

Applying NRHP Criteria to Architectural Properties and Assessing Effects

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Intent

This presentation was put together to convey how historians and architectural historians think through these issues and write evaluations of properties. It provides interpretation of common topics and tips for completing evaluations of NRHP eligibility.

Evaluations are *arguments* for significance

- Writing a narrative is not the same as drafting an argument.
- Arguments do not present themselves through narratives and photographs.
- Arguments for significance link information in narratives with comparative considerations in an explicit statement of significance.

Argument language

- This property *represents* as an
 - early
 - late
 - typical **OR**
 - exceptionally (ornate, finely crafted,...)
example of this
- Property needs to be categorized,
but not with a superlative

Argument language

- After summary of important aspects of property history, or highlighting of the property's character-defining aspects, or statement about the significance of a person

then continue with

- “for these reasons” this property is significant under criterion X as

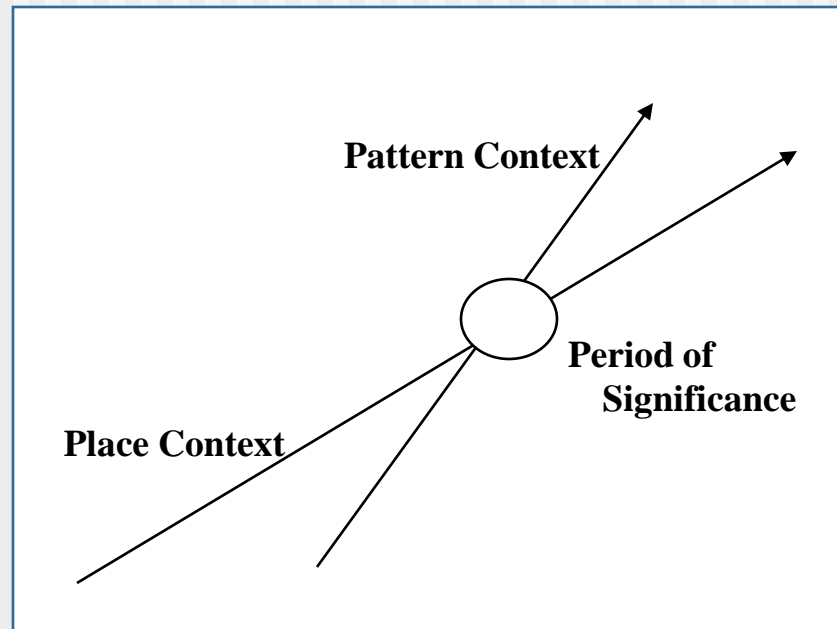
Historical Contexts

- Relate the history of the place, government agency, or entity (railroad) concentrating on the likely period of significance
- Identify *areas of significance* that the property is related to (government, transportation)
- Are focused on relevant places and times
- Summarize and interpret (perhaps through periodization or rise and fall)

Historic Contexts

- Might address a series of related events, such as homesteading in the Powder River basin OR a property type, such as schools
- Are based on existing contexts that are referred to and summarized, and then continued in more detail for the specific context of the property as needed

Intersection of Contexts



Why can't you evaluate the significance of a property without a context?

- Evaluation won't meet Section 106 standards (and SHPO will notice)
- Evaluation doesn't supply evidence for argument for significance

Criterion A:

The event or pattern

- First thought with Criterion A is EVENT, but
- Criterion A also recognizes patterns of events and historic trends
- Second application of Criterion A more likely to be relevant to properties in WY

Series of events

- Properties must be directly related to an event that reoccurs, not just there



Criterion A examples

- Downtown commercial historic districts
- A recreational lodge that is related to an historic shift in that type of commercial operation
- An historic government agency building that represents an important management period

Applying Criterion A

- Applying this criteria relies on an historic context so a case can be made that the property represents an important aspect of a trend, not just generally associated with it
- The trend or pattern of events must have significance at the local, state or national level

Statement of Significance

- The Hotel LaBonte is eligible for listing in the National Register of Historic Places under Criterion A in the **area** of Community Development and Planning. The construction of the Hotel LaBonte in 1913 *represents* the maturation and modernization of Douglas as a commercial, transportation, and local governmental center in Converse County. The Hotel LaBonte, one of the largest of the new buildings erected in Douglas between 1913 and 1916, was the result of the resolve of a group of prominent Douglas citizens that the city would have a modern hotel.

The Challenge of Criterion B

- The property must be directly associated with and illustrate a person's significant achievements
- The person must be *individually* significant
- The property must be considered in terms of other properties associated with the individual

Criterion B

- Tends to be overused in evaluations in Wyoming
- If B seems a possibility, A should also be considered as a more likely argument

Ames Monument, Albany County



- Areas of Significance: Ames Brothers work in transportation; art and architecture
- Criteria B requires that a property reflect the significance of one individual only

Trail End, Sheridan

- “That man (Kendrick) was a cattleman representative of the era : cattleman’s Frontier ... this house is a symbol of wealth and of the owner’s desire to build a more stable and cultured society.”



Criterion C:

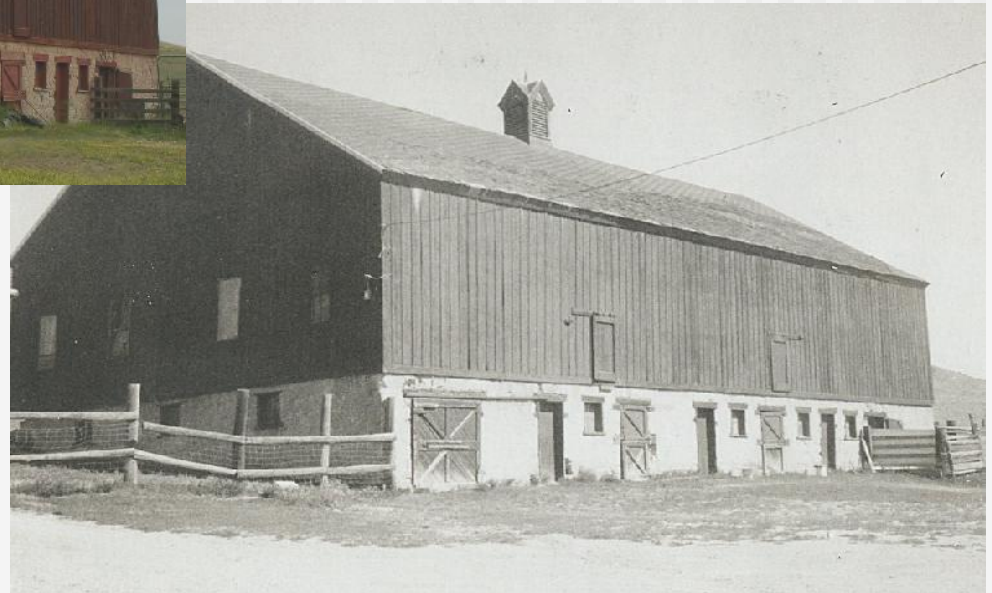
Design/Construction

- Embody distinctive characteristics of a type, period, or method of construction
- Work of a master
- High artistic value
- Entity greater than individual parts (historic district)

Representative type

- Must have the distinctive characteristics of a class of resources
- Could be an important variation of or transitional phase of that class
- May represent a building type and/or style
- Mandate for excellent integrity of design and materials

Crow Creek/Cole Ranch Barn



Barn: Criterion C
Entire property:
Criterion A

Considering the Criteria

- An evaluation of eligibility should address all criteria
- Eligibility under one criterion is enough
- Many properties are eligible under both A and C; architecture is often closely allied with a pattern of events:
 - Brick commercial buildings in railroad towns
 - Aluminum and glass storefronts and the post-World War II building boom

Criteria A and C: Integrity and Effects

- The demand for high integrity of design and materials is greater under Criterion C than for A; high integrity of setting, feeling, and association may be more important under Criterion A
- The consideration of effects is related to the above statements

Hotel LaBonte



Previous evaluations

- Age: 10 years old, assume needs to be updated if not determined eligible or listed
- Why? Additional information on specific property now available or context(s) has been expanded

Example of revised evaluation

Contrary to the 2005 findings of the Wyoming SHPO, this report finds that Building 011 is contributing to the Camp Guernsey Historic District under both the WPA and World War II historic contexts.

(Several statements of fact here)

The building has a direct association with the expansion and development of the Wyoming Army National Guard, which has made significant contributions to the broad pattern of Army National Guard and Wyoming history (Criterion A).

Why Identify and Evaluate?

- In order to consider effects and identify adverse effects to historic properties

Effects vs Adverse Effects

- Effect = change
- Adverse effect = change that alters historic character and integrity
- Section 106 identifies adverse effects, leaving us to differentiate between effect and adverse effect

Assessing Effects

Adverse effect: when an undertaking may alter – directly or indirectly – any of the characteristics of a historic property that qualify it for NRHP listing

In a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling or association

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- Consideration shall be given to all qualifying characteristics of an historic property, including those that may have been identified *subsequent to the original evaluation* of the property.
 - Adverse effects may include reasonably *foreseeable effects* caused by the undertaking that may occur later in time, be *farther removed in distance* or be *cumulative*.

Potential Direct AEs

- Physical destruction of or damage to all or part of the property
- Alteration of a property through work that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines
- Removal of the property from its historic location
- Change of the character of the property's use or of physical features within the property's **setting** that contribute to its historic significance (A vs C)

Potential Indirect AEs

- Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- Neglect of a property that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization

The Federal Potential AE

- Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

The Area of Potential Effect

- Consider both direct and indirect effects
- APE for indirect effects ALWAYS larger than the one for direct effects
- “Potential effect” should probably be potential adverse effect

APE Comments

- When considering eligibility of a segment of a linear resource, the segment might extend well beyond the boundary of the APE
- If the APE boundary crosses a property, evaluate buildings that are part of that property yet outside the APE

Cumulative Effects

- Intensification of effects – not outspreading effects
- Useful concept: tipping point when integrity of property no longer sufficient
- Evaluator must know and understand effects that have already occurred

Visual, Atmospheric, Audible Effects

- Adverse effects include:
 - Change of emphasis in setting and views
 - Change of perception of an historic time and place
 - Blocking views to/from historic resources
 - Change in attractiveness of occupancy and use of properties

Consider

- Retreat-like properties where noise and visual intrusions really do change the feeling and association
- Expectations for normal change over time
- Whose perceptions of effects?

Pitfalls and Suggestions

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- Setting description focuses on soil and geography at the expense of type of place: rural, outskirts of town, isolated valley, etc.

Solution:

- Adjust your description for the audience

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- Information is presented in tables that require study to reveal overall and individual information

Solution

- Add a summary of what tabled information presents; tables don't speak for themselves

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- Segmentation of resources:
evaluating part of a larger resource

Solutions

- Record and evaluate entire farmstead or other small property
- Recognize and refer to potential historic district or landscape

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- Too much detail, not enough focus and analysis in description

Solutions

- Keep *character-defining feature* concept front and center
- Subdue *data recording* habit

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- Evaluation of integrity focuses on small details at the expense of the overall picture

Solutions

- Keep *character-defining feature* concept front and center

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- Lack of knowledge of architectural vocabulary

Solution

- Recognize the character-defining features and have a strong analysis and don't fret about the specialized words

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- Tendency to let photos “speak for themselves”

Solutions

- Captions that identify and highlight character-defining features
- Use text boxes and arrows when needed

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- APE for indirect effects indefensible Solutions
 - Use some generally accepted distances related to project – $\frac{1}{4}$ or $\frac{1}{2}$ mile, etc.
 - Also use topography, vegetation, and visibility

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- Evaluation of NRHP criteria and/or effects is boilerplate

Solutions

- Adjust boilerplate where necessary
- Recognize that each property its own integrity and that one action could have different effects on similar properties

Resources

- NRHP Bulletins
- Handbooks
- SHPO Staff
 - Betsy Bradley
 - Kara Hahn
 - Laura Nowlin
 - Nancy Weidel

Questions? Comments?

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