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National Register 101

Criteria Considerations

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ALTHOUGH THE NATIONAL PARK SERVICE tries to make the National Register eligibility guidelines and listing process easy to understand, NPS missed the mark when it named and described the Criteria Considerations. Even some professionals find the language explaining these important listing factors to be confusing. This installment of National Register 101 will attempt to translate the jargon.

In the December 2010 issue of *Preservation in Print*, we discussed the kinds of properties the National Register accepts — buildings, structures, sites, objects and districts. The Criteria Considerations define categories within these property types that the Register declines to list unless they meet special situations, or loopholes. Each Criteria Consideration is identified by a letter of the alphabet.

In brief, the Criteria Considerations exclude seven types of candidates: religious properties, moved properties, reconstructed properties, commemorative proper-

ties, birthplaces and graves, cemeteries and resources achieving significance within the past 50 years. However, the Register includes numerous examples of these property types that achieved listing through loopholes.

Criteria Consideration A RELIGIOUS PROPERTIES

The separation of church and state clause in the U.S. Constitution confirms that the government cannot favor one spiritual doctrine or belief over another. Thus, the National Register is very cautious about listing religious properties. These are defined as those that are currently used or were used during the historic period for religious purposes. The definition also extends to include those constructed, currently owned or owned during the historic period by a religious institution. Special situations that might allow listing of religious resources include architectural or artistic merit and representation of an important historic or cultural force. The latter may include the history of religion

if the topic has been acknowledged and studied by non-clerical scholars. Otherwise, secular significance is the key. For example, the Register would not list a church because its building is 100 years old or its congregation was the first religious group formed in a community. However, it would list a church for its architectural significance.

Criteria Consideration C BIRTHPLACES AND GRAVES

These resource types are grouped together because the Register's concern over their listing is the same. As NPS explains, the birthplaces and graves of distinguished people represent the beginning and ending of their lives rather than their formative years, productive lives or specific contributions. Addition-



Photo courtesy Division of Historic Preservation

Moved from St. James to Iberville Parish, Bagatelle achieved Register listing despite Criteria Consideration B. As a major expression of the Greek Revival taste along Louisiana's Great River Road, it is important to the region rather than only to its original home parish.

Criteria Consideration B MOVED PROPERTIES

As discussed in the March 2011 issue of *Preservation in Print*, integrity of location and setting are serious considerations when evaluating the National Register eligibility of a resource. Moving a property to a different site and environment usually destroys its association with the historic event or person upon which its significance is based. For this reason, NPS prefers not to list moved properties. Additionally, it will remove a previously listed property from the Register if a later move occurs.

Despite these concerns, many moved properties are included on the Register. Some of these were relocated before they achieved their significance. Others qualified because they were the sole surviving property most directly associated with a historic event or person. Moved architectural candidates may be listed if they retain enough of their stylistic features, workmanship, feeling and association to portray their architectural values. All moved properties must have an orientation, setting and general environment similar to that of their original location. Because moving a resource also changes the area within which it must be evaluated, staff members often tell applicants that moved candidates must be more important than the usual nominee and significant within a broader geographic area if a nomination is to succeed.

ally, these sites are often located far from the places where contributions actually occurred. It is the latter that the National Register seeks to recognize. Thus, the Register provides few loopholes for listing these sites. A grave or birthplace must be that of a person of extraordinary importance, and no more appropriate place associated with his or



Due to Criteria Consideration C, Huey Long's grave site in downtown Baton Rouge is the only grave outside a cemetery listed on the National Register in the Pelican State. The nomination provided great detail justifying Long's outstanding importance to Louisiana and, even then, the grave was listed only as part of the broader nomination of the State Capitol and grounds.



Criteria Consideration A allowed St. Paul's Lutheran Church in Avoyelles Parish to be listed on the National Register because it is of local educational significance as the only place where local African-American children could receive schooling between 1916 and the late 1930s. The church's religious history was not considered in the listing process.

her contribution can survive. Both of these caveats must be met. According to National Register federal reviewers Patrick Andrus and James Gabbert, a person of extraordinary importance is “one who truly and recognizably changed history, had a significant impact on the course of events or on the fabric of the community.” Birthplaces and graves also can be listed if they are the sites of historic events, are associated with other significant persons, are architecturally significant or have achieved commemorative value after the passage of time (usually designated as 50 years). There are no birthplaces or graves individually listed in Louisiana.

Criteria Consideration D CEMETERIES

NPS hesitates to list cemeteries because they are often associated with family history, ethnic identity and/or religion. Additionally, if all of the



Although there are also historical reasons that may apply, an architecturally significant burial ground like Metairie Cemetery in Orleans Parish has the best chance of overcoming Criteria Consideration D's prohibition against the Register listing of cemeteries.

thousands of cemeteries in the nation were eligible for Register listing, the recognition would be meaningless. Therefore, cemeteries can be placed on the Register only when they possess a factor that raises their importance above that of the average burial ground. Examples include 1) a cemetery important for its age in relation to its locale, i.e. a number of its burials date to the area's founding, 2) a cemetery eligible for design, i.e. layout/plan, landscape or artistic merit of tombstones, 3) a cemetery associated with a historic event or that somehow illustrates a broad historical pattern, 4) a cemetery with the potential to answer previously identified research questions, generally associated with the field of archaeology, and 5) a cemetery containing the graves of a number of persons of transcendent importance. The latter are persons of great eminence and impact in their fields or in the history of their communities, state or nation. In all cases, a cemetery containing more modern than historic burials is ineligible for listing.

Criteria Consideration E RECONSTRUCTED PROPERTIES

The National Park Service explains that reconstructed properties are those that are reproduced in the “exact form and detail of a vanished building, structure, object or a part thereof, as it appeared at a specific period of time.” A reconstruction can consist of new materials or be reassembled using old and new parts. Although copies



can provide important lessons when original resources have been lost, they are usually not eligible for the Register because they lack integrity of materials and association.

A reconstructed property must meet all of the following requirements to achieve listing: 1) it must be part of a larger group of mostly original historic resources (most likely a district), 2) it must be an essential component of a restoration master plan that encompasses the entire area, 3) it must stand with its original companion buildings and on the earlier building's site, 4) it must be an accurate copy based upon reliable archaeological, architectural and historical research, 5) there must be no surviving building with the same association, and 6) it must be acknowledged as a reproduction rather than presented as an authentic historic resource.

Occasionally a reconstruction may be listed if, after the passage of an appropriate time frame, it has become significant in its own right. In such a case, the reconstructed resource would be important for what it illustrates

about the period in which it was built rather than the historic period it depicts. There are no reconstructed properties listed in Louisiana.

Criteria Consideration F COMMEMORATIVE PROPERTIES

Commemorative properties are those created to honor historic events or significant persons. They are designed and constructed at some point after the event or death of the individual being honored, are not directly associated with them and reflect a later generation's artistic values and opinion of the past. These resources are eligible for the Register only when age, artistic or architectural design, tradition or symbolic value has given them their own historical significance.

Criteria Consideration G PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST 50 YEARS

The National Park Service believes that time must have passed before a Register candidate can be evaluated with perspective and objectivity. To avoid the listing of resources of only passing interest the Register usually declines to accept those with a significance occurring less than 50 years ago. However, some events are so significant that they merit Register status despite their relative youth. Criteria Consideration G allows these listings through an exceptional importance clause. Exceptional importance does not mean that a resource must be nationally significant. Instead, 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.” This loophole can apply to a single resource or a category of fragile resources.

When considering the nomination of a property under Criteria Consideration G, one begins by answering several questions. What is the historic context (pattern, theme or event) and what is the candidate's role within it? Do other examples with the same associations and importance exist? If so, why does this candidate best represent the context? Finally, does scholarly research and evaluation confirming the resource's exceptional importance exist? Only when these questions are answered can an applicant know whether or not to pursue nomination of a young candidate. Preparing a National Register nomination for a young but exceptionally important resource is challenging. Nevertheless, it is worth the time and effort.

For more information on Criteria Considerations, see the National Reg-



Photo by Patricia L. Duncan

New Orleans' National Register listed General Beauregard Equestrian Statue (1913-1915), obviously a commemorative resource generally excluded under Criteria Consideration F, because it serves as a tangible symbol of the early twentieth century Southern cultural tradition known as the “Cult of the Lost Cause.”

ister Bulletin titled *How to Apply the National Register Criteria for Evaluation*, <http://www.nps.gov/history/nr/publications/bulletins/pdfs/nrb15.pdf>, upon which much of this article is based. Note that the introduction to the examples provided for each Criteria Consideration is confusing. In essence, when the introduction says a property “must meet” the Criteria Consideration, it means that the prohibited property type can qualify for the Register only if one of the loopholes applies. When the example says the candidate does not need to meet the Criteria Consideration, it means that the general exclusion of the property type does not apply in that situation. However, the candidate must still meet the Register's significance and integrity requirements.



New Orleans' William Frantz School achieved Register status 45 years after its 1960 desegregation. Had this event not been of exceptional importance in the Civil Rights Movement, Criteria Consideration G's prohibition against listing resources and events less than 50 years old would have prevented the early recognition.