



**Heritage Preservation Commission Agenda**  
**Rochester Boards & Commissions - Heritage Preservation Commission**  
**August 22, 2023**  
**5:00 p.m.**

**Attending and Viewing the Meeting**

Attend the meeting in person - come to Government Center Council Chamber, 151 4th Street SE  
A recording is made available after the meeting at the [City's website](#).

**1. Open Public Comment Period**

*This is an opportunity for the public to provide comments to the Commission regarding items not on the agenda. The public has up to four minutes to provide comments. The Commission will not discuss or take action on them.*

**2. Call to Order/Roll Call**

**3. Order of Agenda**

**4. Consent Agenda**

**4.A. Minutes of June 27, 2023**

Accepting the minutes and video of the June 27, 2023, Heritage Preservation meeting as the official record of the Heritage Preservation Commission.

**5. Reports and Recommendations**

**5.A. Discussion on Fire Hall Clock & Bell - Preparing for Evaluation to consider Local Landmark Eligibility**

No action is recommended at this time.

**6. Public Hearings**

**7. Other Business**

**8. Adjournment**



## **REQUEST FOR ACTION**

Minutes of June 27, 2023

**MEETING DATE:**  
August 22, 2023

**ORIGINATING DEPT:**  
Community Development

**AGENDA SECTION:**  
Consent Agenda

**PRESENTER:**  
Molly Patterson-Lundgren

### **Action Requested:**

Accepting the minutes and video of the June 27, 2023, Heritage Preservation meeting as the official record of the Heritage Preservation Commission.

### **Report Narrative:**

The Minutes are the official record of the Heritage Preservation Commission.

### **Priorities & Foundational Principles:**

Quality Services for Quality Living  
Social Equity

### **Prepared By:**

Janelle McGee

### **Attachments:**

[Minutes - June 27, 2023](#)



**CITY OF ROCHESTER, MINNESOTA  
Heritage Preservation Commission MINUTES**

***Attending and Viewing the Meeting***

**1) [Open Public Comment Period](#)**

The following individuals spoke:

1. John Kruesel
2. Dr. Loring Stead

**2) [Call to Order/Roll Call](#)**

<b>Attendee Name</b>	<b>Status</b>
Barry Skolnick	Present
Thomas Meilander	Present
Shawn Fagan	Present
Jennifer M Shabel	Present
Mark S Hubly	Present
Andrew Napier	Present
Aden W Homard	Present
Adaheid L Mestad	Absent
Nancy D Bergner	Absent

Commissioner Homard arrived to the meeting late at 5:23pm.

**3) [Order of Agenda](#)**

Motion to approve the Order of Agenda with the addition of item 7.D) Setting Priorities for HPC.

**MOVER:** Barry Skolnick  
**SECONDER:** Thomas Meilander  
**AYES:** Barry Skolnick, Thomas Meilander, Shawn Fagan, Jennifer M Shabel, Mark S Hubly, Andrew Napier  
**ABSENT:** Adaheid L Mestad, Nancy D Bergner, Aden W Homard  
**RESULT:** **APPROVED [UNANIMOUS]**

#### 4) [Consent Agenda](#)

##### 4.A) Minutes of May 23, 2023

**Official Act:** Accepting the minutes and video of the May 23, 2023, Heritage Preservation meeting as the official record of the Heritage Preservation Commission.

[Cover Page](#) 

[Minutes - May 23, 2023](#) 

Motion to Accept the minutes and video of the May 23, 2023, Heritage Preservation meeting as the official record of the Heritage Preservation Commission.

**MOVER:** Andrew Napier  
**SECONDER:** Shawn Fagan  
**AYES:** Shawn Fagan, Jennifer M Shabel, Mark S Hubly, Andrew Napier  
**ABSTAIN:** Barry Skolnick, Thomas Meilander  
**ABSENT:** Adaheid L Mestad, Nancy D Bergner, Aden W Homard  
**RESULT:** **APPROVED [4 - 0 - 2 - 3]**

#### 5) [Reports and Recommendations](#)

##### 5.A) Evaluating Properties for Historic Landmark Designation

**Official Act:** No specific action is recommended at this time.

[Cover Page](#) 

[Excerpt National Register Bulletin 15 - How to Apply Standards](#) 

[Excerpt National Register Bulletin 22 - Less Than 50 Years](#) 

[Excerpt National Register Bulletin 32 - Important People](#) 

Molly Patterson-Lundgren presented the staff report.  
Discussion ensued between Staff and Commissioners.

#### 6) **Public Hearings - None**

#### 7) [Other Business - Updates](#)

[Cover Page](#) 

7.A) [State Hospital Context Study](#)

7.B) [Soldiers Field Memorial Park Appeal](#)

7.C) [Lourdes High School Property - Historic Inventory](#)

7.D) [Setting Priorities for HPC](#)

Motion to instruct Staff to prepare the appropriate paperwork that recommends landmark designation of Soldiers Field Park under criteria 1, 2, 4, and 8.

**MOVER:** Jennifer M Shabel  
**SECONDER:** Mark S Hubly  
**AYES:** Shawn Fagan, Jennifer M Shabel, Mark S Hubly, Andrew Napier, Aden W Homard  
**NAYS:** Barry Skolnick, Thomas Meilander  
**ABSENT:** Adaheid L Mestad, Nancy D Bergner  
**RESULT:** **APPROVED [5 - 2 - 2]**

8) [Adjournment](#)

Motion to Adjourn.

**MOVER:** Andrew Napier  
**SECONDER:** Shawn Fagan  
**AYES:** Barry Skolnick, Thomas Meilander, Shawn Fagan, Jennifer M Shabel, Mark S Hubly, Andrew Napier, Aden W Homard  
**ABSENT:** Adaheid L Mestad, Nancy D Bergner  
**RESULT:** **APPROVED [UNANIMOUS]**



## REQUEST FOR ACTION

Discussion on Fire Hall Clock & Bell - Preparing for Evaluation to consider Local Landmark Eligibility

**MEETING DATE:**

August 22, 2023

**ORIGINATING DEPT:**

Community Development

**AGENDA SECTION:**

Reports and Recommendations

**PRESENTER:**

Molly Patterson-Lundgren

**Action Requested:**

No action is recommended at this time.

**Report Narrative:**

In recent months, the HPC has discussed the application of Rochester's local landmark criteria, including the 8 criteria for historic significance and the 7 aspects of historic integrity. We have focused our discussion on properties that are on our historic inventory, as we review whether to recommend to City Council landmark designation of those, or remove them from further consideration. To date, all properties discussed were buildings, structures, sites, landscapes, or districts. Our heritage preservation program also allows for the landmark designation of objects.

One object that we have on our historic inventory is the Fire Hall Clock, originally located in the 1898 Fire Hall, which stood at the south end of Broadway Avenue. When that building was demolished to allow for Broadway Avenues extension to the south, the clock and bell were removed and preserved. Attached is a phase I study, which provides a brief overview of the history of the locations where these objects have stood over time in the community.

Additional research and evaluation will be needed to determine whether these objects qualify for our landmark program. Most likely, the historic significance of them fits within criteria one, the *objects' character, interest, or value as part of the development, heritage, or cultural characteristics of the city, state, or United States*. The historic context of the significance of these objects fall within the established context, "Urban/Downtown Development, 1889-present". Historic Integrity, will focus on the objects themselves (not past or future locations or tower structures) and best practices from the National Register Bulletin (excerpts attached) will be used to evaluate this.

At our meeting on August 22nd, we will discuss these issues to better understand both these objects as well as others that have been discussed by HPC in the past. We will also discuss the process moving forward for the consideration of the clock and bell for possible landmark designation.

**Prior Legislative Actions & Community Engagement:**

Placement of the clock on the original inventory/potential landmark list, February 22, 2017, by City Council.

**Prepared By:**

Molly Patterson-Lundgren

**Attachments:**

Central Fire Station Clock - Phase I.

Excerpt from National Register Bulletin - Designation

## ARCHITECTURE – HISTORY INVENTORY FORM (Phase I/Windshield)

Identification		Description	
<b>Historic Name</b>	<i>Central Fire Station Clock</i>	<b>SHPO Inventory Number</b>	
<b>Current Name</b>	Central Fire Station Clock		
<b>Field #</b>			
<b>Address</b>	Not final		
<b>City/Twp</b>	Rochester		
<b>County</b>	Olmsted	<b>Linear Feature?</b>	
<b>Legal Descript</b>		<b>HPC Status</b>	Historic Inventory (2-22-2017)
<b>USGS Quad</b>		<b>Resource Type</b>	
<b>UTM Zone</b>		<b>Architect/Engineer</b>	<i>Designed by John M. Doherty</i>
		<b>Style</b>	Other
		<b>Construction Date</b>	Completed 1890
<b>Property ID (PIN)</b>		<b>Original Use</b>	
		<b>Current Use</b>	

### History Center of Olmsted County<sup>1</sup>:

Bell: originally installed in 1887 in current fire station; moved to new station building in 1890

Clock: Purchased and installed in 1898

In 1890, the Rochester Fire Department opened its new Central Station, spanning South Broadway with the Zumbro River at its back. The bell was moved from the existing Fire Station and installed in the new building. A large clock, funded by local citizens, was installed in the tower in 1898 and linked to the bell. It remained there until 1930 when the old Central Station was demolished to make way for a new bridge. The clock and bell were salvaged from the tower and placed in storage. They were later rescued by Fire Chief Orville Mertz and housed in a tower built by First Bank, dedicated in 1982. The clock and bell were moved in 2001 to a new tower near the Mayo Civic Center. In 2014, the clock and bell were displaced by further expansion of the Civic Center, and again placed in storage. Alan Calavano, local historian and community activist, then began working with the Rochester Fire Department to create a permanent site for these important artifacts of the city's history. This was his final project, which continued after his untimely death in 2016.

Source:

Allsen, Ken & Calavano, Alan, "A Bell, a Clock and a Tower"; *The Scribe*, September 2017; History Center of Olmsted County

Allsen, Ken, Old College Street: The Historic Heart of Rochester, Minnesota; The History Press, Charleston SC 2012; (pp. 31-35)

<sup>1</sup> Information from HCOG provided via e-mail, 9-25-2020 from [Archivist@olmstedhistory.com](mailto:Archivist@olmstedhistory.com) (Krista Lewis) to [mplundgren@rochestermn.gov](mailto:mplundgren@rochestermn.gov) (Molly Patterson)



## ARCHITECTURE – HISTORY INVENTORY FORM (Phase I/Windshield)

### Rochester Heritage preservation Sites Review, January 2015

- Phase I, The 106 Group – not recommended for further evaluation

### Post Bulletin, “7 Things to Know about Rochester’s Fire Station Bell and Clock Tower Project” May 16, 2023<sup>2</sup>

- The original fire station tower was built at South Broadway Avenue and Fourth Street in 1898.
- The 1,200-pound bell was part of the original structure, but the Seth Thomas clock was added a year later.
- The clock and bell remained in place until a new Central Fire Station was built at Sixth Street in 1930.
- The clock and bell were featured in two different towers in recent decades
- First phase of construction for the tower outside the fire station at 521 S. Broadway Ave, May 2023
- 50-foot vertical beams for the tower will be installed for phase 2 of the project



**1898 Fire Hall with  
Clock and Bell, 1922  
State Fire-fighters  
Convention**

(note location,  
proximity to Riverside  
Building on left –  
current location of  
Winona State University  
& Limb Lab)

<sup>2</sup> <https://www.postbulletin.com/news/local/7-things-to-know-about-rochesters-fire-station-bell-and-clock-tower-project>  
OL-ROC-

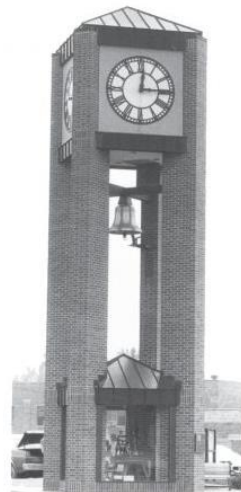
## ARCHITECTURE – HISTORY INVENTORY FORM (Phase I/Windshield)



Clock and Bell at Civic Center location <sup>3</sup>



1898 - 1930



1982 - 2001



2001 - 2015



2019 Vision

Clock locations over time – BKV Group <sup>4</sup>

*Inventory Form – Rochester Community Development, August 9, 2023*

<sup>3</sup> Photo Source: Rochester Post Bulletin, Answer Man: Clock & Tower Effort Moving Forward, November 11, 2019  
<https://www.postbulletin.com/opinion/answer-man-clock-and-tower-effort-moving-forward>

<sup>4</sup> Bkvgroup.com

Excerpt from:

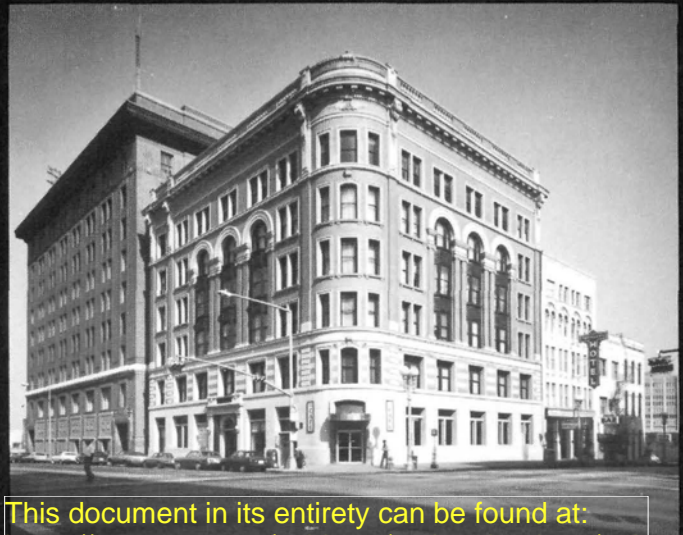
# NATIONAL REGISTER BULLETIN

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



This document in its entirety can be found at:  
[https://www.nps.gov/subjects/nationalregister/upoad/NRB-15\\_web508.pdf](https://www.nps.gov/subjects/nationalregister/upoad/NRB-15_web508.pdf)

## 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.

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# V. HOW TO EVALUATE A PROPERTY WITHIN ITS HISTORIC CONTEXT

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## 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.

**Rochester's Historic Contexts can be found at:**

<https://www.rochestermn.gov/home/showpublisheddocument/6449>

## 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).

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

# 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*.

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# CRITERIA CONSIDERATION F: COMMÉMORATIVE PROPERTIES

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

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## UNDERSTANDING CRITERIA CONSIDERATION F: COMMÉMORATIVE 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: COMMÉMORATIVE 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.

# 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.



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# VIII. HOW TO EVALUATE THE INTEGRITY OF A PROPERTY

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## 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.