Evaluating Common Resources for National Register of Historic Places Eligibility A National Register White Paper Barbara Wyatt, with additions by Roger Reed March 27, 2020

This paper is not intended to replace information in the National Register Bulletins and other NPS publications. It is intended as a supplement and, if discrepancies are found between this paper and other NPS publications, the existing publications should be considered correct. Comments are welcome and should be directed to one of the authors or any National Park Service National Register reviewer. After review and discussion, the substance of this paper may be incorporated into future publications.

Introduction

Common resources can be defined as any property type that is ubiquitous and, therefore, difficult to evaluate. A property type is a group of individual properties characterized by common physical attributes, such as style, size, scale, proportions, design, architectural details, and methods of construction.¹ Property types are united by shared historical or cultural attributes, such as relationships to important persons, activities and events, dates of construction, and cultural affiliations.² Common property types can be urban or rural and can be prevalent on a local, regional, or statewide basis. Apartment buildings, various house styles of the mid-twentieth century, and schools are among the common property types that present evaluation challenges. The National Register program has published guidance that explicitly addresses the evaluation of some common property types in the National Register Bulletins.

Property types should be considered common in terms of their current prevalence. Some once-common property types have dwindled in numbers significantly, even since the introduction of today's historic preservation programs. For example, one-room schools (even derelict examples) are no longer a common sight in many rural landscapes. Once-common resources need to be fully described, including a description of property subtypes. However, the more stringent integrity requirements that may apply to today's common properties, should not apply to evaluations of once common, but vanishing, property types.

The Multiple Property Documentation Form (MPDF) requires a research model that includes historic background material (contexts) and the establishment of evaluation benchmarks and parameters. When the multiple property format was introduced in 1991, its reliance on historic contexts dovetailed with the preparation and implementation of various federal and state historic preservation planning initiatives, increased appreciation for vernacular and ordinary buildings, and recognition that a more objective approach to evaluation was needed. The multiple property approach is essential for the evaluation of common property types.

¹ See How to Complete the National Register Multiple Property Documentation Form, NPS, rev. 1999, p. 14.

² See How to Complete the National Register Multiple Property Documentation Form, NPS, rev. 1999, p. 14.

A Familiar Approach

The evaluation of common property types requires a great deal of background work and a deep familiarity with the resources. Without development of an analytical framework, based on research and field work, an objective evaluation is nearly impossible. The approach to the evaluation of ubiquitous resources requires the same steps needed to evaluate resources that are fewer in number, although identification and research phases that precede or accompany the evaluation process may be more challenging.

The multiple property approach to evaluation provides an excellent model for common property types, and the steps required to develop a context for an MPDF should be the approach used to develop a context for the evaluation of common property types. The following information must be provided:

- 1. Background history and context, particularly related to the Areas of Significance, identified themes, or property types;
- 2. Associated property types, including sub-types;
- 3. Applicability of the NR Criteria and Criteria Considerations;
- 4. Registration and integrity requirements for each property type.

Common resources, however, require a particular approach to each step of the process, because of the large number of resources that potentially form a basis of comparison. The following guidance is provided to make the evaluation of ubiquitous resources more manageable and defensible:

- 1. Develop a strong context statement;
- 2. Establish property types and subtypes;
- 3. Focus on historic districts as the most manageable property type;
- 4. Clearly define registration and integrity requirements.

A Strong Context Statement

All properties must be evaluated within a historic context, and for common property types development of a context may require more comparative information. If the appropriate context does not exist, it must be developed with as much data as possible before an evaluation can be attempted.

For ubiquitous property types, the context must be thoughtfully designed to be usable in practice, that is, to reduce the number of properties or groups of properties that constitute a basis of comparison. However, the context must remain valid. For example, a given state may approach the evaluation of post-war housing by creating subtypes based on variations in style or form, geographic ranges, time brackets, or some combination of meaningful and logical distinctions. In contrast, a subtype defined by the works of a particular builder, whose contributions cannot be considered distinguished or particularly meaningful, lacks validity as a historically meaningful context.

The context and its associated property types should represent important aspects of history that are worthy of National Register recognition. For example, a city with many parks may

identify *parks* as a context, and it may subdivide parks by landscape development phases or park types. If each subtype is defined by landscape and cultural characteristics, intended use, architectural elements, general size and location, etc., eligibility can be more logically assessed. However, in the spirit of compartmentalizing outdoor spaces to facilitate evaluations, the state should not identify sub-types that are too narrow or whose features may be ephemeral. Neighborhood playgrounds may be an example. They tend to be among the least static of outdoor park-like facilities. Playgrounds are subject to equipment replacement and other design changes that reflect the ebb and flow of popular culture, the demographics of the neighborhood, and city responses to maintenance, safety, codes, and budgets. Playgrounds, therefore, in many places would not constitute a context within the wider arena of "parks," even though they reflect an important aspect of landscape and recreation history and design.

For many common resources, the context must portray the history of the subject in terms of national trends, significant developments, influential theories and designs, and relevant cultural, economic, and political factors. Such background history lends substance, credence, and relevance to the context, whether associated resources are evaluated as significant at the local, state, or national level. This is true for historically and architecturally significant properties. It cannot be assumed that a familiar term in one state is used for a building of the same description elsewhere. Ultimately, the context must be bolstered with information that explains its significance within the state and within the local or regional area, if pertinent.

Establish Property Subtypes

The definition of subtypes can be an essential tool for managing ubiquitous resources. For example, in Kansas City, Missouri, apartment buildings are a common property type. A means for evaluating historic apartment buildings has been established through the development of a series of multiple property documentation forms. Each addresses one type of apartment, and subtypes of each type have been identified. The city has identified apartment types and subtypes in the following multiple property documentation forms:

Historic Colonnade Apartment Buildings of Kansas City Apartment Buildings of the North End of the Paseo Blvd. in Kansas City Working-Class and Middle-Income Apartment Buildings in Kansas City

The colonnade apartments provide a good example of subtype definition. For each subtype, a detailed description is provided, the significance of the subtype is established in terms of national apartment trends, and registration requirements are specified. The subtypes identified for the colonnade apartments are:

Classical Colossal Column Porch
Combined Column Porch
Square Brick Column Porch
Transitional Colonnade Apartment Building

Without the development of an adequate context and the definition of property subtypes, the evaluation of apartment buildings could be subjective and lack historical perspective. With the

context, significance in terms of the city's growth and development in relation to wider trends can be evaluated.

Regardless of the Criteria applied, apartments should be evaluated in terms of this comprehensive approach. If an Art Deco apartment building is considered significant under Criterion C, it probably is not enough to simply evaluate it in the context of five other Art Deco apartments in town. The Art Deco design motifs may be an embellishment on an apartment form or stylistic trend of wider significance. A fuller context must be provided, so the evaluation is not merely an aesthetic judgment of determining "the prettiest" among those that share some design elements.

Subtype definitions do not have to be limited to individual building forms. The multiple property documentation form *Historic Residential Suburbs in the United States, 1830-1960,* uses historic districts based on time periods as the relevant property type and identifies four types of historic districts:

Railroad and Horsecar Suburbs, 1830-1890 Streetcar Suburbs, 1888-1928 Early Automobile Suburbs, 1908-1945 Post-World War II and Early Freeway Suburbs, 1945-1960

Historical background on each district type is presented, with guidelines for applying each of the four National Register Criteria and Criteria Consideration G (less than 50 years old). The form provides pointers for determining whether a district is significant at the national, state, or local level and for addressing the seven aspects of integrity. It has widespread application throughout the nation.

Individual Listing based on Common Architectural Styles or Vernacular Plan Types

Architectural styles are academic tools to categorize and understand why buildings look the way they do. Because they reflect popular fashions, they can also be helpful in dating buildings. Vernacular plan types may also reflect fashions, as well as long-standing traditions. However, this paper is not the venue to debate the validity of stylistic terms or interpretations of vernacular house types. Rather, this a guide on how to develop an argument to support individual listing of a common property type.

National Register Bulletin 15, How to Apply National Register Criteria for Evaluation, provides general guidance that includes the following caution under Type, Period and Method of Construction [Criterion C]: "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" (page 18). Note the use of *important*.

The following two examples illustrate this principle.

Celine and Albert Goddard House

111 South Van Buren, Pierre, South Dakota

NRIS: 10002102

Criterion C, Period of Significance 1908

"The Goddard House is one of the best examples remaining locally and the best example of a concrete block house whose blocks imitate dressed stone. Executed in a small, bungalow form, the house also represents a once common but increasingly rare housing type."

The design of the Goddard House is a very typical form that could be found in any community in America. The nomination is divided into four sections:

<u>Concrete Block Construction</u>. This provides background information on concrete in building construction.

<u>Architectural Classification</u>. This section discusses the bungalow (not an architectural style), the use of formed concrete block construction in Pierre, and possible origins of the plans for the house, such as plan books or kit houses, noting neither are likely given the relatively early (1908) construction date.

<u>Development in Pierre</u>. This section provides a brief context for housing development in Pierre.

<u>History of the Goddard House</u>. A history of the construction and ownership of the house is provided.

While these categories may suggest book-length documentation, the description is three pages and the statement of significance is five pages.

Singhi Double House

98-200 Broadway, Rockland, Maine

NRIS: 100003589

Criterion C, Period of Significance, 1891

"The significance of the Singhi Double House is based on two sets of characteristics: the double house plan and the manner in which it is reflects some of the ideas of wealth and stability that authors of pattern book houses espoused in their volumes. The house was built as an investment, rather than to be owner occupied, but at the same time it was designed to give the appearance of a single-family home."

The nomination develops a context for double houses in Rockland, noting that the property type is common locally and in New England as a region. While this is not a multiple property document with several examples of this property type, the nomination provides a basis to develop such a document.

Historic Districts: A Strategy if Individual Properties Lack Distinction

Ubiquitous resources may be better evaluated as historic districts, rather than as individual properties. Some property types may so lack distinction that registration requirements preclude nominations of individual examples. Such houses, for example, may be considered significant in the context of suburban development and, therefore, historic districts may be the required resource type. A single ranch house built as infill construction in an established neighborhood may lack the suburban location and tract house setting established as a registration requirement. In this case, registration requirements could establish that such individual examples lack the necessary context for eligibility.

States or localities that have not done the research and fieldwork required to evaluate individual houses of this period can use the MPDF for suburbs (*Historic Residential Suburbs in the United States, 1830-1960*) for background information, and limit their evaluations to historic districts, until further research identifies other options. For example, with time, research may reveal that the work of a particular local architect is distinctive in its own right. Note that the suburb MPDF cautions that "contextual discussion beyond that provided in Section E (Statement of Historic Contexts) of this multiple property form" will be needed" (p. F-44). Research from a regional and local perspective is essential for nominating a district concerned with this multiple property context.

Registration and Integrity Requirements

Registration requirements are intended to distinguish eligible from ineligible resources among properties of a type. In theory, if a property meets the collection of requirements, and passes the integrity tests it should be evaluated as significant. In practice, this is only effective if the registration and integrity requirements are explicitly defined. Otherwise, an untenable number of eligible resources may exist. After all, the National Register is intended to recognize "districts, sites, buildings, structures, and objects **significant** in American history, architecture, archeology, engineering, and culture" (*National Historic Preservation Act* (a)(1)[A]). Determining significance (or the lack thereof) is the goal of any evaluation exercise.

The MPDF for *Historic Colonnade Apartments of Kansas City* provides a good model for specifying registration and integrity requirements for common properties.³ The registration requirements reference the historic context in Section E and specify the defining elements that must be evident for apartments to be considered eligible. Exterior and interior modifications that do not diminish the buildings' significance are described. Six characteristics that must be in place for a building to qualify for individual listing under Criterion C are identified, and a similar list presents qualities that must be evident for listing under Criterion A, either individually or contributing to a district. Loss of integrity that precludes National Register listing is specified in six bullet points.

An evaluation of a common resource should include an evaluation of compliance with registration requirements. An assessment of integrity can contribute to an evaluation, but such an assessment should only be made after significance is established. All seven aspects of integrity should be addressed in the context: location, setting, design, material, workmanship,

³ All multiple property covers have been placed on the National Park Service website.

feeling, and association. For some resources, particularly those that are less common, some aspects of integrity may be overlooked for the property to be deemed eligible. The bulletin *How to Complete the National Register Registration Form* states, "All seven qualities do not need to be present for eligibility as long as the overall sense of past time and place is evident" (p. 4). However, for common property types the integrity requirements are more stringent, and the context statement may specify that individual properties must meet all seven aspects of integrity to be evaluated as significant.

Summary

Common property types present evaluation challenges, but strategies exist for grappling with the ubiquitous resources that began to challenge National Register reviewers and Review Boards when architecture of the 1950s became 50-years-old. The multiple property documentation form for historic residential suburbs is the only National Park Service context that deals with these property types explicitly. That context, however, deals exclusively with historic districts.

The multiple property documentation form for *Historic Colonnade Apartment Buildings of Kansas City, Missouri,* presents a good research model for evaluating individual resources that represent a common property type. It includes a well-researched and relevant background context, a logical definition of property types, and explicit registration and integrity requirements.

There are few shortcuts that can be taken to evaluate common properties. Such evaluations require background information that portrays a given property in its historical context, knowledge of the property type and its subtypes, and an assessment of what constitutes eligibility and ineligibility. If such information and analysis are not available, evaluations—at least for individual properties—may be too subjective to be valid.