



May 31, 2023

City of Cincinnati Planning Commission,

Cincinnati Preservation Association has partnered with Evanston residents to bring forth the Historic Landmark Designation for Hoffman School. There is wide support in the Evanston Community for this designation as is shown through the petition that the residents started. We have mapped all signatories from both the petitions that the residents have submitted as well as those that would like to demolish the building have submitted to visually show that the **residents that will be directly affected are in favor of a Historic Landmark for the Hoffman School**. The petition and the map are attached.

The neighbors and the church are the entities that are directly affected by this designation. **Luckily there is a developer that has already put a second back up offer on the table stating the offer is upward of 7 figures**. The letter from Diversified Capital to the Historic Conservation Board with examples of the work that they have done as well as their back up offer are also attached to this letter. There have also been other developers that have expressed interest in redeveloping the building.

Designating the property would still provide the church with the ability to sell the building for over 7 figures so they can provide a new home to their congregation and continue their ministry in the community. Designating the building would also allow the residents directly adjacent and within the vicinity to protect the historic charm and character of the neighborhood that they choose to live in. **Designating the building is a win-win for the church and for the neighborhood**.

Below are additional counter points to statements made by the Developer that would like to demolish the building

- 1) It would take \$400-500/sf to rehabilitate the building. Diversified Capital has a proven track record in rehabilitation of uninhabitable buildings, and they state it would be **\$200-250/sf to rehabilitate the building**.
- 2) Diversified Capital would be able to get a max of **41 units** within the building, increasing the density of the site and providing more housing for the Evanston Community.

JOHN HAUCK HOUSE
812 DAYTON ST
CINCINNATI, OH 45214

- 3) Historic Tax Credits would be able to be used on the building to support rehabilitation costs potential up to **45% of the rehabilitation costs** if both state and federal are awarded.
- 4) **Asbestos abatement is required if the building is demolished or rehabilitated.** The National Emissions Standard for Hazardous Air Pollutants requires that friable asbestos containing materials be removed prior to demolition. This is a cost that will be required with demolition or rehabilitation.
- 5) Section 106 would not apply to this property unless federal funds (CDBG, HOME, LIHTC) are used on the project. This would include any funds used for demolition of the school to prepare the site for a new development. If funds are only used on the new development, demolition of historic sites is still considered part of the undertaking and is part of the review. **If the developer that wants to demolish the building proposes using LIHTC, those credits potentially could be at risk if the building,** which is already listed as a historic asset by the state, **is proposed to be demolished.**
- 6) **Section 106 and Historic Tax Credits will not prevent changes to the floor plan,** it would require they be done thoughtfully and in keeping with the Secretary of the Interior's Standards for Rehabilitation.
- 7) The Department of Buildings and Inspections does not have any violations listed against the property and has not declared the building a public safety hazard.
- 8) **The building is historically significant.** The Urban Conservator, the City's expert on historic preservation, City Planning Staff, the Historic Conservation Board, multiple City Inventories, and the State Historic Preservation Office all concur that the building is historically significant.
- 9) **Designating the Building is an implementation step within the City Adopted 2019 Evanston Work Plan.** Designating the building will meet multiple goals of the work plan including goal 1 of providing more and diverse housing options as well as goal 9 of preservation of the built history of Evanston.
- 10) **The Evanston neighborhood voted on February 16, 2023 that they do not want the building to be demolished.** (minutes attached)

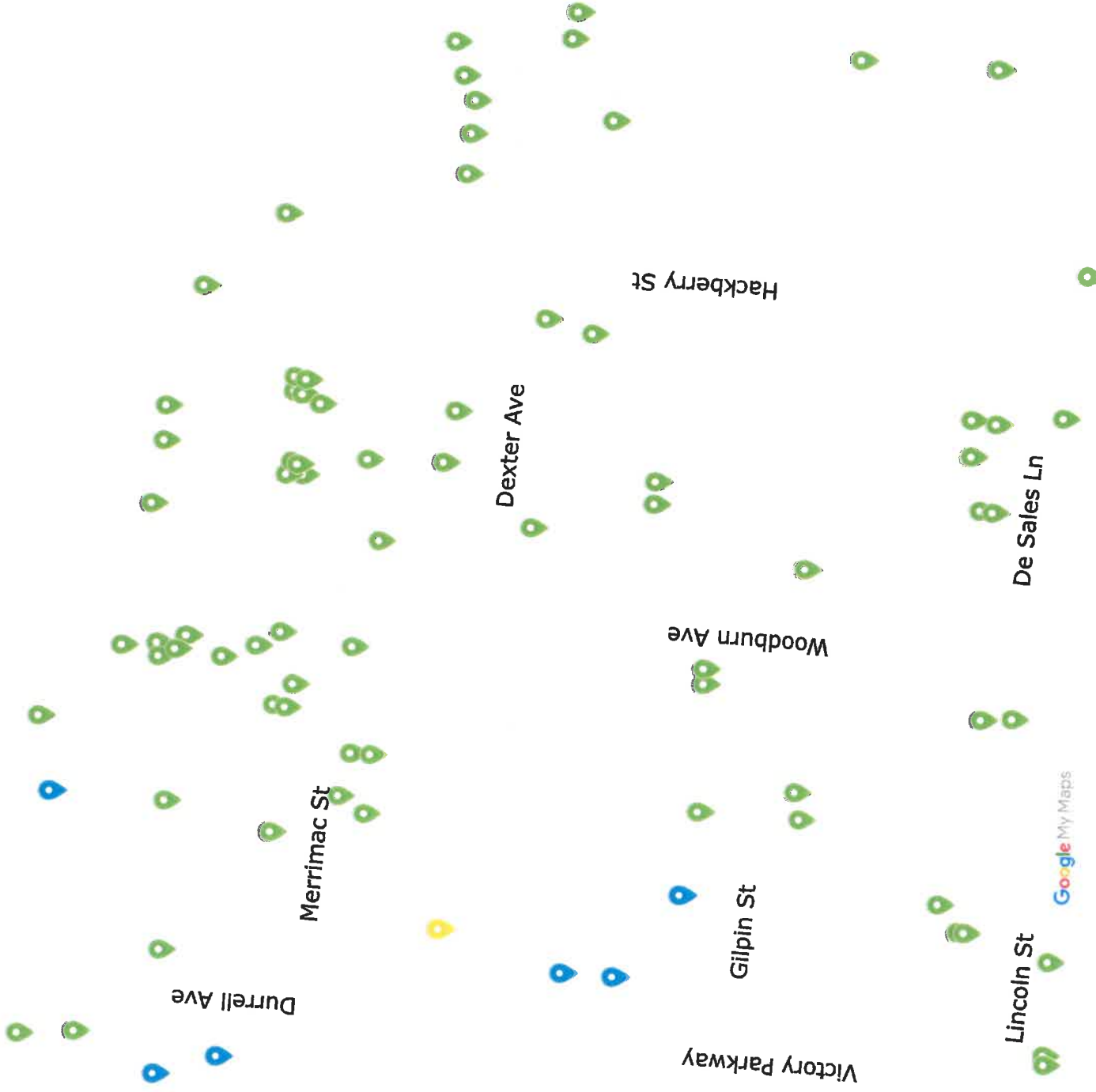
Thank you for your time and consideration of the Historic Landmark Designation,




Beth Johnson
Executive Director
Cincinnati Preservation Association


JOHN HAUCK HOUSE
812 DAYTON ST
CINCINNATI, OH 45214

Hoffman School Designation Petitions



 Hoffman School-
Proposed Historic
Landmark

 Supports
Designation per petition
submitted

 Opposes
Designation per petition
submitted

All petition signatories for and against the designation were mapped as long as the address was submitted and legible.

This map shows the direct vicinity of the proposed designation. A full map of all signatories within the Cincinnati Region can be found

https://www.google.com/maps/d/u/0/edit?hl=en&mid=1RvcbIF5OpEGRW8DeNoxkD17p_7kitY&ll=39.13374395073876%2C-84.47643042438615&z=18

PETITION TO SAVE HOFFMAN SCHOOL AND PARK!

In Support of the Cincinnati Preservation Association (CPA) Application to Designate the Hoffman School and Park ('Site') at 3060 Durrell Ave, Cincinnati OH 45207 as a Local Historic Landmark by the City of Cincinnati (City Historic Conservation Board, City Planning Commission, and City Council).

NAME (printed)	Address	Signature	Date
Garland Walden	1535 Merrimac	Garland Walden	4/3/23
Brenda Jones	1540 Merrimac	B. Jones	4/3/23
Robert Stern	1544 Merrimac	Robert Stern	4/3/23
Susan H. Murray	1608 Merrimac	Susan H. Murray	4/3/23
RICHARD BRETT	1608 Merrimac ST	RICHARD BRETT	4/3/23
Robert Jones	1590 Merrimac	Robert Jones	4/3/23
Gwendolyn Echols	7743 NEW BEDFORD AVE.	Gwendolyn Echols	4/8/23
Lance Harris	115 Baker Ave	Lance Harris	4/8/23
Frank [unclear]	7527 Merrimac	Frank [unclear]	4/12/23
Betty S. PARKER	1427 Lakeland AVE.	Betty S. Parker	4-15-23
MICHAEL [unclear]	9074 WOODBURN AVE	MICHAEL [unclear]	4-9-23
Carrie Gilliam	1526 Gilpin	Carrie Gilliam	5/9/23
Morganne Ray	910 Craft St	Morganne Ray	5/9/23
Amy Lang	1520 Lincoln Ave, Unit B	Amy Lang	5/9/23
Jack Davis	1512 Lincoln ave	Jack Davis	5/9/23
Lia Stacy	1512 Lincoln ave	Lia Stacy	5/9/23
David Gibson	1618 DeSole's	David Gibson	5/9/23
JESSE Sherman	1618 DeSole's	JESSE Sherman	5/9/23
Ora Young	1627 DeSales	Ora Young	5/9/23
Mark Stegman	2328 Caladstone ave	Mark Stegman	5/9/23
Jim ABT	2944 Haxberry Street	Jim ABT	5/9/23
Melanie Uy	3005 Woodburn Ave	Melanie Uy	5/9/23
Scott McLeamy	1304 Duncan Ave	Scott McLeamy	5/9/23
Ashley Scalic	3059 Hackberry St	Ashley Scalic	5/9/23

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NAME (printed)	Address	Signature	Date
Jacob Knight	1535 Merrimac St	Jacob Knight	4/3/2023
Betsy Dike	3105 Woodburn #1	Betsy Dike	4/3/2023
Karen Crump	3109 Woodburn St.	Karen Crump	4/3/2023
Shay Isbel	2716 Woodburn Ave #11	Shay Isbel	4/3/2023
Irene Hamrick	1611 Merrimac St	Irene Hamrick	4/3/2023
Robert Dahlstrom	1610 Merrimac St #5109	Robert Dahlstrom	4/3/2023
Susan Dahlstrom	1610 Merrimac 45207	M. Susan Dahlstrom	4/3/2023
Cathy Fowler	1618 Merrimac	Cathy Fowler	4/3/23
Brian Fowler	1618 Merrimac	Brian Fowler	4/3/23
Ann Book	1620 Merrimac	Ann Book	4/3/2023
Mary Tompkins	1620 Merrimac	Mary Tompkins	4/3/2023
BRUCE UNDERHILL	3112 Woodburn	Bruce Underhill	4-3-2023
LUKE FINLEY	1520 MERRIMAC ST	Luke Finley	4/3/23
Emma Green	2215 Crane Ave	Emma Green	4/3/23
Ben Finley	1520 Merrimac St	Ben Finley	4/3/23
Jake Striebel	3033 Woodburn Ave	Jake Striebel	5/9/23
Ashley Striebel	2033 Woodburn Ave	Ashley Striebel	5/9/23
MANNING KUMPT	2424 Merrimac	Manning Kumpt	5-9-23
Stephan Row	1507 Kenon Ave	Stephan Row	5-9-23
Patricia Vanstait	1501 Lincoln Ave	Patricia Vanstait	5-9-22
Nicole Runas	1515 Lincoln Ave	Nicole Runas	5-9-22
Melissa Dickman	1618 DeSales	Melissa Dickman	5-9-23
Timothy Hopkins	1626 DeSales Ln	Timothy Hopkins	5-9-23
Thomas True	1626 DeSales Ln APT A	Thomas True	5-9-23
Shirley Frazier	3055 Hackberry St.	Shirley Frazier	5-9-2023

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NAME (printed)	Address	Signature	Date
LARRY SMITH	3079 WOODBURN	[Signature]	5-10-23
Carrie Rountray	3229 Woodburn Ave	[Signature]	5/10/23
Sylvia Padon	1529 Merrimac St	[Signature]	5/20/23
Demetrius Felton	3117 Harvard ave	[Signature]	5/20/23
Oscar Higgins	3132 Harvard ave	[Signature]	5/20/23
Conner Ward	3132 Harvard ave	[Signature]	5/20/23
Daryl Crowe	3231 Hg r rd grc	[Signature]	5/20/23
Horanbe Tallman	3228 Gilbert	[Signature]	5/22/23
SANORA LYLES	3207 GILBERT AVE	[Signature]	5-22/23
CART DESSIT	3214 Gilbert	[Signature]	5-22-23
Darva Conley	340 Durrell Ave	[Signature]	5/22/23
Bob Lee	3136 Durrell Ave	[Signature]	5/22/23
Ruby Marshall	3129 DURRELL AVE	[Signature]	5/22/23
JAMES CLARK	3123 Durrell Ave	[Signature]	5/22/23
Joye McClinton	3114 Durrell Ave	[Signature]	5/22/23

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NAME (printed)	Address	Signature	Date
Victor Smith	438 Hillside Ave	Victor Smith	4/12/23
Tony Fulton	8125 SEWARD AVE	Tony Fulton	4/12/23
Klaire Austin	6385 Center Hill Ave	Klaire Austin	4/12/23
Y.L. Neal	8921 Oak	Y.L. Neal	4-12-23
Robin Brown	2000 Brentwood Ave	Robin Brown	4/12/23
Jerry Bay	6463 Brookline	Jerry Bay	4-12-23
Clare Sule	1091 Pennington	Clare Sule	
Clare Sule	2113 Belmont	Clare Sule	4/12/23
BARBARA J. STENSON	6431 MEADOWVISTA CT	Barbara J. Stenson	4/12/23
Raymond C. Lewis	6431 MEADOWVISTA CT	Raymond C. Lewis	4/12/23
Lenora Jones	1302 Random Hill Rd	Lenora Jones	4/12/23
Augustine Fields	11678 HANOVER RD	Augustine Fields	4/12/23
JAMES FIELDS	11678 HANOVER RD	James Fields	04/12/23
BRENDA STINSON	1205 CONGRESS AVE	Brenda Stinson	4/12/23
Brenda Ross	479 Spruce Rd	Brenda Ross	4-12-23
David Phillips	2440 Broadhurst Avenue	David Phillips	4-12-2023
Queen Smith	110 BAVARIAN ST	Queen Smith	4-12-23
Queen Smith	1506 Westfield	Queen Smith	4-12-23
Timothy Stapples	1428 Springfield	Timothy Stapples	4-12-23
Timothy Stapples	947 Byrd Ave	Timothy Stapples	4-12-23
Maria Kallisto	321 Mayview Forest Dr	Maria Kallisto	4/10/23
Virginia Hall	3375 McHenry	Virginia Hall	4/12/23
Isaiah Blacklock	857 W. North Bend Rd	Isaiah Blacklock	4/12/23
Rhonda Hudson	1142 Towne St	Rhonda Hudson	4/12/23
R. Morris	1514 Lake	R. Morris	4/12/23
CHEYLA MORRIS	792 North Hill Lane 45204	Cheyla Morris	4/12/23
Helen Marie Lewis	2023 Ohio Ave 45204	Helen Marie Lewis	4/12/23
Luella Kessler	1289 Chicago	Luella Kessler	4/12/23
Andrew Brakins	514 Wyand 45205	Andrew Brakins	4/12/23

NAME	ADDRESS	SIGNATURE	DATE
FRANK FAIRL	770 HOLYoke DR	[Signature]	12 APR 2023
Diamond Brooks	1105 Well Spring	[Signature]	4-12-23
Walter R. Wellman	1838 Linwood	WALTER WILLIAMS	4-12-23
Dennis Moore	859 W Northpark	D. Moore	4-12-23
Royal B. [Signature]	895 Venetian Tr	Reboul Bouchard	4-12-23

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NAME (printed)	Address	Signature	Date
DEAN Cleverger	2725 Johnstone Pl	Dean Cleverger	5/26/23
Tasha Tanner	990 Nassau St	Tasha Tanner	5/26/23
Stanley Stephens	3750 Reading Rd	Stanley Stephens	5/26/23
Jeremy Shapiro	1303 Cypress St	Jeremy Shapiro	5/26/23
Lauren Brassfield	1408 Locust St	Lauren Brassfield	5/26/23
John Barnes	3050 Hampton Ct.	John Barnes	5/26/23
Deb Derashkevich	1411 Locust St.	Deb Derashkevich	5/26/23
Grandolyn Perham	1387 Myrtle Ave.	Grandolyn Perham	5/26/23
MARY BETH KINGS	3021 Fairfield Ave A3	Mary Beth Kings	5-26-23
Clara Brown	2215 Victory Pkwy	Clara Brown	5/26/23
Lauren Sluder	1550 Madison Rd.	Lauren Sluder	5/26/23
DEAN FORSTER	1369 Myrtle Ave	Dean Forster	5/26/23
Anna Pinto Cesar	1303 Cypress St.	Anna Pinto Cesar	5/26/23
SUBSHAN FRANK	2412 Englewood	Cin. 45206	5/26/23
SWIT CAROL	1617 FAIRVIEW AVE	SWIT CAROL	26 MAY 23
Marlon McLaughlin	2849 Osceola St.	Marlon McLaughlin	26/5/23
Rachha Laksh	2519 Moorway Ave H9	Rachha Laksh	20/5/23
Joel Mellor	2519 Moorway Apt H1	Joel Mellor	20/5/23
Megan Fliter	1760 Cleary Ave	Megan Fliter	5/26/23
YASHU DHAMISA	1714 GRANDMERE LN	YASHU DHAMISA	5/26/23
Kemede O	1405 Myrtle Ave	Kemede O	5/26/23
Jeffrey Hill	3126 HACKBERRY ST APT 5	Jeffrey Hill	5/26/23
Kathy Underhill	3112 Woodburn Ave	Kathy Underhill	5/26/23
Stephen Solomon	1238 Cassin Ave 45205	Stephen Solomon	5/26/23
Keith Glaser	10 Hill Hollow Ln	Keith Glaser	5/26/23
Derek Moore	3169 Madison Dr. Cincinnati, OH	Derek Moore	5/26/23
Ben Dyer	2716 Hackberry St 45206	Ben Dyer	5/26/23
Amanda Dyer	2716 Hackberry St 45206	Amanda Dyer	5/26/23

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NAME (printed)	Address	Signature	Date
Tyler Hirano	1343 Burdette Ave	Tyler Hirano	5/20/23
Sarena Jackson	1973 Fairfax Ave	Sarena Jackson	5/20/23
Will Pratt	1973 Fairfax Ave	Will Pratt	05/20/2023
Tristan Anstadt	2600 Heckberg St.	Tristan Anstadt	05/20/2023
Jarman Shaw	4521 Hunt Rd	Jarman Shaw	5/20/2023
Aaron Shew	4521 Hunt Rd	Aaron Shew	5/20/2023
MARC EDDINGWOOD	814 WASHINGTON AVE 4521	MARC EDDINGWOOD	5/20/23
Rachel Taylor	2553 Ingleside	Rachel Taylor	5/26/23
Jessica Taylor	2553 INGLESIDE	Jessica Taylor	5/26/23
Jeanne Kostekamp	2401 Ingleside Ave Unit 1B	Jeanne Kostekamp	5/26/23
Srothi Pillai	2204 Lawn ave #8	Srothi Pillai	5/26/23
Clara Blitz	2574 Park Ave Unit 24	Clara Blitz	5/26/23
Chuck Jacobs	5 Beechrest Lane	Chuck Jacobs	5/26/23
Ellen Gruber	227 McGregor Ave.	Ellen Gruber	5/26/23
Bryden Hurd	1537 Saint Leger Pl	Bryden Hurd	26 MAY 2023
Daniel McMillan	1506 William Howard Fast	Daniel McMillan	20-05-23
Nick Hilda	215 Findly St.	Nick Hilda	5/26/23
Madison Shafer	1045 Viribat Dr.	Madison Shafer	5/20/23
Noah Blich	2533 Woodburn Ave Apm	Noah Blich	5/20/23
Christina Rodriguez	427 Torrence Ct	Christina Rodriguez	5/26/23
Christiana Hill	3053 N. Hagley Cir	Christiana Hill	5/26/23
Michael Borovin	5465 Starcrest Dr	Michael Borovin	5/26/23
Leah Wilson	2413 Salfatoris Ave	Leah Wilson	5/26/23
Boris Adafic	2929 Annwood St.	Boris Adafic	5-26-23
Rebecca Barnes	2929 Annwood St.	Rebecca Barnes	5-26-23
Melanie Prevost	5055 Fairfield Ave	Melanie Prevost	5-26-23
Greg Skura	7981 Haysuckle	Greg Skura	5-26-23
Kate Skura	7981 Haysuckle	Kate Skura	5.26.23



This petition has collected
35 signatures
using the online tools at www.ipetitions.com

Printed on 2023-05-30

Save Hoffman School and Field from Demolition!

About this petition

Support the historic designation of Hoffman School and Field!

Background:

Cincinnati Preservation Association has applied to designate the Hoffman building and grounds as a historic landmark, which would prevent developers from demolishing the structure. Completed in 1922 and designed by the renowned Hannaford and Sons (whose other local works include Cincinnati Music Hall and City Hall), this Evanston architectural treasure exemplifies the Progressive Era schools that increased investment in public education and in the surrounding community.

We only have one chance to preserve buildings like this--once they're gone, they're gone forever. A developer already plans to buy the property in order to demolish the school and build over 300 modern apartments and two large parking lots on the grounds. We can prevent demolition. Act now to support the historic designation of the Hoffman School, an Evanston community and greater Cincinnati architectural gem!

Sign and Support:

In support of the Cincinnati Preservation Association (CPA) Application to Designate the Hoffman School and Park ('Site') at 3060 Durrell Ave, Cincinnati OH 45207 as a Local Historic Landmark by the City of Cincinnati (City Historic Conservation Board, City Planning Commission, and City Council).

Signatures

1. Name: Carrie J Stacy on 2023-05-20 01:23:43
Street address: 1733 Dexter Ave Cincinnati, Oh 45206

2. Name: Emma McAvoy on 2023-05-20 19:26:49
Street address: 2308 Madison Drive

3. Name: Judith Serling-Sturm on 2023-05-21 00:22:30
Street address: 1201 edgecliff place Cincinnati oh

4. Name: Kit anderson on 2023-05-21 00:23:24
Street address: 3178 Golden hollow

5. Name: Noah blach on 2023-05-21 15:29:48
Street address: 2533 Woodburn ave apt 555 Cincinnati ohio 45206

6. Name: Ashley frankalnd on 2023-05-22 01:15:44
Street address: 775 chipley ct Cincinnati, oh 45240

7. Name: Sarah Ferris on 2023-05-22 01:16:00
Street address: 121 E Freedom Way Cincinnati, OH 45202

8. Name: Kristen Curtiss on 2023-05-22 01:16:28
Street address: 4136 Witler St

9. Name: Erin Ferrigni on 2023-05-22 01:17:39
Street address: Wellington PI

10. Name: Benjamin Stacy on 2023-05-22 01:18:07
Street address: 1733 Dexter Avenue Cincinnati Ohio 45206

11. Name: Brianna Cloney on 2023-05-22 01:18:37
Street address: 2171 Sohn St

12. Name: David Salmon on 2023-05-22 01:19:02
Street address: 7216 Deer Ridge Rd. Prospect, KY 40059

13. Name: Angela Lipscomb on 2023-05-22 01:22:48
Street address: 1729 Dexter Ave Cincinnati OH

14. Name: Todd Lipscomb on 2023-05-22 01:23:40

Street address: 1729 Dexter Ave Cincinnati OH

15. Name: AJ Smith on 2023-05-22 01:37:18
Street address: 2101 Hudson Ave

16. Name: Jackson on 2023-05-22 01:42:40
Street address: 4136 Witler Street Cincinnati OH

17. Name: Emily Lang on 2023-05-22 03:41:41
Street address: 6630 Bramble Avenue

18. Name: Matt Owens on 2023-05-22 03:47:01
Street address: 6630 Bramble Ave Cincinnati, OH 45227

19. Name: Sarah Smith on 2023-05-22 11:22:29
Street address: 4224 Turrill Street

20. Name: Katie Moroski on 2023-05-22 12:01:00
Street address: 400 Pike St, 45202

21. Name: Rachael Stroebel on 2023-05-22 12:34:30
Street address: 3214 Woodburn Ave

22. Name: Jeff Boyle on 2023-05-22 13:50:25
Street address: 590 Delta Avenue Cincinnati OH 45226

23. Name: Courtney Reynolds on 2023-05-22 14:20:29
Street address: 2823 McKinley Avenue

24. Name: Deidre Lewis on 2023-05-22 15:48:34
Street address: 980 Woodbriar Lane

25. Name: Aimee Dexter on 2023-05-23 03:44:45
Street address: 1733 Dexter Avenue

26. Name: Michele D Perry on 2023-05-23 12:15:33
Street address: 1613 Fairfax Avenue Apt 1

27. Name: Michael Perry on 2023-05-23 13:31:12
Street address: 1613 Fairfax Ave Apt 1

28. Name: Nina Rice on 2023-05-23 17:12:24

Street address: 9111 Country View Lane, Loveland, OH. 45140

29. Name: Anne Shannon on 2023-05-25 16:23:30
Street address: 1525 Gilpin #E

30. Name: Rod Browne on 2023-05-25 16:24:45
Street address: 1525 Gilpin #E

31. Name: Cecie Chewning on 2023-05-25 21:21:21
Street address: 2412 Ingleside

32. Name: Patty salas on 2023-05-26 21:30:50
Street address: 3470 Hudson ave

33. Name: William Brady Harrison on 2023-05-27 00:52:43
Street address: 2359 Kemper Ln, Cincinnati, OH 45206

34. Name: Julietta Toedtman on 2023-05-29 00:45:10
Street address: 2518 Ingleside Ave

35. Name: Benjamin Kerksmar on 2023-05-29 12:10:49
Street address: 1369 Myrtle Ave, Cincinnati, OH, 45206



P.O. Box 12128 • Cincinnati, Ohio 45212 • (513) 281-2775 voice •

General body Meeting Minutes on: February 16th 2023

Start time : 6:34 p.m

End time: 8:22 p.m

Total minutes: 108 mins

Guest: Kingsley Property - Chan

Meeting minutes was approved

Delayed: voting on 3060 Darrell avenue will be delayed until further notice.

Issues Discuss:

- **Misunderstanding of what a PUD includes.**
- **Kingsley company did not explain that the "PUD" included tearing down the building and zoning change**
- **Sharon Moon amended her motion for the letter of attempt without demo**

Decisions : There was a vote-

- **21 agreed to rezoning only**
- **8 agreed to zoning and demo**

Actions- Brian (community neighbor) amended the motion for the letter of support with demo PUD, there was a new vote held 12 said yes, 17 said no.

Final decision to the vote was NO letter of support regarding rezoning and teardown.

Takeaways: Evanston In Person Developer Forums for Neyer is on Monday March 6 at 10am at the Evanston Employment Resource Center 3301 Montgomery Road, Cincinnati, Ohio 45207 in person. Monday March 6 at 6pm via zoom only. Tuesday March 7 at the Evanston Recreation Center 3204 Woodburn Ave Cincinnati, Ohio 45207 in person.

Housing committee is working on a benefit agreement and letter for rezoning only.

Thanks

Shakeita Moore (secretary)

"Evanston Community Council is dedicated to the well-being of all residents and to the development of the community through education, business and spirituality."

Goal	Strategy or Action Step	Timeframe	Responsible Party	Key Partners	Measurable Outcomes
<p>Evanston builds upon its rich history through the preservation of buildings and the stories from residents past and present who shaped the neighborhood.</p>	<p>Collaborate with the City of Cincinnati's Urban Conservator to inventory and identify the history of 100 structures and their sustainability for repurposing vacant or underutilized buildings.</p>	<p>Short-Term</p>	<p>Evanston Community Council</p>	<p>Archdiocese of Cincinnati, St. Marks Alumni Association, City of Cincinnati Urban Conservator</p>	<p>Receive Historic Landmark designation; Receive tourism planning grant from the State of Ohio</p>
	<p>Explore landmark designation for other historic buildings such as Hoffman School and Calvary United Methodist Church</p>	<p>Short-Term</p>			
	<p>Decide which structures from the Cincinnati Conservator's inventory results will be used for tourism purposes, i.e. tours, brochures, etc.</p>	<p>Short-Term</p>			
	<p>Find funding for signage, tour guides, etc.</p>	<p>Short-Term</p>			
	<p>Apply to the State of Ohio for a tourism planning grant</p>	<p>Now</p>			
	<p>Submit the application to the City designating St. Marks as an historic landmark.</p>	<p>Now</p>			
	<p>Continue to collaborate with the alumni of St. Marks to save the building for repurposing as a multi-use facility</p>	<p>Now</p>			
	<p>Work with the alumni to capture stories about St. Marks and its significance to African-Americans in the Evanston community</p>	<p>Now</p>			
	<p>Begin fundraising for the \$1500 application fee required to apply to the City for historic designation</p>	<p>Now</p>			
	<p>Continue to work with the Archdiocese on the status of St. Marks</p>	<p>Now</p>			





DIVERSIFIED CAPITAL

May 5, 2023

Historic Conservation Board

805 Central Avenue, Suite 500

Cincinnati, OH 45202

Dear Historic Conservation Board,

On behalf of Diversified Capital Management (DCM) a firm with extensive experience in historical rehabilitation, I am writing in support of the proposed Local Historic Landmark designation of the Hoffman School and all related parcels located at and around 3060 Durrell Avenue in Evanston. I would like this letter and the exhibits attached to be included as part of the record of the May 8, 2023, Historic Conservation Board Meeting.

The designation should be approved because the building is, without question, historically significant; and despite what development plans have suggested, it is also economically feasible to rehabilitate the structure and convert it back into productive use. A landmark status would propel this economic feasibility even further as tax credits would be much easier to obtain and reduce the economic burden of saving the building. Furthermore, it does not appear this building was ever marketed for sale in the traditional sense, seriously hindering the ability of qualified redevelopers to make competitive offers.

To this point, there have been numerous statements made in letters sent to the board and other city officials regarding developing the building that, in our experience, seem to paint an unrealistically bleak picture of the prospects of successful rehabilitation. It seems the legal owner in this case has been mistakenly led to believe it is impossible to redevelop the building or receive competitive offers from redevelopers. This is unfortunate for the owner who may have received a higher or better offer if the building were marketed through traditional channels. However, the buyer certainly has the benefit of not having to compete for this contract on the open market with a non-real estate professional counterparty.

After reading many of the letters to the city and this board from the developer, it becomes clear an argument is being made that this building is beyond saving. I would like to address some of those comments specifically and offer a different opinion. An opinion formed through dozens of historic rehabilitations.

"It is impossible to renovate the existing structure. The building exterior is distressed from top to bottom, as you can see in the images attached to this letter."

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This statement of impossibility carries with it a great responsibility to prove that it is, in fact, impossible to renovate. In our opinion, this is also egregiously untrue. As the images attached to my letter prove, my firm has taken on historic projects in significantly higher levels of disrepair and not only saved them but brought them back as some of the finest properties in the community - and profitably! We feel quite strongly we could successfully rehabilitate the building into a multifamily residential dwelling.

“Even if we could renovate the building, it would be prohibitively expensive. Our team uses existing infrastructure at every opportunity, and we spent thousands of dollars over the last year and a half studying the current building. The existing building is simply unsafe. We estimate that it would cost \$400-\$500 per square foot to renovate the structure, which would limit our ability to make the residential units affordable.”

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The cost estimate here, although perhaps accurate for this developer, is not, in our opinion, in line with the costs experts in historical redevelopment incur. Historical renovations are not by any means cheap, however \$400-500 per square foot is completely out of line with any of the historic preservation projects Diversified Capital Management has taken on. Again, using a recently completed local renovation on a more dilapidated building as a reference point with photographic supporting evidence of such, our costs hovered right around \$200 per square foot according to our audited financials. Furthermore, the Landmark designation would make capturing historic tax credits worth as much as 40% of renovation costs highly probable.

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This is one of several claims by both Kingsley and the owner that this landmark designation will terminate their contract. If that is true and I believe it to be as it is on record repeatedly, Diversified Capital Management is prepared to make a significant secondary offer, and immediately start redevelopment plans for the building and surrounding space. Again, we find the statement that the building will sit empty to be an egregious use of conjecture for a building that, to our knowledge, was never formally marketed for sale.

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Attached to this letter are numerous exhibits of before and after photos of one of our most recent historic renovation projects, which show that far more dilapidated spaces can be saved. DCM believes that we can save 3060 Durrell too!

Regards,

Duane Cronin

Founder & CEO

Diversified Capital Management

EXHIBIT 1 & 2



EXHIBIT 3 & 4



EXHIBIT 5



EXHIBIT 6



EXHIBIT 7 & 8



EXHIBIT 9



EXHIBIT 10



EXHIBIT 11



EXHIBIT 12



EXHIBIT 13



EXHIBIT 14



EXHIBIT 15



EXHIBIT 16 & 17



EXHIBIT 18

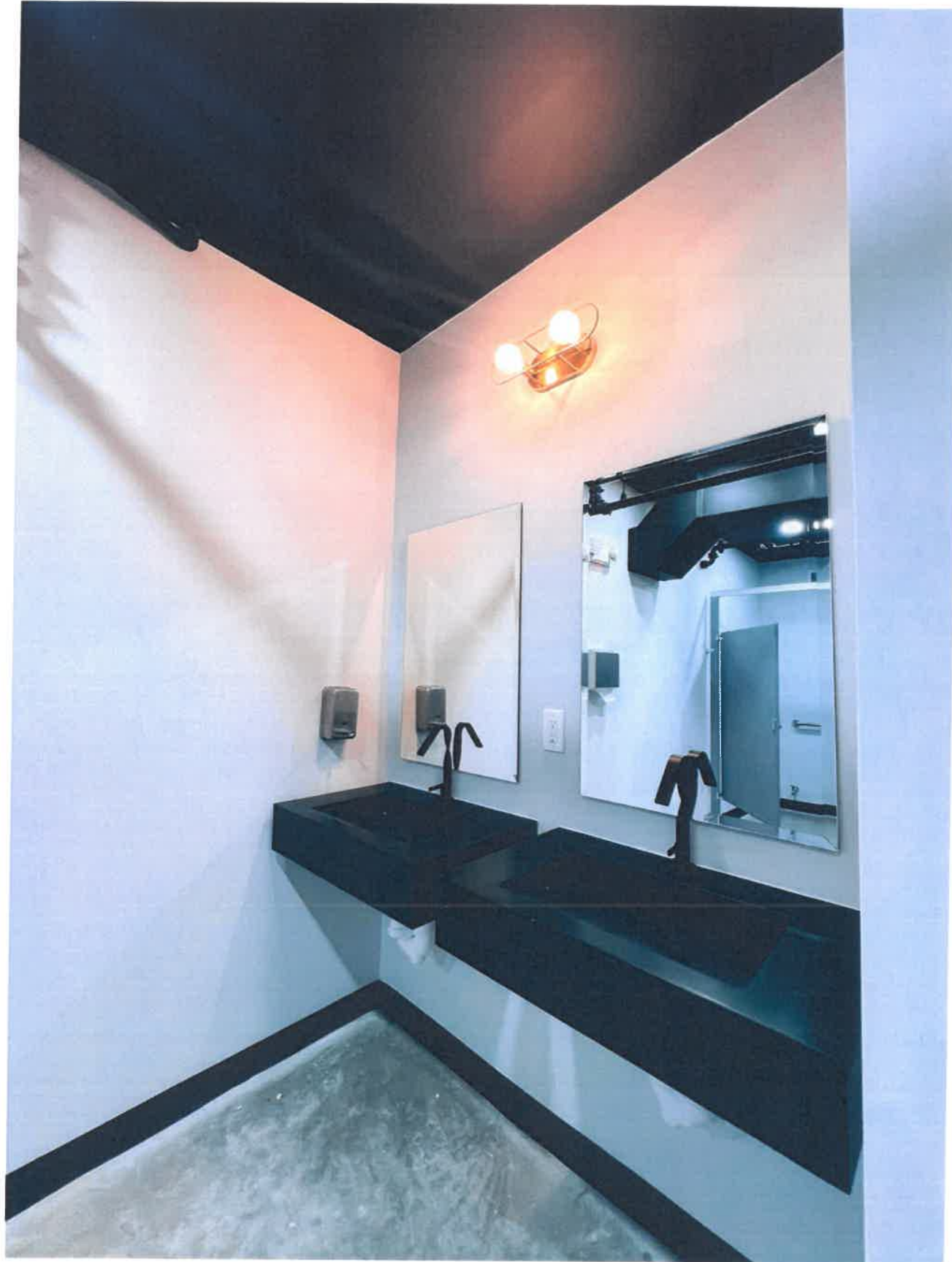


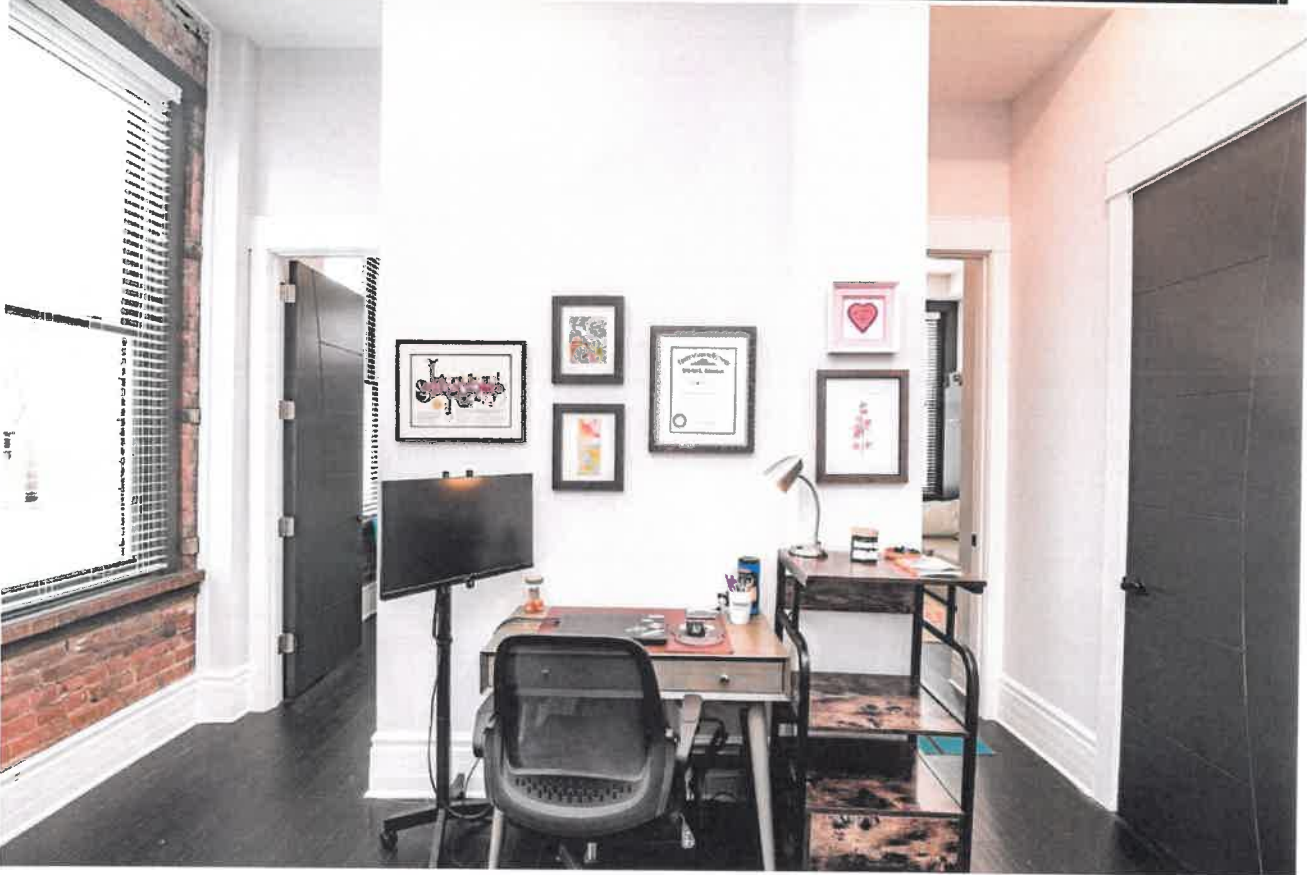
EXHIBIT 19 & 20



EXHIBIT 21 & 22



EXHIBIT 23 & 24





EXHIBITS 25 & 26



EXHIBITS 27 & 28

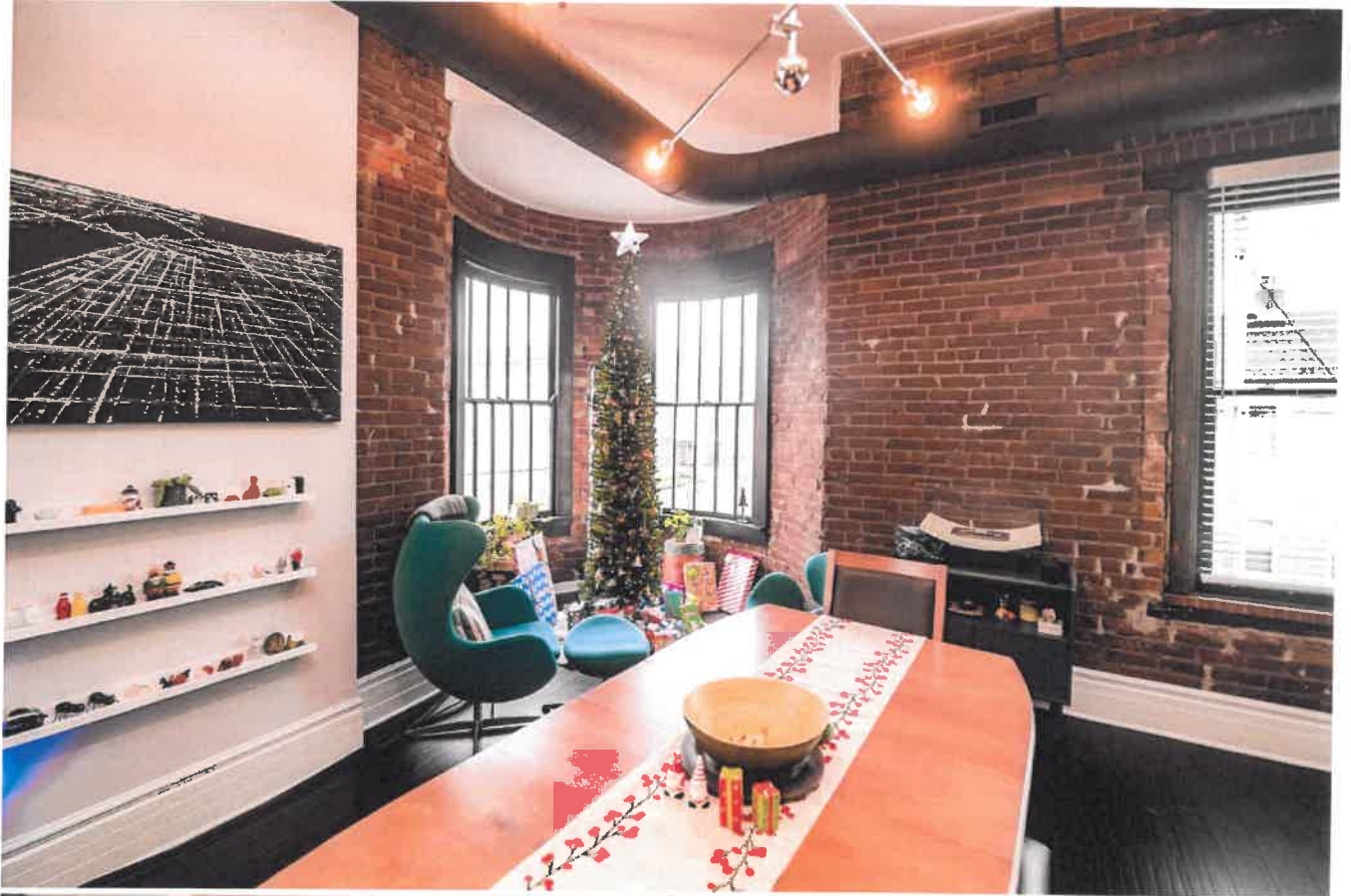


EXHIBIT 29



EXHIBIT 30





DIVERSIFIED CAPITAL

May 5, 2023

Historic Conservation Board
805 Central Avenue, Suite 500
Cincinnati, OH 45202

Dear Historic Conservation Board,

On behalf of Diversified Capital Management (DCM) a firm with extensive experience in historical rehabilitation, I am writing in support of the proposed Local Historic Landmark designation of the Hoffman School and all related parcels located at and around 3060 Durrell Avenue in Evanston. I would like this letter and the exhibits attached to be included as part of the record of the May 8, 2023, Historic Conservation Board Meeting.

The designation should be approved because the building is, without question, historically significant; and despite what development plans have suggested, it is also economically feasible to rehabilitate the structure and convert it back into productive use. A landmark status would propel this economic feasibility even further as tax credits would be much easier to obtain and reduce the economic burden of saving the building. Furthermore, it does not appear this building was ever marketed for sale in the traditional sense, seriously hindering the ability of qualified redevelopers to make competitive offers.

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Regards,

Duane Cronin

Founder & CEO

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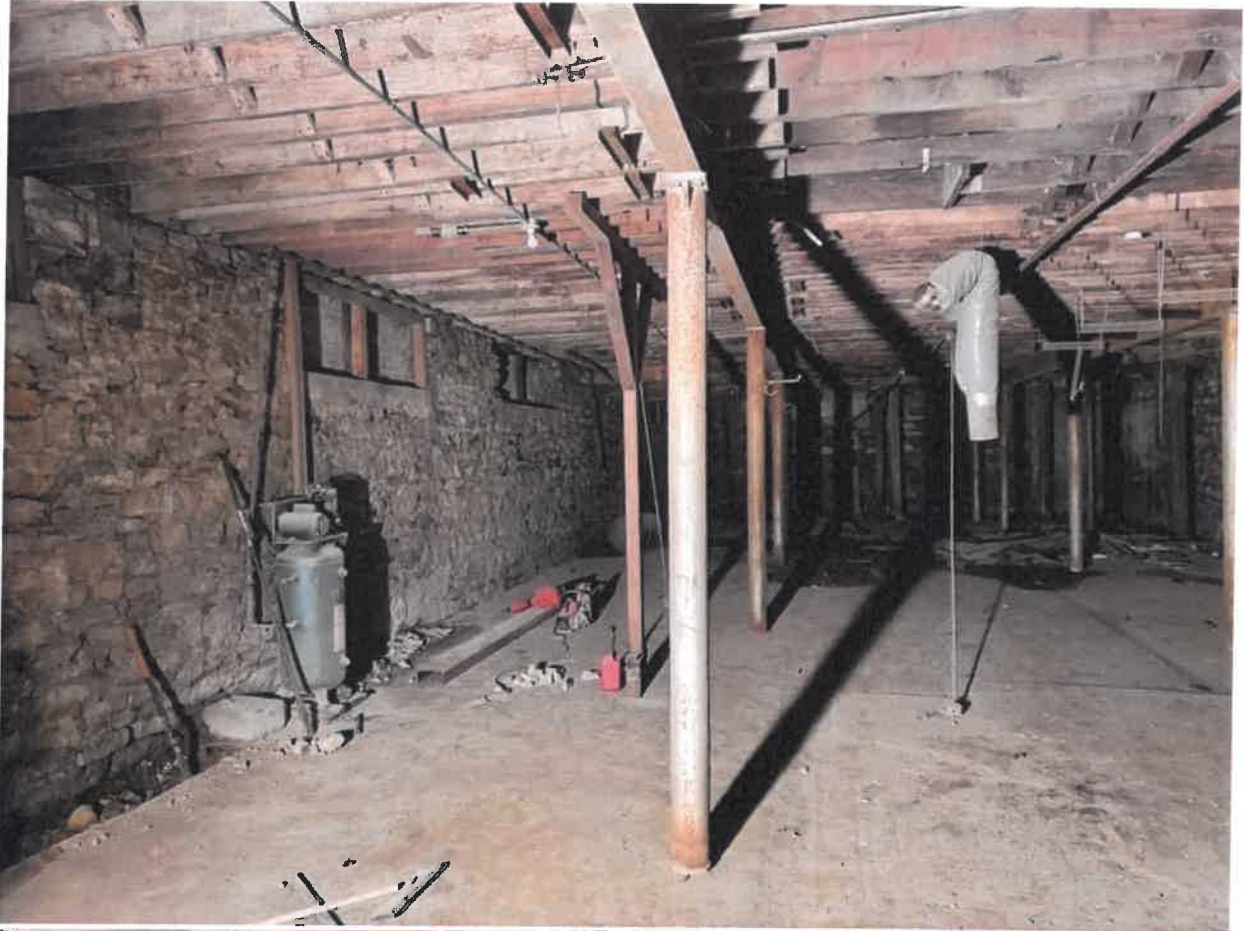


EXHIBIT 3 & 4



EXHIBIT 5



EXHIBIT 6



EXHIBIT 7 & 8



EXHIBIT 9



EXHIBIT 10



EXHIBIT 11



EXHIBIT 12



EXHIBIT 13



EXHIBIT 14



EXHIBIT 15



EXHIBIT 16 & 17



EXHIBIT 18



EXHIBIT 19 & 20



EXHIBIT 21 & 22



EXHIBIT 23 & 24





EXHIBITS 25 & 26



EXHIBITS 27 & 28

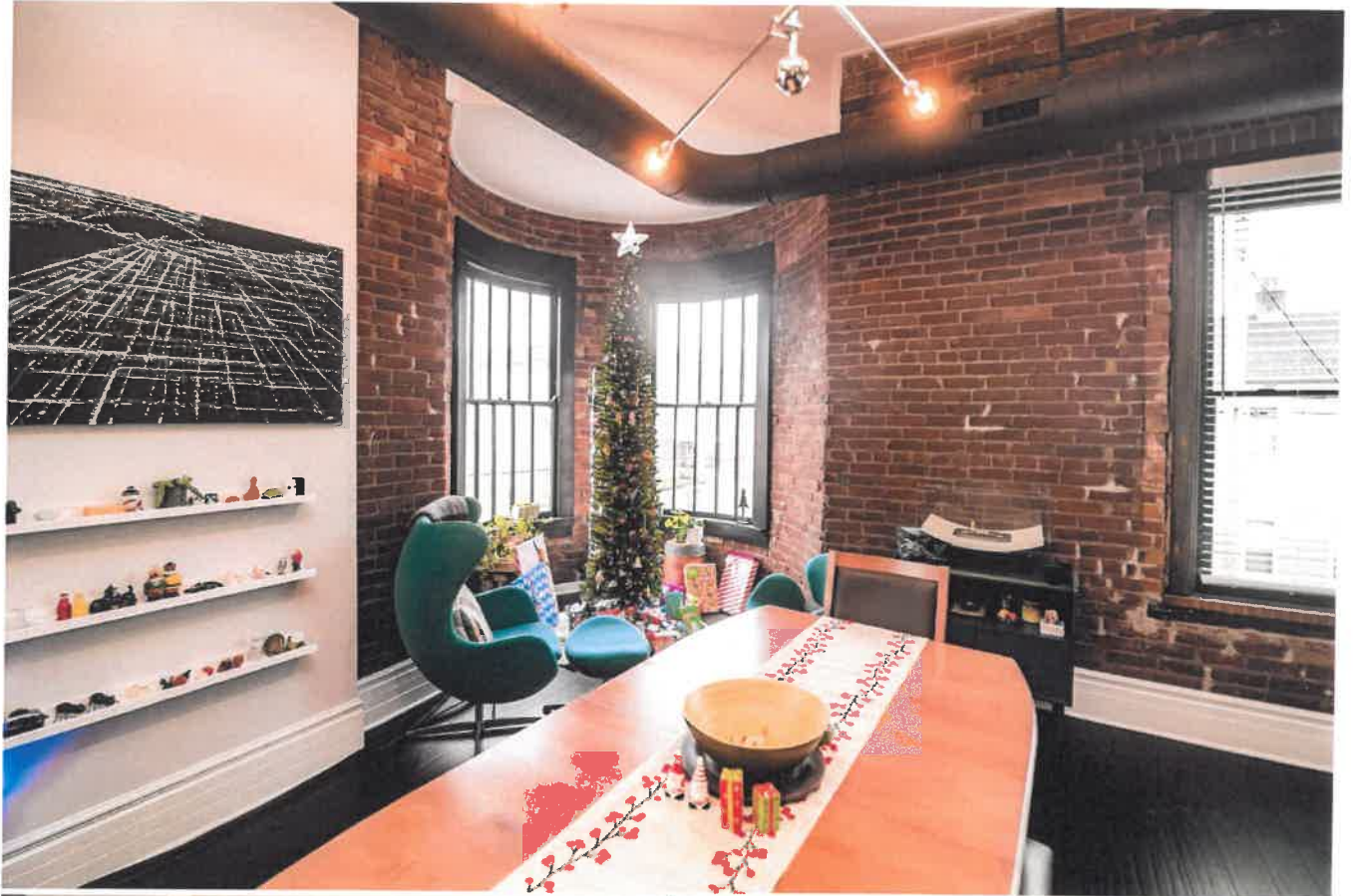


EXHIBIT 29



EXHIBIT 30



DRESSMAN BENZINGER LAVELLE psc
MEMORANDUM

TO: Cincinnati City Planning Commission
FROM: Christ Temple Full Gospel Baptist Church, property owner of the former Hoffman School at 3060 Durrell Avenue
DATE: May 31, 2023
RE: Opposition Statement to the Historic Designation Application for the former Hoffman School at 3060 Durrell Ave

INTRODUCTION

This memorandum was prepared by DBL Law on behalf of the Christ Temple Full Gospel Baptist Church (“Christ Temple” or “Church”). This memorandum further represents Christ Temple and its congregation’s opposition to the local Historic Designation Application of the former Hoffman School at 3060 Durrell Avenue (the “Hoffman School” or “Building”). Christ Temple hereby incorporates by reference its previous filing, the Response in Opposition to the Historic Designation Application for the former Hoffman School at 3060 Durrell Ave, and all arguments and statements contained therein.

ARGUMENT

I. The Building is Not Eligible for Designation as a Historic Landmark.

The Cincinnati Code of Ordinances provides that a structure may be deemed as having Historic Significance if it has at least one of the following attributes:

- (1) Association with events that have made a significant contribution to the broad patterns of our history;
- (2) Association with the lives of persons significant in our past;
- (3) Embodies the distinctive characteristics of a type, period, method of construction, or that represent a significant and distinguishable entity whose components lack individual distinction; or
- (4) That has yielded, or may be likely to yield, information important in prehistory or history.¹

¹ Cincinnati Code of Ordinances, § 1435-07-01(a)(1)-(4).

The above historic designation criteria is based upon the criteria set forth by the National Register.² As such, the National Register’s guidance in evaluating properties according to the criteria, attached hereto as **Exhibit A**, is illustrative in determining whether a property qualifies for designation as a historic landmark. The Cincinnati Preservation Association (“CPA”) argues that the Building meets the criteria under subsections (1) and (3).³ However, it is clear from the National Register’s Guidance that the record evidence does not support designation under either.

a. The Building is not associated with events that have made a significant contribution to the broad patterns of our history.

To be considered for listing under this subsection, the property must be associated with a single event or historic trends.⁴ Additionally, “the property must have an important association within the associated context.”⁵ There are several steps involved to determine 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 an important way.⁶

The property being evaluated must be documented to have existed at the time of the event or pattern of events and to have been associated with those events. Most importantly, a property is **not eligible** if its associations are speculative.⁷ A property must have a specific association which has importance in the trend.

i. The Building is not associated with the Progressive Era.

² See <https://www.cincinnati-oh.gov/planning/historic-conservation/local-historic-designation/>, “Historic Designation eligibility is based on the Criteria outlined in Chapter 1435-07-01 of the Cincinnati Zoning Code. These criteria are based on the four National Register criteria for eligibility ...”

³ See Historic Designation Report, p. 12.

⁴ Exhibit A, p. 12.

⁵ *Id.*

⁶ *Id.*

⁷ *Id.* (emphasis added).

The CPA's Historic Designation Report ("Report") sets forth zero evidence to establish the Building's "specific association which has importance" within the Progressive Era. In fact, several paragraphs are devoted to explaining the significance of the Progressive Era, yet the CPA set forth only a bulleted list to show that the Building has features that are reflective of the Progressive Era.⁸ This is not the standard for designation. A property cannot merely be reflective of a historic trend or event. The National Register is clear that a property must have a "specific association which has importance" within the historic event or trend.

The record is devoid of any evidence asserting the Building's association as important within the Progressive Era. The CPA's only evidence is characteristics that are reflective of the Progressive Era. These "reflective" characteristics are too speculative to establish importance within the Progressive Era, let alone designation under this criteria. As such, the Building is not associated with the Progressive Era as required under this subsection.

ii. The Building is not associated with the City Beautiful Movement.

The CPA asserts that the Building is also associated with the City Beautiful Movement.⁹ However, this assertion fails for the same reasons as set forth above. The connection between the City Beautiful Movement and the Building is more attenuated than the Building's alleged association with the Progressive Era. The CPA's Report devotes only two sentences in an attempt to establish that the Building is associated with the City Beautiful Movement. Moreover, the argument is purely speculative and does not set forth any concrete evidence to establish the Building's association.

⁸ See Historic Designation Report, p. 8.

⁹ *Id.* at p. 9.

The CPA also argues that Samuel Hannaford believed in the City Beautiful Movement and designed buildings which specifically contributed to the movement.¹⁰ While this may be true, this is irrelevant for the purposes of establishing the Building's individual association with the City Beautiful Movement. Notwithstanding the fact that Samuel Hannaford was deceased prior to the design and construction of the Building, thereby extinguishing any possibility that Samuel Hannaford's personal belief was carried onto the design and construction of the Building, but there is no evidence in the record to establish the Building's association itself with the movement. However, he speculative connections do not end there. The CPA continues in arguing that the Building's placement near the Victory Parkway also evidences its "association" with the movement.¹¹ Once again, this is not enough evidence to establish the Building's specific, important association within the movement. The CPA's arguments do not rely upon evidence in the record to establish whether the Building actually has a specific important association within the City Beautiful Movement. Therefore, the CPA's argument falls short, and the Building is not eligible for designation under this subsection.

b. The Building does not embody the characteristics of a type, period, method of construction, represent the works of a master, or represent a significant and indistinguishable entity.

To be eligible for designation under this subsection, the property must meet at least one of the following requirements:

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

¹⁰ *Id.*

¹¹ *Id.*

- Represent a significant and distinguishable entity whose components may lack individual distinction.¹²

The CPA primarily argues that the building is eligible because it embodies distinctive characteristics of a type, period or method of construction, it represents the works of a master, and that it represents a significant and distinguishable entity whose components lack individual distinction. However, the CPA falls short of establishing the Building's eligibility pursuant to these criteria.

i. The Building does not embody distinctive characteristics of a type, period or method of construction.

A type, period or method of construction is identified as 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.¹³ To be eligible as a property of a type, period or method of construction, the building must be “an important example of building practices of a particular time in history.”¹⁴ Additionally,

“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.”¹⁵

While the Building does not exhibit enough “distinctive characteristics” to be eligible for designation under this subsection, a fact made clear in our previous Response in Opposition, the CPA has also failed to provide any evidence that Building “is an important example of building practices of a particular time in history.” Moreover, there is no evidence in the record that the Building had an impact on later buildings in the community.

¹² See Exhibit A, p. 17.

¹³ See Exhibit A, p. 18.

¹⁴ *Id.*

¹⁵ *Id.*

The CPA's arguments for designation are conclusory and rely upon surveys that were conducted several years ago. The building has faced significant changes over the years, including the addition of an elevator, significantly impacting the layout and integrity of the Building. The Building has also deteriorated significantly, and the reality of its current state is a stark contrast to the picture the CPA paints in its Report.

ii. The Building does not represent the works of a master.

"The work of a master" generally refers to the technical or aesthetic achievement of an architect or craftsman.¹⁶ A master is a figure of generally recognized greatness in a field.¹⁷ Most importantly, it is an individual – not a firm or collection of individuals. To be considered "the work of a master," the property must: (1) specifically express a particular phase in the development of the master's career; (2) an aspect of his or her work; or (3) a particular idea or theme in his or her craft.¹⁸ "A property is **not eligible** as the work of a master . . . simply because it was designed by a prominent architect."¹⁹

The Director of the CPA, Beth Johnson, argued before the Historic Conservation Board that the Building further qualified for designation as a historic landmark because it represents the works of a master as it was designed and constructed by the architectural firm Hannaford & Sons. However, it is clear that this is not possible. First, a master is an individual, not a company or a firm. While the CPA argues that the building is associated with Samuel Hannaford and Sons, the architectural firm, there is no evidence in the record which associates the Building with the individual, Samuel Hannaford. In fact, there is ample evidence to the contrary, as Christ Temple's previous memorandum clearly sets forth that Samuel Hannaford predeceased the design and

¹⁶ *Id.* at p. 17.

¹⁷ *Id.* at p. 19.

¹⁸ *Id.*

¹⁹ *Id.*

construction of the Building. Moreover, the CPA has not set forth any evidence establishing that the Building expresses a particular phase in the development of Samuel Hannaford's career; an aspect of Samuel Hannaford's work, nor a particular theme or idea in Samuel Hannaford's craft. Thus, it is clear that the Building is not associated with the works of a master, and therefore not eligible for designation pursuant to this criteria.

iii. The Building does not represent a significant and distinguishable entity whose components may lack individual distinction.

The Report undermines any argument that the Building is in any way a unique example of Jacobethan Revival Style Architecture, let alone a "significant and distinguishable" entity. In fact, the CPA listed several other schools in the Cincinnati School system that are representative of the Jacobethan Revival Style:

- *Roosevelt School*.²⁰ Designed in 1925 by Fechheimer & Ihorst located at 1559 Tremont Street.
- *McKinley School Addition*.²¹ Designed in 1919 by Bausmith & Drainie located at 3905 Eastern Avenue.
- *Central Fairmount School*.²² Designed in 1906 by E.H. Dornette and located at 2475 White Street.²³

As the pictures attached hereto illustrate, these other buildings demonstrate this style of architecture in a similar, or even more distinctive fashion, than the Hoffman School does. Therefore, the Hoffman School is not a unique, nor a "significant and distinguishable" entity eligible for designation pursuant to this criterion.

II. The City Planning Commission has Discretion to Review Additional Considerations.

²⁰ See Exhibit B, attached.

²¹ See Exhibit C, attached.

²² See Exhibit D, attached.

²³ See Historic Designation Report, p. 7.

Pursuant to the Cincinnati Municipal Code, the City Planning Commission may consider the following factors to determine whether to follow the recommendation of the Historic Conservation Board:

- (1) The relationship of the proposed designation to the comprehensive plans of the city and of the community in which the proposed Historic Landmark, Historic District or Historic Site is located; and
- (2) The effect of the proposed designation on the surrounding areas and economic development plans of the city; and
- (3) Such other planning and historic preservation considerations as may be relevant to the proposed designation.²⁴

As such, the City Planning Commission has ample discretion to consider all matters it deems relevant to the proposed designation. While the Building does not qualify for designation pursuant to the Cincinnati Code of Ordinances, the additional considerations that follow support denial of the local Historic Designation Application.

a. Kingsley & Company's Proposed Use of the Building Comports with the 2019 Evanston Work Plan.

The number one goal of the 2019 Evanston Work Plan is to create sustainable, mixed income housing without displacement.²⁵ The Evanston Work Plan acknowledged that housing is an essential need for all people, and that a goal of the Evanston Community Council is to ensure that the affordable housing crisis does not impact residents of Evanston.²⁶ While there are homes within Evanston that are being fixed up, blight and poor housing conditions remain.²⁷ Moreover, attempting to maintain affordable housing is a struggle in Evanston, as it is throughout the state and the country.²⁸

²⁴ § 1435-07-2-B(c).

²⁵ See Evanston Work Plan (2019), p. 40.

²⁶ *Id.* at p. 41.

²⁷ *Id.* at p. 38.

²⁸ *Id.*

Kingsley & Company’s plan for the Hoffman School is to demolish the building and rebuild affordable, mixed-income housing for the Evanston community. This plan is exactly in accordance with the primary goal of the 2019 Evanston Work Plan – to create a sustainable, mixed income neighborhood without displacement. However, this is possible because of the plan for demolition. Redevelopment/renovation of the Hoffman School is a substantial economic burden. Redeveloping the Building would significantly increase costs and would not allow for the Kingsley & Company to offer mixed-income housing. The plan for mixed-income housing is possible solely because of the plans for demolition and rebuilding. Thus, if the Historic Designation Application for the Hoffman School were approved, the goal of providing mixed-income housing to comply with the Evanston Work Plan would be unattainable.

b. The Historic Conservation Board’s Recommendation is Arbitrary.

This Historic Conservation Board (“HCB”)’s recommendation to designate the Building as a local historic landmark is arbitrary for several reasons. First, the HCB improperly considered the mention of, and testimony by, third-party developers who have at most a speculative interest in the Building. Second, a member of the HCB expressed concern for the Church’s fundamental and constitutional property rights, but nevertheless chose to perpetuate an unnecessary process upon the property owner. Finally, another member of the HCB discussed whether or not the Building could be deemed “demolition by neglect.” Not only was this line of questioning entirely unsupported by the record, it was inapplicable, as this term applies to properties that have already been designated a local historic landmark.

i. Speculative third-party developers are irrelevant.

While several parties testified as to a hopefulness that the Building could be restored and/or renovated by a third-party developer, any consideration of this type of wishful thinking is

inappropriate. The Building is already under contract with a developer who testified extensively as to the infeasibility of renovating and restoring the Building. There is no evidence to support that there are economically feasible plans for renovation and restoration, and therefore any consideration of a third-party developer who may or may not choose to explore renovation and restoration is speculative. Additionally, any attempts to solicit and/or market the property to third-party developers dangerously approaches tortious interference with an existing contract.

ii. Forcing a property owner to undergo an unnecessary process in contravention of fundamental and constitutional property rights is arbitrary.

The Building is already in disrepair and is quickly deteriorating. The CPA has no plan to actually preserve the Building and is clearly unaware of the current state of the Building, as evidenced by the dated pictures submitted in its Report which are an inaccurate representation of the Building's current state. The HCB acknowledged that property rights are fundamental, constitutional rights. However, a statement was made regarding the fact that a process still exists to demolish the building if deemed a Historic Landmark. While the process for obtaining a certificate of appropriateness to demolish is not a disputed fact, it is arbitrary to force a property owner to continue through a lengthy Historic Designation process, only for the property to be subsequently demolished through yet an additional lengthy process, particularly when it has been shown that preservation of the building through renovation and restoration is infeasible. To force Christ Temple to undergo this process while the Building is already in a dangerous condition will only perpetuate the deterioration and dangers the Building presents.

iii. Improper discussion regarding Demolition by Neglect.

The Cincinnati Code of Ordinances provides a minimum maintenance requirement for Historic Assets.²⁹ A Historic Asset is defined to include a historic structure within a historic district, a historic landmark, or a historic site.³⁰ The minimum maintenance requirement prescribes a duty for owners of Historic Assets which includes, “the duty to provide sufficient maintenance and upkeep for such structure to ensure its perpetuation and to prevent its destruction by deterioration.”³¹ If the owner of a Historic Asset fails to fulfill this duty, the Historic Asset may be deemed to be neglected and therefore determined as “demolition by neglect.”³²

The HCB’s mention of the Building being a case of “demolition by neglect” was inappropriate and unsupported by the record. The Building is not a Historic Asset, as is the purpose of the CPA’s Application for Designation as a Local Historic Landmark. Furthermore, there is no evidence that the Church has failed to provide sufficient maintenance and upkeep. The Church has expended significant resources in attempts to maintain the building, including a \$40,000.00 expenditure which resulted in an unsuccessful attempt to restore heating to the Building. The maintenance and repairs the Building requires are economically infeasible, especially in consideration of the return on such an investment as compared to demolition. Finally, the HCB posed this question to the CPA Director, Beth Johnson, who has no personal knowledge of the extensive issues with the building, has not independently hired a third-party expert to evaluate/inspect the building, and has no knowledge, outside of this application process, of any efforts made by the Church to maintain the Building.

CONCLUSION

²⁹ Cincinnati Code of Ordinances, § 1435-01-H.

³⁰ Cincinnati Code of Ordinances, § 1435-09-4.

³¹ *Id.*

³² *Id.*

Christ Temple acknowledges the important of preserving the rich history of the Evanston community. However, the Building does not meet the criteria for recognition as a historic landmark which allows for preservation. To designate the Building as a historic landmark would be a grave intrusion into fundamental, constitutional property rights. Moreover, designation of the Building would be directly contrary to the Municipal Code and the National Register's requirements for eligibility. Therefore, Christ Temple respectfully requests the City Planning Commission to deny the CPA's Historic Designation Application.

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, Venango 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:

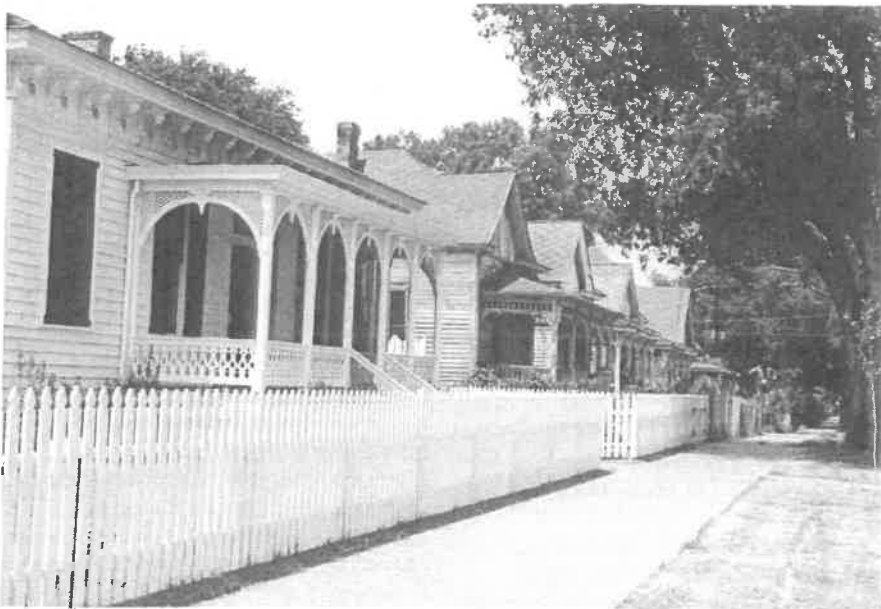
- Elements are spatially discrete;
- Space between the elements is not related to the significance of the district; and
- Visual continuity is not a factor in the significance.

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. Mohny).

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.

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.

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.

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

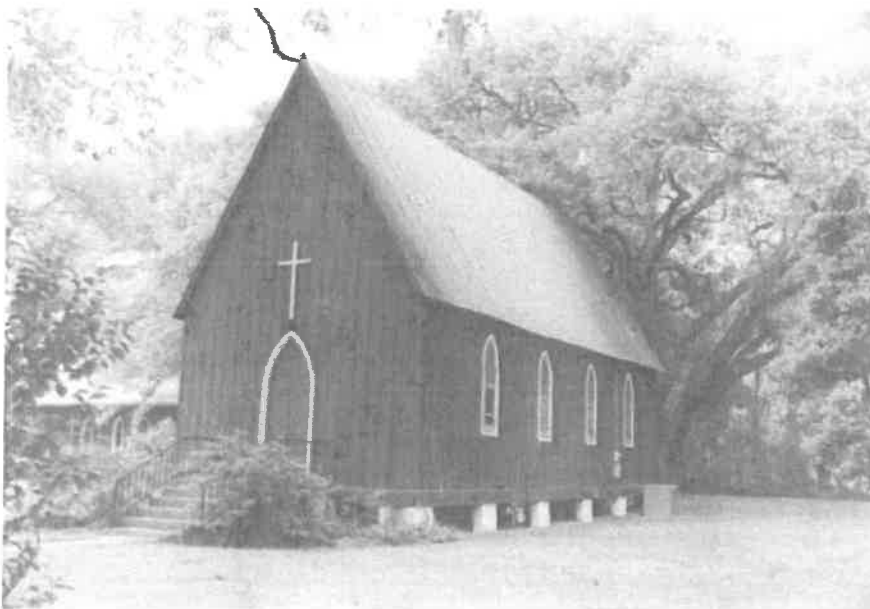
As with all eligible properties, religious properties must physically represent the period of time for which they are significant. For instance, a recent building that houses an older congregation cannot qualify based on the historic activities of the group because the current building does not convey 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

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.

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.

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.

EXHIBIT B



EXHIBIT C



EXHIBIT D



Kellam, Caroline

From: Switzer, Alexis R. <aswitzer@dbllaw.com>
Sent: Wednesday, May 31, 2023 3:52 PM
To: Kellam, Caroline; Cincinnati City Planning
Subject: [External Email] Opposition Statement to 3060 Durrell Ave Historic Designation Application
Attachments: Opposition Statement - City Planning Commission(1228474.1).docx; Opposition Statement - Exhibit A(1229499.1).pdf; Opposition Statement - Exhibits B, C and D(1229498.1).docx

External Email Communication

Good afternoon, Ms. Kellam and City Planning Commission:

My name is Alexis Switzer and I am the attorney, along with my colleague Patrick Hughes, representing the property owner of 3060 Durrell Ave, Christ Temple Full Gospel Baptist Church. Attached is Christ Temple's Opposition Statement and associated exhibits to the Historic Designation Application that is up for consideration by the City Planning Commission this Friday, June 2nd. We request that the attached Opposition Statement and Exhibits to the Statement be included in and made part of the written record for consideration by the City Planning Commission.

Additionally, the following individuals will be speaking at the meeting on behalf of Christ Temple:

- Patrick Hughes, counsel for Christ Temple
- Shay Stewart
- Glenda Cousins
- Brittney Cousins
- Freeman McNeal
- Sister Mingo
- Pastor Mingo

If you have any questions, please do not hesitate to reach out.

Thank you,
Alexis Switzer
Associate

109 East Fourth Street
Covington, KY 41011
Direct: (859) 426-2110

General: (859) 341-1881 Fax: 859-788-2011

www.dbllaw.com / aswitzer@dbllaw.com



Cincinnati / Northern Kentucky / Louisville

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Dear City Planning Commission/Mayor/Council:

My name is Rosemary Oglesby-Henry and I am the CEO and Founder of Rosemary's Babies Co.

I believe in the City of Cincinnati and the mission of the Cincinnati Preservation Association. However, I oppose the proposed designation of "Local Historic Landmark" at 3060 Durrell Avenue in Evanston. This proposition is directly in opposition of the request by Paster Peterson Mingo, Christ Temple Full Gospel Baptist Church to sell the property.

I support the construction efforts of Kingsley + Co. to create a mixed-income housing development at 3060 Durrell Avenue. As a former resident of Evanston and an organization that helps to address the affordable housing shortfalls, I believe this project is necessary and essential for the greater good. This minority led development will create quality affordable housing which is needed for families in Greater Cincinnati. A historic designation will prevent new affordable housing from coming to an underutilized space and area.

Thank you for your attention to this matter.

Sincerely,
Rosemary D. Oglesby-Henry

Rosemary D. Oglesby-Henry
Chief Executive Officer
Rosemary's Babies Co.
Change the Outlook for Teen Parents
4439 Reading Road Suite 107
Cincinnati, Ohio 45229
Phone: 513.813.TEEN (8336)
Email: rosemarysbabies.cincy@gmail.com
Website: www.rosemarysbabies.co

Demetrius Hill
1605 Young Street Unit 2
Cincinnati, Ohio 45202
(513) 667-0403
Demetriushill@gmail.com

Dear City Planning Commission, Mayor, Cincinnati City Council,

I am writing to oppose the proposed designation of 3060 Durrell in Evanston as a Cincinnati local Historic Landmark and to express my support for Pastor Peter Mingo and his church members at Christ Temple Full Gospel Baptist Church and its efforts to construct a mixed- income housing development at 3060 Durrell. I support having a Black developer to develop this project. This project is to make way for much needed affordable housing in Evanston. It is very strange to me that after the church voted to sell the church and had a contract with a developer, the developer filed a permit to have the building demolished. The Cincinnati preservation society filed an injunction to stop that from happening.... It's very strange that Beth Johnson the executive director has a white developer who wants to buy the building and do luxury condos and never had one conversation with Pastor Peter Mingo and or his church members about it. This is white privilege at its finest and tortious interference and intentional interference with contractual relations.

The Cincinnati preservation society had no problem demolishing Revelation Missionary Baptist Church that was built in 1865. That had more historic value. It had sentimental value, beautiful architecture and historical significance. After all, this was the same church once pastored by Civil Rights Leader Reverend Fred Shuttlesworth. It was the place of worship for around 500 Black residents at the height of its activity in the '60s and '70s. Even Martin Luther

King, Jr. was known to visit the congregation on occasion. Revelation's leadership explained they were also inclined to leave their landmark location because their building, originally a synagogue built in 1865, had long been falling apart.

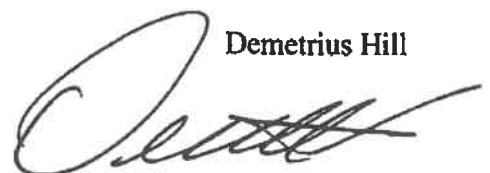
We had no mortgage note," Brown said. "But it was a lot of work to be done. The roof was falling in. It was leaking inside. We had buckets catching water...and we didn't have enough to get all that stuff repaired. This is the same story going on with Christ Temple Full Gospel Baptist church there building is falling apart.

Even Anne selser from the planning commission said this about the revelation missionary Baptist church project that after a contract is signed and demolish permit is submitted that "is naked political and inappropriate", **I agree, and this project should not be designated as a historic building at 3060 Durrell.**

Team spokeswoman Anne Sesler previously told The Enquirer that the team purchased the church at the congregation's request, with the intent to have the building vacated and then demolished. Tuesday she said that the move to now create a historical designation, after the club's legal purchase and filing for a demolition permit, "is nakedly political and inappropriate."

In conclusion, when the City of Cincinnati didn't make Revelation Missionary Baptist Church a Historic building. The City of Cincinnati then set a precedent when it didn't allow a third party to jump in after a contract was signed and a demolish permit was pulled. The Revelation Missionary Baptist Church and old Hoffman school are identical case....

Demetrius Hill



Kellam, Caroline

From: Owen, Douglas
Sent: Wednesday, May 31, 2023 8:00 AM
To: Kellam, Caroline
Subject: FW: [External Email] Please save Hoffman school

Please note, updated New Construction Guidelines for the Over-the-Rhine Historic District have been approved by City Council and will go into effect on July 8, 2023. If you are considering new construction in this district, please review the updated guidelines at the following link: <https://www.cincinnati-oh.gov/planning/planning-projects-and-studies/active-ongoing/over-the-rhine-historic-conservation-guidelines-for-new-construction/>

Douglas Owen | Urban Conservator
City of Cincinnati
(513)352-4848

-----Original Message-----

From: Kate Lash <katelash06@gmail.com>
Sent: Wednesday, May 31, 2023 3:54 AM
To: Conservator, Urban <urban.conservator@cincinnati-oh.gov>
Subject: [External Email] Please save Hoffman school

[You don't often get email from katelash06@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

External Email Communication

Please save Hoffman School in Evanston. This is a beautiful, historic building in a neighborhood that has already seen so many of its culturally important buildings and houses destroyed to make way for inferior, lackluster, "white box" style new construction. If we do not protect these landmarks, we fail to protect these vulnerable communities from being erased. How sad would it be to see this beauty of a building fall only to be remembered by photographs at the museum? I really don't know "who" is in favor of destroying this spectacular building but I'm confident those in favor of destruction are chasing the almighty dollar. Tearing down Hoffman School would be penny wise, pound foolish. I'll go a step further - Hoffman is pure gold; please treasure it accordingly.

Thank you,

Kate Motiani

Sent from my iPhone

CHRIST TEMPLE

Full Gospel Baptist Church

3060 Durrell Ave. Cincinnati, Ohio 45207

513-861-9563 christtemplechurch@fuse.net

Overseer Peterson W. Mingo, Pastor

Overseer Peterson W. Mingo Senior Pastor

Christ Temple Full Gospel Baptist Church.

Cincinnati-Dayton, District Overseer.



May 30, 2023

To Cincinnati Planning Commission

Attn: Caroline Kellum

This letter is in response to your letter received by the Christ Temple Full Gospel Baptist Church On or about the 22nd of May 2023. Regarding the City Planning Commission meeting scheduled to be held on Friday June 2, 2023. Pertaining to the designation of our property located at 3060 Durrell Ave. Cincinnati, Ohio 45207. We're requesting that this meeting be vacated for the following reason(s).

1. The Church is not interested in obtaining historical significance for our property located a 3060 Durrell Ave. Cincinnati, Ohio 45207.
2. It is not in the Churches best interest to obtain such designation.
3. Who, What, When and How was such a meeting scheduled without the Churches consent.

For the record we're requesting any and all information pertaining to the request of such a designation, including any and all entities or individuals requesting this action.

Please respond within 48 hrs. prior to said Planning Commission meeting Friday June 2, 2023 at 9:00 a.m.

This letter has been hand delivered.


Peterson W. Mingo,

Pastor

Christ Temple Full Gospel Baptist Church

513-602-4619

Kellam, Caroline

From: Donna Luggen <luggens@yahoo.com>
Sent: Friday, May 26, 2023 10:53 PM
To: Kellam, Caroline
Subject: [External Email] Hoffman School

External Email Communication

Hoffman school is such a beautiful presence on Victory Parkway. It sits up on that hill as you round the bend like a castle. It's one of the reasons we settled in East Walnut Hills 27 years ago. I was taking kids to school at N. Avondale Montessori, Walnut Hills H.S., and Purcell Marian, and it drew me into the neighborhood. We bought our house at 11 Dexter Place and have worked all these years to maintain and improve our home. We love EWH for the historic buildings that surround us. Hoffman school needs to be saved. It's a wonderful architectural specimen...it's like artwork that is part of our neighborhood. It should be saved and repurposed. Once it's gone, demolished, what is left? New housing that is functional for the moment. What's its place in Evanston in 10 years? Are the new buildings going to be aesthetically pleasing or significant architecture? We dumb down our own neighborhoods sometimes in the name of progress.

If Hoffman school can find a new use with a new developer I believe that that is the best plan. The church wins either way. They had no investment in the property and even with a new developer they are ahead. It's a win win for all concerned to save the school and let the church move on to a more sustainable residence.

Thank you for letting me express my opinion. I feel very strongly that the loss of Hoffman school is a huge loss to the Evanston community and EWH.

Sent from my iPhone
Donna Luggen





Kellam, Caroline

From: Carrie Rhodus <carrierhodus@gmail.com>
Sent: Tuesday, May 30, 2023 6:34 PM
To: Kellam, Caroline
Subject: [External Email] Hoffman School Written Comments

External Email Communication

Hi Caroline,

I would like the below written comments regarding the designation of Hoffman Elementary to be included in the record for the Planning meeting on Friday. I understand today is the deadline, so I hope I am not too late. Thank you.

Carrie

The Evanston Community is facing an attack on their history and their collective community identity by Kingsley and Company yet again. This time, it is the potential demolition of Hoffman Elementary school for the new construction of an exorbitant number of apartment units. Rather, the school could be reused for residential purposes, as has been done with almost a dozen other former schools in the region, without adding strain to the existing infrastructure of the area. Hoffman School is a 1922 Jacobethan Revival gem, designed by the city's most prominent architectural legacy. However, this breathtakingly beautiful building is not just architecturally significant. It is also a wonderful representation of Progressive Era school design, including a more holistic approach to the welfare of students through physical activity, access to light and fresh air, and providing lunch. Most importantly, this building has been a nexus to the historically excluded Evanston community for over 100 years. Neighborhood children attended the school until it closed in 2012. Since then, the community has continued to use the fields as a rare source of green space, regularly walking pets and playing with children on the grounds. The Evanston Bulldogs also used the site to form their youth football team. Lastly, it has served as an anchor church in the community. To lose this institution, especially for the sake of housing that will be unaffordable to the neighborhood, would be an extreme loss.

Hoffman School has been identified as a significant resource in the community numerous times over. In 1977, an Ohio Historic Inventory form listed the property as National Register Eligible. As our local ordinance follows National Register guidelines, this also means it is eligible for local listing. In 1978, a Cincinnati Historic Resource Survey described Hoffman as a property that greatly contributes to the historic and architectural quality of the city. Our historic buildings are what make Cincinnati the wonderful community that it is. This building is a piece of that fabric. In 1998, a Cincinnati Public Schools Historic Inventory again lists the property as eligible for the National Register. Lastly, in 2019 the Evanston Work Plan specifically listed the Hoffman School as an important site where Historic Landmark status should be considered. As a result of that plan, an Ohio History Service Corps member submitted a National Register Questionnaire to begin the process of listing. The State Historic Preservation Office response determined, once again, that the site was eligible for listing. Since then, I have

been working with a community member on creating a National Register of Historic Places nomination. This community member is not included in your record, as she has been intimidated by the current property owner and potential developer against speaking the truth. Finally, the Evanston Community Council voted on February 16th of this year to oppose the demolition of Hoffman School. You may see a low number of community members submitting comments or testifying. That is because they are afraid. They have been intimidated and threatened by a bully corporation, who seems intent on destroying their neighborhood, one historic resource at a time.

Finally, I wish to address some misconceptions that Kingsley and Company will be submitting in their arguments. First, the use of historic tax credits will make the rehabilitation of Hoffman School feasible. This was the reason for the community effort to landmark the property over the last few years and continues to be true. There is another developer who has submitted a cash offer to the church to purchase the property with the intent of creating 27-41 units of housing within the existing building. This developer has saved properties that were in much worse condition than Hoffman currently is, speaking to the second point. I was inside of the Hoffman School last fall. Yes, the property is deteriorating, but it is not a safety issue, nor is it too far gone to save. Yes there is asbestos, but that remediation cost would be the same to rehabilitate the building vs. demolishing it. Third, Section 106 does not prevent the reuse of the school and would only be required if federal funds are used to rehabilitate the property. Forth, and most importantly, designation has not occurred before now ONLY because this community is under served and under resourced.

Please save the Hoffman School and save the Evanston neighborhood from one more misguided developer seeking to ruin their community and history.

--

Carrie Rhodus

Historic Preservation Specialist

Phone: (513) 967-3727

Email: carrierhodus@gmail.com

Kellam, Caroline

From: Peppers, Alex
Sent: Tuesday, May 30, 2023 8:50 PM
To: Kellam, Caroline
Subject: Fwd: [External Email] Hoffman School / 3060 Durrell Ave Statement

From: Angie Lipscomb <lipscomb78@gmail.com>
Sent: Tuesday, May 30, 2023 8:25:46 PM
To: Peppers, Alex <Alex.Peppers@cincinnati-oh.gov>
Subject: [External Email] Hoffman School / 3060 Durrell Ave Statement

External Email Communication

Hi, Alex.

I'd like to submit the following statement for the preservation meeting this Friday. If possible, can I also receive the zoom link for the meeting?

Thanks!
Angie Lipscomb

Hello,

I am a neighbor of Hoffman School (I reside with my family on Dexter Ave). I was also a tenant at the school until September 2022 (for a total of 2 years). In the two years I spent growing my photography business in a third floor classroom, I became well-acquainted with a situation in which a landlord was not able to truly keep and maintain a building of that magnitude. I regret that such a large and costly building was gifted to Rev. Mingo, as his church would not have the resources to maintain and improve the property. There are issues that have arisen over the years as a result (roof leaks, heating issues, electrical issues, plumbing). For these and many other reasons, I decided to relocate my business.

My assessment of the building, having been on all floors and in many different spaces, is that it is a great candidate for preservation and renovation. While there are issues associated with neglect and age, the structure is architecturally intact. The building interior is stunningly almost unaltered from its days as a school, with beautiful woodwork and archways, tile work, stained glass, and sculpture. Reports of it being dangerous or uninhabitable are simply part the strategy of the current owner and the prospective developer to have it razed. It is ripe for the right developer to rescue and renovate.

The replacement of Hoffman and the adjacent field with hundreds of apartments will not only erase community history and a well-loved and used park, but it will also create an unsustainable burden on this part of Evanston with new traffic, additional rainwater runoff in an overloaded sewer system, and even more unsightly cheap buildings along the Woodburn Ave corridor. Where will all of these new residents purchase food and other goods? We currently have to drive or bus miles to buy groceries, as Evanston/E Walnut Hills is a food desert. Living two blocks away, I cannot imagine remaining in my beloved neighborhood after so many new units are built in such a congested area. It will cause irreversible damage to the quality of life here.

In recent years, Evanston has been the target of developers who see obscene profits in building and flipping units in bulk, cheaply. Short-term, it has sent housing costs through the roof. BUT, cheap improvements mean devaluing the community assets long-term. Kingsley plans reveal a very large, uninspired addition that may or may not help from an affordable housing standpoint, and based on previous statements, some of us have little faith that this developer will ultimately include affordable units in their final plans. We are not against development, but we want SMART development. Evanston's 10-year-plan notes its priorities smart development, and it specifically acknowledges the importance of Hoffman.

With regard to the developer, we have very real concerns about his tactics over the past many months. He has commandeered Evanston Community Council meetings, stuffed the ballot box by submitting a large number of new memberships right before a vote on his development (all written in the same handwriting, believed to be purchased by one person). He has been impatient and aggressive in these meetings at times, and most recently, he brought a large group of people with him, many of whom (possibly all?) are not Evanston residents. Of late, I have heard from neighbors that he and his associates have been actively intimidating people from speaking out against him at the June 2nd meeting. This is deeply concerning.

When I look down the street from my front yard at this beautiful lot, I see pee wee footballers and dog owners playing. I see softball games and grill outs. The community gathers in the shadow of Hoffman School. It is a community asset that can become even better with care. There are currently other developers who would like to renovate the school, and I fully support plans to preserve it. Hoffman deserves to be saved and restored, and Evanston deserves to have its historical buildings intact and functional.



June 1, 2023

Beth Johnson
Executive Director
Cincinnati Preservation Association
812 Dayton Street
Cincinnati, Ohio 45214

Re: **Hoffman School**
3060 Durrell Avenue

Dear Ms. Johnson:

I am writing in support of the preservation of the Hoffman School located at 3060 Durrell Avenue. Historic school buildings often offer unique opportunities for adaptive reuse, combining the preservation of educational heritage with modern needs. As I'm sure you are all aware, the school was built in 1922, and was designed by the city's most prominent architectural firms, Hannaford and Sons. Beyond its pedigree, it is also representative of an era where schools took the welfare of the students into greater consideration, offering physical education, access to light and air, and providing school lunches.

Hub+Weber has been involved with many historic renovations and conversions. Many of these were initially touted as unfeasible or unrealistic. Most notably, Hotel Covington, which is now an expanding centerpiece of downtown Covington. Most school conversions focus on residential uses. Scholar House in Covington renovated the Lincoln Grant School (not a Hub+Weber project) into affordable housing with new construction on available area on the school grounds. These projects are always difficult and costly. These projects typically involve a variety of funding sources including tax credits and grants. It's not easy.

Most of our conversion projects are residential. Classroom spaces match up very nicely with small (and sometimes affordable) apartments. The programmatic struggle often presents in the large gym and theater spaces. Here we've considered historically appropriate infill to boost unit count or amenities that can serve the residents. Often these structures provide unique housing opportunities to house our aging population, affording them the opportunity to remain in the communities where they developed relationships and lived a significant portion of their lives.

As exhibited in Hotel Covington, historic school buildings can easily be converted into boutique hotels, bed and breakfasts, or tourist accommodations. Classrooms are often sized appropriately for lodging use and large community spaces can serve amenity functions. The unique architectural features and historical significance of the building can attract visitors looking for a distinctive experience.

Hub+Weber is working with the city of Danville, Kentucky in the conversion of an elementary school into a community center with a daycare, entrepreneurial spaces, community gym, and community pool. It's a complex project with lots of partners to share the programmatic and financial load. We've considered similar types of conversions for a school in Falmouth, Kentucky that offered space for a community theater/presentation as well as office and co-working spaces for the community. We worked with the Center for Great Neighborhoods in Covington, Kentucky in converting an old lumber mill into community spaces and offices. Modern libraries are reconsidering how they fit in and provide their communities and often fit well within the structures of these schools. Think makerspaces, video equipment, instruction, gathering, etc. Cultural and Arts Centers have similar synergies. Transforming a historic school building into a cultural or arts center can preserve its educational heritage while promoting creativity and artistic expression. The building can house galleries, studios, theaters, or exhibition spaces, supporting local artists and cultural organizations. All of these visions consider community needs first and how the structure can contribute and support the community around it.

I could write an entire separate summary of the environmental and sustainability opportunities (and perhaps obligation) that greatly favors preservation over demolition. But I'm already long here.

The building has been an important and central feature to the surrounding community for over 100 years. Neighborhood children attended this public school until it closed in 2012. It continues to operate in various community capacities. The Evanston community is a diverse neighborhood with a rich history, especially associated with the Black experience.

The architecture of the Hoffman school is outstanding, largely standing the test of time for over 100 years. Replacing it with "modern bland" apartment building would be hugely inappropriate in my opinion. The proposed construction will likely last 20 or 30 years at best. The erasure of a structure so deeply engrained in its community is a travesty that occurs far too often in our black communities. I hope everyone involved will commit to working harder to save these important features of our communities.

Sincerely,

HUB + WEBER ARCHITECTS



Jim Guthrie, AIA, NCARB, NOMA
Principal

Attachments: Sample Projects
Floor Plate Evaluation for Residential

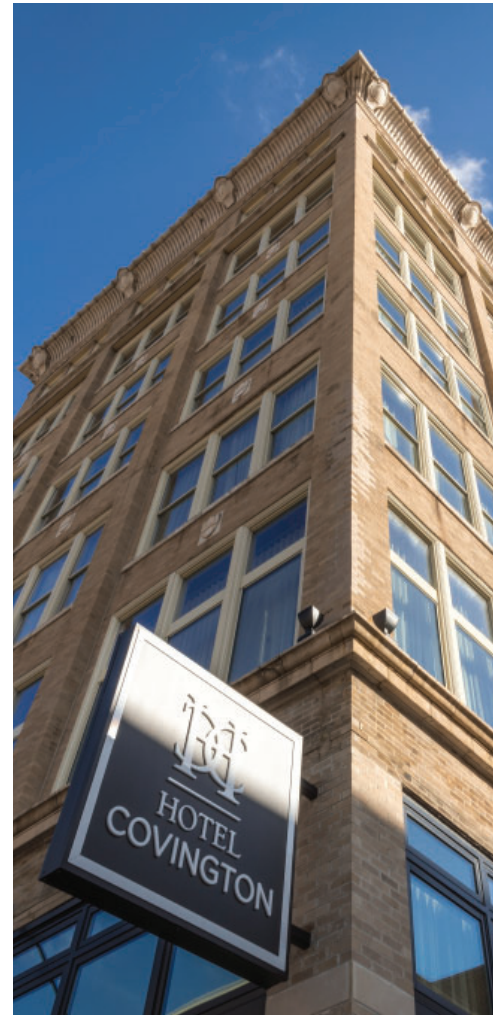
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REGISTRATIONS

Kentucky
Ohio
Connecticut
Florida
Tennessee

+ RELEVANT PROJECTS

St. Aloysius Apts Covington, KY	(48 Apt Units)
Parkway Apts (11th District School) Covington, KY	(26 Apt Units)
Dayton Square Apts (Dayton H.S.) Dayton, KY	(34 Apt Units)
St. Vincent Newport, KY	(16 Apt Units)
Center Park Bellevue, KY	(30 Apt Units)
Bromley Apts (Bromley Elementary) Bromley, KY	(17 Apt Units)
Maysville Apts (Maysville High School) Maysville, KY	(29 Apt Units)
Ripley Schoolhouse Apts Ripley, OH	(19 Apt Units)
Paducah Apts (Jetton High School) Paducah, KY	(43 Apt Units)
Jetton Elementary Paducah, KY	(20 Apt Units)



HOTEL COVINGTON

COVINGTON, KY

Hotel Covington is a 91,000 square foot, 114-room boutique hotel in downtown Covington, KY with banquet, bar and restaurant functions. The renovated building originally contained Coppin's Departments store, constructed in the early 20th century as the region's first concrete high-rise. The front corner of the building is seven stories tall with a rear alley portion that is four stories. Historic tax credit funding was a driving factor of the design, requiring creative work-arounds to convert the space for the new use while maintaining the historic character.

The redevelopment focused on a concept of "trans-locality" that sought to create a space that both the locals and travelers would feel comfortable in. The lobby accommodates different levels of interaction, from relaxed couch seating—a "living room" for the city—to informal and formal dining options.

The design and redevelopment of Hotel Covington has transformed the Covington Central Business District into an iconic destination for the tri-state.

Photos by Phil Armstrong & Salyers Group

CLIENT INFO

Guy van Rooyen
Salyers Group, Inc.
gvanrooyen@fabulousfurs.com
(859) 982-0016

TEAM

Jim Guthrie
Principal-In-Charge

Cody Chitwood
Project Designer





KENT LOFTS

BELLEVUE, KY

CLIENT INFO

Tony Kruetzjans
Orleans Development
tonyk@orleansdev.com
(859) 393-1472

TEAM

Jim Guthrie
Principal-In-Charge

Erin Graham
Project Manager

Various additions and modifications throughout the life of this historic industrial warehouse presented design challenges for this residential iteration—creating completely unique floor plans for each unit, interesting volumes within the lofts and corridors, and creative fire assemblies to keep the historic structure exposed. Special attention was given to the parking layout, exterior plaza, and preservation of the warehouse windows and structure during the pursuit of State and Federal Historic Tax Credits.

The massive building, built up over a century to accommodate growing manufacturing uses, is an anomaly amongst the single-family houses of Bellevue. Now, the four stories contain over 150 units, ranging from studios and lofts to 2-bedroom apartments. Every unit features high ceilings (some REALLY high) and walls of gridded windows that let light deep into the spaces. The clerestory skylights that used to illuminate workspaces and assembly lines now cast dramatic shadows along the corridors. Evidence of the building's history appears in small vignettes: large columns with tapered capitals still carry bright swatches of paint from past tenants, bumpers and corner protectors still serve the old loading dock, and the freight elevator helps new tenants move their furniture.

Photos courtesy of Orleans Development





Hellmann Creative Center

Covington, Kentucky



The adaptive re-use of an old lumber mill into flexible community space, artist studios, and the administrative offices of the Center for Great Neighborhoods. There are also six artist studios in the Creative Center. Including a photographer, potter, a wig artist, and the construction space for the Carnegie set design.

Square Footage: 16,000
Completed: 2016

The Center for Great Neigh-
borhoods

Tom DiBello

321 W MLK Blvd., Covington, KY 41011

+ OTHER RELEVANT PROJECTS

Old Walnut Hills High School Condos | *Cincinnati, OH*

Old Fairview School | *Cincinnati, OH*

Old 1st District School | *Cincinnati, OH*

Old Edison School | *Covington, KY*

Old Lincoln Grant School | *Covington, KY*

Old Mt. Adams School | *Cincinnati, OH*

Old Windsor School Flats | *Cincinnati, OH*

Old Salmon P. Chase School | *Cincinnati, OH*

Kirby School Apartments | *Cincinnati, OH*

Old Sands School | *Cincinnati, OH*

Alumni Lofts | *Cincinnati, OH*

The Washington | *Bellevue, KY*

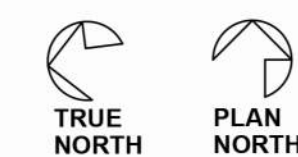
Renaissance North Apartments | *Cincinnati, OH*

The Hannaford | *Newport, KY*

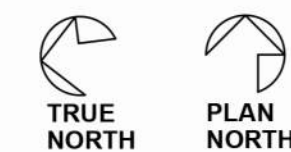
Corpus Christi Apartments | *Newport, KY*

99 Main Street | *Newport, KY*

APARTMENT UNIT COUNTS				
LEVEL	1BR UNITS	2BR UNITS	3BR UNITS	UNIT TOTAL
GROUND	5	6	0	11
FIRST	5	4	2	11
SECOND	6	4	0	10
THIRD	0	0	1	1
TOTAL	13	13	4	33



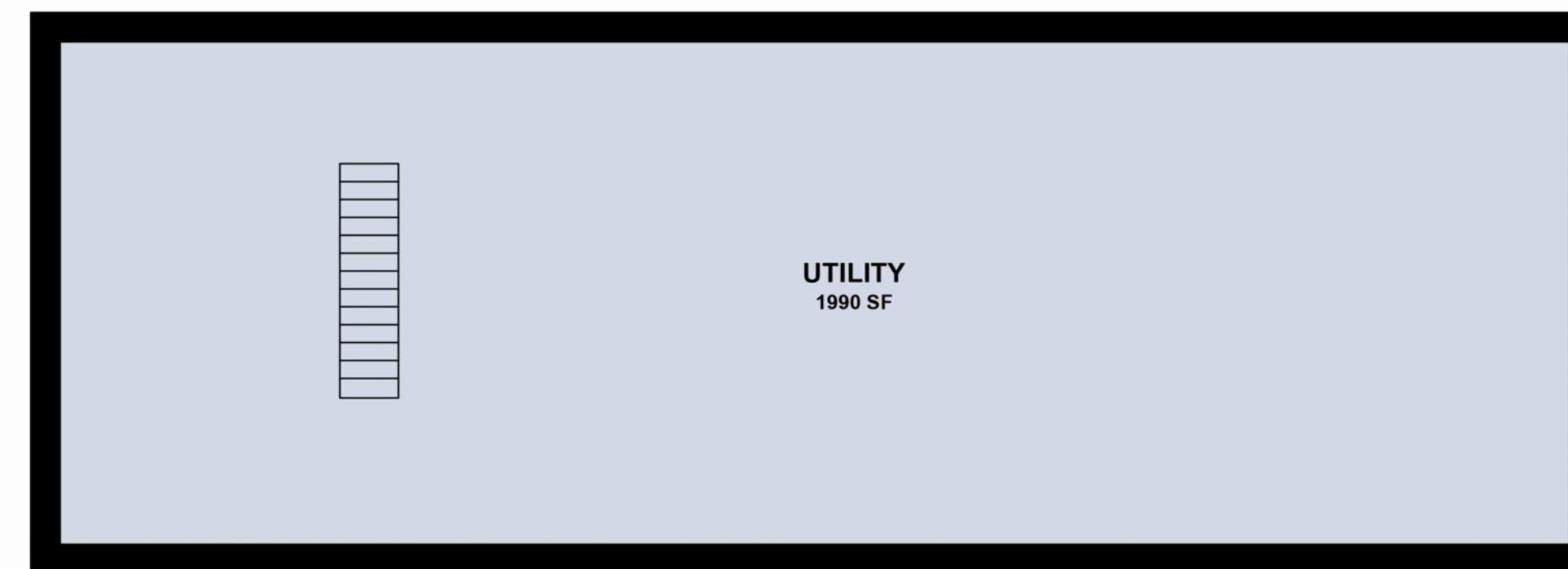
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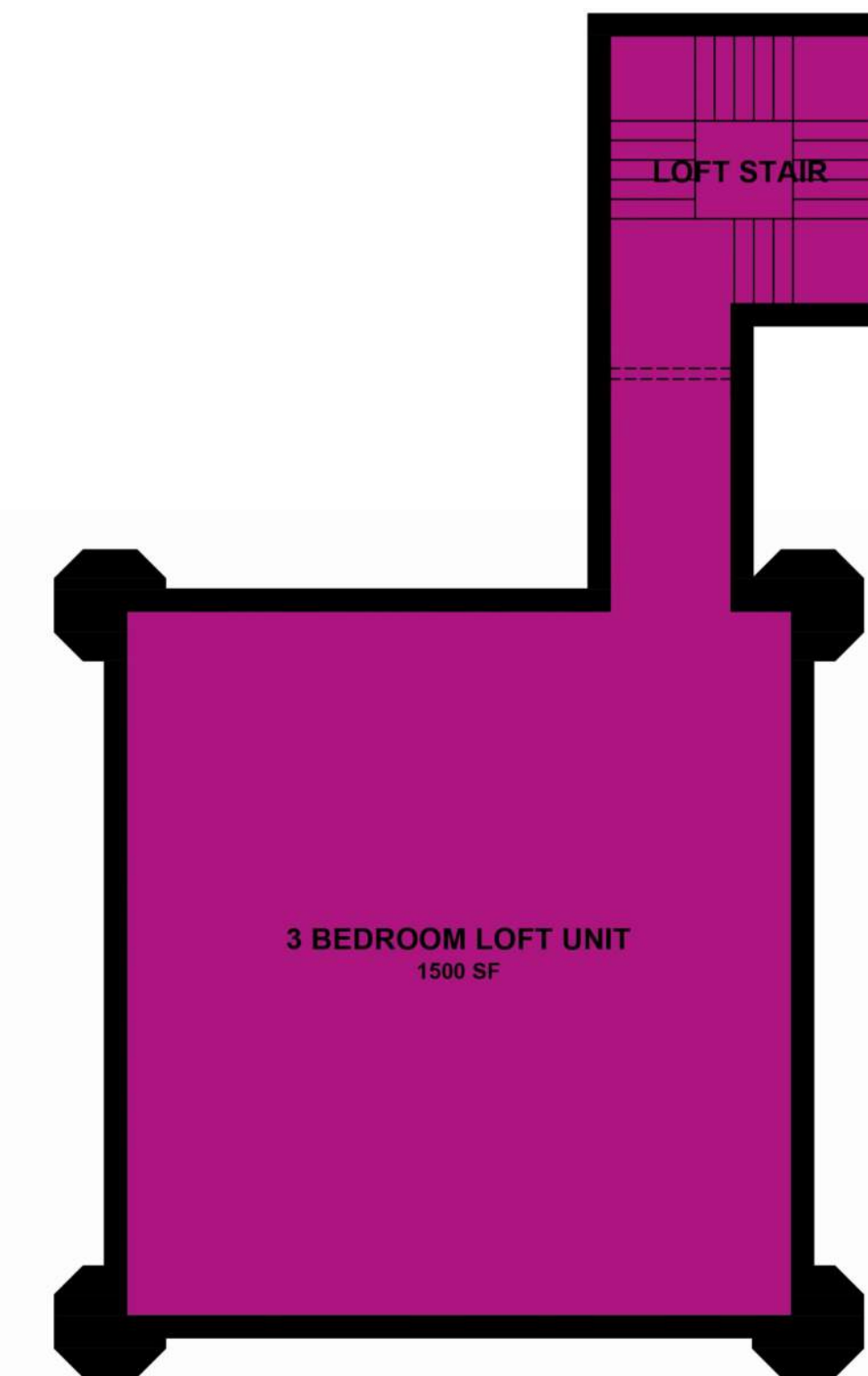
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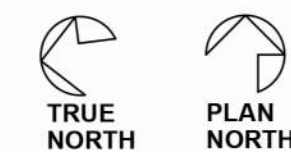


TRUE NORTH PLAN NORTH
1/8" = 1'-0"

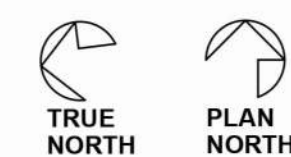
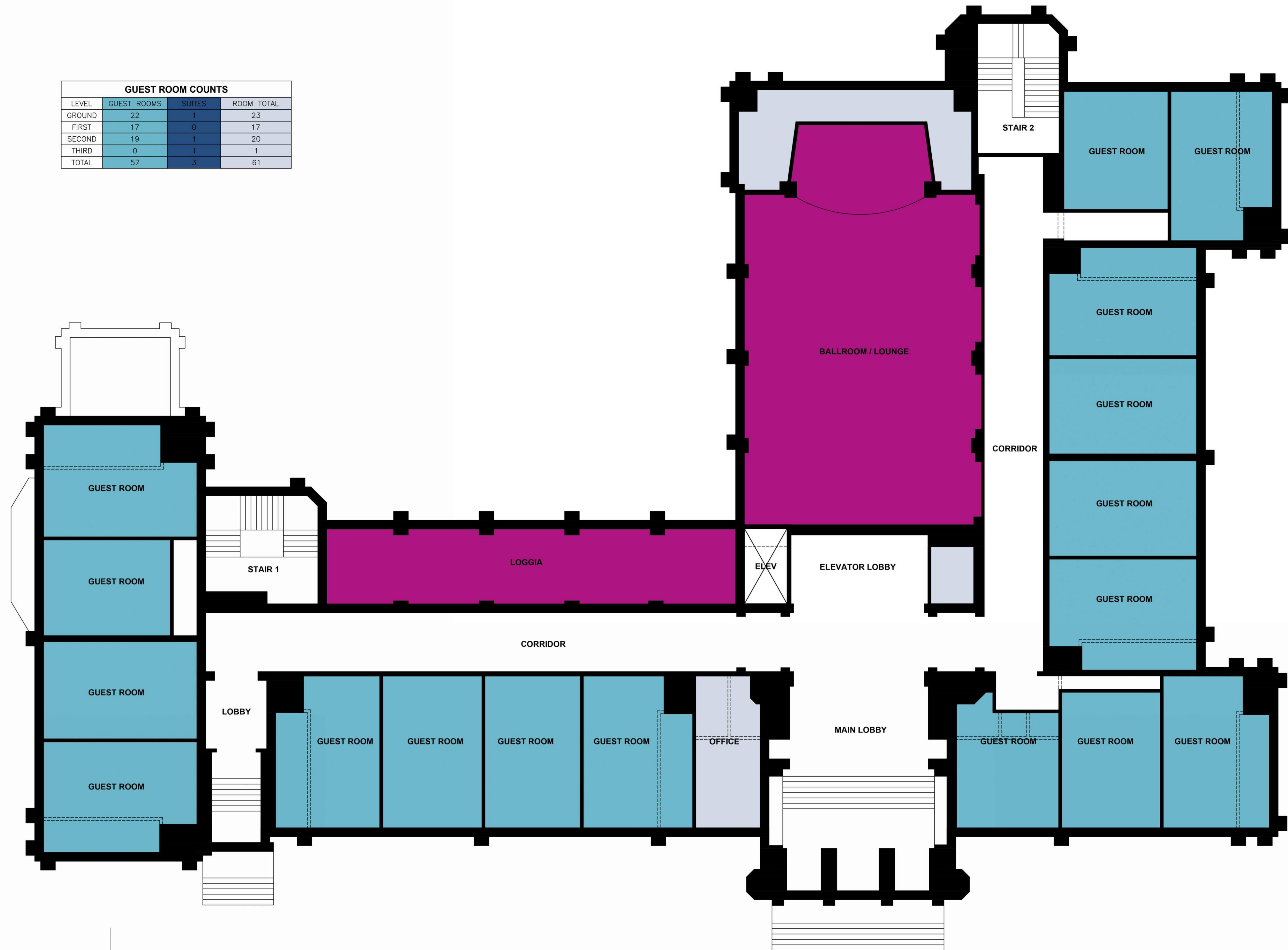


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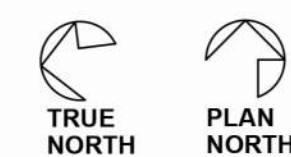
GUEST ROOM COUNTS			
LEVEL	GUEST ROOMS	SUITES	ROOM TOTAL
GROUND	22	1	23
FIRST	17	0	17
SECOND	19	1	20
THIRD	0	1	1
TOTAL	57	3	61



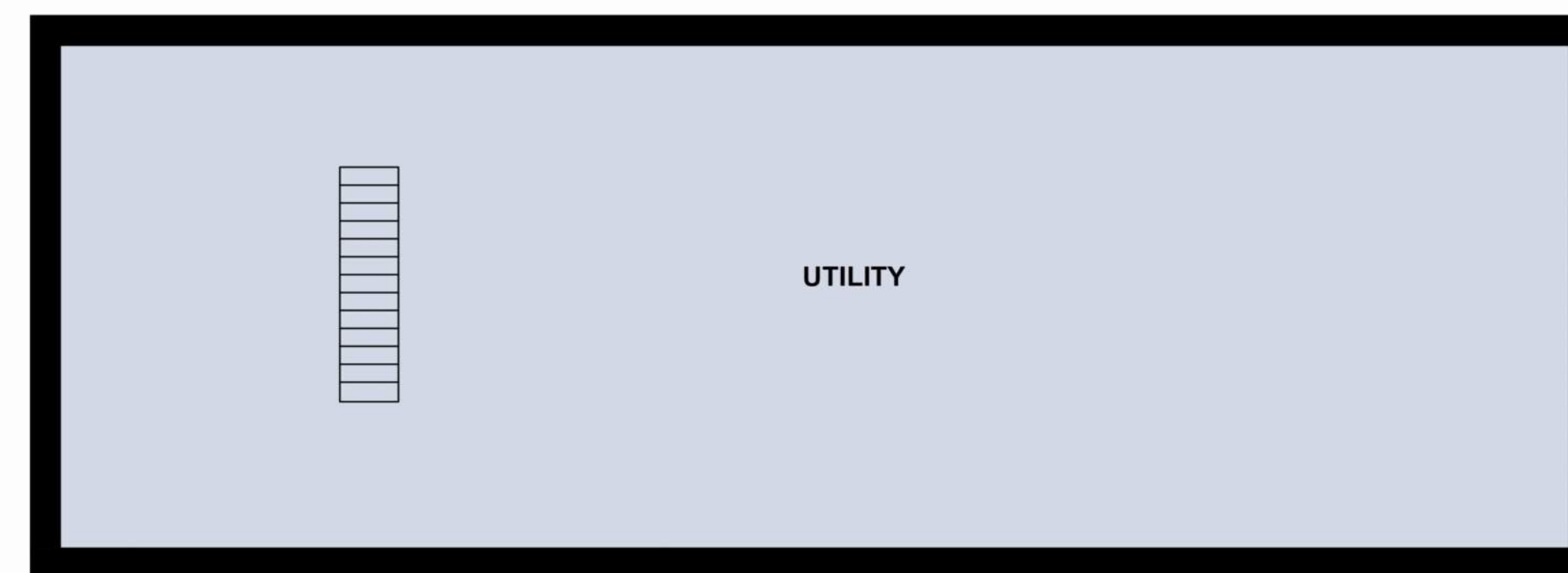
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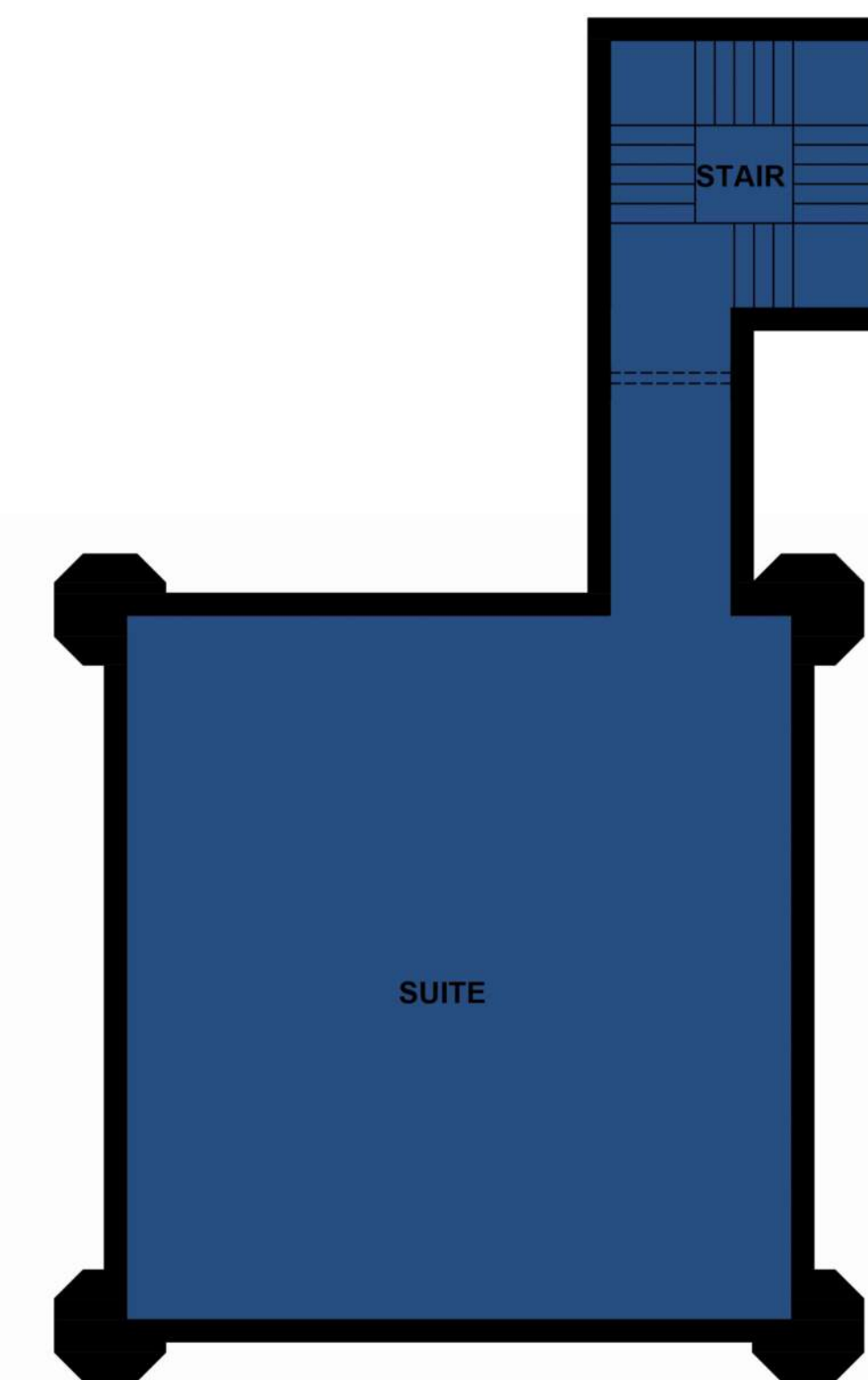


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BASEMENT PLAN - HOTEL
 1/8" = 1'-0"





THIRD AND FOURTH FLOOR PLAN - HOTEL
 1/8" = 1'-0"