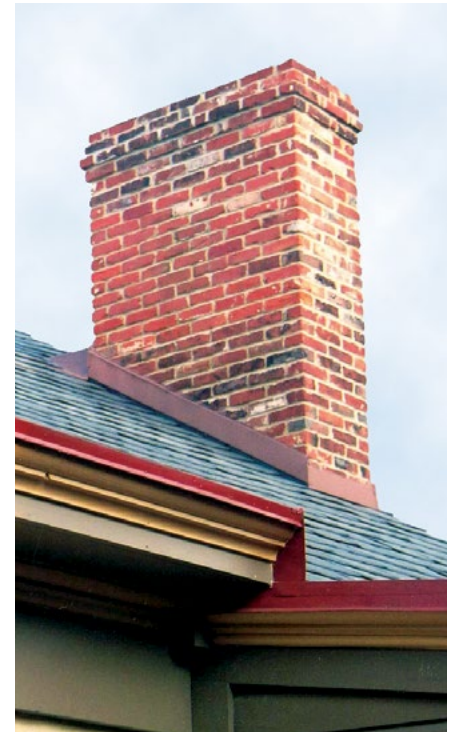
RECOMMENDED

NOT RECOMMENDED

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| <p>Replacing in kind an entire metal feature from the restoration period that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. Examples of such a feature could include cast-iron porch steps or steel-sash windows. If using the same kind of material is not feasible, then a compatible substitute material may be considered as long as it has the same appearance as the original. The new work may be unobtrusively dated to guide future research and treatment.</p> | <p>Removing a metal feature from the restoration period that is unreparable and not replacing it, or replacing it with a new feature that does not match.</p> <p>Using a substitute material for the replacement that does not convey the same appearance of the surviving components of the metal feature from the restoration period or that is physically or chemically incompatible.</p> |
| <p><i>The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing historic masonry features that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing metal features from the restoration period using all new materials.</i></p> | |
| <p>Removing Existing Features from Other Historic Periods</p> | |
| <p>Removing metal features from other historic periods, such as a cast-iron porch railing or aluminum windows.</p> | <p>Failing to remove a metal feature from another period, thereby confusing the depiction of the building's appearance from the restoration period.</p> |
| <p>Documenting metal features dating from other periods prior to their alteration or removal. If possible, selected examples of these features or materials should be stored for future research.</p> | <p>Failing to document metal features from other historic periods that are removed from the building so that a valuable portion of the historic record is lost.</p> |
| <p>Recreating Missing Features from the Restoration Period</p> | |
| <p>Recreating a missing metal feature that existed during the restoration period based on documentary and physical evidence; for example, duplicating a cast-iron storefront or porch.</p> | <p>Constructing a metal feature that was part of the original design for the building but was never actually built, or a feature which was thought to have existed during the restoration period but cannot be documented.</p> |

ROOFS

| RECOMMENDED | NOT RECOMMENDED |
|---|---|
| <p>Identifying, retaining, and preserving roofs from the restoration period and their functional and decorative features. The form of the roof (gable, hipped, gambrel, flat, or mansard) is significant, as are its decorative and functional features (such as cupolas, cresting, parapets, monitors, chimneys, weather vanes, dormers, ridge tiles, and snow guards), roofing materials (such as slate, wood, clay tile, metal, roll roofing, or asphalt shingles) and size, color, and patterning.</p> | <p>Altering roof and roofing materials from the restoration period.</p> <p>Failing to document roof features from the restoration period, which may result in their loss.</p> <p>Changing the type of paint or coating or the color of restoration-period roof features, unless the work can be substantiated by historical documentation.</p> <p>Stripping the roof of sound historic roofing material (such as slate, clay tile, wood, or metal) from the restoration period.</p> |
| <p>Protecting and maintaining a roof from the restoration period by cleaning gutters and downspouts and replacing deteriorated flashing. Roof sheathing should also be checked for indications of moisture due to leaks or condensation.</p> | <p>Failing to clean and maintain gutters and downspouts so that water and debris collect and cause damage to roof fasteners, sheathing, and the underlying structure.</p> |
| <p>Providing adequate anchorage for roofing material from the restoration period to guard against wind damage and moisture penetration.</p> | <p>Allowing flashing, caps, and exposed roof fasteners to corrode, which accelerates deterioration.</p> |
| <p>Protecting a leaking roof with a temporary waterproof membrane with a synthetic underlayment, roll roofing, plywood, or a tarpaulin until it can be repaired.</p> | <p>Leaving a leaking roof unprotected so that accelerated deterioration of historic building materials from the restoration period (such as masonry, wood, plaster, paint, and structural members) results.</p> |
| <p>Repainting a roofing material from the restoration period that requires a protective coating and was painted historically (such as a terneplate metal roof or gutters) as part of regularly-scheduled maintenance.</p> | <p>Failing to repaint a roofing material from the restoration period that requires a protective coating and was painted historically as part of regularly-scheduled maintenance.</p> |
| <p>Protecting a restoration-period roof covering when working on other roof features from the restoration period.</p> | <p>Failing to protect restoration-period roof coverings when working on other roof features from the restoration period.</p> |
| <p>Evaluating the overall condition of the roofing materials from the restoration period to determine whether more than protection and maintenance, such as repairs to roof features, will be necessary.</p> | <p>Failing to undertake adequate measures to ensure the protection of roof features from the restoration period.</p> |



[7 a-b] This crumbling chimney was restored to its historic appearance using matching bricks.

[8] The missing steeple of this historic church was replaced with a new steeple made of a substitute material that, from the street below, closely resembles the original steeple. *Photo: en.Wikipedia.*

ROOFS

| RECOMMENDED | NOT RECOMMENDED |
|--|--|
| <p>Repairing a roof from the restoration period by reinforcing the materials that comprise the roof using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing components of features when there are surviving prototypes (such as cupola louvers, cresting, dormer roofing, roof monitors, or slate or tile on a main roof) or when replacement can be based on physical or historic documentation. The new work should match the old in materials, design, scale, color, and finish.</p> | <p>Replacing an entire roof feature from the restoration period, such as a dormer, when repair of the roofing materials and limited replacement of deteriorated or missing components are feasible.</p> <p>Failing to reuse intact slate or tile from the restoration period when only the roofing substrate or fasteners need replacement.</p> |
| <p>Replacing in kind an entire roof covering or feature from the restoration period that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. Examples of such a feature could include a large section of roofing, a dormer, or a chimney. If using the same kind of material is not feasible, then a compatible substitute material may be appropriate.</p> | <p>Removing a roof feature from the restoration period that is unrepairable, such as a chimney or dormer, and not replacing it, or replacing it with a feature that does not match.</p> <p>Using a substitute material for the replacement of a single element of a roof (such as a tile or slate) or an entire feature that does not convey the same appearance of the surviving components of the roof feature from the restoration period or that is physically or chemically incompatible.</p> |
| <p><i>The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing historic masonry features that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing roof features from the restoration period using all new materials.</i></p> | |
| <p>Removing Existing Features from Other Historic Periods</p> | |
| <p>Removing roofs or roof features from other historic periods, such as a dormer or asphalt roofing.</p> | <p>Failing to remove a roof feature from another period, thereby confusing the depiction of the building's appearance from the restoration period.</p> |
| <p>Documenting roof features dating from other periods prior to their alteration or removal. If possible, selected examples of these features or materials should be stored for future research.</p> | <p>Failing to document roofing materials and roof features from other historic periods that are removed from the building so that a valuable portion of the historic record is lost.</p> |
| <p>Recreating Missing Features from the Restoration Period</p> | |
| <p>Recreating a missing roofing material or roof feature that existed during the restoration period based on documentary and physical evidence; for example, duplicating a former dormer or cupola.</p> | <p>Constructing a roof feature that was part of the original design for the building but was never actually built, or a feature which was thought to have existed during the restoration period but cannot be documented.</p> |

WINDOWS

RECOMMENDED

NOT RECOMMENDED

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| <p>Identifying, retaining, and preserving windows from the restoration period and their functional and decorative features. The window material and how the window operates (e.g., double hung, casement, awning, or hopper) are significant, as are its components (including sash, muntins, ogee lugs, glazing, pane configuration, sills, mullions, hardware, casings or brick molds) and related features, such as shutters.</p> | <p>Altering windows or window features from the restoration period.</p> <p>Failing to document window features from the restoration period, which may result in their loss.</p> <p>Applying paint or other coatings to restoration-period window features, or removing them, if such treatments cannot be documented to the restoration period.</p> <p>Changing the type of paint or coating or the color of restoration-period windows, unless the work can be substantiated by historical documentation.</p> <p>Stripping windows of sound historic material (such as wood or metal) from the restoration period.</p> |
| <p>Conducting an in-depth survey of the condition of existing windows from the restoration period early in the planning process so that repair, upgrading, and, if necessary, possible replacement options can be fully explored.</p> | <p>Replacing windows from the restoration period solely because of peeling paint, broken glass, stuck sash, or high air infiltration. These conditions, in themselves, do not indicate that windows are beyond repair.</p> |
| <p>Protecting and maintaining the restoration-period wood or metal which comprises the window jamb, sash, and trim through appropriate surface treatments such as cleaning, paint removal, and reapplication of the same protective coatings.</p> | <p>Failing to protect and maintain window materials from the restoration period on a cyclical basis so that deterioration of the window results.</p> |
| <p>Protecting windows from the restoration period against vandalism before work begins by covering them and by installing alarm systems that are keyed into local protection agencies.</p> | <p>Leaving windows unprotected before work begins, thereby also allowing the interior to be damaged if it can be accessed through unprotected windows.</p> |
| <p>Installing impact-resistant glazing, when necessary for security, so that it is compatible with the historic windows from the restoration period and does not damage them or negatively impact their character.</p> | <p>Installing impact-resistant glazing, when necessary, for security that is not compatible with the historic windows from the restoration period and damages them or negatively impacts their character.</p> |

WINDOWS

RECOMMENDED

NOT RECOMMENDED

| | |
|--|---|
| Protecting restoration-period windows when working on other features of the building. | Failing to protect restoration-period windows when working on other features of the building. |
| Protecting and retaining historic glass from the restoration period when replacing putty or repairing other components of the window. | Failing to protect historic glass from the restoration period when making repairs. |
| Sustaining the historic operability of windows from the restoration period by lubricating friction points and replacing broken components of the operating system (such as hinges, latches, sash chains or cords) and replacing deteriorated gaskets or insulating units. | Failing to maintain windows and window components from the restoration period so that windows are inoperable, or sealing operable sash permanently. Failing to repair and reuse window hardware from the restoration period, such as sash lifts, latches, and locks. |
| Evaluating the overall condition of windows from the restoration period to determine whether more than protection and maintenance, such as repairs to windows and window features, will be necessary. | Failing to undertake adequate measures to ensure the protection of window features from the restoration period. |
| Repairing window frames and sash from the restoration period by patching, splicing, consolidating, or otherwise reinforcing them using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated, broken, or missing components of windows when there are surviving prototypes (such as sash, sills, hardware, or shutters) or when the replacement can be based on physical or historic documentation. The new work should match the old in material, design, scale, color, and finish. | Replacing an entire window from the restoration period when repair of materials and limited replacement in kind are appropriate. Removing a window from the restoration period that is unrepairable and not replacing it, or replacing it with a new window that does not match. |



[9] Historic window and shutter hardware such as that shown here should be retained and repaired in a restoration project.

WINDOWS

RECOMMENDED

NOT RECOMMENDED

Replacing in kind an entire window from the restoration period that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. If using the same kind of material is not feasible, then a compatible substitute material may be considered. The new work may be unobtrusively dated to guide future research and treatment.

Removing a window from the restoration period that is unrepairable and not replacing it, or replacing it with a new window that does not match.

Using substitute material for the replacement that does not convey the same appearance of the surviving components of the window from the restoration period or that is physically incompatible.

The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing historic masonry features that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing window features from the restoration period using all new materials.

Removing Existing Features from Other Historic Periods

Removing windows or window features from other historic period, such as the glazing pattern or inappropriate shutters.

Failing to remove a window or window feature from another period, thereby confusing the depiction of the building's appearance from the restoration period.

Documenting window features dating from other periods prior to their alteration or removal. If possible, selected examples of these features or materials should be stored for future research.

Failing to document window features from other historic periods that are removed from the building so that a valuable portion of the historic record is lost.

Recreating Missing Features from the Restoration Period

Recreating a missing window or window feature that existed during the restoration period based on documentary and physical evidence; for example, duplicating a hoodmold or shutter.

Constructing a window feature that was part of the original design for the building but was never actually built, or constructing a feature which was thought to have existed during the restoration period but cannot be documented.

ENTRANCES AND PORCHES

| RECOMMENDED | NOT RECOMMENDED |
|---|---|
| <p><i>Identifying, retaining, and preserving</i> entrances and porches from the restoration period and their functional and decorative features. The materials themselves (including wood, masonry, and metal) are important, as are their features, such as doors, transoms, pilasters, columns, balustrades, stairs, roofs, and projecting canopies.</p> | <p>Altering entrances and porch features from the restoration period.</p> <p>Failing to document entrance and porch features from the restoration period, which may result in their loss.</p> <p>Applying paint or other coatings to restoration-period entrance and porch features, or removing them, if such treatments cannot be documented to the restoration period.</p> <p>Changing the type of paint or coating or the color of restoration-period entrance and porch features, unless the work can be substantiated by historical documentation.</p> <p>Stripping entrances and porches of sound material from the restoration period, such as wood, cast iron, tile, or brick.</p> |
| <p><i>Protecting and maintaining</i> the masonry, wood, and metals which comprise entrances and porches from the restoration period through appropriate surface treatments, such as cleaning, rust removal, paint removal, and reapplication of protective coatings.</p> | <p>Failing to protect and maintain materials from the restoration period on a cyclical basis so that deterioration of the entrance or porch results.</p> |
| <p>Protecting entrances and porches against arson and vandalism before work begins by covering them and by installing alarm systems keyed into local protection agencies.</p> | <p>Leaving entrances and porches unprotected and subject to vandalism before work begins, thereby also allowing the interior to be damaged if it can be accessed through unprotected entrances.</p> |
| <p>Protecting entrance and porch features from the restoration period when working on other features of the building.</p> | <p>Failing to protect entrances and porches from the restoration period when working on other features of the building.</p> |
| <p>Evaluating the overall condition of entrances and porches from the restoration period to determine whether more than protection and maintenance, such as repairs to entrance and porch features, will be necessary.</p> | <p>Failing to undertake adequate measures to ensure the protection of entrance and porch features from the restoration period.</p> |

ENTRANCES AND PORCHES

RECOMMENDED

Repairing entrances and porches from the restoration period by reinforcing them or replacing deteriorated materials using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing components of features when there are surviving prototypes (such as balustrades, columns, and stairs) or when the replacement can be based on physical or historic documentation. The new work should match the old in material, design, scale, color, and finish.

NOT RECOMMENDED

Replacing an entire entrance or porch feature from the restoration period when the repair of materials and limited replacement of deteriorated or missing components are feasible.

[10] (a) The entrance of this house had been altered over the years, including removal of the porch floor and steps. (b) This photograph shows the house after the porch and steps were restored to their historic appearance.



ENTRANCES AND PORCHES

| RECOMMENDED | NOT RECOMMENDED |
|---|--|
| <p>Replacing in kind an entire entrance or porch from the restoration period that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. If using the same kind of material is not feasible, then a compatible substitute material may be considered. The new work may be unobtrusively dated to guide future research and treatment.</p> | <p>Removing an entrance or porch feature from the restoration period that is unrepairable and not replacing it, or replacing with a new entrance or porch that does not match.</p> <p>Using a substitute material for the replacement that does not convey the same appearance of the surviving components of restoration-period entrance or porch features or that is otherwise incompatible.</p> |
| <p><i>The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing historic entrances and porches or their features that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing entrances and porches or their features from the restoration period using all new materials.</i></p> | |
| <p>Removing Existing Features from Other Historic Periods</p> | |
| <p>Removing entrances and porches and their features from other historic periods, such as a porch railing.</p> | <p>Failing to remove an entrance or porch feature from another period, thereby confusing the depiction of the building's appearance from the restoration period.</p> |
| <p>Documenting entrance and porch features dating from other periods prior to their alteration or removal. If possible, selected examples of these features or materials should be stored for future research.</p> | <p>Failing to document entrance and porch features from other historic periods that are removed from the building so that a valuable portion of the historic record is lost.</p> |
| <p>Recreating Missing Features from the Restoration Period</p> | |
| <p>Recreating a missing entrance or porch or its features that existed during the restoration period based on documentary and physical evidence; for example, duplicating a transom or porch column.</p> | <p>Constructing an entrance or porch feature that was part of the original design for the building but was never actually built, or constructing a feature which was thought to have existed during the restoration period but cannot be documented.</p> |

STOREFRONTS

RECOMMENDED

NOT RECOMMENDED

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|---|---|
| <p>Identifying, retaining, and preserving storefronts from the restoration period and their functional and decorative features. The storefront materials (including wood, masonry, metals, ceramic tile, clear glass, and pigmented structural glass) and the configuration of the storefront are significant, as are its features, such as display windows, base panels, bulkheads, signs, doors, transoms, kick plates, corner posts, piers, and entablatures.</p> | <p>Altering storefronts and their features from the restoration period.</p> <p>Failing to document storefront features from the restoration period, which may result in their loss.</p> <p>Applying paint or other coatings to restoration-period storefront features, or removing them, if such treatments cannot be documented to the restoration period.</p> <p>Changing the type of paint or coating or the color of restoration-period storefront features, unless the work can be substantiated by historical documentation.</p> <p>Stripping storefronts of material from the restoration period, such as wood, cast iron, ceramic tile, pigmented structural glass, or masonry.</p> |
| <p>Protecting and maintaining masonry, wood, glass, ceramic tile, and metals which comprise storefronts from the restoration period through appropriate surface treatments, such as cleaning, paint removal, and reapplication of protective coatings.</p> | <p>Failing to protect and maintain storefront materials from the restoration period on a cyclical basis so that deterioration of storefront features results.</p> <p>Replacing storefront windows from the restoration period rather than maintaining all the components of the window system.</p> |
| <p>Protecting storefronts against arson and vandalism before work begins by covering windows and doors and by installing alarm systems keyed into local protection agencies.</p> | <p>Leaving the storefront unprotected and subject to vandalism before work begins, thereby also allowing the interior to be damaged if it can be accessed through unprotected entrances.</p> |
| <p>Protecting restoration-period storefront features when working on other features of the building.</p> | <p>Failing to protect the restoration-period storefront when working on other features of the building.</p> |
| <p>Evaluating the overall condition of the storefront from the restoration period to determine whether more than protection and maintenance, such as repairs to storefront features, will be necessary.</p> | <p>Failing to undertake adequate measures to ensure the protection of storefront features from the restoration period.</p> |



[11] (a) Some of the materials on the front of this historic building had been previously replaced, but the façade retained its essential distinctive features and design. (b) A vintage postcard of the building (far left) provided sufficient documentation to restore the façade to its historic 1945 appearance, using spandrel glass as a replacement for the original Carrara glass (c). *Photo (b): Courtesy Kelsey & Associates.*

STOREFRONTS

| RECOMMENDED | NOT RECOMMENDED |
|--|---|
| <p>Repairing storefronts from the restoration period by reinforcing them or replacing deteriorated materials using recognized preservation methods. Repair may include the limited replacement in kind or with compatible substitute materials of those extensively deteriorated or missing components of features when there are surviving prototypes (such as transoms, pilasters, or signs) or when the replacement can be based on physical or historic documentation. The new work should match the old in material, design, scale, color, and finish.</p> | <p>Replacing an entire storefront from the restoration period when repair of materials and limited replacement of deteriorated or missing components are feasible.</p> |
| <p>Replacing in kind an entire storefront from the restoration period that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. If using the same kind of material is not feasible, then a compatible substitute material may be considered. The new work may be unobtrusively dated to guide future research and treatment.</p> | <p>Removing a storefront from the restoration period that is unrepairable and not replacing it, or replacing it with a new storefront that does not match.</p> <p>Using a substitute material for the replacement that does not convey the same appearance of the surviving components of the restoration-period storefront or that is physically incompatible.</p> |
| <p><i>The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing historic entrances and porches or their features that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing storefronts or their features from the restoration period using all new materials.</i></p> | |
| <p>Removing Existing Features from Other Historic Periods</p> | |
| <p>Removing storefronts and their features from other historic periods, such as later cladding or signage.</p> | <p>Failing to remove a storefront feature from another period, thereby confusing the depiction of the building's appearance from the restoration period.</p> |
| <p>Documenting storefront features dating from other periods prior to their alteration or removal. If possible, selected examples of these features or materials should be stored for future research.</p> | <p>Failing to document storefront features from other historic periods that are removed from the building so that a valuable portion of the historic record is lost.</p> |
| <p>Recreating Missing Features from the Restoration Period</p> | |
| <p>Recreating a missing storefront or storefront feature that existed during the restoration period based on documentary and physical evidence; for example, duplicating a display window or transom.</p> | <p>Constructing a storefront feature that was part of the original design for the building but was never actually built, or constructing a feature which was thought to have existed during the restoration period but which cannot be documented.</p> |

CURTAIN WALLS

| RECOMMENDED | NOT RECOMMENDED |
|--|--|
| <p>Identifying, retaining, and preserving curtain wall systems from the restoration period and their components. The design of the curtain wall is significant, as are its component materials (metal stick framing and panel materials, such as clear or spandrel glass, stone, terra cotta, metal, and fiber-reinforced plastic), appearance (e.g., glazing color or tint, transparency, and reflectivity), and whether the glazing is fixed, operable, or louvered glass panels. How a curtain wall is engineered and fabricated, and the fact that it expands and contracts at a different rate from the building's structural system, are important to understand when undertaking the restoration of a curtain wall system.</p> | <p>Altering curtain wall components from the restoration period.</p> <p>Failing to document curtain wall systems from the restoration period, which may result in their loss.</p> <p>Replacing curtain wall features from the restoration period instead of repairing or replacing only the deteriorated components.</p> |
| <p>Protecting and maintaining curtain walls and their components from the restoration period through appropriate surface treatments, such as cleaning, paint removal, and reapplication of protective coating system; and by making them watertight and ensuring that sealants and gaskets are in good condition.</p> | <p>Failing to protect and maintain curtain wall components from the restoration period on a cyclical basis so that deterioration of the curtain wall results.</p> |
| <p>Protecting ground-level curtain walls from the restoration period from vandalism before work begins by covering them, while ensuring adequate ventilation, and by installing alarm systems keyed into local protection agencies.</p> | <p>Leaving ground-level curtain walls from the restoration period unprotected and subject to vandalism before work begins, thereby also allowing the interior to be damaged if it can be accessed through unprotected glazing.</p> |
| <p>Protecting restoration-period curtain wall components when working on other features of the building.</p> | <p>Failing to protect curtain wall components from the restoration period when working on other features of the building.</p> |
| <p>Installing impact-resistant glazing, when required by safety codes or necessary for security, with color, transparency, and reflectivity as close as possible to the original in a curtain wall system from the restoration period so that it is compatible with the historic curtain walls and does not damage them or negatively impact their character.</p> | <p>Installing impact-resistant glazing, when required by safety codes or necessary for security, that is not compatible with the historic curtain walls and damages them or negatively impacts their character.</p> |
| <p>Evaluating the overall condition of the curtain wall system from the restoration period and its individual components to determine whether more than protection and maintenance, such as repairs to curtain wall features, will be necessary.</p> | <p>Failing to undertake adequate measures to ensure the protection of curtain wall features from the restoration period.</p> |

CURTAIN WALLS

RECOMMENDED

Repairing curtain walls from the restoration period by reinforcing them or replacing deteriorated materials, including replacing deteriorated or missing sealants or gaskets, when necessary, to seal any gaps between system components. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing components of curtain walls where there are surviving prototypes or when the replacement can be based on physical or historic documentation. The new work should match the old in material, design, scale, color, and finish.

NOT RECOMMENDED

Replacing an entire curtain wall from the restoration period when repair of materials and limited replacement of deteriorated or missing components are feasible.



[12] This historic curtain wall features a distinctive variety of panel types which must be repaired or replicated in a restoration project if any are damaged or missing.

CURTAIN WALLS

| RECOMMENDED | NOT RECOMMENDED |
|--|---|
| <p>Replacing in kind an entire curtain wall from the restoration period that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. If using the same kind of material is not feasible, then a compatible substitute material may be considered. The new work may be unobtrusively dated to guide future research and treatment.</p> | <p>Removing a curtain wall feature from the restoration period that is unrepairable and not replacing it, or replacing it with a new curtain wall feature that does not match.</p> <p>Using a substitute material for the replacement that does not convey the same appearance of the surviving components of the restoration-period curtain wall or that is physically incompatible.</p> |
| <p><i>The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing historic entrances and porches or their features that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing curtain walls or their features from the restoration period using all new materials.</i></p> | |
| <p>Removing Existing Features from Other Historic Periods</p> | |
| <p>Removing curtain wall components from other historic periods.</p> | <p>Failing to remove a curtain wall component from another period, thereby confusing the depiction of the building's appearance from the restoration period</p> |
| <p>Documenting curtain wall components dating from other periods prior to their alteration or removal. If possible, selected examples of these components or materials should be stored for future research.</p> | <p>Failing to document curtain wall components from other historic periods that are removed from the building so that a valuable portion of the historic record is lost.</p> |
| <p>Recreating Missing Features from the Restoration Period</p> | |
| <p>Recreating a missing curtain wall component that existed during the restoration period based on documentary and physical evidence.</p> | <p>Constructing a curtain wall component that was part of the original design for the building but was never actually built, or constructing a feature which was thought to have existed during the restoration period but which cannot be documented.</p> |

STRUCTURAL SYSTEMS

RECOMMENDED

NOT RECOMMENDED

| | |
|---|---|
| <p><i>Identifying, retaining, and preserving</i> structural systems and features from the restoration period. This includes the materials that comprise the structural system (i.e., wood, metal, and masonry), the type of system, and its features, such as posts and beams, trusses, summer beams, vigas, cast-iron or masonry columns, above-grade stone foundation walls, or load-bearing masonry walls.</p> | <p>Altering visible features of structural systems from the restoration period.</p> <p>Failing to document structural systems from the restoration period, which may result in their loss.</p> <p>Overloading the structural system from the restoration period, or installing equipment or mechanical systems which could damage the structure.</p> <p>Replacing a load-bearing masonry wall from the restoration period that could be augmented and retained.</p> <p>Leaving known structural problems untreated, such as deflected beams, cracked and bowed walls, or racked structural members.</p> |
| <p>Protecting and maintaining the structural system from the restoration period by keeping gutters and downspouts clear and roofing in good repair; and by ensuring that wood structural members are free from insect infestation.</p> | <p>Failing to protect and maintain exterior materials and features from the restoration period on a cyclical basis so that deterioration of the structural system results.</p> <p>Using treatments or products that may retain moisture, which accelerates deterioration of structural members.</p> |
| <p>Evaluating the overall condition of the structural system from the restoration period to determine whether more than protection and maintenance, such as repairs to structural features, will be necessary.</p> | <p>Failing to undertake adequate measures to ensure the protection of the structural system from the restoration period.</p> |

STRUCTURAL SYSTEMS

| RECOMMENDED | NOT RECOMMENDED |
|--|--|
| <p>Repairing structural systems from the restoration period by reinforcing them by augmenting or upgrading individual components or features in a manner that is consistent with the restoration period. For example, weakened structural members, such as floor framing, can be paired with a new member, braced, or otherwise supplemented and reinforced. The new work should match the old in material, design, scale, color, and finish.</p> | <p>Upgrading the building structurally in a manner that diminishes the restoration-period character of the exterior (such as installing strapping channels or removing a decorative masonry cornice) or that damages interior features or spaces.</p> <p>Replacing a component of the restoration-period structural system when it could be repaired or augmented and retained.</p> <p>Installing a visible or exposed structural replacement feature that does not match the restoration-period feature (e.g., replacing an exposed wood summer beam with a steel beam).</p> <p>Using substitute material that does not equal the load-bearing capabilities of the restoration-period structural component; does not convey the same appearance of the restoration-period component, if it is visible; or is physically incompatible.</p> |
| <p>Replacing in kind or with a compatible substitute material large portions or entire features of the structural system from the restoration period that are either extensively damaged or deteriorated or that are missing when there are surviving prototypes, such as cast-iron columns, trusses, or sections of load-bearing walls, or when the replacement can be based on historic documentation. Substitute material must be structurally sufficient, physically compatible with the rest of the system, and, where visible, must have the same form, design, and appearance as the restoration-period feature. The new work may be unobtrusively dated to guide future research and treatment.</p> | |

STRUCTURAL SYSTEMS

RECOMMENDED

NOT RECOMMENDED

The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing visible historic structural features that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing visible structural features from the restoration period using all new materials.

Removing Existing Features from Other Historic Periods

| | |
|---|---|
| Removing visually-intrusive structural features from other historic periods, such as a non-matching column. | Failing to remove or alter a visually-intrusive structural feature from another period, thereby confusing the depiction of the building's appearance from the restoration period. |
| Documenting structural features dating from other periods prior to their alteration or removal. If possible, selected examples of these features or materials should be stored to facilitate future research. | Failing to document structural features from other historic periods that are removed from the building so that a valuable portion of the historic record is lost. |

Recreating Missing Features from the Restoration Period

| | |
|--|---|
| Recreating a missing, visible structural feature that existed during the restoration period based on documentary and physical evidence; for example, duplicating a viga or cast-iron column. | Constructing a visible structural feature that was part of the original design for the building but was never actually built, or constructing a feature which was thought to have existed during the restoration period but cannot be documented. |
|--|---|

MECHANICAL SYSTEMS: HEATING, AIR CONDITIONING, ELECTRICAL, AND PLUMBING

| RECOMMENDED | NOT RECOMMENDED |
|--|---|
| <i>Identifying, retaining, and preserving</i> visible features of mechanical systems from the restoration period, such as radiators, vents, fans, grilles, and plumbing and lighting fixtures. | Altering visible features of mechanical systems from the restoration period. Failing to document visible features of mechanical systems from the restoration period, which may result in their loss. |
| <i>Protecting and maintaining</i> functioning mechanical, plumbing, and electrical systems and their features from the restoration period through cyclical maintenance. | Failing to protect and maintain functioning mechanical, plumbing, and electrical systems from the restoration period on a cyclical basis so that their deterioration results. |
| Improving the energy efficiency of functioning mechanical systems to help reduce the need for a new system by installing storm windows and insulating attics and crawl spaces, if appropriate. | |
| <i>Repairing</i> functioning mechanical systems by augmenting or upgrading system components (such as installing new pipes and ducts), rewiring, or adding new compressors or boilers. | Replacing a functioning mechanical system or its components when it could be upgraded and retained. |
| <i>Replacing</i> in kind or with a compatible substitute material those extensively deteriorated or missing visible features of restoration-period mechanical systems when there are prototypes, such as ceiling fans, radiators, grilles, or lighting fixtures. | Installing a visible replacement feature that does not convey the same appearance as the restoration-period feature. |
| Installing a new mechanical system, if required, in a manner that results in the least alteration possible to the building's appearance from the restoration period. | Installing a new mechanical system in a manner that the appearance of visible structural or interior features from the restoration period is significantly changed, or the features are damaged or destroyed. |
| Providing adequate structural support for new mechanical equipment. | Failing to consider the weight and design of new mechanical equipment so that, as a result, restoration-period structural members or finished surfaces are weakened or cracked. |

MECHANICAL SYSTEMS: HEATING, AIR CONDITIONING, ELECTRICAL, AND PLUMBING

RECOMMENDED

NOT RECOMMENDED

| | |
|---|---|
| <p>Installing new mechanical and electrical systems and ducts, pipes, and cables in closets, services areas, and wall cavities to preserve the restoration-period character of the interior space.</p> | <p>Installing ducts, pipes, and cables where they will obscure features from the restoration period.</p> <p>Concealing mechanical equipment in walls or ceilings in a manner that results in extensive loss or damage or otherwise obscures restoration-period building materials and features.</p> |
| <p>Installing air conditioning units, if needed, in such a manner that features from the restoration period are not damaged or obscured, and so that excessive moisture is not generated that will accelerate deterioration of materials from the restoration period.</p> | |
| <p><i>The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing visible features of the mechanical system that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing visible features of the mechanical system from the restoration period using all new materials..</i></p> | |
| <p>Removing Existing Features from Other Historic Periods</p> | |
| <p>Removing mechanical systems and their visible features from other periods, such as a later elevator.</p> | <p>Failing to remove or alter a visually-intrusive structural feature from another period, thereby confusing the depiction of the building's appearance from the restoration period.</p> |
| <p>Documenting mechanical systems and features from other periods prior to their alteration or removal. If possible, selected examples of these features should be stored for future research.</p> | <p>Failing to document structural features from other historic periods that are removed from the building so that a valuable portion of the historic record is lost.</p> |
| <p>Recreating Missing Features from the Restoration Period</p> | |
| <p>Recreating a missing feature of the mechanical system that existed during the restoration period based on documentary and physical evidence; for example, duplicating a heating vent or lighting fixture.</p> | <p>Constructing a mechanical system or feature that was part of the original design for the building but was never actually built, or constructing a feature which was thought to have existed during the restoration period but cannot be documented.</p> |

INTERIOR SPACES, FEATURES, AND FINISHES

| RECOMMENDED | NOT RECOMMENDED |
|---|---|
| <p><i>Identifying, retaining, and preserving</i> a floor plan and interior spaces, features, and finishes from the restoration period. Significant spatial characteristics include the size, configuration, proportion, and relationship of rooms and corridors; the relationship of features to spaces; and the spaces themselves, such as lobbies, lodge halls, entrance halls, parlors, theaters, auditoriums, gymnasiums, and industrial and commercial interiors. Color, texture, and pattern are important characteristics of features and finishes, which can include such elements as columns, plaster walls and ceilings, flooring, trim, fireplaces and mantels, paneling, light fixtures, hardware, decorative radiators, ornamental grilles and registers, windows, doors, and transoms; plaster, paint, wallpaper and wall coverings, and special finishes, such as marbleizing and graining; and utilitarian (painted or unpainted) features, including wood, metal, or concrete exposed columns, beams, and trusses and exposed load-bearing brick, concrete, and wood walls.</p> | <p>Altering a floor plan, interior spaces (including individual rooms), features, or finishes from the restoration period.</p> <p>Failing to document interior spaces, features, and finishes from the restoration period, which may result in their loss.</p> <p>Applying paint, plaster, or other coatings to surfaces that have been unfinished historically, if the work cannot be documented.</p> <p>Changing the type of finish or the color, such as painting a historically-varnished wood feature from the restoration period, or removing paint from a historically-painted feature from the restoration period and staining and varnishing it, unless the work can be substantiated by physical or historic documentation.</p> <p>Stripping paint to bare wood rather than repainting, or not reapplying documented grained or marbled finishes from the restoration period to features, such as doors and paneling.</p> <p>Removing restoration-period interior features (such as mantels, woodwork, doors, windows, light fixtures, or radiators) or other decorative materials from the restoration period.</p> |
| <p><i>Protecting and maintaining</i> interior spaces, and materials, features, and finishes from the restoration period through appropriate surface treatments, such as cleaning, paint removal, and reapplication of protective coating systems.</p> | <p>Failing to protect interior features and finishes from the restoration period when working on the interior.</p> |
| <p>Protecting interior features and finishes from the restoration period against arson and vandalism before project work begins by covering broken windows and boarding open doorways, while ensuring adequate ventilation, and by installing fire alarm systems keyed into local protection agencies.</p> | <p>Leaving the building unprotected with broken windows and open doorways before restoration begins so that the interior features and finishes from the restoration period can be damaged by exposure to weather and vandalism.</p> |

INTERIOR SPACES, FEATURES, AND FINISHES

| RECOMMENDED | NOT RECOMMENDED |
|---|--|
| Protecting interior features from the restoration period (such as a staircase, mantel, flooring, or decorative finishes) from damage during project work by covering them with plywood, heavy canvas, or plastic sheeting. | Failing to protect interior features and finishes from the restoration period when working on the interior. |
| Removing damaged or deteriorated paint and finishes from the restoration period only to the next sound layer, using the gentlest method possible, prior to repainting or refinishing using compatible paint or other coating systems based on historical documentation. | Using potentially damaging methods, such as open-flame torches or abrasive techniques, to remove paint or other coatings. Removing paint that is firmly adhered to interior surfaces. |
| Repainting with colors that are documented to the building's restoration period. | Using paint colors that are inappropriate to the building's restoration period. |



[13] (a) In the 1990s the Missing Soldier's Office—established by Clara Barton at the end of the Civil War—was discovered still extant on the third floor of a building in Washington, DC, that was slated for demolition. The office was restored to its historic appearance using physical and documentary evidence. The original numeral '9' is still on the door to the office, and wall paper was reproduced from scraps found on the walls (b-d).

INTERIOR SPACES, FEATURES, AND FINISHES

| RECOMMENDED | NOT RECOMMENDED |
|--|---|
| <p>Using abrasive cleaning methods only on the interior of industrial or warehouse buildings with utilitarian, unplastered masonry walls from the restoration period and where wood features are not finished, molded, beaded, or worked by hand. Low-pressure abrasive cleaning (e.g., sandblasting or other media blasting) should only be considered if test patches show no surface damage and after gentler methods have proven ineffective.</p> | <p>Using abrasive methods anywhere but utilitarian and industrial interior spaces or when there are other methods that are less likely to damage the surface of the material.</p> |
| <p>Evaluating the overall condition of interior materials, features, and finishes from the restoration period to determine whether more than protection and maintenance, such as repairs to features and finishes, will be necessary.</p> | <p>Failing to undertake adequate measures to ensure the protection of interior materials, features, and finishes from the restoration period.</p> |
| <p>Repairing Interior features and finishes from the restoration period by patching, splicing, consolidating, or otherwise reinforcing the materials using recognized preservation methods. Repair may include the limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing components of interior features when there are surviving prototypes (such as stairs, balustrades, wood paneling, columns, decorative wall finishes, or pressed-metal or plaster ceilings) or when the replacement can be based on physical or historic documentation. The new work should match the old in material, design, scale, color, and finish.</p> | <p>Replacing an interior feature from the restoration period or a finish when repair of materials and limited replacement of deteriorated or missing components are feasible.</p> |



[14] When the 1931 Fox Theater in Spokane, WA, was rehabilitated as a performing arts center, the auditorium was restored to its original Art Deco splendor.

INTERIOR SPACES, FEATURES, AND FINISHES

| RECOMMENDED | NOT RECOMMENDED |
|---|---|
| <p>Replacing in kind an entire interior feature from the restoration period that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. Examples could include wainscoting, window and door surrounds, or interior stairs. If using the same kind of material is not feasible, then a compatible substitute material may be considered. The new work may be unobtrusively dated to guide future research and treatment.</p> | <p>Removing a feature or finish from the restoration period that is unrepairable and not replacing it, or replacing it with a new feature or finish that does not match.</p> <p>Using a substitute material for the replacement that does not convey the same appearance of the surviving components of the restoration-period interior feature or finish or that is physically incompatible.</p> |
| <p><i>The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing historic interior spaces, features, and finishes that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing interior spaces, features, and finishes from the restoration period using all new materials.</i></p> | |
| Removing Existing Features from Other Historic Periods | |
| <p>Removing or altering interior spaces, features, or finishes from other historic periods, such as a dropped ceiling or wood paneling.</p> | <p>Failing to remove an interior space, feature, or finish from another historic period, thereby confusing the depiction of the building's appearance from the restoration period.</p> |
| <p>Documenting materials and features dating from other periods prior to their alteration or removal. If possible, selected examples of these features or materials should be stored for future research.</p> | <p>Failing to document interior spaces, features, and finishes from other periods that are removed from the building so that a valuable portion of the historic record is lost.</p> |
| Recreating Missing Features from the Restoration Period | |
| <p>Recreating an interior space or a missing feature or finish from the restoration period based on documentary and physical evidence; for example, duplicating a mantel or a staircase.</p> | <p>Creating an interior space, adding a feature, or applying a finish that was part of the original design for the building but was never actually built, or adding a feature which was thought to have existed during the restoration period but cannot be documented.</p> |

BUILDING SITE

RECOMMENDED

NOT RECOMMENDED

| | |
|--|---|
| <p>Identifying, retaining, and preserving features of the building site from the restoration period. Site features may include walls, fences, or steps; circulation systems, such as walks, paths, or roads; vegetation, such as trees, shrubs, grass, orchards, hedges, windbreaks, or gardens; landforms, such as hills, terracing, or berms; furnishings and fixtures, such as light posts or benches; decorative elements, such as sculpture, statuary, or monuments; water features, such as fountains, streams, pools, lakes, irrigation ditches; and subsurface archeological resources, other cultural or religious features, or burial grounds which are also important to the restoration period of the site.</p> | <p>Altering buildings and their features or site features from the restoration period.</p> <p>Failing to document building and site features from the restoration period, which may result in their loss.</p> |
| <p>Reestablishing the relationship between buildings and the landscape on the site that existed during the restoration period.</p> | <p>Retaining non-restoration period buildings or landscape features on the site, thereby confusing the depiction of the restoration-period appearance of the site.</p> |
| <p>Protecting and maintaining buildings and site features from the restoration period by providing proper drainage to ensure that water does not erode foundation walls, drain toward a building, or damage or erode the landscape.</p> | <p>Failing to ensure that site drainage is adequate so that buildings and site features from the restoration period are damaged or destroyed. Or, alternatively, changing the site grading so that water does not drain properly.</p> |
| <p>Minimizing disturbance of the terrain around buildings or elsewhere on the site, thereby reducing the possibility of destroying or damaging important landscape features from the restoration period or archeological resources, other cultural or religious features, or burial grounds.</p> | <p>Using heavy machinery or equipment in areas where it may disturb or damage important landscape features from the restoration period or archeological resources, other cultural or religious features, or burial grounds.</p> |



[15] (a) Cherry Hill House and Farm (c. 1845) in Falls Church, VA, was the site of encampments during the Civil War. Outbuildings on the property, such as the corn crib (b) in the foreground which was the source of provisions for the soldiers, are important in interpreting its role during the war.



BUILDING SITE

| RECOMMENDED | NOT RECOMMENDED |
|--|--|
| Surveying and documenting areas of the site where the terrain will be altered during restoration work to determine the potential impact to important landscape features from the restoration period or archeological resources, other cultural or religious features, or burial grounds from the restoration period. | Failing to survey the building site prior to beginning restoration work, which can result in damaging or destroying landscape features from the restoration period, or archeological resources, other cultural or religious features, or burial grounds. |
| Protecting (e.g., preserving in place) important site features, archeological resources, other cultural or religious features, or burial grounds. | Failing to protect site features from the restoration period, or archeological resources, other cultural or religious features, or burial grounds when working on the site. |
| Planning and carrying out any necessary investigation before restoration of the site begins, using professional archeologists and methods, when preservation in place is not feasible. | Allowing unqualified personnel to perform data recovery on archeological resources, which can result in damage or loss of important archeological material. |
| Preserving important landscape features from the restoration period through regularly-scheduled site maintenance of historic plant material. | Allowing important landscape features from the restoration period to be lost or damaged due to lack of site maintenance. |
| Protecting the building site and landscape features from the restoration period against arson and vandalism before restoration work begins by erecting temporary fencing and by installing alarm systems keyed into local protection agencies. | Leaving the property unprotected and subject to vandalism before work begins so that the building site and landscape features from the restoration period, or archeological resources, other cultural or religious features, or burial grounds can be damaged or destroyed. Removing site features from the restoration period, such as fencing, paths or walkways, masonry balustrades, or plant material. |
| Installing protective fencing, bollards, and stanchions on a building site, when necessary for security, that are as unobtrusive as possible. | Installing protective fencing, bollards, and stanchions on a building site, when necessary for security, without taking into consideration their location and visibility so that they negatively impact the restoration-period character of the site. |

BUILDING SITE

| RECOMMENDED | NOT RECOMMENDED |
|---|---|
| Providing continued protection and maintenance of buildings and landscape features from the restoration-period of the site through appropriate grounds and landscape management. | Failing to protect and maintain materials and features from the restoration period on a cyclical basis so that deterioration of the site results. |
| Protecting buildings and site features from the restoration period when working on the site. | Failing to protect buildings and landscape features from the restoration period when working on the site or failing to repair damaged or deteriorated site features. |
| Evaluating the overall condition of materials and features from the restoration period to determine whether more than protection and maintenance, such as repairs to site features, will be necessary. | Failing to undertake adequate measures to ensure the protection of site features from the restoration period. |
| Repairing site features from the restoration period which have been damaged, are deteriorated, or have missing components to reestablish the whole feature and to ensure retention of the integrity of the historic materials. Repair may include limited replacement in kind or with a compatible substitute material of those extensively deteriorated or missing components of site features when there are surviving prototypes, such as paving, railing, or individual plants within a group (e.g., a hedge), or when the replacement can be based on physical or historic documentation. | Replacing an entire site feature from the restoration period (such as a fence, walkway, or drive) when repair of materials and limited replacement of deteriorated or missing components are feasible. |
| Replacing in kind an entire restoration-period feature of the site that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. Examples could include a walkway or fountain, a land form or plant materials. If using the same kind of material is not feasible, then a compatible substitute material may be used. The new work may be unobtrusively dated to guide future research and treatment. | <p>Removing a site feature from the restoration period that is unrepairable and not replacing it, or replacing it with a new feature that does not match.</p> <p>Using a substitute material for the replacement that does not convey the same appearance of the surviving site feature from the restoration period or that is physically incompatible.</p> <p>Adding conjectural landscape features to the site (such as period reproduction light fixtures, fences, fountains, or vegetation) that cannot be documented, thereby confusing the depiction of the restoration-period appearance of the building site.</p> |

BUILDING SITE

RECOMMENDED

NOT RECOMMENDED

The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing visible features of the building site that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing visible features of the mechanical system from the restoration period using all new materials.

| Removing Existing Features from Other Historic Periods | |
|---|---|
| Removing site features from other historic periods, such as an outbuilding, paved road, or overgrown trees. | Failing to remove a site feature from another historic period, thereby confusing the depiction of the site's appearance from the restoration period. |
| Documenting features of the building site dating from other periods prior to their removal. | Failing to document site features from other periods that are removed during restoration so that a valuable portion of the historic record is lost. |
| Recreating Missing Features from the Restoration Period | |
| Recreating a missing site feature from the restoration period based on documentary and physical evidence; for example, duplicating a no-longer extant terrace, gazebo, fencing, or a hedge. | Constructing a feature of the building or site that was part of the original design but was never actually built, or constructing a feature which was thought to have existed during the restoration period but cannot be documented. |

[16] Archeological investigation of the property was undertaken to ensure accuracy of the restoration of Montpelier. Photo: Courtesy of The Montpelier Foundation.



SETTING (DISTRICT / NEIGHBORHOOD)

| RECOMMENDED | NOT RECOMMENDED |
|---|---|
| <p><i>Identifying, retaining, and preserving</i> building and landscape features from the restoration period in the setting. These features can include circulation systems, such as roads and streets; furnishings and fixtures, such as light posts or benches; vegetation, gardens, and yards; adjacent open space, such as fields, parks, commons, or woodlands; and important views or visual relationships.</p> | <p>Altering restoration-period building and landscape features in the setting.</p> <p>Failing to document restoration-period buildings and landscape features in the setting, which may result in their loss.</p> |
| <p>Retaining or reestablishing the relationship between buildings and landscape features in the setting that existed during the restoration period.</p> | <p>Retaining non-restoration period buildings or landscape features in the setting, thereby confusing the depiction of the restoration-period appearance of the setting.</p> |



[17 a-b] The cobblestone street, brick sidewalks, and stone stoops of these houses are important restoration-period features of the late 18th-through the 19th-century restoration period of this historic district.

(a)

SETTING (DISTRICT / NEIGHBORHOOD)

RECOMMENDED

NOT RECOMMENDED

Protecting and maintaining features from the restoration period in the setting through regularly-scheduled maintenance and grounds and landscape management.

Failing to protect and maintain materials in the setting on a cyclical basis so that deterioration of buildings and landscape features results.

Removing restoration-period building or landscape features in the setting, such as porches, fencing, walkways, or plant material.

Installing protective fencing, bollards, and stanchions in a setting, when necessary for security, that are as unobtrusive as possible.

Installing protective fencing, bollards, and stanchions in a setting, when necessary for security, without taking into consideration their location and visibility so that they negatively impact the historic character of the setting.



(b)

SETTING (DISTRICT / NEIGHBORHOOD)

| RECOMMENDED | NOT RECOMMENDED |
|--|--|
| Protecting buildings and landscape features from the restoration period when undertaking work in the setting. | Failing to protect buildings and landscape features from the restoration period when working in the setting. |
| Evaluating the overall condition of restoration-period materials and features in the setting to determine whether more than protection and maintenance, such as repairs to materials and features, will be necessary. | Failing to undertake adequate measures to ensure the protection of materials and features in the setting from the restoration period. |
| Repairing restoration-period features in the setting by reinforcing the historic materials. Repair may include the replacement in kind or with a compatible substitute material of those extensively deteriorated or missing components of features from the restoration period when there are surviving prototypes, such as porch balustrades, paving materials, or trees. | Replacing an entire building or landscape feature from the restoration period in the setting when repair of materials and limited replacement of deteriorated or missing components are feasible. |
| Replacing in kind an entire restoration-period building or landscape feature in the setting that is too deteriorated to repair (if the overall form and detailing are still evident) using the physical evidence as a model to reproduce the feature or when the replacement can be based on historic documentation. If using the same kind of material is not feasible, then a compatible substitute material may be considered. The new work may be dated to guide future research and treatment. | <p>Removing a restoration-period feature of the building or landscape in the setting that is unrepairable and not replacing it, or replacing it with a new feature that does not match.</p> <p>Using a substitute material for the replacement that does not convey the same appearance of the surviving restoration-period building or landscape feature in the setting or that is physically or ecologically incompatible.</p> |

SETTING (DISTRICT / NEIGHBORHOOD)

RECOMMENDED

NOT RECOMMENDED

The following Restoration work is highlighted to indicate that it involves the removal or alteration of existing historic features of the setting that would be retained in Preservation and Rehabilitation treatments; and the replacement of missing restoration-period features of the setting using all new materials.

Removing Existing Features from Other Historic Periods

Removing features of the building or landscape in the setting from other historic periods, such as a road, sidewalk, or fence.

Failing to remove a feature of the building or landscape in the setting from another period, thereby confusing the depiction of the setting's appearance from the restoration period.

Documenting features of the building or landscape in the setting dating from other periods prior to their removal.

Failing to document features of the building or landscape features in the setting from other periods that are removed during restoration so that a valuable portion of the historic record is lost.

Recreating Missing Features from the Restoration Period

Recreating a missing feature of the building or landscape in the setting that existed during the restoration period based on documentary and physical evidence; for example, duplicating a non-longer extant path or park bench.

Constructing a feature of the building or landscape that was part of the original design for the setting but was never actually built, or constructing a feature which was thought to have existed during the restoration period but cannot be documented.

CODE-REQUIRED WORK

| RECOMMENDED | NOT RECOMMENDED |
|--|---|
| <p><i>Sensitive solutions to meeting accessibility and life-safety code requirements are an important part of protecting the restoration-period of the building and site. Thus, work that must be done to meet use-specific code requirements in the treatment Restoration must also be assessed for its potential impact on the restoration-period of the historic building and site.</i></p> | |
| Accessibility | |
| Identifying the restoration-period exterior features, interior spaces, features, and finishes, and features of the site and setting which may be affected by accessibility code-required work. | Undertaking accessibility code-required alterations before identifying the exterior features, interior spaces, features, and finishes, and features of the site and setting from the restoration period and, therefore, must be preserved. |
| Complying with barrier-free access requirements in such a manner that the restoration-period exterior features, interior spaces, features, and finishes, and features of the site and setting are preserved or impacted as little as possible. | Altering, damaging, or destroying the exterior features, interior spaces, features, and finishes, or features of the site and setting from the restoration period while complying with accessibility requirements. |
| Working with specialists in accessibility and historic preservation to determine the most sensitive solutions to comply with access requirements in a restoration project. | Making changes to historic buildings and their sites without first consulting with specialists in accessibility and historic preservation to determine the most appropriate solutions to comply with accessibility requirements in a manner that will preserve the character of the restoration period. |
| Providing barrier-free access that promotes independence for the user while preserving significant features from the restoration period. | Making access modifications that do not provide independent, safe access while preserving restoration-period features. |
| Finding solutions to meet accessibility requirements that minimize the impact of any necessary alteration on the restoration period of the building, its site, and setting, such as compatible ramps, paths, and lifts. | Making modifications for accessibility without considering the impact on the restoration period of the building, its site, or setting. |
| Using relevant sections of existing codes regarding accessibility for historic buildings that provide alternative means of code compliance when code-required work would otherwise negatively impact the restoration-period character of the property. | |

CODE-REQUIRED WORK

RECOMMENDED

NOT RECOMMENDED

Minimizing the visual impact of accessibility ramps by installing them on secondary elevations when it does not compromise accessibility or by screening them with plantings.

Adding a gradual slope or grade to the sidewalk, if appropriate, to access the entrance rather than installing a ramp that would be more intrusive to the historic character of the restoration period of the building and the district.

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| | |



[18 a-b] The historic Chapel of Our Lady in Cold Spring, NY, is situated on a rocky promontory overlooking the Hudson River. Installing an accessible ramp would greatly compromise the character of the building and the site. However, an audio-visual program available in a separate building—located where it would not impact the character of the site, such as this small pavilion at the rear of the property—could provide visitors otherwise unable to access the Chapel an opportunity to experience the site.

CODE-REQUIRED WORK

| RECOMMENDED | NOT RECOMMENDED |
|--|---|
| Installing a lift as inconspicuously as possible when it is necessary to locate it on a primary elevation of the historic building. | |
| Considering placing accessible facilities needed for visitors to the restored property (e.g., restrooms) in a separate building, such as a visitor center, that is located away from the historic structure rather than in the historic building if their installation would negatively impact character-defining spaces, features, or finishes from the restoration period. | Installing accessible facilities inside or on the exterior of the historic building that are incompatible with the character of the restoration period or would damage or destroy character-defining spaces, features, or finishes from the restoration period. |
| Devising non-permanent or temporary adaptive treatments that meet accessibility requirements to preserve the restoration-period character of the building, its site, and setting. | |
| Developing and providing virtual tours to help interpret the restored property when it is not feasible or it is physically impossible to make the building or its site accessible without damaging or obscuring character-defining building and landscape features in the setting from the restoration period. | |
| LIFE SAFETY | |
| Identifying the restoration-period exterior features, interior spaces, features, and finishes, and features of the site and setting which may be affected by life-safety code-required work. | Undertaking life-safety code-required alterations before identifying the exterior features, interior spaces, features, and finishes, and features of the site and setting from the restoration period and, therefore, must be preserved. |
| Complying with life-safety codes (including requirements for impact-resistant glazing, security, and seismic retrofit) in such a manner that the restoration-period exterior features, interior spaces, features, and finishes, and features of the site and setting are preserved or impacted as little as possible. | Altering, damaging, or destroying the restoration-period exterior features, interior spaces, features, and finishes, or features of the site and setting from the restoration period while making modifications to a building, its site, or setting to comply with life-safety code requirements. |
| Removing building materials from the restoration period only after testing has been conducted to identify hazardous materials, and using only the least damaging abatement methods. | Removing building materials from the restoration period without testing first to identify any hazardous materials, or using potentially-damaging methods of abatement without considering less-invasive methods of abatement. |

CODE-REQUIRED WORK

| RECOMMENDED | NOT RECOMMENDED |
|--|--|
| Providing workers with appropriate personal equipment for protection from hazards on the worksite. | Removing hazardous or toxic materials without regard for workers' health and safety or environmentally-sensitive disposal of the materials. |
| Working with code officials and historic preservation specialists to investigate systems, methods, or devices to make the building compliant with life-safety codes to ensure that necessary alterations will be compatible with the restoration-period character of the building. | Making life-safety code-required changes to the building without consulting code officials and historic preservation specialists, with the result that alterations negatively impact the restoration-period character of the building. |
| Using relevant sections of existing codes regarding life safety for historic buildings that provide alternative means of compliance when life-safety code-required work would otherwise negatively impact the restoration-period character of the building. | |
| Upgrading restoration-period stairways and elevators to meet life-safety codes so that they are not damaged or their historic character is not negatively impacted. | Damaging or making inappropriate alterations to historic stairways or elevators or to adjacent features, spaces, or finishes from the restoration period while complying with life-safety code requirements. |
| Installing sensitively-designed fire-suppression systems, such as sprinklers, so that historic features and finishes from the restoration period are preserved. | Covering wood features from the restoration period with fire-retardant sheathing, which results in altering their appearance. |
| Applying fire-retardant coatings when appropriate, such as intumescent paint, to protect steel structural systems from the restoration period. | Using fire-retardant coatings if they will damage or obscure character-defining features from the restoration period. |

RESILIENCE TO NATURAL HAZARDS

| RECOMMENDED | NOT RECOMMENDED |
|--|---|
| <p><i>Resilience to natural hazards should be addressed as part of a Restoration project. A historic building may have existing characteristics or features from the restoration period that help address or minimize the impacts of natural hazards. These should be used to best advantage and should be taken into consideration early in the planning stages of a restoration project before proposing any additional treatments. When new adaptive treatments are needed they should be carried out in a manner that will have the least impact on the restoration-period character of the building, its site, and setting.</i></p> | |
| <p>Identifying the vulnerabilities of the restoration-period property to the impacts of natural hazards (such as wildfires, hurricanes, or tornadoes) using the most current climate information and data available.</p> | <p>Failing to identify and periodically reevaluate the potential vulnerability of the restoration-period building, its site, and setting to the impacts of natural hazards.</p> |
| <p>Assessing the potential impacts of known vulnerabilities on restoration-period features of the building, its site, and setting; and reevaluating and reassessing potential impacts on a regular basis.</p> | |



[19] The 1951 Mies van der Rohe-designed Farnsworth House, Plano, IL, was built close to the Fox River, which is increasingly prone to floods. To preserve the house in its original location, historic preservation architects and engineers continue to explore ways to protect it from the flooding, including a possible system that would lift the house above the flood waters and lower it back to the ground. *Photo: Courtesy Farnsworth, A Site of the National Trust for Historic Preservation.*

RESILIENCE TO NATURAL HAZARDS

| RECOMMENDED | NOT RECOMMENDED |
|---|--|
| Documenting the restoration-period character of the property as a record and guide for future repair work, should it be necessary, and storing the documentation in a weatherproof location. | Failing to document the restoration-period character of the property with the result that such information is not available in the future to guide repair or reconstruction work, should it be necessary. |
| Ensuring that historic resources inventories and maps are accurate, up to date, and accessible in an emergency. | |
| Maintaining the restoration-period building, its site, and setting in good repair, and regularly monitoring their condition. | Failing to regularly monitor and maintain the restoration-period property and the building systems in good repair. |
| Using and maintaining existing characteristics and features of the restoration-period building, its site, setting, and larger environment (such as shutters for storm protection or a site wall that keeps out flood waters) that may help to avoid or minimize the impacts of natural hazards. | Allowing loss, damage, or destruction to occur to the restoration-period building, its site, or setting by failing to evaluate potential future impacts of natural hazards or to plan and implement adaptive measures, when necessary to address possible threats. |
| Undertaking work to prevent or minimize the loss, damage, or destruction of the historic property while retaining and preserving significant features and the overall restoration-period character of the building, its site, and setting. | Carrying out adaptive measures intended to address the impacts of natural hazards that are unnecessarily invasive or will otherwise adversely impact the restoration-period character of the building, its site, or setting. |
| Ensuring that, when planning work to adapt for natural hazards, all feasible alternatives are considered, and that the options requiring the least alteration to the restoration-period character of the property are considered first. | Implementing local and regional traditions (such as elevating residential buildings at risk of flooding or reducing flammable vegetation around structures in fire-prone areas) for adapting buildings and sites in response to specific natural hazards which would negatively impact the restoration-period character of the property. |
| Using special exemptions and variances when adaptive treatments to protect buildings from known hazards would otherwise negatively impact the restoration-period character of the building, its site, or setting. | |

Sustainability

Sustainability should be addressed as part of a **Restoration** project. Existing energy-efficient features from the restoration period should be retained and restored while those that are no longer extant but which were important in defining the restoration-period character of the building should be recreated. New sustainability treatments should only be undertaken if they will not impact the restoration-period character of the building.

The topic of sustainability is addressed in detail in *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings*. Although specifically developed for the treatment Rehabilitation, the Sustainability Guidelines can be used to help guide the other treatments

STANDARDS FOR RECONSTRUCTION & GUIDELINES
FOR RECONSTRUCTING HISTORIC BUILDINGS

Reconstruction

Reconstruction is defined 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.



Standards for Reconstruction

1. Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture and such reconstruction is essential to the public understanding of the property.
2. Reconstruction of a landscape, building, structure or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.
3. Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.
4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color and texture.
5. A reconstruction will be clearly identified as a contemporary re-creation.
6. Designs that were never executed historically will not be constructed.

GUIDELINES FOR RECONSTRUCTING HISTORIC BUILDINGS

INTRODUCTION

Reconstruction is different from the other treatments in that it is undertaken when there are often no visible historic materials extant or only a foundation remains. Whereas the treatment **Restoration** provides guidance on restoring historic building features, the **Standards for Reconstruction and Guidelines for Reconstructing Historic Buildings** should be followed when it is necessary to recreate a non-surviving building using new material. But, like restoration, reconstruction also involves recreating a historic building which appears as it did at a particular—and at its most significant—time in its history. Because of the potential for historical error in the absence of sound physical evidence, this treatment can be justified only rarely and, thus, is the least frequently undertaken of the four treatments. Reconstructing a historic building should only be considered when there is accurate documentation on which to base it. When only the appearance of the exterior of the building can be documented, it may be appropriate to reconstruct the exterior while designing a very simple, plain interior that does not attempt to appear historic or historically accurate. Signage and interpretative aids should make it clear to visitors that only the exterior of the building is a true reconstruction. Extant historic surface and subsurface materials should also be preserved. Finally, the reconstructed building must be clearly identified as a contemporary recreation.

Research and Document Historical Significance

The guidance for the treatment **Reconstruction** begins with *researching and documenting* the building's historical significance to determine whether its recreation is essential to the public understanding of the property. In some instances, reconstruction may not be necessary if there is a historic building still existing on the site or in a setting that can explain the history of the property. Justifying a reconstruction requires detailed physical and documentary evidence to minimize or eliminate conjecture and to ensure that the reconstruction is as accurate as possible. Only one period of significance is generally identified; a building—as it evolved—is rarely recreated. If research does not provide adequate documentation for an accurate reconstruction, other interpretive methods should be considered, such as an explanatory marker.

Investigate Archeological Resources

Investigating archeological resources is the next area of guidance in the treatment **Reconstruction**. The purpose of archeological research is to identify any remaining features of the building, site, and setting that are essential to an accurate recreation and must be reconstructed. Archeological resources that are not essential to the reconstruction should be left in place. The archeological findings, together with archival documentation, should be used to replicate the design, materials, and plan of the historic building.

Identify, Protect, and Preserve Extant Historic Features

Closely aligned with archeological research, recommendations are given for *identifying, protecting, and preserving* extant features of the historic building. It is never appropriate to base a **Reconstruction** upon conjectural designs or on features from other buildings. Any remaining historic materials and features should be retained and incorporated into the reconstruction when feasible. Both the historic and new materials should be documented to assist in interpretation.

Reconstruct Non-Surviving Building and Site

After the research and documentation phases, guidance is given for **Reconstruction** work itself. Exterior and interior features are addressed in general, always emphasizing the need for an accurate depiction (i.e., careful duplication of the appearance of historic materials and features for interpretative purposes). While the use of traditional materials and finishes is always preferred, in some instances substitute materials may be used if they are able to convey the same appearance. Where non-visible features of the building are concerned, such as interior structural systems, contemporary materials and technology may be used. Recreating the features of the building site or setting based on archeological findings should also be an integral part of project work.

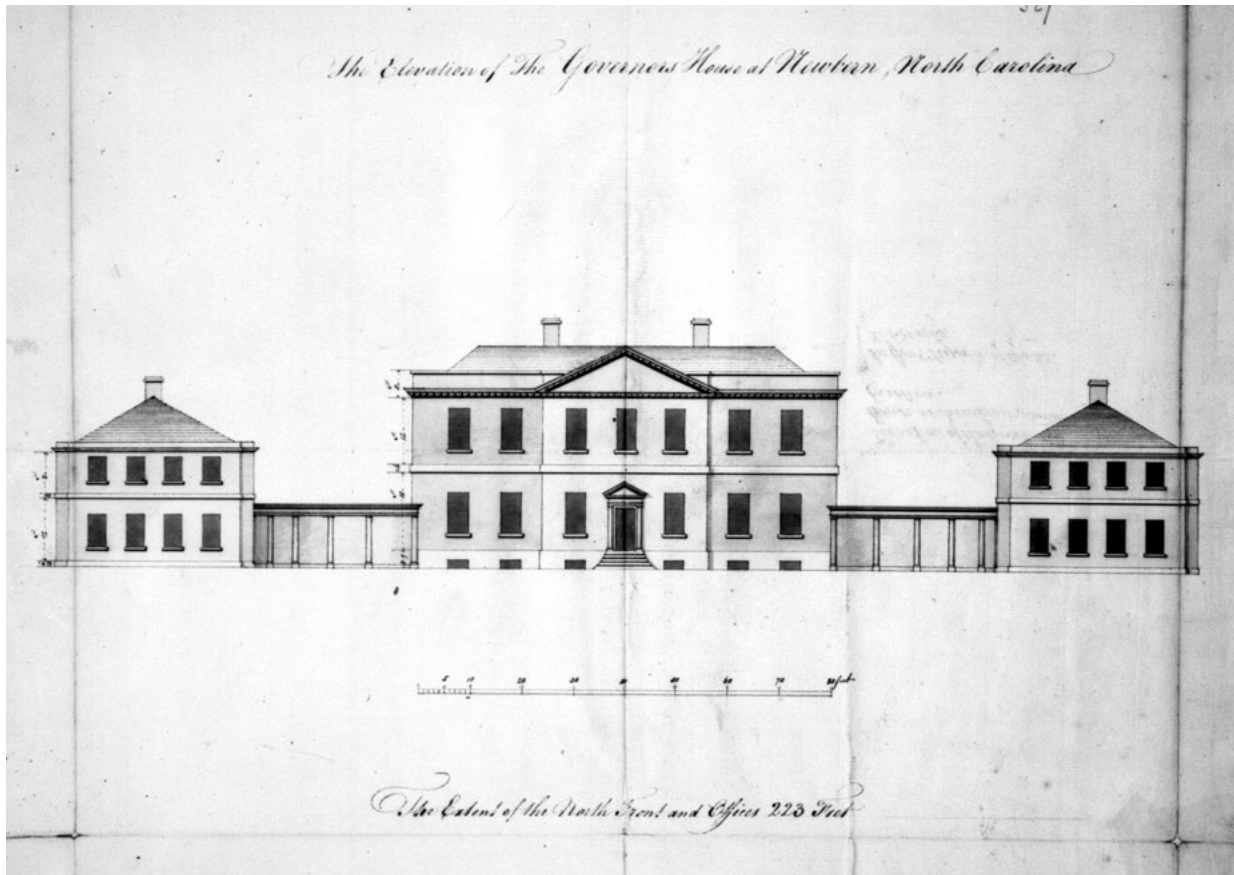
Accessibility and Life Safety, Natural Hazards, and Sustainability

Whereas preservation, rehabilitation, and restoration treatments usually necessitate retrofitting to meet code requirements and to

address other issues (including natural hazards and sustainability), in this treatment it is assumed that the **Reconstructed** building will be essentially new construction. Thus, code-required work, treatments to reduce the potential impact of natural hazards, and ensuring that the reconstructed building is as sustainable as possible should be considered during the design phase—when appropriate to the particular Reconstruction project—so as not to negatively impact or detract from the reconstructed appearance of the building, its site, and setting. The fact that the non-surviving building was located in a floodplain or another area especially vulnerable to the impact of natural hazards is crucial to consider when determining whether the building should be reconstructed.

The topic of sustainability is addressed in detail in *The Secretary of the Interior's Standards for Rehabilitation & Illustrated Guidelines on Sustainability for Rehabilitating Historic Buildings*. Although specifically developed for the treatment Rehabilitation, the Guidelines can be used to help guide the other treatments.

***Reconstruction as a Treatment.** When a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction, **Reconstruction** may be considered as a treatment. Prior to undertaking work, a documentation plan for Reconstruction should be developed.*



[1 a-b] Tyron Palace, New Bern, NC, was designed by John Hawks in 1767 for Governor William Tyron. It was completed in 1770, but destroyed by fire in 1798. The palace was reconstructed in 1959 based on the original plans, and on its original foundation, which was found 5 feet below the street, with the help of the 1767 drawing. *Photo: Courtesy Tyron Palace, New Bern, NC. Drawing: Courtesy of the State Archives of North Carolina.*



[2] The Saugus Iron Works, Saugus, MA, a National Historic Site, was active from 1646 to about 1670 and was the first integrated iron works in North America. The forge and mill (shown here) are part of the site which was reconstructed based on archeological research and historic documents and opened in 1954. *Photo: Daderot at the English language Wikipedia.*

OVERVIEW

| RECOMMENDED | NOT RECOMMENDED |
|--|---|
| <p>Researching and documenting the property's historical significance, focusing on documentary and physical evidence which is needed to justify reconstruction of the non-surviving building.</p> | <p>Undertaking a reconstruction based on insufficient research so that, as a result, a historically inaccurate building is created.</p> <p>Reconstructing a building unnecessarily when an existing building adequately reflects or explains the history of the property, the historical event, or has the same associative value.</p> <p>Executing a design for a building that was never constructed.</p> |
| <p>Investigating archeological resources to identify and evaluate those features and artifacts which are essential to the design and plan of the building.</p> | <p>Failing to identify and evaluate archeological material prior to reconstruction, or destroying extant historic material not relevant to the reconstruction but which should be preserved in place.</p> |
| <p>Minimizing disturbance of the terrain around buildings or elsewhere on the site, thereby reducing the possibility of destroying or damaging important landscape features, archeological resources, other cultural or religious features, or burial grounds.</p> | <p>Using heavy machinery or equipment in areas where it may disturb or damage important landscape features, archeological resources, cultural or religious features, or burial grounds.</p> |
| <p>Identifying, retaining, and preserving extant historic features of the building, site, and setting, such as remnants of a foundation, chimney, or walkway.</p> | <p>Beginning reconstruction work without first conducting a detailed site investigation to physically substantiate the documentary evidence.</p> <p>Basing a reconstruction on conjectural designs or on features from other historic buildings.</p> |

[3] The Cathedral of Saint Michael the Archangel, built in the early 1840s in Sitka, AK, was devastated by fire in 1966. It was reconstructed using measured drawings done in 1961 by the Historic American Buildings Survey (HABS). While the original cathedral was built of logs covered on the exterior with wood siding, its replacement is a fire-resistant structure with concrete and steel walls that replicates the historic building's appearance. *Photo: Berek at Wikimedia Commons.*



BUILDING EXTERIOR

| RECOMMENDED | NOT RECOMMENDED |
|---|---|
| Reconstructing a non-surviving building to depict the documented historic appearance. Although the use of the original building materials (such as masonry, wood, and architectural metals) is preferable, substitute materials may be used as long as they recreate the historic appearance. | Reconstructing features that cannot be documented historically or for which existing documentation is inadequate. Using substitute materials that do not convey the appearance of the historic building. |
| Recreating the documented design of exterior features, such as the roof form and its coverings, architectural detailing, windows, entrances and porches, steps and doors, and their historic spatial relationships and proportions. | Omitting a documented exterior feature, or rebuilding a feature but altering its historic design. Using inappropriate designs or materials that do not convey the historic appearance. |
| Reproducing the appearance of historic paint colors and finishes based on documentary and physical evidence. | Using paint colors that cannot be documented through research and investigation or using other undocumented finishes. |
| Installing exterior electrical and telephone cables underground or in the least obtrusive location possible, unless they can be documented as having been aboveground historically. | Attaching exterior electrical and telephone cables to the principal elevations of the reconstructed building, unless they can be documented as having been there historically. |
| Using signage to identify the building as a contemporary recreation. | Failing to explain that the building is a reconstruction, thereby confusing the public's understanding of the property. |



[4] The McLean House, where Robert E. Lee surrendered to Ulysses S. Grant, is located on the site of the battlefield—now part of Appomattox Courthouse National Historical Monument (VA). Several years after the end of the Civil War, measured drawings were made of the house before it was dismantled to be moved to Washington, DC, where it was to be reconstructed as a tourist attraction. This scheme never came to fruition, and the dismantled pieces gradually disappeared. The house was accurately reconstructed in 1949 on the original site based on the measured drawings.

BUILDING INTERIOR

| RECOMMENDED | NOT RECOMMENDED |
|---|---|
| <p>Recreating the appearance of <i>visible</i> features of the historic structural system, such as posts and beams, trusses, summer beams, vigas, cast-iron columns, above-grade masonry foundations, or load-bearing brick or stone walls. Contemporary methods and materials may be used for the actual structural system of the reconstructed building.</p> | <p>Changing the documented appearance of visible features of the structural system.</p> |
| <p>Recreating the historic floor plan and interior spaces, including the size, configuration, proportion, and relationship of rooms and corridors; the relationship of features to spaces; and the spaces themselves.</p> | <p>Altering the documented historic floor plan, or relocating an important interior feature, such as a staircase, so that the historic relationship between the feature and the space is inaccurately depicted.</p> <p>Reconstructing the historic appearance of the interior without accurate documentation.</p> |
| <p>Duplicating the documented historic appearance of the building's interior features and finishes (including columns, cornices, baseboards, fireplaces and mantels, paneling, light fixtures, hardware, and flooring); plaster, paint, and finishes (such as stenciling or marbleizing); and other decorative or utilitarian materials and features.</p> | <p>Altering the documented appearance of the building's interior features and finishes so that, as a result, an inaccurate depiction of the historic building is created. For example, moving a feature from one area of a room to another, or changing the type or color of the finish.</p> |
| <p>Installing mechanical systems and their components in the least obtrusive way possible so as not to impact the recreated interior spaces, features, or finishes while meeting user needs.</p> | <p>Altering the historic plan or the recreated appearance unnecessarily when installing mechanical systems.</p> |
| <p>Installing ducts, pipes, and cables in closets, service areas, and wall cavities.</p> | <p>Installing ducts, pipes, and cables where they will intrude upon the historic appearance of the building.</p> |



[5] The parlor of the McLean House was reconstructed to its appearance on the occasion of Robert E. Lee's surrender to Ulysses S. Grant in this room on April 9, 1865.

BUILDING SITE

| RECOMMENDED | NOT RECOMMENDED |
|---|--|
| <p>Reconstructing building site features based on documentary and physical evidence.</p> | <p>Reconstructing building site features without documentary and physical evidence.</p> |
| <p>Inventorying the building site to determine the existence of aboveground remains and subsurface archeological resources, other cultural or religious features, or burial grounds, and using this evidence as corroborating documentation for the reconstruction of related site features. These may include walls, fences, or steps; circulation systems, such as walks, paths, or roads; vegetation, such as trees, shrubs, grass, orchards, hedges, wind-breaks, or gardens; landforms, such as hills, terracing, or berms; furnishings and fixtures, such as light posts or benches; decorative elements, such as sculpture, statuary, or monuments; water features, including fountains, streams, pools, lakes, or irrigation ditches.</p> | <p>Giving the building's site an inaccurate appearance by basing the reconstruction on conjectural designs or on features from other sites.</p> |
| <p>Recreating the historic spatial relationship between buildings and related site features.</p> | <p>Changing the historic spatial relationship between buildings and related site features, or reconstructing some site features but not others, thereby confusing the depiction of the reconstructed site.</p> |



[6] This lighthouse on Lake Ponchartrain in New Orleans was reconstructed after the historic 1890 lighthouse was destroyed by Hurricane Katrina.

SETTING (DISTRICT / NEIGHBORHOOD)

| RECOMMENDED | NOT RECOMMENDED |
|---|--|
| Reconstructing features in the building’s historic setting based on documentary and physical evidence. | Reconstructing features in the setting without documentary and physical evidence. |
| Inventorying the setting to determine the existence of above-ground remains and subsurface archeological resources, other cultural or religious features, or burial grounds, and using this evidence as corroborating documentation for the reconstruction of missing features of the historic setting. These may include circulation systems, such as roads and streets; furnishings and fixtures, such as light posts or benches; vegetation, gardens, and yards; adjacent open space, such as fields, parks, commons, or woodlands; and important views or visual relationships. | Giving the building’s setting an inaccurate appearance by basing the reconstruction on conjectural designs or on features from other locations. |
| Recreating the historic spatial relationship between buildings and landscape features in the setting. | Changing the historic spatial relationship between buildings and landscape features in the setting by reconstructing some features but not others, thereby confusing the depiction of the reconstructed setting. |

[7] The Muhlenberg Brigade Huts are reconstructions of nine log huts erected in 1777 at Valley Forge during the Revolutionary War. They have been reconstructed on the historic road with logs cut with modern power tools and finished with cement, unlike the original logs which were hand hewn and finished with traditional chinking. *Photo: Rdsmith4 at Wikimedia Commons.*





[8] The Palace of Fine Arts was designed by Bernard Maybeck and built for the 1915 Panama-Pacific Exposition in San Francisco. The pavilion was intended to be temporary and, although it had a steel structure, the exterior was finished only with stucco, an impermanent material composed of plaster and fiber. The building was not torn down after the exposition, and it eventually fell into ruin. In 1964, all but the steel structure was demolished, and the building was reconstructed with lightweight poured-in-place concrete. *Photo: KevinIcole at Wikimedia Commons.*





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