

National Register Policy Clarification
Integrity Requirements
for Settings and Locations of Locomotives and Other Rolling Stock
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This paper examines the integrity of setting that must be evident for locomotives and other rolling stock to qualify for National Register listing.¹ The intent of the paper is to clarify guidelines regarding movable resources that have been published in various NR bulletins, and to explain their application to locomotives. It is not the purpose of this paper to reinterpret the content of the bulletins, but to seek clarity and consistency among them, specifically related to integrity requirements for rolling stock. Current and past practices regarding this aspect of integrity have been questioned recently, although other aspects of integrity--location, feeling, association, design, workmanship, and materials--have not been problematic.

Many movable resources are listed in the National Register, including aircraft, trolleys, ships, and locomotives. Usually they are listed under Criterion A, for their association with an aspect of transportation history or an important event, or under Criterion C for their engineering and design significance. The majority of settings of listed locomotives correspond with the clarification set forth in this paper, but some do not; however, past interpretations made in error do not establish a precedent for all nominations that follow. Instead, misunderstandings that may have led to certain evaluations and listings will be clarified, so that those preparing or reviewing nominations in the future will have a common understanding.

Interpreting Existing Bulletins for Locomotives and Other Moving Stock

Locomotives are rarely specifically mentioned in the National Register bulletins, but parallels can be drawn with other movable resources that are mentioned. Those that address location and setting for movable resources include *Guidelines for Evaluating and Documenting Historic Aviation Properties* and *Nominating Historic Vessels and Shipwrecks to the National Register of Historic Places*. Consider what is stated in these bulletins and how it can be applied to locomotives and other rolling stock:

1. **Location.** The *Aviation* bulletin does not require aircraft to be located in an original location and it states that Criteria Consideration B, which concerns buildings or structures moved from their original locations, does not have to be addressed (page 32).

¹ The *Collegiate Dictionary* defines a *locomotive* as “a self-propelled vehicle that runs on rails and is used for moving railroad cars” (2002:683). The same dictionary defines a *train* as a “connected line of railroad cars with or without a locomotive” (2002:1247). *Rolling stock* is defined as “the wheeled vehicles owned and used by a railroad or motor carrier” (2002:1012), and a *railroad* is defined as a “permanent road having a line of rails fixed to ties and laid on a roadbed and providing a track for cars or equipment drawn by locomotives or propelled by self-contained motors” (2002:962). In this paper, the term *locomotive* will be used to describe the rail car that contains the engine, and any attachments will be called *cars*, unless a more specific term exists. Note: National Register Bulletins that are quoted in this report may use this terminology differently.

It makes sense that Criteria Consideration B does not have to be addressed if locomotives and rolling stock are listed under Criterion C. In fact, it is expected that an original location may be difficult to find for locomotives. Although a parallel is not made in the *Aviation* bulletin, if Criterion A applies to rolling stock the original location may be important. For example, if a cable car was nominated for its service in San Francisco, it probably would be important for the cable car to be located in San Francisco because of the iconic nature of that city's cable car system.

2. **Setting.** The *Aviation* bulletin states that aircraft must have an appropriate setting. An appropriate setting for aircraft is an air-related facility, such as an aircraft parking ramp, a hangar, a naval aviation station, or a municipal airport (page 36).

Locomotives and other rolling stock also must have an appropriate setting. In any setting, the locomotive or rolling stock must be positioned on track. In addition, an appropriate setting should include, but may not be limited to, the following settings:

- a. A railroad line or a section of track adjacent to or near a railroad line; or
 - b. The inside of a roundhouse, repair shop, or other rail-related building or structure;
or
 - c. The exterior of a rail-related building or structure.
3. **Fragile resources.** Similarly, the *Historic Vessels* bulletin states that historic vessels must be maintained in the water, unless their preservation compels their removal from the water. In that case, a historic vessel should be in a natural waterfront setting, such as a drydock, but the setting must not present the vessel as a museum object (pages 8-9).

Likewise, some rare locomotives may have to be situated to enhance their preservation, precluding an entirely authentic setting. Conditions that may warrant special storage include fragile fabric and vulnerability to vandalism. In such cases, the locomotive must be located on tracks, in a setting that does not detract from an appreciation of the locomotive as a vehicle designed to travel within the nation's rail system. As with historic vessels, the setting should minimize the appearance of the locomotive as a museum object.

4. **Settings of collections.** The *Aviation* bulletin states that aircraft that are parts of collections can be eligible if the setting is appropriate (pages 36-37). The bulletin says that as part of a collection, the aircraft must be individually significant under the National Register criteria, retain integrity of materials, design, workmanship, feeling and association, and be in a setting that is appropriate to aircraft and allows the aircraft to convey its significance as an aircraft. In fact, the *Aviation* bulletin states that among collections, "the deciding factor will be appropriateness of setting" (page 36). The *Historic Vessels* bulletin is not quite as accepting of collections, but it states

that in exceptional cases a collection of vessels may be eligible if exhibited in an appropriate setting (page 10).

If a locomotive is part of a collection, the setting must be appropriate *and* the locomotive must individually meet the National Register criteria *and* it must retain integrity of materials, design, workmanship, feeling and association. An appropriate setting, as described in #2, above, will allow it to convey its significance as a historic locomotive. For an entire collection of locomotives or rolling stock to be found eligible, the individual significance of each car must be demonstrated, as with aircraft.

Locomotives Listed in the National Register

Sixty-five locomotives are individually listed in the National Register, with several others included in non-railroad historic districts. For example, Centennial Park in Nashville, TN, was listed as a park (district), with a locomotive in the park evaluated as a contributing resource. Staff evaluated a significant sampling of listed locomotives, which were identified using a key word search of the National Register Information System (NRIS) database. Based on this review, the settings of listed locomotives generally fall into the following categories:

- Former railroad shops, depots, or other railroad facilities, some converted to museums—either inside a building or outside;
- A main line or a spur track, perhaps running through a museum or park;
- Inside a non-rail related building or structure, which may be a museum.

Due to their fragile condition, some locomotives are sheltered by an open-sided pavilion. Others are surrounded by fencing to prevent vandalism. Such treatments constitute non-historic settings, but they may be essential protective devices. Recall that the *Aviation* bulletin stated that aircraft “that have been removed from an aviation setting and are now museum objects, in the traditional sense, generally will not qualify for the National Register. National Register status for museum objects is redundant since the objectives of recognition and preservation are inherent in the museum mission” (page 36). However, if a setting is otherwise appropriate, the use of protective structures, such as sheds, may have a moderate to minimal impact on integrity. Such protective devices generally do not relegate locomotives to museum objects “in the traditional sense.”

From an examination of the submitted text, maps, and photographs of nominations, it seems that about 15% of those studied are located in settings with serious integrity problems. Examples of inappropriate settings include:

East Tennessee and Western North Carolina Railroad Locomotive No. 12, Watauga County, NC. Sits on track of the Tweetsie Railroad theme park, three miles from the eastern

end of the former railroad. The setting appears inappropriate, although the theme park has incorporated several miles of track for short excursions.

Denver and Rio Grande Railroad Locomotive No. 169, Alamosa County, CO. Located in Cole Park in Alamosa, on a section of track behind a chain link fence. It is not near a railroad line.

C&O Steam Locomotive #2755, Logan Co, WV. Located in a state park, not near a railroad line.

Soo Lumber Shay, Wexford County, MI. Located in Cadillac City Park under a shelter, not near a railroad line.

The Lion Locomotive (c.1840), Washington County, Maine. Located inside the state museum in Augusta. The locomotive is one of the earliest in the country and could not survive in an outside setting; however, a setting so clearly a museum setting does not meet the guidelines for aircraft or vessels and, therefore, in the future will not be deemed appropriate for locomotives.

Other settings of listed locomotives may not be composed of a historic roundhouse or depot, but at least the locomotives are on stretches of track with historic associations. A few are behind fencing. At least two were moved from city parks to other locations, probably for reasons of security. Collections of cars generally seem to be located in areas that historically had a great deal of train activity, for example railroad shops.

The National Register has occasionally listed properties that today do not seem to meet the Criteria, Criteria Considerations, or integrity requirements. Such properties are not removed from the National Register, but they inspire NPS to prepare guidelines that clarify the application of the Criteria, Criteria Considerations, and integrity requirements to a particular property type. The National Register bulletins have traditionally been the vehicle for such clarification. In the case of the settings of locomotives and other rolling stock, the bulletins that concern aviation and historic vessels provide the guidance needed to clarify the required settings of locomotives and other moving stock.

Please see the attached clarification that pertains to locomotives and other moving stock.

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The National Register Bulletins *Guidelines for Evaluating and Documenting Historic Aviation Properties and Nominating Historic Vessels and Shipwrecks to the National Register of Historic Places* have been adapted to address the locations and settings of locomotives and other moving stock. Based on the Aviation and Vessels bulletins, the following parameters will prevail in future evaluations of eligibility.

Location

1. If Criterion A applies, the placement of the locomotive in an original *location* may be important. Such locations refer to the place a locomotive was built or housed for a significant part of its productive life. If location is important, it must retain integrity of setting for the property to be eligible.
2. If Criterion C applies, locomotives generally do not have to be in original *locations*, referring to the place they were built or housed for a significant part of their productive life. Such locomotives were intended to move from place to place; therefore, Criterion Consideration B does not have to be addressed.

Setting

3. Locomotives, whether sited alone or as part of a collection, must be placed in an appropriate railroad-related setting. They must be situated on railroad track. The setting may be, but is not limited to, the following:
 1. A railroad line or a section of track adjacent to or near a historic railroad line.
 2. Inside a historic roundhouse, repair shop, or other rail-related building or structure. The appropriateness of buildings and structures that are not historic will be evaluated for their compatibility with the remainder of the setting and the nominated locomotive.
 3. In the yard or vicinity of a rail-related building or structure.
 4. If a rare locomotive requires fencing and a shelter to preserve historic fabric and deter vandalism, it must be located on tracks in a setting that does not detract from an appreciation of the locomotive as a vehicle designed to travel within the nation's rail system. The setting must not present the locomotive strictly as a museum object, but must maintain feeling and associative qualities.
 5. A setting should not be contrived to create an appearance that never existed historically. For example, a false sense of history is created when a setting with characteristics of a rail facility is assembled in an area removed from actual railroad facilities. Railroad theme parks are exaggerated examples of such artificial settings.