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All compliant submissions may be accessed as follows:

- **“Initial Submissions”**: Compliant submissions received no later than by 4:00 p.m. Thursday of the week prior to the meeting, which are not integrated by reference or exhibit in the Staff Report.
- **“Secondary Submissions”**: Compliant submissions received after the Initial Submission deadline up to 24-hours prior to the Commission meeting are contained in this file and bookmarked by the case number.
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If you have any questions, please contact the Commission Office at (213) 978-1300.

INITIAL SUBMISSIONS

The following submissions by the public are in compliance with the Commission Rules and Operating Procedures (ROPs), Rule 4.3a. Please note that “compliance” means that the submission complies with deadline, delivery method (hard copy and/or electronic) AND the number of copies. The Commission’s ROPs can be accessed at <http://planning.lacity.org>, by selecting “Commissions & Hearings” and selecting the specific Commission.

The following submissions are not integrated or addressed in the Staff Report but have been distributed to the Commission.

Material which does not comply with the submission rules is not distributed to the Commission.

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If you have any questions, please contact the Commission Office at (213) 978-1300.

June 11, 2026

VIA EMAIL

Los Angeles Cultural Heritage Commission
Attn: Commission Executive Assistant
200 North Spring Street, Room 1010
Los Angeles, CA 90012

Re: Cultural Heritage Commission June 18, 2026 Meeting to Consider Application for
Nomination of Park La Brea Apartments (6200 West Burnside Avenue and Related
Addresses; CHC-2026-2159-HCM; ENV-2026-2160-CE)

Dear President Milofsky and Honorable Commissioners:

We are writing on behalf of our client Prime Park LaBrea Titleholder LLC (the "Owner"), the owner of Park La Brea Apartments located at 6200 West Burnside Avenue and related addresses (the "Property"). The Cultural Heritage Commission ("CHC") is being asked to take an application for designation of the Property as a Historic-Cultural Monument ("HCM") under formal consideration at its June 18, 2026 meeting. As set forth in more detail below, the application for nomination dated February 26, 2026 (the "Application"), is not complete as required by law, and it does not provide the CHC or the Department of City Planning's ("Department's") Office of Historic Resources ("OHR") sufficient information to evaluate the eligibility of the Property for HCM status. As detailed further below, many basic information requirements are missing or not provided and others are grossly in error, such as the 34-acre discrepancy in the size of the Property.

The Los Angeles Administrative Code ("LAAC") governs the designation of HCMs and requires that an application for designation of an HCM be "complete" and "include all information required." (LAAC Sec. 22.171.10(b).) The Department's *Historic-Cultural Monument Nomination Form* ("Nomination Form"), included as Attachment A, details the materials required to constitute a complete application, and the Nomination Form along with additional guidance materials from the Department explain the type of information and level of detail necessary for an application to be considered complete. The requirement that an application be complete is an indispensable threshold for initiating the nomination of an HCM. Without a complete submittal, the CHC cannot take an application under consideration, and the nomination cannot proceed.

Given the short time frames mandated by the LAAC for considering a nomination to designate an HCM, having a complete application with sufficient information and detail is even more critical. Once the process begins to consider an HCM nomination, there is limited ability on the part of the CHC, the applicant, or the property owner to extend the mandated timeframes. Unless extended, the CHC must act within 75 days of taking the Application under consideration. Even with a possible extension, the timeframe to act is only extended by 60 days. (LAAC Sec.

22.171.10(e)(1).) While these timeframes may allow for sufficient evaluation when an individual building is nominated as an HCM, for a property the size and scope of the Park La Brea Apartments, it is absolutely crucial that detailed information, documentation, and clarity on what is being proposed for designation is provided in the Application to ensure that proper evaluation of the Property occurs.

The Application, as submitted, is missing required materials and does not provide complete information to understand which sites, buildings, or structures are proposed to be included in the nomination. The Application fails to provide details and documentation necessary to evaluate whether such sites, buildings, or structures are historically or culturally significant. Additionally, the Property is more similar to a neighborhood or a district, therefore the process, principles, and standards of review that govern the evaluation of a historic district or Historic Preservation Overlay Zone (“HPOZ”) should apply here. However, the Application relies only on the HCM standards for evaluating an isolated building that is proposed for designation. As such, the Application does not include the required materials, information, or documentation necessary to be determined complete or to provide sufficient information to properly evaluate the Property. We, therefore, respectfully request that the CHC find the Application to be incomplete and decline to take it under consideration as submitted.

I. The Application Lacks Required Information and Detail and Cannot Be Considered Complete

A nomination for designation of an HCM may be initiated by the submittal of a complete application that provides the detail necessary to evaluate whether a proposed monument demonstrates the required level of significance. The Application is missing key materials and information and lacks detail sufficient to enable a proper review of the Property’s significance. Therefore, the Application should not have been deemed complete by the Department. As such, the LAAC does not allow the CHC to take the Application under further consideration as submitted.

A. Requirements for a Complete Application

Section 22.171.10(b) of the LAAC requires that an applicant for the proposed designation of an HCM “shall complete the application ... on a form provided by the Department; include all information required; pay the required fee, if any; and file the application with the Department.” The Department’s Nomination Form details the required information for all nomination applications, including an Application Checklist in Section 9 that lists the materials required for a complete submittal. Those mandatory materials include: (1) Nomination Form, (2) Written Statements A and B, (3) Bibliography, (4) Two Primary Photos of Exterior/Main Facade, (5) Copies of Primary/Secondary Documentation, (6) Copies of Building Permits for Major Alterations, (7) Additional, Contemporary Photos, (8) Historical Photos, and (9) Zimas Parcel Report for all Nominated Parcels (including map).

According to the Nomination Form, the written statements are intended to allow the applicant “to discuss at length the significance of the proposed monument and why it should be

designated as an Historic-Cultural Monument.” (See Section 7.) The Nomination Form’s instructions for preparing the written statements emphasize the need for detail, descriptions of “character-defining elements, structures, interior spaces, or landscape features,” and the importance of including supporting documentation and research. (See Section 7(A), (B).) The Nomination Form states that Written Statement B, the “Statement of Significance” is the “main argument for designation so it is important to substantiate any claims you make with supporting documentation and research.” (See Section 7(B).)

The Department provides further instructions and detail regarding the requirements to submit a complete application for an HCM nomination in the *Historic-Cultural Monument Nomination Information Guide* (“Information Guide”), included as Attachment B. The Information Guide emphasizes the importance of providing “as much information as possible about the proposed monument in [the] nomination.” The Information Guide states that “[a]n application that is deemed complete must provide sufficient evidence and necessary documentation.” (See Information Guide, pgs. 3, 4.)

Only after a complete application, containing all required information and a sufficient level of detail, is submitted to the Department, can that application be considered by the CHC. According to LAAC Section 22.171.10(c)(4), before the CHC can even determine whether an application merits formal consideration, the application must be determined to be complete by the Director of the Department. As described below and set forth in more detail in the *Technical Expert Peer Review Report: Park La Brea, Historic-Cultural Monument Nomination Form* (“Report”) prepared by a preeminent historic resources expert, Architectural Resources Group (“ARG”), included as Attachment C, the Application “does not provide sufficient information or documentation to be considered complete or to provide a sufficient basis to evaluate eligibility under Los Angeles HCM criteria.” (See Report, pg. 1.) The CHC, therefore, cannot take this Application under consideration as submitted.

B. Deficiencies in the Application

The Application is lacking fundamental information such as the delineation of a specific boundary for the area proposed to be designated or accurate information about the number of units or size of the Property. While the Staff Report prepared for the CHC’s June 18, 2026 meeting attempts to define a boundary, the Application itself does not specify what property is intended to be included in the nomination, and the general area described includes several buildings that were not part of the original Park La Brea complex. To further the confusion, the Application refers to a 178-acre site with 4,500 residential units, and the Staff Report states that the site is approximately 175 acres with 4,000 residential units. However, neither are correct as the Property is 144 acres with 4,250 residential units. The discrepancy of up to 34 acres and 250 units further illustrates the lack of precision and clarity regarding what is actually included in the nomination. In fact, the Application is missing the required Zimas Parcel Reports, which would help to clarify what parcels are intended to be covered by the nomination. The Application only includes a Parcel Report for Assessor Parcel Number (“APN”) 5509-003-005, despite there being multiple separate APNs comprising the Property. Because the Parcel Reports are required in the Nomination Form’s Application Checklist, failing to include reports for all nominated parcels renders the Application

incomplete. Additionally, given the absence of a clear boundary or list of nominated parcels, along with inaccurate descriptions of the Property size and residential units, it is not possible for the CHC to determine what portion or portions of the Property are nominated for designation.

The Application does not provide sufficient information to identify which buildings or structures should be evaluated as part of the HCM nomination, nor does it document whether the buildings or structures have been altered in a way that would make them noncontributing. While the Application notes that some structures were built after the initial construction of the Property and that certain elements of the site plan have been changed, it does not provide sufficient identifying information to know what construction postdates the proposed period of significance, what has been altered, and what is intended to be included.

The Application fails to identify what character-defining features are present on the Property's buildings or structures, or make up important site planning features. Despite the Application's focus on the importance of site planning and spatial relationships in the Garden Apartment movement, the Application does not provide any documentation of these features on the Property or of the integrity of the original site plan. In fact, as noted by ARG, the Application fails to provide any new research or analysis, instead relying primarily on prior secondary sources without proper citation. (*See Report*, pg. 5.) This is a troubling precedent that obfuscates and diminishes the integrity of the HCM process.

Based on the information presented in the Application, it is not possible to know what the boundaries of the proposed HCM are, what buildings or structures are proposed to be included and why, whether the spatial relationships and site planning are considered significant, or whether any features have been altered such that they would be considered noncontributing. The Application, therefore, is incomplete, and as such, the CHC cannot take the Application under further consideration.

II. The HCM Process Is Not the Proper Process for Evaluating a Historic District

The Application relies on the HCM designation process to nominate a development that does not fit within that process. Based on our records, the Property is approximately 144 acres, with 49 buildings housing 4,250 residential units, and dozens of related structures, all spanning multiple legal parcels. Although the Property is more similar to a neighborhood or district, the Application categorizes the Property simply as a "building" under the Proposed Monument Property Type in Section 1 of the Nomination Form. The HCM process does not include an option for a "historic district" or a more appropriate monument type, and the Information Guide does not include any instructions for how to document a multi-building HCM.

LAAC Section 22.171.7 defines an HCM as "any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles." The LAAC does not include a definition for a historic district. The National Park Service defines a historic district as "a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development." (*Report*, pg. 3.) The National Park Service's technical bulletin further

states that 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.”¹

The closest designation to a historic district that the Los Angeles Municipal Code includes is an HPOZ. LAMC Chapter 1A, Division 13B.8.C defines an HPOZ as an “area of the City containing buildings, structures, landscaping, Natural Features or lots having Historic, architectural, cultural or aesthetic significance.” The LAMC recognizes that the information necessary to evaluate the significance of a historic district is different than what is required for an HCM, which is typically an individual building or structure. In order for an HPOZ to be established, a Historic Resources Survey must be conducted, which “identifies all contributing and non-contributing buildings, structures and all contributing Landscaping, Natural Features and lots, individually or collectively, including street features, furniture or fixtures, and which is certified as to its accuracy and completeness by the Cultural Heritage Commission.” (LAMC, Ch. 1A, Div. 13B.8.C.)

The Property is closer in type to a district, therefore, the process, principles, and standards for review necessary to establish a historic district would be more relevant here. However, the Application does not provide sufficient information or documentation necessary to evaluate the Property as a historic district, nor does it meet the requirements for evaluating a proposed HPOZ. Therefore, the Application fails to provide the information and documentation necessary for a complete application, and accordingly, should not be taken under further consideration.

III. Conclusion

The Application, as submitted, is missing required materials and does not provide complete information to understand which sites, buildings, or structures are proposed to be included in the nomination. The Application also fails to provide details and documentation necessary to evaluate whether such sites, buildings, or structures are historically or culturally significant, and it relies on standards typically used for a single building, rather than a historic district or an HPOZ, which would be more relevant to the Property.

The Application does not satisfy the requirements necessary to be determined complete, and therefore, the CHC cannot take the Application under further consideration as submitted. We, therefore, respectfully request that the CHC find the Application to be incomplete and decline to take it under consideration.

¹ National Park Service, National Register Bulletin, *How to Apply the National Register Criteria for Evaluation*, pg. 5 (nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf) (included as Attachment D).

Very truly yours,



Francis Y. Park
of PARK & VELAYOS LLP

cc: Councilmember Katy Yaroslavsky
Ms. Erin Bromaghim
Mr. Kristen Torres Pawling
Mr. Charles Turner
Mr. Vince Bertoni
Mr. Kevin Keller
Ms. Lisa Webber
Mr. Ken Bernstein
Mr. Lambert Giessinger
Elif Kimyacioglu, Esq.
Josh Frieman, Esq.
Marcos D. Velayos, Esq.

ATTACHMENT A



HISTORIC-CULTURAL MONUMENT NOMINATION FORM

1. PROPERTY IDENTIFICATION

Proposed Monument Name:		Select source of proposed name	
Other Associated Names:			
Street Address:		Zip:	Council District:
Range of Addresses on Property:		Community Name:	
Assessor Parcel Number:	Tract:	Block:	Lot:
Identification cont'd:			
Proposed Monument Property Type:	☐ Building	☐ Structure	☐ Object
	☐ Site/Open Space	☐ Natural Feature	
Describe any additional resources located on the property to be included in the nomination, here:			

2. CONSTRUCTION HISTORY & CURRENT STATUS

Year built:	☐ Factual ☐ Estimated	Threatened?
Architect/Designer:	Contractor:	
Original Use:	Present Use:	
Is the Proposed Monument on its Original Site? ☐ Yes ☐ No (explain in section 7) ☐ Unknown (explain in section 7)		

3. STYLE & MATERIALS

Architectural Style:		Stories:	Plan Shape:
FEATURE	PRIMARY	SECONDARY	
CONSTRUCTION	Type:	Type:	
CLADDING	Material:	Material:	
ROOF	Type:	Type:	
	Material:	Material:	
WINDOWS	Type:	Type:	
	Material:	Material:	
ENTRY	Style:	Style:	
DOOR	Type:	Type:	



HISTORIC-CULTURAL MONUMENT NOMINATION FORM

4. ALTERATION HISTORY

List date and write a brief description of any major alterations or additions. This section may also be completed on a separate document. Include copies of permits in the nomination packet. Make sure to list any major alterations for which there are no permits, as well.

5. EXISTING HISTORIC RESOURCE IDENTIFICATION (if known)

☐	Listed in the National Register of Historic Places
☐	Listed in the California Register of Historical Resources
☐	Formally determined eligible for the National and/or California Registers
☐	Located in an Historic Preservation Overlay Zone (HPOZ)
☐	Contributing feature
☐	Non-contributing feature
☐	Determined eligible for national, state, or local landmark status by an historic resources survey(s)
Survey Name(s):	
Other historical or cultural resource designations:	

6. APPLICABLE HISTORIC-CULTURAL MONUMENT CRITERIA

The proposed monument exemplifies the following Cultural Heritage Ordinance Criteria (Section 22.171.7):

☐	1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community.
☐	2. Is associated with the lives of historic personages important to national, state, city, or local history.
☐	3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.



HISTORIC-CULTURAL MONUMENT NOMINATION FORM

7. WRITTEN STATEMENTS

This section allows you to discuss at length the significance of the proposed monument and why it should be designated an Historic-Cultural Monument. Type your response on separate documents and attach them to this form.

A. Proposed Monument Description - Describe the proposed monument's physical characteristics and relationship to its surrounding environment. Expand on sections 2 and 3 with a more detailed description of the site. Expand on section 4 and discuss the construction/alteration history in detail if that is necessary to explain the proposed monument's current form. Identify and describe any character-defining elements, structures, interior spaces, or landscape features.

B. Statement of Significance - Address the proposed monument's historic, cultural, and/or architectural significance by discussing how it satisfies the HCM criteria you selected in Section 6. You must support your argument with substantial evidence and analysis. The Statement of Significance is your main argument for designation so it is important to substantiate any claims you make with supporting documentation and research.

8. CONTACT INFORMATION

Applicant

Name:		Company:	
Street Address:		City:	State:
Zip:	Phone Number:	Email:	

Property Owner

Is the owner in support of the nomination? ☐ Yes ☐ No ☐ Unknown

Name:		Company:	
Street Address:		City:	State:
Zip:	Phone Number:	Email:	

Nomination Preparer/Applicant's Representative

Name:		Company:	
Street Address:		City:	State:
Zip:	Phone Number:	Email:	



HISTORIC-CULTURAL MONUMENT NOMINATION FORM

9. SUBMITTAL

When you have completed preparing your nomination, compile all materials in the order specified below. Although the entire packet must not exceed 100 pages, you may send additional material on a CD or flash drive.

APPLICATION CHECKLIST

- | | |
|--|--|
| 1. ☐ Nomination Form | 5. ☐ Copies of Primary/Secondary Documentation |
| 2. ☐ Written Statements A and B | 6. ☐ Copies of Building Permits for Major Alterations
(include first construction permits) |
| 3. ☐ Bibliography | 7. ☐ Additional, Contemporary Photos |
| 4. ☐ Two Primary Photos of Exterior/Main Facade
(8x10, the main photo of the proposed monument. Also
email a digital copy of the main photo to:
planning.ohr@lacity.org) | 8. ☐ Historical Photos |
| | 9. ☐ Zimas Parcel Report for all Nominated Parcels
(including map) |

10. RELEASE

Please read each statement and check the corresponding boxes to indicate that you agree with the statement, then sign below in the provided space. Either the applicant or preparer may sign.	
☐	I acknowledge that all documents submitted will become public records under the California Public Records Act, and understand that the documents will be made available upon request to members of the public for inspection and copying.
☐	I acknowledge that all photographs and images submitted as part of this application will become the property of the City of Los Angeles, and understand that permission is granted for use of the photographs and images by the City without any expectation of compensation.
☐	I acknowledge that I have the right to submit or have obtained the appropriate permission to submit all information contained in this application.

Name: _____

Date: _____

Signature: _____

Mail your Historic-Cultural Monument Submittal to the Office of Historic Resources.

Office of Historic Resources
Department of City Planning
221 N. Figueroa St., Ste. 1350
Los Angeles, CA 90012

Phone: 213-874-3679
Website: preservation.lacity.org

ATTACHMENT B



HCM # 225: Los Angeles Theatre

CITY OF LOS ANGELES

Office of Historic Resources | Cultural Heritage Commission

HISTORIC-CULTURAL MONUMENT NOMINATION INFORMATION GUIDE

Updated April 2018



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INTRODUCTION

The Office of Historic Resources welcomes your interest in the City of Los Angeles' Historic-Cultural Monument (HCM) designation program. The Cultural Heritage Ordinance defines a Historic-Cultural Monument as a building, structure, site, or significant trees or other plant life of particular historic or cultural significance to the City of Los Angeles. The City of Los Angeles is home to a wide variety of Historic-Cultural Monuments, from grand movie palaces, to modest Victorian cottages, to monumental canals, bridges, and natural rock formations. The images in this packet provide a glimpse of the diversity of historic resources in Los Angeles.

It is important that you provide as much information as possible about the proposed monument in your nomination. Visit library archives, search historic newspapers, peruse books about Los Angeles history and architecture, and reach out to local historic preservation organizations. In addition, explore the *Office of Historic Resources* and *SurveyLA* website to become familiar with our preservation program and review tips for conducting historic property research. Conducting thorough research will enable you present a stronger nomination.

We understand that many individuals may not have engaged in this type of research before. Do not feel intimidated or overwhelmed by the research process if it is new to you, as our office will gladly assist you if you have questions. Please note, however, that the Office of Historic Resources cannot prepare your nomination for you. However, staff may supplement your application with additional information should the need surface during the review period.

Additionally, if you wish to seek outside assistance for preparing your nomination, several consulting companies and individuals offer fee-based services. Although we can provide you contact information, our office does not endorse any specific entity to assist you, as any transaction or agreement is between you and the consultant.

This instructions packet will guide you through each section of the nomination form. Do not hesitate to contact our office if you need further assistance in completing the form or have questions regarding the nomination requirements. Lastly, know that we value your work and appreciate your time and commitment to preserving Los Angeles's unique cultural and architectural identity.

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DESIGNATION TIMELINE

STEP 1: Upon receipt, the Office of Historic Resources (OHR) reviews the application for completion. An application that is deemed complete must provide sufficient evidence and necessary documentation. If no additional materials are needed, OHR prepares an initial staff report that states whether the Cultural Heritage Commission (CHC) should take the proposed designation under formal consideration.

STEP 2: CHC holds a public hearing during which it will vote on whether it will formally begin the HCM review process. It is recommended that applicants supplement a presentation of their proposed monument with a brief photo slideshow. If the CHC votes to take the nomination under formal consideration, the application process formally begins.

STEP 3: OHR formally notifies the property owner about the nomination. Additionally, all permits in process are flagged for review and a temporary stay on demolition or substantial alteration becomes effective. The stay remains while the property undergoes review.

STEP 4: OHR evaluates the proposed monument for designation and may conduct a site visit.

STEP 5: After evaluating the property, OHR prepares a final staff report recommending approval/denial of Historic-Cultural Monument designation for consideration by CHC.

STEP 6: CHC holds a second public hearing during which it will vote to approve/deny Historic-Cultural Monument status. If the commission votes denial, the designation process ends and the stay on demolition or alteration is lifted.

STEP 7: If CHC approves Historic-Cultural Monument designation, the nomination is forwarded to the City Council's Planning and Land Use Management Committee (PLUM).

STEP 8: The three-member Planning and Land Use Management Committee holds an initial hearing to recommend a final approval or denial for consideration by the full City Council.

STEP 9: The City Council grants the property, site, or structure inclusion on the list of HCM's.



HCM #311: Los Altos Apartments



HCM #159: Ralph J. Bunche Home



HCM #68: Charles Lummis Residence

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APPLICATION CHECKLIST

You must submit all application materials in the order stated below. Although the page limit for mailed applications is 100 pages, you may submit additional material on a CD, flash drive, or as email attachments.

Nomination Form: All entries must be typed. Handwritten forms are not accepted.

Written Statements: This section should be typed on a separate document. Although you may choose to structure your statement in any format, you must address the stated prompts.

Bibliography: Cite the title, author, and source for all books, websites, media clips, interview, etc. that you used your research.

Primary Photos: We ask that you include two, 8x10, *high quality* photos of the exterior, main façade, or other primary viewpoint. Prints *and* digital copies are necessary.

Primary Documents: Include copies of relevant newspaper clippings, maps, or articles used in your research.

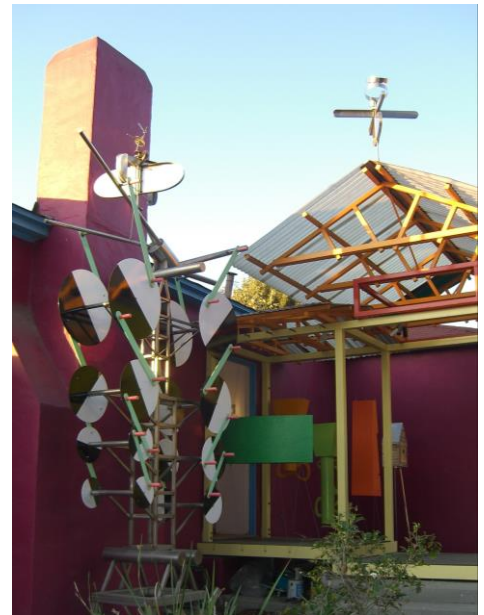
Copies of building permits for major alterations: In addition to the original building permit, you must attach copies of building permits for all significant alterations.

Contemporary Photos: These photos should exhibit various exterior angles, interior spaces, or secondary structures. It is a good idea to include photos of character-defining features or unique details mentioned in the Proposed Monument Description. Contemporary photos should reflect the property's most recent condition.

Historical Photos: If available, include photos from newspapers, books, etc. that provide historical perspective and demonstrate change.

ZIMAS Parcel Report: Print the property's parcel report from the ZIMAS website. Navigate to *Reports* → *Parcel Reports* → *Run Report*.

****Disclaimer:** *Please note that all documents submitted will become public records under the California Public Records Act, and must be made available upon request to members of the public for inspection and copying.*



HCM #972: Shire Art House



HCM #532: Venice Arcades

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IMPORTANT RESOURCES

Guides to Conducting Historical Research

<http://www.preservation.lacity.org/news/ohrs-how-guide-conducting-historical-research>

<https://www.laconservancy.org/resources/guide/historical-research-guide>

Zone Information and Map System (ZIMAS):

www.zimas.lacity.org

ZIMAS is the portal that contains all legal, jurisdictional, planning, zoning, and assessor information for parcels in the City of Los Angeles. For more on how to use ZIMAS to find required information your nomination, review this [step-by-step guide](#).

SurveyLA:

www.preservation.lacity.org/survey

SurveyLA, the Los Angeles Historic Resources Survey, is the City's first comprehensive program to identify significant historic resources. The project will increasingly be a vital resource for historic resource identification as its goal is to evaluate properties based on a set of historic contexts, sub-contexts, and themes.

Architecture Reference Books

The following is a list of prominent books on architectural history:

- Blumenson, John J.G. *Identifying American Architecture: A Pictorial Guide for Styles and Terms, 1600-1945*. Nashville: American Association for State and Local History, 1981.
- Carley, Rachel. *The Visual Dictionary of American Domestic Architecture*. New York: Genry Hotl and Company, 1994.
- Harris, Cyril M. *American Architecture: An Illustrated Encyclopedia*. New York: W.W. Norton & Company, 1998.
- McAlester, Virginia Savage. *A Field Guide to American Houses: The Definitive Guide to Identifying and Understanding Domestic Architecture*. New York: Alfred A. Knopf, 2013.



HCM #653: Bryson Apartments



HCM #679: Maverick's Flat



HCM #659: Pacific's Cinerama Dome Theatre and Marquee

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NOMINATION FORM INSTRUCTIONS

SECTION 1: PROPERTY IDENTIFICATION

Choosing the Proposed Monument Name:

The historical name of the building is most often used as the name of the proposed monument. If the building does not have a historical name, the name of the original owner/builder is appropriate. For example, if the original owner/builder of a property was named “Phillip J. Adams,” the building may be titled “Adams Residence.” If a later figure in the property’s history contributed significance, this person’s last name can be hyphenated with the original owner’s name, for example, “Adams-Jones Residence.” If the original owner/builder is not significant or cannot be identified, the address may be used to identify the building, such as “1234 Main St. Residence.” However, using the current property owner’s name as part of the proposed monument’s name is generally not acceptable.

Name Source: Clarify the reason you chose the proposed name, e.g., it’s the name of a former property owner.

Other Associated Names: If the structure has a long history of different names, for example a restaurant that had different proprietors over the years, list them here.

You can find the following property information in ZIMAS:

Street Address: Choose the address associated with the property’s street-facing entrance.

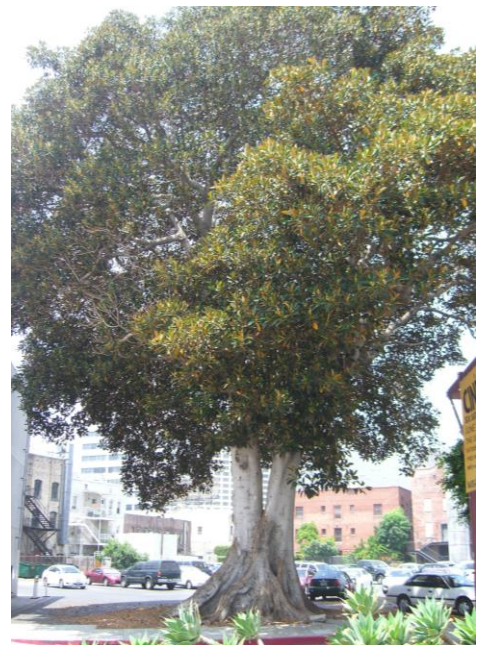
Range of Addresses: Multiple addresses may be listed in the property’s ZIMAS inventory if it spans multiple parcels.

Community: Identify the community in which your property is located (e.g., Highland Park, Chinatown, Little Tokyo). It is also acceptable to provide the property’s Community Plan Area.

Assessor Parcel Number (APN): 10-digit number that identifies unique parcels.



HCM #51: Carroll Avenue Residence



HCM #920: Aoyama Tree

Proposed monument property type:

Select the property type that *best* describes the proposed monument.

- Building: Houses, churches, theatres, offices, restaurants, studios, hotels, etc.
- Structure: Memorials, fountains, bridges, auditoriums, sculptures, stairways, etc.
- Object: Small sculptures, signs, etc.
- Site/Open Space: Built landscapes such as parks, cemeteries, and public spaces, or an open space with historic significance.
- Natural feature: Trees, plants, bodies of water, and waterways which may or may not be man-made.

SECTION 2: CONSTRUCTION HISTORY AND CURRENT STATUS

Year Built:

The factual date of construction can be found on the original construction permit or other official document. If an original building permit or official document cannot be found, you can use Sanborn Maps, oral histories, the construction method, or the architectural style to help you estimate the date of construction.

Threats:

Does the property face any physical threats?

Architect/Designer/Contractor:

The architect, designer, engineer, or contractor are often listed on building permits, and are sometimes mentioned in publications such as *Southwest Builder and Contractor*.

However, if the name of the architect or contractor on the building permit is also that of the owner, this does not necessarily mean that the owner designed the building. Rather, it usually means the owner acted as the general contractor, and may have purchased the design from a catalog. If you discovered that this is the case, write “unknown” and note your findings in the statement of significance.

Original/Present Use:

The original use is the purpose the property was built to serve. The present use is the property’s occupation status today. Discuss major changes of use in the Statement of Significance.



HCM #187: Korean Bell and Belfry of Friendship in Angel's Gate Park



HCM #270: Venice Canals



HCM #914: Avalon Boulevard Mexican Fan Palm Trees

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Is the Proposed Monument on its Original Site?

You may assume that the building or structure is on its original site, especially if you obtain an original building permit and other documentary evidence. If you have evidence that the building has been moved, select “no” and discuss the changes in your Written Statements. If you cannot determine if the building has been moved, select “unknown” and discuss in the Written Statement.

SECTION 3: BUILDING STYLE AND MATERIALS

Identify the architectural style, if possible, as well as the form and material of exterior elements. The objective of this section is to delineate the overall structure and defining characteristics of the proposed monument. Because this section specifically applies to buildings, nominations for property types that are not identified with an architectural style need not have it completed. Complete this section by selecting from the drop-down menus or typing your own entries. See Appendix for a list of all the drop-down options.

Architectural Style:

Select the appropriate architectural style from the dropdown menu. For descriptions of each style, search the *Architecture and Engineering Context Summary Table*, on the SurveyLA website. If the appropriate style is not provided in the drop-down, you may type in a better fit.

Stories: How many stories is the subject building?

Plan Shape: Select the appropriate plan shape of the subject building.

Exterior Description:

Identify the primary features of the building’s construction, cladding, roof, windows, entry and doors by selecting from the drop-down boxes. Identify a primary and secondary type for each category. For example, if a building has multiple types of windows, identify the two most common types.



HCM #468: Sacred Heart Church



HCM #134: Crossroads of the World

SECTION 4: ALTERATION HISTORY

In the table, specify alterations that were made to the original structure or character of the proposed monument such as remodeling, additions, changes of use, or exterior modifications. Fill in the provided table or complete this section on a separate sheet.

This history can be found by performing permit searches for all associated addresses of the building (though you should list all known alterations whether there is a permit or not). To locate building permits, visit the Department of Building and safety (201 N. Figueroa or 6262 Van Nuys Blvd) where staff members will assist you (See OHR “How-to” Guide form more information). Organize building permits in chronological order in the nomination packet, beginning with the initial construction permit.

SECTION 5: EXISTING HISTORIC RESOURCE IDENTIFICATION

If the property has been identified or listed as eligible for historic designation, this section is the place to provide that information.

Federal/State Historic Resource Designation:

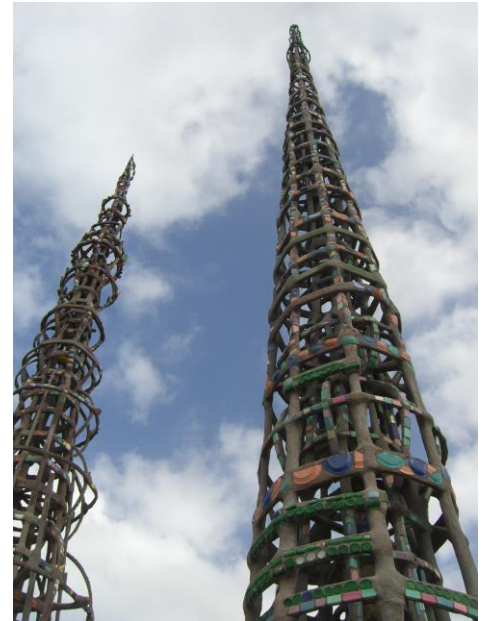
You can find out whether the property has been identified by the National Register of Historic Places or California Register of Historical Resources under the Planning/Zoning tab in ZIMAS.

- ***Using ZIMAS to Find Historic Preservation Information:*** Step-by-step instructions.
- ***Federal and State Designation Programs:*** Short summary and eligibility criteria.

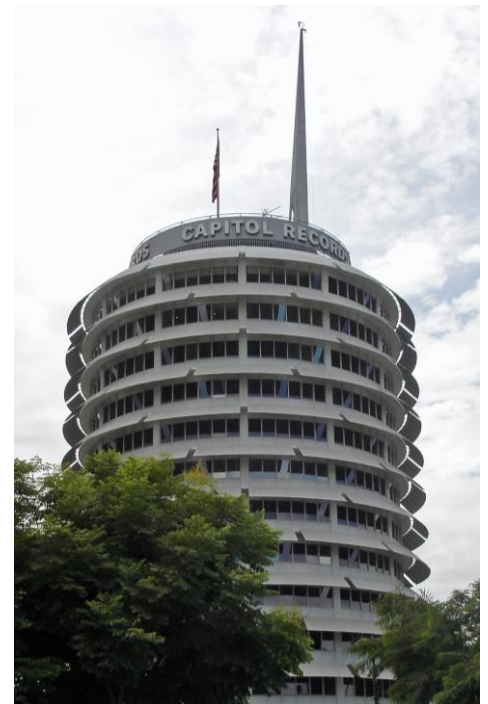
Historic Preservation Overlay Districts (HPOZ)

<http://www.preservation.lacity.org/hpoz/homepage/about-hpoz-program>

An HPOZ is a City-designated historic district that is defined by a cohesive and unique architectural identity. Properties located within the boundaries of these districts may be identified as either contributing features, if they conform to the primary architectural style of the district, or non-contributing, if they do not. To find out whether the property is located in an HPOZ, search in ZIMAS (Planning/Zoning) or the HPOZ website.



HCM #15: Towers of Simon Rodia



HCM #857: Capitol Tower

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Historic Resource Surveys:

An historic resource survey identifies and catalogues historic properties. You can access historic resource surveys prepared by the City of Los Angeles on the SurveyLA website.

SurveyLA Field Survey Findings and Reports: Results of SurveyLA and Community Redevelopment Agency (CRA) surveys.

SECTION 6: HISTORIC-CULTURAL MONUMENT CRITERIA

*Indicate which of the three criteria best represent(s) the historic character of the proposed monument. Choose all that apply, however, know that each selection **must** be addressed and explained within the Statement of Significance and substantiated with primary and secondary resources that support your claim.*

The three criteria for HCM designation, stated in the Cultural Heritage Ordinance Section 22.171.7, are listed below:

1. Is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city or community;
2. Is associated with the lives of historic personages important to national, state, city, or local history; or
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.



HCM #116: Wilshire Boulevard Temple



HCM #750: The Munch Box

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SECTION 7: WRITTEN STATEMENTS

In this section, discuss at length the property's character-defining features as well as its historic, cultural, and/or architectural significance. Although there is no formal structure to the written statements, we ask that you address the prompts stated below. As with the rest of the form, the written statements must be typed. Generally, each section must be a minimum length of half a page.

Proposed Monument Description:

Please identify and describe all original, character-defining structures, elements, interior spaces, or landscape features.

Consider organizing your statement as a narrative that progresses from a large to small scale perspective. Begin by discussing the site and surrounding environment. How many structures are on the lot? Does the site contain distinctive landscaping or natural features such as trees or hedges? Is the site on a slope? If the property is not on a large lot, the site description may be minimal.

If a visitor were to approach the proposed monument, what would they notice first? You might first describe the plan shape, then exterior elements, interior spaces, and lastly, character-defining features and unique details.

Statement of Significance:

Address the proposed monument's historic, cultural and/or architectural significance by discussing how it satisfies each Cultural Heritage Ordinance criteria that you selected in SECTION 4. For example, you might provide a brief history of significant property owners. Or, you might discuss how the proposed monument represents its cultural milieu. Be sure to support your claims with reputable sources such as autobiographies, articles, books etc. A bibliography that lists all sources you used in your research is required.



HCM #939: The Black Cat



HCM #10: Eagle Rock

SECTION 8: CONTACT INFORMATION

Applicant: The individual or party initiating the nomination. If the applicant is both the owner and nomination writer, only this box should be completed.

Owner: Complete if the nomination is not owner-initiated.

Nomination Preparer/Applicant Representative: The preservation agency or other third party that prepared the nomination and/or represent the applicant.

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SECTION 9: SUBMITTAL CHECK-LIST

All of the listed items are necessary for an application to be considered complete.

SECTION 10: RELEASE

The applicant must sign to acknowledge the following:

- 1) All documents submitted as part of the nomination packet will become public records under the California Public Records Act, and must be made available upon request to members of the public for inspection and copying.
- 2) All photographs and images submitted will become the property of the City of Los Angeles. The City has the permission to use any photographs and images received in the packet without compensation. Be sure to accurately and thoroughly cite the sources of all the materials you used. For example, if you received photos from the public library, state the title, photographer, filing information, and date in a bibliography.
- 3) The applicant has the right or permission to submit all information contained in the application.

SUBMITTAL

Send application with the subject header,
“Historic-Cultural Monument Nomination,” to:

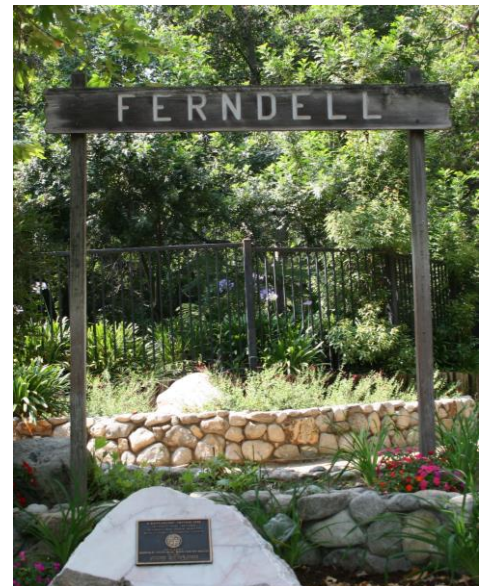
Office of Historic Resources
Department of City Planning
221 North Figueroa Street, Ste. 1350
Los Angeles, CA 90012

PLUS

Email digital copies of your primary photos to:
melissa.jones@lacity.org



HCM #522: State Theater Building



HCM #112: Gabrielino Indian Site in Griffith Park

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ATTACHMENT C



June 11, 2025

Francis Park
Park & Velayos LLP
801 South Figueroa Street, Suite 450
Los Angeles, CA 90017

Re: Technical Expert Peer Review Report: Park La Brea, Historic-Cultural Monument Nomination Form

Dear Mr. Park:

Architectural Resources Group (ARG) has conducted a technical peer review of the Historic-Cultural Monument (HCM) Nomination Form (the Nomination) prepared by James Dastoli and dated February 26, 2026. The Nomination was deemed complete by the Los Angeles Director of Planning in a letter addressed to the property owner, dated May 6, 2026, and City staff recommended that the Cultural Heritage Commission (CHC) “take the property under consideration as an HCM ... because the application and accompanying photo documentation suggest the submittal warrants further investigation” (Los Angeles Department of City Planning Recommendation Report, CHC-2026-2159-HCM).

The purpose of this technical expert peer review report is to assess the Nomination and provide ARG’s professional opinion regarding the accuracy and completeness of the Nomination. This peer review does not opine on the eligibility of the property. This letter was prepared by Katie Horak, Principal, Architectural Resources Group. Ms. Horak meets the Secretary of the Interior’s Professional Qualification Standards in Architectural History and was the co-author of the *Garden Apartments in Los Angeles Historic Context Statement* (2012). Based upon our technical review, ARG’s professional opinion is that the Nomination does not provide sufficient information or documentation to be considered complete or to provide a sufficient basis to evaluate eligibility under Los Angeles HCM criteria.

Summary of HCM Nomination Application

The following is a summary of the Nomination as submitted.

Description

The Nomination describes the complex as occupying a superblock bounded roughly by 3rd Street, 6th Street, Fairfax Avenue, and Cochran Avenue, and containing 31 two-story buildings and 18 thirteen-

story buildings. It states that the complex contains additional structures such as seven parking structures, garages, guardhouses, swimming pools, and signs. The Nomination does not individually describe each building, structure, or any of the site features. It provides a summary of alterations, culled from the permit history and historic photographs. Generally, the Nomination states that the exteriors of the two-story buildings and towers are mostly unaltered, with some window replacements being the only exterior alterations. The description also notes that the color of the buildings has changed over time, according to historic photographs.

Significance

The Nomination asserts that Park La Brea meets two criteria for designation as an HCM:

1. It is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city, or community.

The Nomination asserts that Park La Brea meets Criterion 1 for its significance as the largest housing community west of the Mississippi River, and as translating Garden City principles and ideals of Southern California indoor/outdoor living. It also states that it demonstrates how life insurance companies committed themselves to the public good by alleviating housing shortages through their large construction projects during and after World War II.

3. It embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

The Nomination asserts that Park La Brea meets Criterion 3 by serving as an excellent example of a garden apartment complex in Los Angeles. It states that Park La Brea “meets the key elements that the Los Angeles Conservancy uses to define garden apartments, which include having a superblock site plan, repeating nearly identical building models that are stylistically simple, and arranging buildings around large open spaces located at the interior of the site plan.” The Nomination notes that Park La Brea is notable for its second phase of construction of high-rises at the eastern portion of the complex, making it an unusual example incorporating both low-rise and high-rise multi-family housing. The Nomination does not state that Park La Brea represents a notable work of any of any master designers, builders, architects, or landscape architect.

The Nomination states Park La Brea was identified as eligible for local, state, and national listing as part of SurveyLA.

Assumingly to support the findings of eligibility under Criteria 1 and 3, the Nomination provides narratives describing the following:

- Development of Park La Brea
- Racial Integration of Park La Brea
- Architecture of Park La Brea
- The Garden City Movement and Early 20th Century Public Housing
- Garden Apartments in Los Angeles
- Metropolitan Life Social Programs
- Earl Theodore Hietschmidt
- Leonard Schultz

Finally, the Nomination provides an assessment of the integrity of Park La Brea using the National Register seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. It states that the complex has “a high degree of integrity, with the individual buildings, and overall plan being mostly unaltered.”

Nomination Peer Review

Upon careful review of the Nomination, ARG’s professional opinion is that it does not provide sufficient information or documentation to be considered complete or to provide a sufficient basis to evaluate eligibility under Los Angeles HCM criteria. The Nomination is fundamentally lacking information that would inform Office of Historic Resources staff and Cultural Heritage Commission review of the Nomination and concurrence with its position that the property should be regulated as an HCM, as detailed below.

Structural Deficiencies

The Nomination categorizes Park La Brea as a “Building” under the Proposed Monument Property Type on page 1 of the Nomination Form. There is no option for “Historic District,” which would appear to be a more appropriate categorization of a development like Park La Brea. A historic district is defined by the National Park Service as a significant concentration, linkage, or continuity of buildings, structures, or objects united historically or aesthetically by plan or physical development.¹ The City of Los Angeles’ *Historic-Cultural Monument Nomination Information Guide* does not include guidance or instructions for documenting the significance of historic districts or multi-building monuments as part

¹ National Park Service, National Register Bulletin, *How to Apply the National Register Criteria for Evaluation*, 5.

of the HCM nomination process, as historic districts in Los Angeles are typically designated through the Historic Preservation Overlay Zone (HPOZ) adoption process.

In practice, multi-building garden apartment complexes have been designated as HCMs in Los Angeles, both in instances as single ownership (Lincoln Place Apartments and Chase Knolls) and multiple ownership (Village Green). However, there are no instructions for documenting multi-building HCMs in the *Historic-Cultural Monument Nomination Information Guide*.

Even though this vagary exists in the City's HCM guidance, the nomination should follow best practices laid out by the National Park Service and the California Office of Historic Preservation for recording historic districts. For instance, the HCM nomination for Lincoln Place prepared by Historic Resources Group in 2011 states in the first sentence of the Significance section that "Lincoln Place is significant as a historic district," and an attached Lincoln Place Historic Resources Evaluation included an extensive list of character-defining features of the buildings, site, and landscapes.²

The Park La Brea HCM Nomination does not once mention the property as being best categorized as a historic district, and thus it lacks sufficient analysis and documentation of its existing conditions and significance. The following are missing from the Nomination:

- Delineation of a district boundary. Although the Nomination states that the property is roughly bounded by 3rd Street, 6th Street, Fairfax Avenue, and Cochran Avenue, there are a number of buildings within that boundary that are not part of the original Park La Brea complex. Although this is stated in the staff report, it is unclear in the Nomination.
- Accurate information about the size of the property, number of units, and identification of nominated parcels. The Nomination and staff report contain inconsistent and inaccurate information about the property's acreage and unit count. The Nomination refers to a 178-acre site with 4,250 units, and the staff report refers to a 175-acre site with 4,000 units. The property is 144 acres and contains 4,250 units. Additionally, the Nomination does not include ZIMAS Parcel Reports for all nominated parcels as required.
- Identification of district contributors and non-contributors. Are all of the buildings complex contributing? Are there any buildings within the Park La Brea complex that are too altered, or that post-date the period of significance, that would be appropriately categorized as non-contributors? For instance, the Nomination states that a greenhouse, parking lot, gatehouse, and swimming pool complex have been added after the period of initial construction, and that

² Lincoln Place Apartments, Case Number CHC-2011-2002-HCM; accessed online [11-1881 RPT CHC 10-11-11.pdf](#)

some elements of the site plan and street patterns have changed (Continuation Sheets, page 2). Are these elements contributing or non-contributing to the district?

- Documentation of building alterations. For instance, the Nomination states, “Some windows have been replaced within original openings on some of the two story buildings, but the vast majority of original windows that are visible from the public right of way have been retained” (Continuation Sheets, page 2). However, there is no indication of which of the 50 or so buildings at Park La Brea have been altered and which have not. The City of Los Angeles regulates elements of HCMs that are not visible from the public right-of-way, and Park La Brea is almost entirely gated and closed to the public. Thus, it is likely the author of the Nomination did not document building-specific alterations, but won’t this information be necessary for regulation of future work at the complex?
- Identification of character-defining features. When documenting historic districts, character-defining features may include spatial relationships, site plan and hardscape features, planning elements, and features on each of the buildings/structures within the district. These features are essential to an understanding of the significant character of any historic district and are taken into consideration when regulating future change. The Nomination does not provide any documentation of character-defining spatial relationships, materials, or features (of buildings, structures, or site). On page 17 of the Nomination, it provides a list of “character-defining features that epitomize the property type in its purest expression,” which is lifted directly from the *Garden Apartments of Los Angeles Historic Context Statement* (ARG, 2012), but nowhere in the Nomination does it state whether, or how, Park La Brea features these characteristics.

Other Deficiencies

- The author of the Nomination cites primarily secondary sources in the nomination narratives and integrates blocks of text from other reports into the narrative without proper citation. Although much has been written about garden apartments and it is appropriate to use these sources in the Nomination, the author should use block quotes when using the work of other authors rather than just stating generally in a footnote that text has been “excerpted and adapted.” This is a troubling practice that obfuscates ownership of work. Also, because only secondary sources were used, there is no new research and analysis of the history of Park La Brea, specifically, in the Nomination.
- The Nomination does not include any descriptive or analytical information about the designed landscapes of Park La Brea or the landscape architects who participated in its design, which is another notable omission.

- The Nomination does not include any graphic documentation of Park La Brea's significant features or historic/existing conditions. Although some aerial photography is included in the Nomination attachments, they are not annotated to provide any analytical information. The inclusion of maps in a nomination for a garden apartment complex the size of Park La Brea would be essential to convey the following: district boundary, phases of development, contributors and non-contributors, and change over time.

Summary

In conclusion, it is ARG's professional opinion that the Nomination does not include sufficient documentation or analysis to provide a complete picture of the significance or existing conditions of the complex. Additionally, it should be noted that primarily secondary sources were used in the preparation of the Nomination, and thus it relies on the accuracy of the sources it cites without verifying with primary sources. Without sufficient information and documentation, it is challenging to understand the parameters of the HCM (which properties, buildings, or site features, contribute to its significance) and would be even more challenging for City Planning staff to regulate future work at the HCM due to the lack of building and site-specific information.

ATTACHMENT D

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



The mission of the Department of the Interior is to protect and provide access to our Nation's natural and cultural heritage and honor our trust responsibilities to tribes.

The National Park Service preserves unimpaired the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The Park Service cooperates with partners to extend the benefits of natural and cultural resource conservation and outdoor recreation throughout this country and the world.

This material is partially based upon work conducted under a cooperative agreement with the National Conference of State Historic Preservation Officers and the U.S. Department of the Interior.

Date of publication: 1990; revised 1991, 1995, 1997. Revised for Internet 1995.

Cover

*(Top Left) **Criterion B - Frederick Douglass Home, Washington, D.C.** From 1877-1899, this was the home of Frederick Douglass, the former slave who rose to become a prominent author, abolitionist, editor, orator, and diplomat. (Walter Smalling, Jr.)*

*(Top Right) **Criterion D - Francis Canyon Ruin, Blanco vicinity, Rio Arriba County, New Mexico.** A fortified village site composed of 40 masonry-walled rooms arranged in a cluster of four house blocks. Constructed ca. 1716-1742 for protection against raiding Utes and Comanches, the site has information potential related to Navajo, Pueblo, and Spanish cultures. (Jon Samuelson)*

*(Bottom Left) **Criterion C - Bridge in Cherrytree Township, Venango County, Pennsylvania.** Built in 1882, this Pratt through truss bridge is significant for engineering as a well preserved example of a type of bridge frequently used in northwestern Pennsylvania in the late 19th century. (Pennsylvania Department of Transportation)*

*(Bottom Right) **Criterion A - Main Street/Market Square Historic District, Houston, Harris County, Texas.** Until well into the 20th century this district marked the bounds of public and business life in Houston. Constructed between the 1870s and 1920s, the district includes Houston's municipal and county buildings, and served as the city's wholesale, retail, and financial center. (Paul Hester)*

PREFACE

Preserving historic properties as important reflections of our American heritage became a national policy through passage of the Antiquities Act of 1906, the Historic Sites Act of 1935, and the National Historic Preservation Act of 1966, as amended. The Historic Sites Act authorized the Secretary of the Interior to identify and recognize properties of national significance (National Historic Landmarks) in United States history and archeology. The National Historic Preservation Act of 1966 authorized the Secretary to expand this recognition to properties of local and State significance in American history, architecture, archeology, engineering, and culture, and worthy of preservation. The National Register of Historic Places is the official list of these recognized properties, and is maintained and expanded by the National Park Service on behalf of the Secretary of the Interior.¹

The National Register of Historic Places documents the appearance and importance of districts, sites, buildings, structures, and objects signifi-

cant in our prehistory and history. These properties represent the major patterns of our shared local, State, and national experience. To guide the selection of properties included in the National Register, the National Park Service has developed the National Register Criteria for Evaluation. These criteria are standards by which every property that is nominated to the National Register is judged. In addition, the National Park Service has developed criteria for the recognition of nationally significant properties, which are designated National Historic Landmarks and prehistoric and historic units of the National Park System. Both these sets of criteria were developed to be consistent with the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation*, which are uniform, national standards for preservation activities.²

This publication explains how the National Park Service applies these criteria in evaluating the wide range of properties that may be significant in local, State, and national history.

It should be used by anyone who must decide if a particular property qualifies for the National Register of Historic Places.

Listing properties in the National Register is an important step in a nationwide preservation process. The responsibility for the identification, initial evaluation, nomination, and treatment of historic resources lies with private individuals, State historic preservation offices, and Federal preservation offices, local governments, and Indian tribes. The final evaluation and listing of properties in the National Register is the responsibility of the Keeper of the National Register.

This bulletin was prepared by staff of the National Register Branch, Interagency Resources Division, National Park Service, with the assistance of the History Division. It was originally issued in draft form in 1982. The draft was revised into final form by Patrick W. Andrus, Historian, National Register, and edited by Rebecca H. Shrimpton, Consulting Historian.

Beth L. Savage, National Register and Sarah Dillard Pope, National Register, NCSHPO coordinated the latest revision of this bulletin. Antionette J. Lee, Tanya Gossett, and Kira Badamo coordinated earlier revisions.

¹Properties listed in the National Register receive limited Federal protection and certain benefits. For more information concerning the effects of listing, and how the National Register may be used by the general public and Certified Local Governments, as well as by local, State, and Federal agencies, and for copies of National Register Bulletins, contact the National Park Service, National Register, 1849 C Street, NW, NC400, Washington, D.C., 20240. Information may also be obtained by visiting the National Register Web site at www.cr.nps.gov/nr or by contacting any of the historic preservation offices in the States and territories.

²The *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* are found in the *Federal Register*, Vol. 48, No. 190 (Thursday, September 29, 1983). A copy can be obtained by writing the National Park Service, Heritage Preservation Services (at the address above).

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I. INTRODUCTION

The National Register is the nation's inventory of historic places and the national repository of documentation on the variety of historic property types, significance, abundance, condition, ownership, needs, and other information. It is the beginning of a national census of historic properties. The National Register Criteria for Evaluation define the scope of the National Register of Historic Places; they identify the range of resources and kinds of significance that will qualify properties for listing in the National Register. The Criteria are written broadly to recognize the wide variety of historic properties associated with our prehistory and history.

Decisions concerning the significance, historic integrity, documentation, and treatment of properties can be made reliably only when the resource is evaluated within its historic context. The historic context serves as the framework within which the National Register Criteria are applied to specific properties or property types. (See *Part V* for a brief discussion of

historic contexts. Detailed guidance for developing and applying historic contexts is contained in *National Register Bulletin: How to Complete the National Register Registration Form* and *National Register Bulletin: How to Complete the National Register Multiple Property Documentation Form*.)

The guidelines provided here are intended to help you understand the National Park Service's use of the Criteria for Evaluation, historic contexts, integrity, and Criteria Considerations, and how they apply to properties under consideration for listing in the National Register. Examples are provided throughout, illustrating specific circumstances in which properties are and are not eligible for the National Register. This bulletin should be used by anyone who is:

- Preparing to nominate a property to the National Register,
- Seeking a determination of a property's eligibility,
- Evaluating the comparable significance of a property to those listed in the National Register, or
- Expecting to nominate a property as a National Historic Landmark in addition to nominating it to the National Register.

This bulletin also contains a summary of the National Historic Landmarks Criteria for Evaluation (see *Part IX*). National Historic Landmarks are those districts, sites, buildings, structures, and objects designated by the Secretary of the Interior as possessing national significance in American history, architecture, archeology, engineering, and culture. Although National Register documentation includes a recommendation about whether a property is significant at the local, State, or national level, the only official designation of national significance is as a result of National Historic Landmark designation by the Secretary of the Interior, National Monument designation by the President of the United States, or establishment as a unit of the National Park System by Congress. These properties are automatically listed in the National Register.

II. THE NATIONAL REGISTER CRITERIA FOR EVALUATION

CRITERIA FOR EVALUATION:³

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. That are associated with the lives of persons significant in our past; or
- C. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. That have yielded, or may be likely to yield, information important in prehistory or history.

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 50 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, or 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.

³The Criteria for Evaluation are found in the *Code of Federal Regulations, Title 36, Part 60*, and are reprinted here in full.

III. HOW TO USE THIS BULLETIN TO EVALUATE A PROPERTY

For a property to qualify for the National Register it must meet one of the National Register Criteria for Evaluation by:

- **Being associated with an important historic context** *and*
- **Retaining historic integrity of those features necessary to convey its significance.**

Information about the property based on physical examination and documentary research is necessary to evaluate a property's eligibility for the National Register. Evaluation of a property is most efficiently made when following this sequence:

1. Categorize the property (Part IV).
A property must be classified as

a district, site, building, structure, or object for inclusion in the National Register.

2. **Determine which prehistoric or historic context(s) the property represents** (Part V). A property must possess significance in American history, architecture, archeology, engineering, or culture when evaluated within the historic context of a relevant geographic area.
3. Determine whether the property is significant under the National Register Criteria (Part VI). This is done by identifying the links to important events or persons, design or construction features, or information potential that make the property important.

4. Determine if the property represents a type usually excluded from the National Register (Part VII). If so, determine if it meets any of the Criteria Considerations.

5. Determine whether the property retains integrity (Part VIII). Evaluate the aspects of location, design, setting, workmanship, materials, feeling, and association that the property must retain to convey its historic significance.

If, after completing these steps, the property appears to qualify for the National Register, the next step is to prepare a written nomination. (Refer to *National Register Bulletin: How to Complete the National Register Registration Form*.)

IV. HOW TO DEFINE CATEGORIES OF HISTORIC PROPERTIES

The National Register of Historic Places includes significant properties, classified as buildings, sites, districts, structures, or objects. It is not used to list intangible values, except in so far as they are associated with or reflected by historic properties. The National Register does not list cultural events, or skilled or talented individuals, as is done in some countries. Rather, the National Register is oriented to recognizing physically concrete properties that are relatively fixed in location.

For purposes of National Register nominations, small groups of properties are listed under a single category, using the primary resource. For example, a city hall and fountain would be categorized by the city hall (building), a farmhouse with two outbuildings would be categorized by the farmhouse (building), and a city park with a gazebo would be categorized by the park (site). Properties with large acreage or a number of resources are usually considered districts. Common sense and reason should dictate the selection of categories.

BUILDING

A building, such as a house, barn, church, hotel, or similar construction, is created principally to shelter any form of human activity. "Building" may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn.

Buildings eligible for the National Register must include all of their basic structural elements. Parts of buildings, such as interiors, facades, or wings, are not eligible independent of the rest of the existing building. The

whole building must be considered, and its significant features must be identified.

If a building has lost any of its basic structural elements, it is usually considered a "ruin" and is categorized as a site.

Examples of buildings include:

*administration building
carriage house
church
city or town hall
courthouse
detached kitchen, barn, and privy
dormitory
fort
garage
hotel
house
library
mill building
office building
post office
school
social hall
shed
stable
store
theater
train station*

STRUCTURE

The term "structure" is used to distinguish from buildings those functional constructions made usually for purposes other than creating human shelter.

Structures nominated to the National Register must include all of the extant basic structural elements. Parts of structures can not be considered eligible if the whole structure remains. For example, a truss bridge is composed of the metal or wooden truss, the abutments, and supporting

piers, all of which, if extant, must be included when considering the property for eligibility.

If a structure has lost its historic configuration or pattern of organization through deterioration or demolition, it is usually considered a "ruin" and is categorized as a site.

Examples of structures include:

*aircraft
apiary
automobile
bandstand
boats and ships
bridge
cairn
canal
carousel
corncrib
dam
earthwork
fence
gazebo
grain elevator
highway
irrigation system
kiln
lighthouse
railroad grade
silo
trolley car
tunnel
windmill*

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.

GEOGRAPHICAL BOUNDARIES

A district must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects, or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management, or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district.

DISCONTIGUOUS DISTRICTS

A district is usually a single geographic area of contiguous historic properties; however, a district can also be composed of two or more definable significant areas separated by nonsignificant areas. A discontinuous district is most appropriate where:

- Elements are spatially discrete;
- Space between the elements is not related to the significance of the district; and
- Visual continuity is not a factor in the significance.

In addition, a canal can be treated as a discontinuous district when the system consists of man-made sections of canal interspersed with sections of river navigation. For scattered archeological properties, a discontinuous district is appropriate when the deposits are related to each other through cultural affiliation, period of use, or site type.

It is not appropriate to use the discontinuous district format to include an isolated resource or small group of resources which were once connected to the district, but have since been separated either through demolition or new construction. For example, do not use the discontinuous district format to nominate individual buildings of a downtown commercial district that have become isolated through demolition.

Examples of districts include:

*business districts
canal systems
groups of habitation sites
college campuses
estates and farms with large acreage/
numerous properties
industrial complexes
irrigation systems
residential areas
rural villages
transportation networks
rural historic districts*



Ordeman-Shaw Historic District, Montgomery, Montgomery County, Alabama. Historic districts derive their identity from the interrelationship of their resources. Part of the defining characteristics of this 19th century residential district in Montgomery, Alabama, is found in the rhythmic pattern of the rows of decorative porches. (Frank L. Thiermonge, III)

V. HOW TO EVALUATE A PROPERTY WITHIN ITS HISTORIC CONTEXT

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.

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).

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

Determine how the theme of the context is significant in the history of the local area, the State, or the nation.

A theme is a means of organizing properties into coherent patterns based on elements such as environment, social/ethnic groups, transportation networks, technology, or political developments that have influenced the development of an area during one or more periods of prehistory or history. A theme is considered significant if it can be demonstrated, through scholarly research, to be important in American history. Many significant themes can be found in the following list of Areas of Significance used by the National Register.

AREAS OF SIGNIFICANCE

Agriculture
Architecture
Archeology
 Prehistoric
 Historic—Aboriginal
 Historic—Non-Aboriginal
Art
Commerce
Communications
Community Planning and Development
Conservation
Economics
Education
Engineering
Entertainment/Recreation
Ethnic Heritage
 Asian
 Black
 European
 Hispanic
 Native American
 Pacific Islander
 Other
Exploration/Settlement
Health/Medicine
Industry
Invention
Landscape Architecture
Law
Literature
Maritime History
Military
Performing Arts
Philosophy
Politics/Government
Religion
Science
Social History
Transportation
Other

Determine what the property type is and whether it is important in illustrating the historic context.

A context may be represented by a variety of important property types. For example, the context of "Civil War Military Activity in Northern Virginia" might be represented by such properties as: a group of mid-19th century fortification structures; an open field where a battle occurred; a knoll from which a general directed troop movements; a sunken transport ship; the residences or public buildings that served as company headquarters; a railroad bridge that served as a focal point for a battle; and earthworks exhibiting particular construction techniques.

Because a historic context for a community can be based on a distinct period of development, it might include numerous property types. For example, the context "Era of Industrialization in Grand Bay, Michigan, 1875 - 1900" could be represented by important property types as diverse as sawmills, paper mill sites, salt refining plants, flour mills, grain elevators, furniture factories, workers housing, commercial buildings, social halls, schools, churches, and transportation facilities.

A historic context can also be based on a single important type of property. The context "Development of County Government in Georgia, 1777 - 1861" might be represented solely by courthouses. Similarly, "Bridge Construction in Pittsburgh, 1870 - 1920" would probably only have one property type.

Determine how the property represents the context through specific historic associations, architectural or engineering values, or information potential (the Criteria for Evaluation).

For example, the context of county government expansion is represented under Criterion A by historic districts or buildings that reflect population growth, development patterns, the role of government in that society, and political events in the history of the State, as well as the impact of county government on the physical development of county seats. Under Criterion C, the context is represented by properties whose architectural treatments reflect their governmental functions, both practically and symbolically. (See *Part VI: How to Identify the Type of Significance of a Property.*)

Determine what physical features the property must possess in order for it to reflect the significance of the historic context.

These physical features can be determined after identifying the following:

- Which types of properties are associated with the historic context,
- The ways in which properties can represent the theme, and
- The applicable aspects of integrity.

Properties that have the defined characteristics are eligible for listing. (See *Part VIII: How to Evaluate the Integrity of a Property.*)

PROPERTIES SIGNIFICANT WITHIN MORE THAN ONE HISTORIC CONTEXT

A specific property can be significant within one or more historic contexts, and, if possible, all of these should be identified. For example, a public building constructed in the 1830s that is related to the historic context of Civil War campaigns in the area might also be related to the theme of political developments in the community during the 1880s. A property is only required, however, to be documented as significant in one context.

COMPARING RELATED PROPERTIES

Properties listed in the National Register must possess significance when evaluated in the perspective of their historic context. Once the historic context is established and the property type is determined, it is not necessary to evaluate the property in question against other properties if:

- It is the sole example of a property type that is important in illustrating the historic context or
- It clearly possesses the defined characteristics required to strongly represent the context.

If these two conditions do not apply, then the property will have to be evaluated against other examples of the property type to determine its eligibility. The geographic level (local, State, or national) at which this evaluation is made is the same as the level of the historic context. (See *Part V: How to Evaluate a Property Within Its Historic Context*.)

LOCAL, STATE, AND NATIONAL HISTORIC CONTEXTS

Historic contexts are found at a variety of geographical levels or scales. The geographic scale selected may relate to a pattern of historical development, a political division, or a cultural area. Regardless of the scale, the historic context establishes the framework from which decisions about the significance of related properties can be made.

LOCAL HISTORIC CONTEXTS

A local historic context represents an aspect of the history of a town, city, county, cultural area, or region, or any portions thereof. It is defined by the importance of the property, not necessarily the physical location of the property. For instance, if a property is of a type found throughout a State, or its boundaries extend over two States, but its importance relates only to a particular county, the property would be considered of local significance.

The level of context of archeological sites significant for their information potential depends on the scope of the applicable research design. For example, a Late Mississippian village site may yield information in a research design concerning one settlement system on a regional scale, while in another research design it may reveal information of local importance concerning a single group's stone tool manufacturing techniques or house forms. It is a question of how the available information potential is likely to be used.

STATE HISTORIC CONTEXTS

Properties are evaluated in a State context when they represent an aspect of the history of the State as a whole (or American Samoa, the District of Columbia, the Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, or the Virgin Islands). These properties do not necessarily have to belong to property types

found throughout the entire State: they can be located in only a portion of the State's present political boundary. It is the property's historic context that must be important statewide. For example, the "cotton belt" extends through only a portion of Georgia, yet its historical development in the antebellum period affected the entire State. These State historic contexts may have associated properties that are statewide or locally significant representations. A cotton gin in a small town might be a locally significant representation of this context, while one of the largest cotton producing plantations might be of State significance.

A property whose historic associations or information potential appears to extend beyond a single local area might be significant at the State level. A property can be significant to more than one community or local area, however, without having achieved State significance.

A property that overlaps several State boundaries can possibly be significant to the State or local history of each of the States. Such a property is not necessarily of national significance, however, nor is it necessarily significant to all of the States in which it is located.

Prehistoric sites are not often considered to have "State" significance, per se, largely because States are relatively recent political entities and usually do not correspond closely to Native American political territories or cultural areas. Numerous sites, however, may be of significance to a large region that might geographically encompass parts of one, or usually several, States. Prehistoric resources that might be of State significance include regional sites that provide a diagnostic assemblage of artifacts for a particular cultural group or time period or that provide chronological control (specific dates or relative order in time) for a series of cultural groups.

NATIONAL HISTORIC CONTEXTS

Properties are evaluated in a national context when they represent an aspect of the history of the United States and its territories as a whole. These national historic contexts may have associated properties that are locally or statewide significant representations, as well as those of national significance.

Properties designated as nationally significant and listed in the National Register are the prehistoric and historic units of the National Park System and those properties that have been designated National Historic Landmarks. The National Historic Landmark criteria are the standards for nationally significant properties; they are found in the *Code of Federal*

Regulations, Title 36, Part 65 and are summarized in this bulletin in *Part IX: Summary of National Historic Landmarks Criteria for Evaluation*.

A property with national significance helps us understand the history of the nation by illustrating the nationwide impact of events or persons associated with the property, its architectural type or style, or information potential. It must be of exceptional value in representing or illustrating an important theme in the history of the nation.

Nationally significant properties do not necessarily have to belong to a property type found throughout the entire country: they can be located in only a portion of the present political boundaries. It is their historic context that must be important nationwide. For example, the American Civil War

was fought in only a portion of the United States, yet its impact was nationwide. The site of a small military skirmish might be a locally significant representation of this national context, while the capture of the State's largest city might be a statewide significant representation of the national context.

When evaluating properties at the national level for designation as a National Historic Landmark, please refer to the National Historic Landmarks outline, *History and Prehistory in the National Park System and the National Historic Landmarks Program 1987*. (For more information about the National Historic Landmarks program, please write to the Department of the Interior, National Park Service, National Historic Landmarks, 1849 C Street, NW, NC400, Washington, DC 20240.)

VI. HOW TO IDENTIFY THE TYPE OF SIGNIFICANCE OF A PROPERTY

INTRODUCTION

When evaluated within its historic context, a property must be shown to be significant for *one or more of the four Criteria for Evaluation - A, B, C, or D* (listed earlier in *Part II*). The Criteria describe how properties are significant for their association with important events or persons, for their importance in design or construction, or for their information potential.

The basis for judging a property's significance and, ultimately, its eligibility under the Criteria is *historic context*. The use of historic context allows a property to be properly evaluated in a nearly infinite number of capacities. For instance, Criterion C: Design/Construction can accommodate properties representing construction types that are unusual or widely practiced, that are innovative or traditional, that are "high style" or vernacular, that are the work of a famous architect or an unknown master craftsman. *The key to determining whether the characteristics or associations of a particular property are significant is to consider the property within its historic context.*

After identifying the relevant historic context(s) with which the property is associated, the four Criteria are applied to the property. Within the scope of the historic context, the National Register Criteria define the kind of significance that the properties represent.

For example, within the context of "19th Century Gunpowder Production in the Brandywine Valley," Criterion A would apply to those properties associated with important events in the founding and development of the industry. Criterion B would apply to those properties associated with persons who are significant in the founding of the industry or associated with important inventions related to gunpowder manufacturing. Criterion C would apply to those buildings, structures, or objects whose architectural form or style reflect important design qualities integral to the industry. And Criterion D would apply to properties that can convey information important in our understanding of this industrial process. If a property qualifies under more than one of the Criteria, its significance under each should be considered, if possible, in order to identify all aspects of its historical value.

NATIONAL REGISTER CRITERIA FOR EVALUATION*

The National Register Criteria recognize different types of values embodied in districts, sites, buildings, structures, and objects. These values fall into the following categories:

Associative value (Criteria A and B): Properties significant for their association or linkage to events (Criterion A) or persons (Criterion B) important in the past.

Design or Construction value (Criterion C): Properties significant as representatives of the manmade expression of culture or technology.

Information value (Criterion D): Properties significant for their ability to yield important information about prehistory or history.

*For a complete listing of the Criteria for Evaluation, refer to Part II of this bulletin.

CRITERION A: EVENT

Properties can be eligible for the National Register if they are associated with events that have made a significant contribution to the broad patterns of our history.

UNDERSTANDING CRITERION A: EVENT

To be considered for listing under Criterion A, a property must be associated with one or more events important in the defined historic context. Criterion A recognizes properties associated with single events, such as the founding of a town, or with a pattern of events, repeated activities, or historic trends, such as the gradual rise of a port city's prominence in trade and commerce. The event or trends, however, must clearly be important within the associated context: settlement, in the case of the town, or development of a maritime economy, in the case of the port city. Moreover, the property must have an important association with the event or historic trends, and it must retain historic integrity. (See *Part V: How to Evaluate a Property Within its Historic Context.*)

Several steps are involved in determining whether a property is significant for its associative values:

- Determine the nature and origin of the property,
- Identify the historic context with which it is associated, and
- Evaluate the property's history to determine whether it is associated with the historic context in any important way.

APPLYING CRITERION A: EVENT

TYPES OF EVENTS

A property can be associated with either (or both) of two types of events:

- A specific event marking an important moment in American prehistory or history and
- A pattern of events or a historic trend that made a significant contribution to the development of a community, a State, or the nation.

Refer to the sidebar on the right for a list of specific examples.

ASSOCIATION OF THE PROPERTY WITH THE EVENTS

The property you are evaluating must be documented, through accepted means of historical or archeological research (including oral history), to have existed at the time of the event or pattern of events *and* to have been associated with those events. A property is *not* eligible if its associations are speculative. For archeological sites, well reasoned inferences drawn from data recovered at the site can be used to establish the association between the site and the events.

SIGNIFICANCE OF THE ASSOCIATION

Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well. For example, a building historically in commercial use must be shown to have been significant in commercial history.

EXAMPLES OF PROPERTIES ASSOCIATED WITH EVENTS

Properties associated with specific events:

- *The site of a battle.*
- *The building in which an important invention was developed.*
- *A factory district where a significant strike occurred.*
- *An archeological site at which a major new aspect of prehistory was discovered, such as the first evidence of man and extinct Pleistocene animals being contemporaneous.*
- *A site where an important facet of European exploration occurred.*

Properties associated with a pattern of events:

- *A trail associated with western migration.*
- *A railroad station that served as the focus of a community's transportation system and commerce.*
- *A mill district reflecting the importance of textile manufacturing during a given period.*
- *A building used by an important local social organization.*
- *A site where prehistoric Native Americans annually gathered for seasonally available resources and for social interaction.*
- *A downtown district representing a town's growth as the commercial focus of the surrounding agricultural area.*

TRADITIONAL CULTURAL VALUES

Traditional cultural significance is derived from the role a property plays in a community's historically rooted beliefs, customs, and practices. Properties may have significance under Criterion A if they are associated with events, or series of events, significant to the cultural traditions of a community.⁵

Eligible

- A hilltop associated in oral historical accounts with the founding of an Indian tribe or society is eligible.
- A rural community can be eligible whose organization, buildings, or patterns of land use reflect the cultural traditions valued by its long-term residents.
- An urban neighborhood can be eligible as the traditional home of a particular cultural group and as a reflection of its beliefs and practices.

Not Eligible

- A site viewed as sacred by a recently established utopian or religious community does not have traditional cultural value and is not eligible.



Criterion A - The Old Brulay Plantation, Brownsville vicinity, Cameron county, Texas. Historically significant for its association with the development of agriculture in southeast Texas, this complex of 10 brick buildings was constructed by George N. Brulay, a French immigrant who introduced commercial sugar production and irrigation to the Rio Grande Valley. (Photo by Texas Historical Commission).

⁵For more information, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

CRITERION B: PERSON

Properties may be eligible for the National Register if they are associated with the lives of persons significant in our past.

UNDERSTANDING CRITERION B: PERSON⁶

Criterion B applies to properties associated with individuals whose specific contributions to history can be identified and documented. Persons "significant in our past" refers to individuals whose activities are demonstrably important within a local, State, or national historic context. The criterion is generally restricted to those properties that illustrate (rather than commemorate) a person's important achievements. (The policy regarding commemorative properties, birthplaces, and graves is explained further in *Part VIII: How to Apply the Criteria Considerations*.)

Several steps are involved in determining whether a property is significant for its associative values under Criterion B. First, determine the importance of the individual. Second, ascertain the length and nature of his/her association with the property under study and identify the other properties associated with the individual. Third, consider the property under Criterion B, as outlined below.

EXAMPLES OF PROPERTIES ASSOCIATED WITH PERSONS

Properties associated with a Significant Person:

- The home of an important merchant or labor leader.
- The studio of a significant artist.
- The business headquarters of an important industrialist.



Criterion B - The William Whitney House, Hinsdale, DuPage County, Illinois. This building is locally significant for its historical association with William Whitney, the founder of the town of Hinsdale, Illinois. Whitney, a citizen of New York State, moved to Illinois, established the town, and while living here between 1870 and 1879 was a prominent local businessman and politician. (Photo by Frederick C. Cue).

⁶For further information on properties eligible under Criterion B, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Properties Associated with Significant Persons*.

APPLYING CRITERION B: PERSON

SIGNIFICANCE OF THE INDIVIDUAL

The persons associated with the property must be *individually* significant within a historic context. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group.

Eligible

- The residence of a doctor, a mayor, or a merchant is eligible under Criterion B if the person was significant in the field of medicine, politics, or commerce, respectively.

Not Eligible

- A property is not eligible under Criterion B if it is associated with an individual about whom no scholarly judgement can be made because either research has not revealed specific information about the person's activities and their impact, or there is insufficient perspective to determine whether those activities or contributions were historically important.

ASSOCIATION WITH THE PROPERTY

Properties eligible under Criterion B are usually those associated with a person's *productive* life, reflecting the time period when he or she achieved significance. In some instances this may be the person's home; in other cases, a person's business, office, laboratory, or studio may best represent his or her contribution. Properties that pre- or post-date an individual's significant accomplishments are usually not eligible. (See *Comparison to Related Properties*, below, for exceptions to this rule.)

The individual's association with the property must be documented by accepted methods of historical or archeological research, including written or oral history. Speculative associations are not acceptable. For archeological sites, well reasoned inferences drawn from data recovered at the site are acceptable.

COMPARISON TO RELATED PROPERTIES

Each property associated with an important individual should be compared to other associated properties to identify those that best represent the person's historic contributions. The best representatives usually are properties associated with the person's adult or *productive* life. Properties associated with an individual's formative or later years may also qualify if it can be demonstrated that the person's activities during this period were historically significant or if no properties from the person's productive years survives. Length of association is an important factor when assessing several properties with similar associations.

A community or State may contain several properties eligible for associations with the same important person, if each represents a different aspect of the person's productive life. A property can also be eligible if it has brief but consequential associations with an important individual. (Such associations are often related to specific events that occurred at the property and, therefore, it may also be eligible under Criterion A.)

ASSOCIATION WITH GROUPS

For properties associated with several community leaders or with a prominent family, it is necessary to identify specific individuals and to explain their significant accomplishments.

Eligible

- A residential district in which a large number of prominent or influential merchants, professionals, civic leaders, politicians, etc., lived will be eligible under Criterion B if the significance of one or more specific individual residents is explicitly justified.
- A building that served as the seat of an important family is eligible under Criterion B if the significant accomplishments of one or more individual family members is explicitly justified.

Not Eligible

- A residential district in which a large number of influential persons lived is not eligible under Criterion B if the accomplishments of a specific individual(s) cannot be documented. If the significance of the district rests in the cumulative importance of prominent residents, however, then the district might still be eligible under Criterion A. Eligibility, in this case, would be based on the broad pattern of community development, through which the neighborhood evolved into the primary residential area for this class of citizens.
- A building that served as the seat of an important family will not be eligible under Criterion B if the significant accomplishments of individual family members cannot be documented. In cases where a succession of family members have lived in a house and collectively have had a demonstrably significant impact on the community, as a family, the house is more likely to be significant under Criterion A for association with a pattern of events.

ASSOCIATION WITH LIVING PERSONS

Properties associated with living persons are usually not eligible for inclusion in the National Register. Sufficient time must have elapsed to assess both the person's field of endeavor and his/her contribution to that field. Generally, the person's active participation in the endeavor must be finished for this historic perspective to emerge. (See Criteria Considerations C and G in *Part VII: How to Apply the Criteria Considerations*.)

ASSOCIATION WITH ARCHITECTS/ARTISANS

Architects, artisans, artists, and engineers are often represented by their works, which are eligible under Criterion C. Their homes and studios, however, can be eligible for consideration under Criterion B, because these usually are the properties with which they are most personally associated.

NATIVE AMERICAN SITES

The known major villages of individual Native Americans who were important during the contact period or later can qualify under Criterion B. As with all Criterion B properties, the individual associated with the property must have made some specific important contribution to history. Examples include sites significantly associated with Chief Joseph and Geronimo.⁷

⁷ For more information, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

CRITERION C: DESIGN/CONSTRUCTION

Properties may be eligible for the National Register if they embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.



Richland Plantation, East Feliciana Parish, Louisiana. Properties can qualify under Criterion C as examples of high style architecture. Built in the 1830s, Richland is a fine example of a Federal style residence with a Greek Revival style portico. (Photo by Dave Gleason).

UNDERSTANDING CRITERION C: DESIGN/ CONSTRUCTION

This criterion applies to properties significant for their physical design or construction, including such elements as architecture, landscape architecture, engineering, and artwork. To be eligible under Criterion C, a property must meet *at least one* of the following requirements:

- Embody distinctive characteristics of a type, period, or method of construction.
- Represent the work of a master.
- Possess high artistic value.

- Represent a significant and distinguishable entity whose components may lack individual distinction.

The first requirement, that properties “embody the distinctive characteristics of a type, period, or method of construction,” refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. “The work of a master” refers to the technical or aesthetic achievements of an architect or craftsman. “High artistic values” concerns the expression of aesthetic ideals or preferences and applies to aesthetic achievement.

Resources “that represent a significant and distinguishable entity whose components may lack individual distinction” are called “districts.” In the Criteria for Evaluation (as published in the *Code of Federal Regulations* and reprinted here in Part II), districts are

defined within the context of Criterion C. Districts, however, can be considered for eligibility under all the Criteria, individually or in any combination, as is appropriate. For this reason, the full discussion of districts is contained in Part IV: *How to Define Categories of Historic Properties*. Throughout the bulletin, however, districts are mentioned within the context of a specific subject, such as an individual Criterion.



Grant Family House, Saco vicinity, York County, Maine. Properties possessing high artistic value meet Criterion C through the expression of aesthetic ideals or preferences. The Grant Family House, a modest Federal style residence, is significant for its remarkably well-preserved stenciled wall decorative treatment in the entry hall and parlor. Painted by an unknown artist ca. 1825, this is a fine example of 19th century New England regional artistic expression. (Photo by Kirk F. Mohney).

EXAMPLES OF PROPERTIES ASSOCIATED WITH DESIGN/ CONSTRUCTION

Properties associated with design and construction:

- A house or commercial building representing a significant style of architecture.
- A designed park or garden associated with a particular landscape design philosophy.
- A movie theater embodying high artistic value in its decorative features.
- A bridge or dam representing technological advances.

APPLYING CRITERION C: DESIGN/ CONSTRUCTION

DISTINCTIVE CHARACTERISTICS OF TYPE, PERIOD, AND METHOD OF CONSTRUCTION

This is the portion of Criterion C under which most properties are eligible, for it encompasses all architectural styles and construction practices. To be eligible under this portion of the Criterion, a property must clearly illustrate, through "distinctive characteristics," the following:

- The pattern of features common to a particular class of resources,
- The individuality or variation of features that occurs within the class,
- The evolution of that class, or
- The transition between classes of resources.

Distinctive Characteristics: "Distinctive characteristics" are the physical features or traits that commonly recur in individual types, periods, or methods of construction. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction.

Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials. They can be general, referring to ideas of design and construction such as basic plan or form, or they can be specific, referring to precise ways of combining particular kinds of materials.

Eligible

- A building eligible under the theme of Gothic Revival architecture must have the distinctive characteristics that make up the vertical and picturesque qualities of the style, such as pointed gables, steep roof pitch, board and batten siding, and ornamental bargeboard and veranda trim.
- A late Mississippian village that illustrates the important concepts in prehistoric community design and planning will qualify.
- A designed historic landscape will qualify if it reflects a historic trend or school of theory and practice, such as the City Beautiful Movement, evidencing distinguished design, layout, and the work of skilled craftsmanship.

Not Eligible

- A commercial building with some Art Deco detailing is not eligible under Criterion C if the detailing was added merely as an afterthought, rather than fully integrated with overall lines and massing typical of the Art Deco style or the transition between that and another style.
- A designed landscape that has had major changes to its historic design, vegetation, original boundary, topography/grading, architectural features, and circulation system will not qualify.

Type, Period, and Method of Construction: "Type, period, or method of construction" refers to the way certain properties are related to one another by cultural tradition or function, by dates of construction or style, or by choice or availability of materials and technology.

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. A property is not eligible, however, simply because it has been identified as the only such property ever fabricated; it must be demonstrated to be significant as well.

Eligible

- A building that has some characteristics of the Romanesque Revival style and some characteristics of the Commercial style can qualify if it illustrates the transition of architectural design and the transition itself is considered an important architectural development.
- A Hopewellian mound, if it is an important example of mound building construction techniques, would qualify as a method or type of construction.
- A building which illustrates the early or the developing technology of particular structural systems, such as skeletal steel framing, is eligible as an example of a particular method of construction.



Swan Falls Dam and Power Plant, Murphy vicinity, Ada County, Idaho. Significant works of engineering can qualify under Criterion C. Built between 1900-1907 the Swan Falls Dam and Power Plant across the Snake River is one of the early hydroelectric plants in the State of Idaho. (Photo by H.L. Hough).



Looney House, Asheville vicinity, St. Clair County, Alabama. Examples of vernacular styles of architecture can qualify under Criterion C. Built ca. 1818, the Looney House is significant as possibly the State's oldest extant two-story dogtrot type of dwelling. The defining open center passage of the dogtrot was a regional building response to the southern climate. (Photo by Carolyn Scott).

HISTORIC ADAPTATION OF THE ORIGINAL PROPERTY

A property can be significant not only for the way it was originally constructed or crafted, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.

A district is eligible under this guideline if it illustrates the evolution of historic character of a place over a particular span of time.

Eligible

- A Native American irrigation system modified for use by Europeans could be eligible if it illustrates the technology of either or both periods of construction.
- An early 19th century farmhouse modified in the 1880s with Queen Anne style ornamentation could be significant for the modification itself, if it represented a local variation or significant trend in building construction or remodeling, was the work of a local master (see *Works of a Master* on page 20), or reflected the tastes of an important person associated with the property at the time of its alteration.
- A district encompassing the commercial development of a town between 1820 and 1910, characterized by buildings of various styles and eras, can be eligible.

WORKS OF A MASTER

A master is a figure of generally recognized greatness in a field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The property must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft.

A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect. For example, not every building designed by Frank Lloyd Wright is eligible under this portion of Criterion C, although it might meet other portions of the Criterion, for instance as a representative of the Prairie style.

The work of an unidentified craftsman is eligible if it rises above the level of workmanship of the other properties encompassed by the historic context.

PROPERTIES POSSESSING HIGH ARTISTIC VALUES

High artistic values may be expressed in many ways, including areas as diverse as community design or planning, engineering, and sculpture. A property is eligible for its high artistic values if it so fully articulates a particular concept of design that it expresses an aesthetic ideal. A property is not eligible, however, if it does not express aesthetic ideals or design concepts more fully than other properties of its type.

Eligible

- A sculpture in a town square that epitomizes the design principles of the Art Deco style is eligible.
- A building that is a classic expression of the design theories of the Craftsman Style, such as carefully detailed handwork, is eligible.
- A landscaped park that synthesizes early 20th century principles of landscape architecture and expresses an aesthetic ideal of environment can be eligible.
- Properties that are important representatives of the aesthetic values of a cultural group, such as petroglyphs and ground drawings by Native Americans, are eligible.

Not Eligible

- A sculpture in a town square that is a typical example of sculpture design during its period would not qualify for high artistic value, although it might be eligible if it were significant for other reasons.
- A building that is a modest example (within its historic context) of the Craftsman Style of architecture, or a landscaped park that is characteristic of turn of the century landscape design would not qualify for high artistic value.

A Significant and Distinguishable Entity Whose Components May Lack Individual Distinction. This portion of Criterion C refers to districts. For detailed information on districts, refer to *Part IV* of this bulletin.

CRITERION D: INFORMATION POTENTIAL

Properties may be eligible for the National Register if they have yielded, or may be likely to yield, information important in prehistory or history.

UNDERSTANDING CRITERION D: INFORMATION POTENTIAL

Certain important research questions about human history can only be answered by the actual physical material of cultural resources. Criterion D encompasses the properties that have the potential to answer, in whole or in part, those types of research questions. The most common type of property nominated under this Criterion is the archeological site (or a district comprised of archeological sites). Buildings, objects, and structures (or districts comprised of these property types), however, can also be eligible for their information potential.

Criterion D has two requirements, which must *both* be met for a property to qualify:

- The property must have, or have had, information to contribute to our understanding of human history or prehistory, and
- The information must be considered important.

Under the first of these requirements, a property is eligible if it has been used as a source of data and contains more, as yet unretrieved data. A property is also eligible if it has not yet yielded information but, through testing or research, is determined a likely source of data.

Under the second requirement, the information must be carefully evaluated within an appropriate context to determine its importance. Information is considered “important” when it is shown to have a significant bearing on a research design that addresses such areas as: 1) current

data gaps or alternative theories that challenge existing ones or 2) priority areas identified under a State or Federal agency management plan.

APPLYING CRITERION D: INFORMATION POTENTIAL

ARCHEOLOGICAL SITES

Criterion D most commonly applies to properties that contain or are likely to contain information bearing on an important archeological research question. The property must have characteristics suggesting the likelihood that it possesses configurations of artifacts, soil strata, structural remains, or other natural or cultural features that make it possible to do the following:

- Test a hypothesis or hypotheses about events, groups, or processes in the past that bear on important research questions in the social or natural sciences or the humanities; or
- Corroborate or amplify currently available information suggesting that a hypothesis is either true or false; or
- Reconstruct the sequence of archeological cultures for the purpose of identifying and explaining continuities and discontinuities in the archeological record for a particular area.

BUILDINGS, STRUCTURES, AND OBJECTS

While most often applied to archeological districts and sites, Criterion D can also apply to buildings, structures, and objects that contain important information. In order for these types of properties to be eligible under Criterion D, they themselves must be, or must have been, the principal source of the important information.

Eligible

- A building exhibiting a local variation on a standard design or construction technique can be eligible if study could yield important information, such as how local availability of materials or construction expertise affected the evolution of local building development.

Not Eligible

- The ruins of a hacienda once contained murals that have since been destroyed. Historical documentation, however, indicates that the murals were significant for their highly unusual design. The ruins can not be eligible under Criterion D for the importance of the destroyed murals if the information is contained only in the documentation.



Criterion D - Champe-Fremont 1 Archeological Site, Omaha vicinity, Douglas County, Nebraska. This archeological site, dating from ca. 1100-1450 A.D., consists of pit houses and storage pits which have the potential to yield important information concerning the subsistence patterns, religious and mortuary practices, and social organization of the prehistoric residents of eastern Nebraska. (Nebraska State Historical Society)

ASSOCIATION WITH HUMAN ACTIVITY

A property must be associated with *human activity* and be critical for understanding a site's historic environment in order to be eligible under Criterion D. A property can be linked to human activity through events, processes, institutions, design, construction, settlement, migration, ideals, beliefs, lifeways, and other facets of the development or maintenance of cultural systems.

The natural environment associated with the properties was often very different from that of the present and strongly influenced cultural development. Aspects of the environment that are pertinent to human activities should be considered when evaluating properties under Criterion D.

Natural features and paleontological (floral and faunal) sites are not usually eligible under Criterion D in and of themselves. They can be eligible, however, if they are either directly related to human activity or critical to understanding a site's historic environment. In a few cases, a natural feature or site unmarked by cultural materials, that is primarily eligible under Criterion A, may also be eligible under Criterion D, if study of the feature, or its location, setting, etc. (usually in the context of data gained from other sources), will yield important information about the event or period with which it is associated.

ESTABLISHING A HISTORIC CONTEXT

The information that a property yields, or will yield, must be evaluated within an appropriate historic context. This will entail consulting the body of information already collected from similar properties or other pertinent sources, including modern and historic written records. The researcher must be able to anticipate if and how the potential information will affect the definition of the context. The information likely to be obtained from a particular property must confirm, refute, or supplement in an important way existing information.

A property is *not* eligible if it cannot be related to a particular time period or cultural group and, as a result, lacks any historic context within which to evaluate the importance of the information to be gained.

DEVELOPING RESEARCH QUESTIONS

Having established the importance of the information that may be recovered, it is necessary to be explicit in demonstrating the connection between the important information and a specific property. One approach is to determine if specific important research questions can be answered by the data contained in the

property. Research questions can be related to property-specific issues, to broader questions about a large geographic area, or to theoretical issues independent of any particular geographic location. These questions may be derived from the academic community or from preservation programs at the local, regional, State, or national level. Research questions are usually developed as part of a "research design," which specifies not only the questions to be asked, but also the types of data needed to supply the answers, and often the techniques needed to recover the data.

Eligible

- When a site consisting of a village occupation with midden deposits, hearths, ceramics, and stratified evidence of several occupations is being evaluated, three possible research topics could be: 1) the question of whether the site occupants were indigenous to the area prior to the time of occupation or recent arrivals, 2) the investigation of the settlement-subsistence pattern of the occupants, 3) the question of whether the region was a center for the domestication of plants. Specific questions could include: A) Do the deposits show a sequential development or sudden introduction of Ceramic Type X? B) Do the dates of the occupations fit our expectations based on the current model for the reoccupation behavior of slash-and-burn agriculturalists? C) Can any genetic changes in the food plant remains be detected?

Not Eligible

- A property is not eligible if so little can be understood about it that it is not possible to determine if specific important research questions can be answered by data contained in the property.

ESTABLISHING THE PRESENCE OF ADEQUATE DATA

To support the assertion that a property has the data necessary to provide the important information, the property should be investigated with techniques sufficient to establish the presence of relevant data categories. What constitutes appropriate investigation techniques would depend upon specific circumstances including the property's location, condition, and the research questions being addressed, and could range from surface survey (or photographic survey for buildings), to the application of remote sensing techniques or intensive subsurface testing. Justification of the research potential of a property may be based on analogy to another better known property if sufficient similarities exist to establish the appropriateness of the analogy.

Eligible

- Data requirements depend on the specific research topics and questions to be addressed. To continue the example in "Developing Research Questions" above, we might want to ascertain the following with reference to questions A, B, and C: A) The site contains Ceramic Type X in one or more occupation levels and we expect to be able to document the local evaluation of the type or its intrusive nature. B) The hearths contain datable carbon deposits and are associated with more than one occupation. C) The midden deposits show good floral/faunal preservation, and we know enough about the physical evolution of food plants to interpret signs that suggest domestication.

Not Eligible

- Generally, if the applicable research design requires clearly stratified deposits, then subsurface investigation techniques must be applied. A site composed only of surface materials can not be eligible for its potential to yield information that could only be found in stratified deposits.

INTEGRITY

The assessment of integrity for properties considered for information potential depends on the data requirements of the applicable research design. A property possessing information potential does not need to recall *visually* an event, person, process, or construction technique. It is important that the significant data contained in the property remain sufficiently intact to yield the expected important information, if the appropriate study techniques are employed.

Eligible

- An irrigation system significant for the information it will yield on early engineering practices can still be eligible even though it is now filled in and no longer retains the appearance of an open canal.

Not Eligible

- A plowed archeological site contains several superimposed components that have been mixed to the extent that artifact assemblages cannot be reconstructed. The site cannot be eligible if the data requirements of the research design call for the study of artifacts specific to one component.

PARTLY EXCAVATED OR DISTURBED PROPERTIES

The current existence of appropriate physical remains must be ascertained in considering a property's ability to yield important information. Properties that have been partly excavated or otherwise disturbed and that are being considered for their potential to yield additional important information must be shown to retain that potential in their remaining portions.

Eligible

- A site that has been partially excavated but still retains substantial intact deposits (or a site in which the remaining deposits are small but contain critical information on a topic that is not well known) is eligible.

Not Eligible

- A totally collected surface site or a completely excavated buried site is not eligible since the physical remains capable of yielding important information no longer exist at the site. (See *Completely Excavated Sites*, on page 24, for exception.) Likewise, a site that has been looted or otherwise disturbed to the extent that the remaining cultural materials have lost their important depositional context (horizontal or vertical location of deposits) is not eligible.
- A reconstructed mound or other reconstructed site will generally not be considered eligible, because original cultural materials or context or both have been lost.

COMPLETELY EXCAVATED SITES

Properties that have yielded important information in the past and that no longer retain additional research potential (such as completely excavated archeological sites) must be assessed essentially as historic sites under Criterion A. Such sites must be significant for associative values related to: 1) the importance of the data gained or 2) the impact of the property's role in the history of the development of anthropology/archeology or other relevant disciplines. Like other historic properties, the site must retain the ability to convey its association as the former repository of important information, the location of historic events, or the representative of important trends.

Eligible

- A property that has been excavated is eligible if the data recovered was of such importance that it influenced the direction of research in the discipline, as in a site that clearly established the antiquity of the human occupation of the New World. (See Criterion A in *Part VI: How to Identify the Type of Significance of a Property* and *Criteria Consideration G* in *Part VII: How to Apply the Criteria Considerations*.)

Not Eligible

- A totally excavated site that at one time yielded important information but that no longer can convey either its historic/prehistoric utilization or significant modern investigation is not eligible.

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*.

CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

A religious property is eligible if it derives its primary significance from architectural or artistic distinction or historical importance.

UNDERSTANDING CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

A religious property requires justification on architectural, artistic, or historic grounds to avoid any appearance of judgment by government about the validity of any religion or belief. Historic significance for a religious property cannot be established on the merits of a religious doctrine, but rather, for architectural or artistic values or for important historic or cultural forces that the property represents. A religious property's significance under Criterion A, B, C, or D must be judged in purely secular terms. A religious group may, in some cases, be considered a cultural group whose activities are significant in areas broader than religious history.

Criteria Consideration for Religious Properties applies:

- If the resource was constructed by a religious institution.
- If the resource is presently owned by a religious institution or is used for religious purposes.
- If the resource was owned by a religious institution or used for religious purposes during its Period of Significance.
- If Religion is selected as an Area of Significance.

Examples of Properties that MUST Meet Criteria Consideration A: Religious Properties

- A historic church where an important non-religious event occurred, such as a speech by Patrick Henry.
- A historic synagogue that is significant for architecture.
- A private residence is the site of a meeting important to religious history.
- A commercial block that is currently owned as an investment property by a religious institution.
- A historic district in which religion was either a predominant or significant function during the period of significance.

Example of Properties that DO NOT Need to Meet Criteria Consideration A: Religious Properties

- A residential or commercial district that currently contains a small number of churches that are not a predominant feature of the district.
- A town meeting hall that serves as the center of community activity and houses a wide variety of public and private meetings, including religious service. The resource is significant for architecture and politics, and the religious function is incidental.
- A town hall, significant for politics from 1875 to 1925, that housed religious services during the 1950s. Since the religious function occurred after the Period of Significance, the Criteria Consideration does not apply.

APPLYING CRITERIA CONSIDERATION A: RELIGIOUS PROPERTIES

ELIGIBILITY FOR HISTORIC EVENTS

A religious property can be eligible under Criterion A for any of three reasons:

- It is significant under a theme in the history of religion having secular scholarly recognition; or
- It is significant under another historical theme, such as exploration, settlement, social philanthropy, or education; or
- It is significantly associated with traditional cultural values.

RELIGIOUS HISTORY

A religious property can be eligible if it is directly associated with either a specific event or a broad pattern in the history of religion.

Eligible

- The site of a convention at which a significant denominational split occurred meets the requirements of Criteria Consideration A. Also eligible is a property that illustrates the broad impact of a religious institution on the history of a local area.

Not Eligible

- A religious property cannot be eligible simply because was the place of religious services for a community, or was the oldest structure used by a religious group in a local area.

OTHER HISTORICAL THEMES

A religious property can be eligible if it is directly associated with either a specific event or a broad pattern that is significant in another historic context. A religious property would also qualify if it were significant for its associations that illustrate the importance of a particular religious group in the social, cultural, economic, or political history of the area. Eligibility depends on the importance of the event or broad pattern and the role of the specific property.

Eligible

- A religious property can qualify for its important role as a temporary hospital during the Revolutionary War, or if its school was significant in the history of education in the community.

Not Eligible

- A religious property is not significant in the history of education in a community simply because it had occasionally served as a school.

TRADITIONAL CULTURAL VALUES

When evaluating properties associated with traditional cultures, it is important to recognize that often these cultures do not make clear distinctions between what is secular and what is sacred. Criteria Consideration A is not intended to exclude traditional cultural resources merely because they have religious uses or are considered sacred. A property or natural feature important to a traditional culture's religion and mythology is eligible if its importance has been ethnohistorically documented and if the site can be clearly defined. It is critical, however, that the activities be documented and that the associations not be so diffuse that the physical resource cannot be adequately defined.⁸

Eligible

- A specific location or natural feature that an Indian tribe believes to be its place of origin and that is adequately documented qualifies under Criteria Consideration A.

ELIGIBILITY FOR HISTORIC PERSONS

A religious property can be eligible for association with a person important in religious history, if that significance has scholarly, secular recognition or is important in other historic contexts. Individuals who would likely be considered significant are those who formed or significantly influenced an important religious institution or movement, or who were important in the social, economic, or political history of the area. Properties associated with individuals important only within the context of a single congregation and lacking importance in any other historic context would not be eligible under Criterion B.

Eligible

- A religious property strongly associated with a religious leader, such as George Whitefield or Joseph Smith, is eligible.

⁸ For more information on applying Criteria Consideration A to traditional cultural properties, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

ELIGIBILITY FOR ARCHITECTURAL OR ARTISTIC DISTINCTION

A religious property significant for its architectural design or construction should be evaluated as are other properties under Criterion C; that is, it should be evaluated within an established architectural context and, if necessary, compared to other properties of its type, period, or method of construction. (See "Comparing Related Properties" in Part V: *How to Evaluate a Property Within Its Historic Context*.)

Eligible

- A historic camp meeting district that meets the requirements of Criterion C for its significance as a type of construction is eligible.

ELIGIBILITY FOR INFORMATION POTENTIAL

A religious property, whether a district, site, building, structure, or object, is eligible if it can yield important information about the religious practices of a cultural group or other historic themes. This kind of property should be evaluated as are other properties under Criterion D, in relation to similar properties, other information sources, and existing data gaps.

Eligible

- A 19th century camp meeting site that could provide information about the length and intensity of site use during revivals of the Second Great Awakening is eligible.
- Rock cairns or medicine wheels that had a historic religious mythological function and can provide information about specific cultural beliefs are eligible.

ABILITY TO REFLECT HISTORIC ASSOCIATIONS

As with all eligible properties, religious properties must physically represent the period of time for which they are significant. For instance, a recent building that houses an older congregation cannot qualify based on the historic activities of the group because the current building does not convey the earlier history. Likewise, an older building that housed the historic activities of the congregation is eligible if it still physically represents the period of the congregation's significance. However, if an older building has been remodeled to the extent that its appearance dates from the time of the remodeling, it can only be eligible if the period of significance corresponds with the period of the alterations.

Eligible

- A church built in the 18th century and altered beyond recognition in the 19th century is eligible only if the additions are important in themselves as an example of late 19th century architecture or as a reflection of an important period of the congregation's growth.

Not Eligible

- A synagogue built in the 1920s cannot be eligible for the important activities of its congregation in the 18th and 19th centuries. It can only be eligible for significance obtained after its construction date.
- A rural 19th century frame church recently sheathed in brick is not eligible because it has lost its characteristic appearance and therefore can no longer convey its 19th century significance, either for architectural value or historic association.



Criteria Consideration A - Religious Properties. A religious property can qualify as an exception to the Criteria if it is architecturally significant. *The Church of the Navity in Rosedale, Iberville Parish, Louisiana, qualified as a rare example in the State of a 19th century small frame Gothic Revival style chapel.* (Robert Obier)

CRITERIA CONSIDERATION B: MOVED PROPERTIES

A property removed from its original or historically significant location can be eligible if it is significant primarily for architectural value or it is the surviving property most importantly associated with a historic person or event.

UNDERSTANDING CRITERIA CONSIDERATION B: MOVED PROPERTIES

The National Register criteria limit the consideration of moved properties because significance is embodied in locations and settings as well as in the properties themselves. Moving a property destroys the relationships between the property and its surroundings and destroys associations with historic events and persons. A move may also cause the loss of historic features such as landscaping, foundations, and chimneys, as well as loss of the potential for associated archeological deposits. Properties that were moved *before* their period of significance do not need to meet the special requirements of Criteria Consideration B.

One of the basic purposes of the National Register is to encourage the preservation of historic properties as living parts of their communities. In keeping with this purpose, it is not usual to list artificial groupings of buildings that have been created for purposes of interpretation, protection, or maintenance. Moving buildings to such a grouping destroys the integrity of location and setting, and can create a false sense of historic development.

APPLYING CRITERIA CONSIDERATION B: MOVED PROPERTIES

ELIGIBILITY FOR ARCHITECTURAL VALUE

A moved property significant under Criterion C must retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association.

Examples of Properties that MUST Meet Criteria Consideration B: Moved Properties

- A resource moved from one location on its original site to another location on the property, during or after its Period of Significance.
- A district in which a significant number of resources have been moved from their original location.
- A district which has one moved building that makes an especially significant contribution to the district.
- A portable resource, such as a ship or railroad car, that is relocated to a place incompatible with its original function.
- A portable resource, such as a ship or railroad car, whose importance is critically linked to its historic location or route and that is moved.

Examples of Properties that DO NOT Need to Meet Criteria Consideration B: Moved Properties

- A property that is moved prior to its Period of Significance.
- A district in which only a small percentage of typical buildings in a district are moved.
- A moved building that is part of a complex but is of less significance than the remaining (unmoved) buildings.
- A portable resource, such as a ship or railroad car, that is eligible under Criterion C and is moved within its natural setting (water, rails, etc.).
- A property that is raised or lowered on its foundations.

ELIGIBILITY FOR HISTORIC ASSOCIATIONS

A moved property significant under Criteria A or B must be demonstrated to be the surviving property most importantly associated with a particular historic event or an important aspect of a historic person's life. The phrase "most importantly associated" means that it must be the single surviving property that is most closely associated with the event or with the part of the person's life for which he or she is significant.

Eligible

- A moved building occupied by an business woman during the majority of her productive career would be eligible if the other extant properties are a house she briefly inhabited prior to her period of significance and a commercial building she owned after her retirement.

Not Eligible

- A moved building associated with the beginning of rail transportation in a community is not eligible if the original railroad station and warehouse remained intact on their original sites.

SETTING AND ENVIRONMENT

In addition to the requirements above, moved properties must still have an orientation, setting, and general environment that are comparable to those of the historic location and that are compatible with the property's significance.

Eligible

- A property significant as an example of mid-19th century rural house type can be eligible after a move, provided that it is placed on a lot that is sufficient in size and character to recall the basic qualities of the historic environment and setting, and provided that the building is sited appropriately in relation to natural and manmade surroundings.

Not Eligible

- A rural house that is moved into an urban area and a bridge that is no longer situated over a waterway are not eligible.

ASSOCIATION DEPENDENT ON THE SITE

For a property whose design values or historical associations are directly dependent on its location, any move will cause the property to lose its integrity and prevent it from conveying its significance.

Eligible

- A farm structure significant only as an example of a method of construction peculiar to the local area is still eligible if it is moved within that local area and the new setting is similar to that of the original location.

Not Eligible

- A 19th century rural residence that was designed around particular topographic features, reflecting that time period's ideals of environment, is not eligible if moved.

PROPERTIES DESIGNED TO BE MOVED

A property designed to move or a property frequently moved during its historic use must be located in a historically appropriate setting in order to qualify, retaining its integrity of setting, design, feeling, and association. Such properties include automobiles, railroad cars and engines, and ships.

Eligible

- A ship docked in a harbor, a locomotive on tracks or in a railyard, and a bridge relocated from one body of water to another are eligible.

Not Eligible

- A ship on land in a park, a bridge placed in a pasture, or a locomotive displayed in an indoor museum are not eligible.

ARTIFICIALLY CREATED GROUPINGS

An artificially created grouping of buildings, structures, or objects is not eligible unless it has achieved significance since the time of its assemblage. It cannot be considered as a reflection of the time period when the individual buildings were constructed.

Eligible

- A grouping of moved historic buildings whose creation marked the beginning of a major concern with past lifestyles can qualify as an early attempt at historic preservation and as an illustration of that generation's values.

Not Eligible

- A rural district composed of a farmhouse on its original site and a grouping of historic barns recently moved onto the property is not eligible.

PORTIONS OF PROPERTIES

A moved *portion* of a building, structure, or object is not eligible because, as a fragment of a larger resource, it has lost integrity of design, setting, materials, workmanship, and location.

CRITERIA CONSIDERATION C: BIRTHPLACES OR GRAVES

A birthplace or grave of a historical figure is eligible if the person is of outstanding importance and if there is no other appropriate site or building directly associated with his or her productive life.

UNDERSTANDING CRITERIA CONSIDERATION C: BIRTHPLACES AND GRAVES

Birthplaces and graves often attain importance as reflections of the origins of important persons or as lasting memorials to them. The lives of persons significant in our past normally are recognized by the National Register through listing of properties illustrative of or associated with that person's productive life's work. Birthplaces and graves, as properties that represent the beginning and the end of the life of distinguished individuals, may be temporally and geographically far removed from the person's significant activities, and therefore are not usually considered eligible.

Examples of Properties that MUST Meet Criteria Consideration C: Birthplaces and Graves

- *The birthplace of a significant person who lived elsewhere during his or her Period of Significance.*
- *A grave that is nominated for its association with the significant person buried in it.*
- *A grave that is nominated for information potential.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration C: Birthplaces and Graves

- *A house that was inhabited by a significant person for his or her entire lifetime.*
- *A grave located on the grounds of the house where a significant person spent his or her productive years.*

APPLYING CRITERIA CONSIDERATION C: BIRTHPLACES AND GRAVES

PERSONS OF OUTSTANDING IMPORTANCE

The phrase "a historical figure of outstanding importance" means that in order for a birthplace or grave to qualify, it cannot be simply the birthplace or grave of a person significant in our past (Criterion B). It must be the birthplace or grave of an individual who was of outstanding importance in the history of the local area, State, or nation. The birthplace or grave of an individual who was one of several people active in some aspect of the history of a community, a state, or the Nation would not be eligible.

LAST SURVIVING PROPERTY ASSOCIATED WITH A PERSON

When an geographical area strongly associated with a person of outstanding importance has lost all other properties directly associated with his or her formative years or productive life, a birthplace or grave may be eligible.

ELIGIBILITY FOR OTHER ASSOCIATIONS

A birthplace or grave can also be eligible if it is significant for reasons other than association with the productive life of the person in question. It can be eligible for significance under Criterion A for association with important events, under Criterion B for association with the productive lives of *other* important persons, or under Criterion C for architectural significance. A birthplace or grave can also be eligible in rare cases if, after the passage of time, it is significant for its commemorative value. (See Criteria Consideration F for a discussion of commemorative properties.) A birthplace or grave can also be eligible under Criterion D if it contains important information on research, e.g., demography, pathology, mortuary practices, socioeconomic status differentiation.



Criteria Consideration C - Birthplaces. *A birthplace of a historical figure is eligible if the person is of outstanding importance and there is no other appropriate site or building associated with his or her productive life. The **Walter Reed Birthplace**, Gloucester vicinity, Gloucester County, Virginia is the most appropriate remaining building associated with the life of the man who, in 1900, discovered the cause and mode of transmission of the great scourge of the tropics, yellow fever. (Virginia Historic Landmarks Commission)*

CRITERIA CONSIDERATION D: CEMETERIES

A cemetery is eligible if it derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events.

UNDERSTANDING CRITERIA CONSIDERATION D: CEMETERIES

A cemetery is a collection of graves that is marked by stones or other artifacts or that is unmarked but recognizable by features such as fencing or depressions, or through maps, or by means of testing. Cemeteries serve as a primary means of an individual's recognition of family history and as expressions of collective religious and/or ethnic identity. Because cemeteries may embody values beyond personal or family-specific emotions, the National Register criteria allow for listing of cemeteries under certain conditions.

Examples of Properties that MUST Meet Criteria Consideration D: Cemeteries

- A cemetery that is nominated individually for Criterion A, B, or C.

Examples of Properties that DO NOT Need to Meet Criteria Consideration D: Cemeteries

- A cemetery that is nominated along with its associated church, but the church is the main resource nominated.
- A cemetery that is nominated under Criterion D for information potential.
- A cemetery that is nominated as part of a district but is not the focal point of the district.

APPLYING CRITERIA CONSIDERATION D: CEMETERIES

PERSONS OF TRANSCENDENT IMPORTANCE

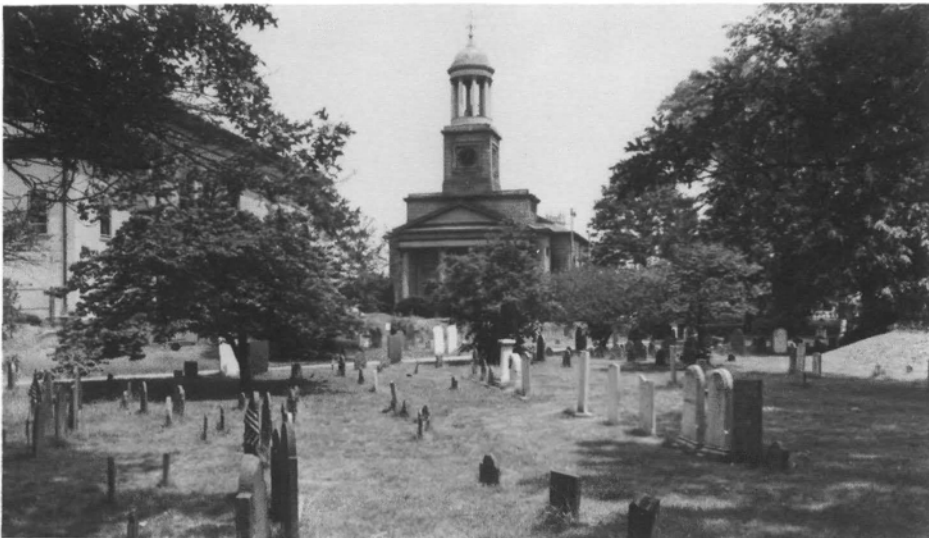
A cemetery containing the graves of persons of transcendent importance may be eligible. To be of transcendent importance the persons must have been of great eminence in their fields of endeavor or had a great impact upon the history of their community, State, or nation. (A single grave that is the burial place of an important person and is located in a larger cemetery that does not qualify under this Criteria Consideration should be treated under Criteria Consideration C: Birthplaces and Graves.)

Eligible

- A historic cemetery containing the graves of a number of persons who were exceptionally significant in determining the course of a State's political or economic history during a particular period is eligible.

Not Eligible

- A cemetery containing graves of State legislators is not eligible if they simply performed the daily business of State government and did not have an outstanding impact upon the nature and direction of the State's history.



Criteria Consideration D - Cemeteries. *The Hancock Cemetery, Quincy, Norfolk County, Massachusetts meets the exception to the Criteria because it derives its primary significance from its great age (the earliest burials date from 1640) and from the distinctive design features found in its rich collection of late 17th and early 18th century funerary art. (N. Hobart Holly)*

ELIGIBILITY ON THE BASIS OF AGE

Cemeteries can be eligible if they have achieved historic significance for their relative great age in a particular geographic or cultural context.

Eligible

- A cemetery dating from a community's original 1830s settlement can attain significance from its association with that very early period.

ELIGIBILITY FOR DESIGN

Cemeteries can qualify on the basis of distinctive design values. These values refer to the same design values addressed in Criterion C and can include aesthetic or technological achievement in the fields of city planning, architecture, landscape architecture, engineering, mortuary art, and sculpture. As for all other nominated properties, a cemetery must clearly express its design values and be able to convey its historic appearance.

Eligible

- A Victorian cemetery is eligible if it clearly expresses the aesthetic principles related to funerary design for that period, through such features as the overall plan, landscaping, statuary, sculpture, fencing, buildings, and grave markers.

Not Eligible

- A cemetery cannot be eligible for design values if it no longer conveys its historic appearance because of the introduction of new grave markers.

ELIGIBILITY FOR ASSOCIATION WITH EVENTS

Cemeteries may be associated with historic events including specific important events or general events that illustrate broad patterns.

Eligible

- A cemetery associated with an important Civil War battle is eligible.
- A cemetery associated with the settlement of an area by an ethnic or cultural group is eligible if the movement of the group into the area had an important impact, if other properties associated with that group are rare, and if few documentary sources have survived to provide information about the group's history.

Not Eligible

- A cemetery associated with a battle in the Civil War does not qualify if the battle was not important in the history of the war.
- A cemetery associated with an area's settlement by an ethnic or cultural group is not eligible if the impact of the group on the area cannot be established, if other extant historic properties better convey association with the group, or if the information that the cemetery can impart is available in documentary sources.

ELIGIBILITY FOR INFORMATION POTENTIAL

Cemeteries, both historic and prehistoric, can be eligible if they have the potential to yield important information. The information must be important within a specific context and the potential to yield information must be demonstrated.

A cemetery can qualify if it has potential to yield important information provided that the information it contains is not available in extant documentary evidence.

Eligible

- A cemetery associated with the settlement of a particular cultural group will qualify if it has the potential to yield important information about subjects such as demography, variations in mortuary practices, or the study of the cause of death correlated with nutrition or other variables.

INTEGRITY

Assessing the integrity of a historic cemetery entails evaluating principal design features such as plan, grave markers, and any related elements (such as fencing). Only that portion of a historic cemetery that retains its historic integrity can be eligible. If the overall integrity has been lost because of the number and size of recent grave markers, some features such as buildings, structures, or objects that retain integrity may be considered as individual properties if they are of such historic or artistic importance that they individually meet one or more of the requirements listed above.

NATIONAL CEMETERIES

National Cemeteries administered by the Veterans Administration are eligible because they have been designated by Congress as primary memorials to the military history of the United States. Those areas within a designated national cemetery that have been used or prepared for the reception of the remains of veterans and their dependents, as well as any landscaped areas that immediately surround the graves may qualify. Because these cemeteries draw their significance from the presence of the remains of military personnel who have served the country throughout

its history, the age of the cemetery is not a factor in judging eligibility, although integrity must be present.

A national cemetery or a portion of a national cemetery that has only been set aside for use in the future is not eligible.

CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

A reconstructed property is eligible when it is 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 associations has survived. All three of these requirements must be met.

UNDERSTANDING CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

“Reconstruction” is defined as the reproduction of the exact form and detail of a vanished building, structure, object, or a part thereof, as it appeared at a specific period of time. Reconstructed buildings fall into two categories: buildings wholly constructed of new materials and buildings reassembled from some historic and some new materials. Both categories of properties present problems in meeting the integrity requirements of the National Register criteria.

Examples of Properties that MUST Meet Criteria Consideration E: Reconstructed Properties

- A property in which most or all of the fabric is not original.
- A district in which an important resource or a significant number of resources are reconstructions.

Examples of Properties that DO NOT Need to Meet Criteria Consideration E: Reconstructed Properties

- A property that is remodeled or renovated and still has the majority of its original fabric.

APPLYING CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

ACCURACY OF THE RECONSTRUCTION

The phrase “accurately executed” means that the reconstruction must be based upon sound archeological, architectural, and historic data concerning the historic construction and appearance of the resource. That documentation should include both analysis of any above or below ground material and research in written and other records.

SUITABLE ENVIRONMENT

The phrase “suitable environment” refers to: 1) the physical context provided by the historic district and 2) any interpretive scheme, if the historic district is used for interpretive purposes. This means that the reconstructed property must be located at the same site as the original. It must also be situated in its original grouping of buildings, structures, and objects (as many as are extant), and that grouping must retain integrity. In addition, the reconstruction must not be misrepresented as an authentic historic property.

Eligible

- A reconstructed plantation manager’s office building is considered eligible because it is located at its historic site, grouped with the remaining historic plantation buildings and structures, and the plantation as a whole retains integrity. Interpretation of the plantation district includes an explanation that the manager’s office is not the original building, but a reconstruction.

Not Eligible

- The same reconstructed plantation manager’s office building would not qualify if it were rebuilt at a location different from that of the original building, or if the district as a whole no longer reflected the period for which it is significant, or if a misleading interpretive scheme were used for the district or for the reconstruction itself.

RESTORATION MASTER
PLANS

Being presented “as part of a restoration master plan” means that: 1) a reconstructed property is an essential component in a historic district and 2) the reconstruction is part of an overall restoration plan for an entire district. “Restoration” is defined as accurately recovering the form and details of a property and its setting as it appeared at a particular period by removing later work or by replacing missing earlier work (as opposed to completely rebuilding the property). The master plan for the entire property must emphasize restoration, not reconstruction. In other words, the master plan for the entire resource would not be acceptable under this consideration if it called for reconstruction of a majority of the resource.

LAST SURVIVING
PROPERTY OF A TYPE

This consideration also stipulates that a reconstruction can qualify if, in addition to the other requirements, no other building, object, or structure with the same association has survived. A reconstruction that is part of a restoration master plan is appropriate only if: 1) the property is the only one in the district with which a particular important activity or event has been historically associated or 2) no other property with the same associative values has survived.

RECONSTRUCTIONS
OLDER THAN FIFTY YEARS

After the passage of fifty years, a reconstruction may attain its own significance for what it reveals about the period in which it was built, rather than the historic period it was intended to depict. On that basis, a reconstruction can possibly qualify under any of the Criteria.

Eligible

- A reconstructed plantation manager’s office is eligible if the office were an important component of the plantation *and* if the reconstruction is one element in an overall plan for restoring the plantation *and* if no other building or structure with the same associations has survived.
- The reconstruction of the plantation manager’s office building can be eligible only if the majority of buildings, structures, and objects that comprised the plantation are extant and are being restored. For guidance regarding restoration see the *Secretary of the Interior’s Standards for Historic Preservation Projects*.

CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

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

UNDERSTANDING CRITERIA CONSIDERATION F: COMMEMORATIVE 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: COMMEMORATIVE 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.

ELIGIBILITY FOR AGE, TRADITION, OR SYMBOLIC VALUE

A commemorative property cannot qualify for association with the event or person it memorializes. A commemorative property may, however, acquire significance after the time of its creation through *age*, *tradition*, or *symbolic* value. This significance must be documented by accepted methods of historical research, including written or oral history, and must meet one or more of the Criteria.

Eligible

- A commemorative marker erected by a cultural group that believed the place was the site of its origins is eligible if, for subsequent generations of the group, the marker itself became the focus of traditional association with the group's historic identity.
- A building erected as a monument to an important historical figure will qualify if through the passage of time the property itself has come to symbolize the value placed upon the individual and is widely recognized as a reminder of enduring principles or contributions valued by the generation that erected the monument.
- A commemorative marker erected early in the settlement or development of an area will qualify if it is demonstrated that, because of its relative great age, the property has long been a part of the historic identity of the area.

Not Eligible

- A commemorative marker erected in the past by a cultural group at the site of an event in its history would not be eligible if the marker were significant only for association with the event, and it had not become significant itself through tradition.
- A building erected as a monument to an important historical figure would not be eligible if its only value lay in its association with the individual, and it has not come to symbolize values, ideas, or contributions valued by the generation that erected the monument.
- A commemorative marker erected to memorialize an event in the community's history would not qualify simply for its association with the event it memorialized.

INELIGIBILITY AS THE LAST REPRESENTATIVE OF AN EVENT OR PERSON

The loss of properties directly associated with a significant event or person does not strengthen the case for consideration of a commemorative property. Unlike birthplaces and graves, a commemorative property usually has no direct historic association. The commemorative property can qualify for historic association only if it is clearly significant in its own right, as stipulated above.

CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS⁹

A property achieving significance within the last fifty years is eligible if it is of exceptional importance.

UNDERSTANDING CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS

The National Register Criteria for Evaluation exclude properties that achieved significance within the last fifty years unless they are of exceptional importance. Fifty years is a general estimate of the time needed to develop historical perspective and to evaluate significance. This consideration guards against the listing of properties of passing contemporary interest and ensures that the National Register is a list of truly historic places.

Examples of Properties that MUST Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Last Fifty Years

- A property that is less than fifty years old.
- A property that continues to achieve significance into a period less than fifty years before the nomination.
- A property that has non-contiguous Periods of Significance, one of which is less than fifty years before the nomination.
- A property that is more than fifty years old and had no significance until a period less than fifty years before the nomination.

Examples of Properties that DO NOT Need to Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Last Fifty Years

- A resource whose construction began over fifty years ago, but the completion overlaps the fifty year period by a few years or less.
- A resource that is significant for its plan or design, which is over fifty years old, but the actual completion of the project overlaps the fifty year period by a few years.
- A historic district in which a few properties are newer than fifty years old, but the majority of properties and the most important Period of Significance are greater than fifty years old.

⁹ For more information on Criteria Consideration G, refer to *National Register Bulletin: Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Last Fifty Years*.

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.

ELIGIBILITY FOR INFORMATION POTENTIAL

A property that has achieved significance within the past fifty years can qualify under Criterion D only if it can be demonstrated that the information is of exceptional importance within the appropriate context and that the property contains data superior to or different from those obtainable from other sources, including other culturally related sites. An archeological site less than fifty years old may be eligible if the former inhabitants are so poorly documented that information about their lifeways is best obtained from examination of the material remains.

Eligible

- Data such as the rate of adoption of modern technological innovations by rural tenant farmers in the 1950s may not be obtainable through interviews with living persons but could be gained by examination of homesites.

Not Eligible

- A recent archeological site such as the remains of a Navajo sheep corral used in the 1950s would not be considered exceptionally significant for its information potential on animal husbandry if better information on the same topic is available through ethnographic studies or living informants.

HISTORIC DISTRICTS

Properties which have achieved significance within the past fifty years can be eligible for the National Register if they are an integral part of a district which qualifies for National Register listing. This is demonstrated by documenting that the property dates from within the district's defined Period of Significance and that it is associated with one or more of the district's defined Areas of Significance.

Properties less than fifty years old may be an integral part of a district when there is sufficient perspective to consider the properties as historic. This is accomplished by demonstrating that: 1) the district's Period of Significance is justified as a discrete period with a defined beginning and end, 2) the character of the district's historic resources is clearly defined and assessed, 3) specific resources in the district are demonstrated to date from that discrete era, and 4) the majority of district properties are over fifty years old. In these instances, it is not necessary to prove exceptional importance of either the district itself or the less-than-fifty-year-old properties. Exceptional importance still must be demonstrated for district where the majority of properties or the major Period of Significance is less than fifty years old, and for less-than-fifty-year-old properties which are nominated individually.

PROPERTIES MORE THAN FIFTY YEARS IN AGE, LESS THAN FIFTY YEARS IN SIGNIFICANCE

Properties that are more than fifty years old, but whose significant associations or qualities are less than fifty years old, must be treated under the fifty year consideration.

Eligible

- A building constructed early in the twentieth century (and having no architectural importance), but that was associated with an important person during the 1950s, must be evaluated under Criteria Consideration G because the Period of Significance is within the past fifty years. Such a property would qualify if the person was of exceptional importance.

REQUIREMENT TO MEET THE CRITERIA, REGARDLESS OF AGE

Properties that are less than fifty years old and are not exceptionally important will *not* automatically qualify for the National Register once they are fifty years old. In order to be listed in the National Register, all properties, regardless of age, must be demonstrated to meet the Criteria for Evaluation.

VIII. HOW TO EVALUATE THE INTEGRITY OF A PROPERTY

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.

NON-HISTORIC EXTERIORS

If the historic *exterior* building material is covered by non-historic material (such as modern siding), the property can still be eligible *if* the significant form, features, and detailing are not obscured. If a property's exterior is covered by a non-historic false-front or curtain wall, the property will not qualify under Criteria A, B, or C, because it does not retain the visual quality necessary to convey historic or architectural significance. Such a property also cannot be considered a contributing element in a historic district, because it does not add to the district's sense of time and place. If the false front, curtain wall, or non-historic siding is removed and the original building materials are intact, then the property's integrity can be re-evaluated.

PROPERTY CONTAINED WITHIN ANOTHER PROPERTY

Some properties contain an earlier structure that formed the nucleus for later construction. The exterior property, if not eligible in its own right, can qualify on the basis of the interior property *only if* the interior property can yield significant information about a specific construction technique or material, such as rammed earth or tabby. The interior property *cannot* be used as the basis for eligibility if it has been so altered that it no longer contains the features that could provide important information, or if the presence of important information cannot be demonstrated.

SUNKEN VESSELS

A sunken vessel can be eligible under Criterion C as embodying the distinctive characteristics of a method of construction if it is structurally intact. A *deteriorated* sunken vessel, no longer structurally intact, can be eligible under Criterion D if the remains of either the vessel or its contents is capable of yielding significant information. For further information, refer to *National Register Bulletin: Nominating Historic Vessels and Shipwrecks to the National Register of Historic Places*.

Natural Features

A natural feature that is associated with a historic event or trend, such as a rock formation that served as a trail marker during westward expansion, must retain its historic appearance, unobscured by modern construction or landfill. Otherwise it is not eligible, even though it remains intact.

COMPARING SIMILAR PROPERTIES

For some properties, comparison with similar properties should be considered during the evaluation of integrity. Such comparison may be important in deciding what physical features are essential to properties of that type. In instances where it has not been determined what physical features a property must possess in order for it to reflect the significance of a historic context, comparison with similar properties should be undertaken during the evaluation of integrity. This situation arises when scholarly work has not been done on a particular property type or when surviving examples of a property type are extremely rare. (See **Comparing Related Properties** in *Part V: How to Evaluate a Property within its Historic Context*.)

RARE EXAMPLES OF A PROPERTY TYPE

Comparative information is particularly important to consider when evaluating the integrity of a property that is a rare surviving example of its type. The property must have the essential physical features that enable it to convey its historic character or information. The rarity and poor condition, however, of other extant examples of the type may justify accepting a greater degree of alteration or fewer features, provided that enough of the property survives for it to be a significant resource.

Eligible

- A one-room schoolhouse that has had all original exterior siding replaced and a replacement roof that does not exactly replicate the original roof profile can be eligible if the other extant rare examples have received an even greater degree of alteration, such as the subdivision of the original one-room plan.

Not Eligible

- A mill site contains information on how site patterning reflects historic functional requirements, but parts of the site have been destroyed. The site is not eligible for its information potential if a comparison of other mill sites reveals more intact properties with complete information.

DETERMINING THE RELEVANT ASPECTS OF INTEGRITY

Each type of property depends on certain aspects of integrity, more than others, to express its historic significance. Determining which of the aspects is most important to a particular property requires an understanding of the property's significance and its essential physical features.

CRITERIA A AND B

A property important for association with an event, historical pattern, or person(s) ideally might retain *some* features of all seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. Integrity of design and workmanship, however, might not be as important to the significance, and would not be relevant if the property were a site. A basic integrity test for a property associated with an important event or person is whether a historical contemporary would recognize the property as it exists today.

For archeological sites that are eligible under Criteria A and B, the seven aspects of integrity can be applied in much the same way as they are to buildings, structures, or objects. It is important to note, however, that the site must have *demonstrated* its ability to convey its significance, as opposed to sites eligible under Criterion D where only the potential to yield information is required.

Eligible

A mid-19th century waterpowered mill important for its association with an area's industrial development is eligible if:

- it is still on its original site (**Location**), and
- the important features of its setting are intact (**Setting**), and
- it retains most of its historic materials (**Materials**), and
- it has the basic features expressive of its design and function, such as configuration, proportions, and window pattern (**Design**).

Not Eligible

A mid-19th century water-powered mill important for its association with an area's industrial development is not eligible if:

- it has been moved (**Location**, **Setting**, **Feeling**, and **Association**), or
- substantial amounts of new materials have been incorporated (**Materials**, **Workmanship**, and **Feeling**), or
- it no longer retains basic design features that convey its historic appearance or function (**Design**, **Workmanship**, and **Feeling**).

CRITERION C

A property significant under Criterion C must retain those physical features that characterize the type, period, or method of construction that the property represents. Retention of design, workmanship, and materials will usually be more important than location, setting, feeling, and association. Location and setting will be important, however, for those properties whose design is a reflection of their immediate environment (such as designed landscapes and bridges).

For archeological sites that are eligible under Criterion C, the seven aspects of integrity can be applied in much the same way as they are to buildings, structures, or objects. It is important to note, however, that the site must have *demonstrated* its ability to convey its significance, as opposed to sites eligible under Criterion D where only the *potential* to yield information is required.

Eligible

A 19th century wooden covered bridge, important for illustrating a construction type, is eligible if:

- the essential features of its design are intact, such as abutments, piers, roof configuration, and trusses (**Design**, **Workmanship**, and **Feeling**), and
- most of the historic materials are present (**Materials**, **Workmanship**, and **Feeling**), and
- evidence of the craft of wooden bridge technology remains, such as the form and assembly technique of the trusses (**Workmanship**).
- Since the design of a bridge relates directly to its function as a transportation crossing, it is also important that the bridge still be situated over a waterway (**Setting**, **Location**, **Feeling**, and **Association**).

Not Eligible

For a 19th century wooden covered bridge, important for its construction type, replacement of some materials of the flooring, siding, and roofing would not necessarily damage its integrity. Integrity would be lost, however, if:

- the abutments, piers, or trusses were substantially altered (**Design**, **Workmanship**, and **Feeling**) or
- considerable amounts of new materials were incorporated (**Materials**, **Workmanship**, and **Feeling**).
- Because environment is a strong factor in the design of this property type, the bridge would also be ineligible if it no longer stood in a place that conveyed its function as a crossing (**Setting**, **Location**, **Feeling**, and **Association**).

CRITERION D

For properties eligible under Criterion D, setting and feeling may not have direct bearing on the property's ability to yield important information. Evaluation of integrity probably will focus primarily on the location, design, materials, and perhaps workmanship.

Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns can be eligible if:

- floral or faunal remains are found in clear association with cultural material (**Materials** and **Association**) and
- the site exhibits stratigraphic separation of cultural components (**Location**).

Not Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns would not be eligible if:

- floral or faunal remains were so badly decomposed as to make identification impossible (**Materials**), or
- floral or faunal remains were disturbed in such a manner as to make their association with cultural remains ambiguous (**Association**), or
- the site has lost its stratigraphic context due to subsequent land alterations (**Location**).

Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period can be eligible if:

- the site contains lithic debitage, finished stone tools, hammerstones, or antler flakers (**Material** and **Design**), and
- the site contains datable material (**Association**).

Not Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period would not be eligible if:

- the site contains natural deposits of lithic materials that are impossible to distinguish from culturally modified lithic material (**Design**) or
- the site does not contain any temporal diagnostic evidence that could link the site to the Late Archaic period (**Association**).

IX. SUMMARY OF THE NATIONAL HISTORIC LANDMARKS CRITERIA FOR EVALUATION

A property being nominated to the National Register may also merit consideration for potential designation as a National Historic Landmark. Such consideration is dependent upon the stringent application of the following distinct set of criteria (found in the *Code of Federal Regulations*, Title 36, Part 65).

NATIONAL HISTORIC LANDMARKS CRITERIA

The quality of national significance is ascribed to districts, sites, buildings, structures, and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering, and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling, and association, and:

1. That are associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained; or
2. That are associated importantly with the lives of persons nationally significant in the history of the United States; or
3. That represent some great idea or ideal of the American people; or
4. That embody the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction; or
5. That are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; or
6. That have yielded or may be likely to yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.

NATIONAL HISTORIC LANDMARK EXCLUSIONS

Ordinarily, cemeteries, birthplaces, 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 and properties that have achieved significance within the past fifty years are not eligible for designation. If such properties fall within the following categories they may, nevertheless, be found to qualify:

1. A religious property deriving its primary national significance from architectural or artistic distinction or historical importance; or
2. A building or structure removed from its original location but which is nationally significant primarily for its architectural merit, or for association with persons or events of transcendent importance in the nation's history and the association consequential; or
3. A site of a building or structure no longer standing but the person or event associated with it is of transcendent importance in the nation's history and the association consequential; or

4. A birthplace, grave or burial if it is of a historical figure of transcendent national significance and no other appropriate site, building, or structure directly associated with the productive life of that person exists; or
5. A cemetery that derives its primary national significance from graves of persons of transcendent importance, or from an exceptionally distinctive design or an exceptionally significant event; or
6. A reconstructed building or ensemble of buildings of extraordinary national significance when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other buildings or structures with the same association have survived; or
7. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own national historical significance; or
8. A property achieving national significance within the past 50 years if it is of extraordinary national importance.

COMPARING THE NATIONAL HISTORIC LANDMARKS CRITERIA AND THE NATIONAL REGISTER CRITERIA

In general, the instructions for preparing a National Register nomination and the guidelines stated in this bulletin for applying the National Register Criteria also apply to Landmark nominations and the use of the Landmark criteria. While there are specific distinctions discussed below, *Parts IV and V* of this bulletin apply equally to National Register listings and Landmark nominations. That is, the categories of historic properties are defined the same way; historic con-

texts are identified similarly; and comparative evaluation is carried out on the same principles enumerated in *Part V*.

There are some differences between National Register and National Historic Landmarks Criteria. The following is an explanation of how each Landmark Criterion compares with its National Register Criteria counterpart:

CRITERION 1

This Criterion relates to National Register Criterion A. Both cover properties associated with events. The Landmark Criterion, however, requires that the events associated with the property be *outstandingly* represented by that property and that the property be related to the broad national patterns of U.S. history. Thus, the quality of the property to convey and interpret its meaning must be of a higher order and must relate to national themes rather than the narrower context of State or local themes.

CRITERION 2

This Criterion relates to National Register Criterion B. Both cover properties associated with significant people. The Landmark Criterion differs in that it specifies that the association of a person to the property in question be an important one and that the person associated with the property be of *national* significance.

CRITERION 3

This Criterion has no counterpart among the National Register Criteria. It is rarely, if ever, used alone. While not a landmark at present, the Liberty Bell is an object that might be considered under this Criterion. The application of this Criterion obviously requires the most careful scrutiny and would apply only in rare instances involving ideas and ideals of the highest order.

CRITERION 4

This Criterion relates to National Register Criterion C. Its intent is to qualify exceptionally important works of architecture or collective elements of architecture extraordinarily significant as an ensemble, such as a historic

district. Note that the language is more restrictive than that of the National Register Criterion in requiring that a candidate in architecture be "a specimen exceptionally valuable for the study of a period, style, or method of construction" rather than simply embodying distinctive characteristics of a type, period, or method of construction. With regard to historic districts, the Landmarks Criterion requires an entity that is distinctive and exceptional. Unlike National Register Criterion C, this Criterion will not qualify the works of a master, *per se*, but only such works which are exceptional or extraordinary. Artistic value is considered only in the context of history's judgement in order to avoid current conflicts of taste.

CRITERION 5

This Criterion does not have a strict counterpart among the National Register Criteria. It may seem redundant of the latter part of Landmark Criterion 4. It is meant to cover collective entities such as Greenfield Village and historic districts like New Bedford, Massachusetts, which qualify for their collective association with a nationally significant event, movement, or broad pattern of national development.

CRITERION 6

The National Register counterpart of this is Criterion D. Criterion 6 was developed specifically to recognize archeological sites. All such sites must address this Criterion. The following are the qualifications that distinguish this Criterion from its National Register counterpart: the information yielded or likely to be yielded must be of *major* scientific importance by revealing new cultures, or by shedding light upon periods of occupation *over large areas* of the United States. Such sites should be expected to yield data affecting *theories, concepts, and ideas* to a *major degree*.

The data recovered or expected to be recovered must make a major contribution to the existing corpus of information. Potentially recoverable data must be likely to revolutionize or substantially modify a major theme in history or prehistory, resolve a substantial historical or anthropological debate, or close a serious gap in a major theme of U. S. history or prehistory.

EXCLUSIONS AND EXCEPTIONS TO THE EXCLUSIONS

This section of the National Historic Landmarks Criteria has its counterpart in the National Register's "Criteria Considerations." The most abundant difference between them is the addition of the qualifiers "national," "exceptional," or "extraordinary" before the word significance. Other than this, the following are the most notable distinctions:

EXCLUSION 2

Buildings moved from their original location, qualify only if one of two conditions are met: 1) the building is nationally significant for

architecture, or 2) the persons or events with which they are associated are of *transcendent* national significance and the association is consequential.

Transcendent significance means an order of importance higher than that which would ordinarily qualify a person or event to be nationally significant. A consequential association is a relationship to a building that had an evident impact on events, rather than a connection that was incidental and passing.

EXCLUSION 3

This pertains to the site of a structure no longer standing. There is no counterpart to this exclusion in the National Register Criteria. In order for such a property to qualify for Landmark designation it must meet the second condition cited for Exclusion 2.

EXCLUSION 4

This exclusion relates to Criteria Consideration C of the National Register Criteria. The only difference is that a burial place qualifies for Landmark designation only if, in addition to other factors, the person buried is of *transcendent* national importance.

When evaluating properties at the national level for designation as a National Historic Landmark, please refer to the National Historic Landmarks outline, *History and Prehistory in the National Park System and the National Historic Landmarks Program, 1987*. (For more information about the National Historic Landmarks program, please write to Department of the Interior, National Park Service, National Historic Landmarks, 1849 C Street, NW, NC400, Washington, DC 20240.)

X. GLOSSARY

Associative Qualities - An aspect of a property's history that links it with historic events, activities, or persons.

Code of Federal Regulations - Commonly referred to as "CFR." The part containing the National Register Criteria is usually referred to as 36 CFR 60, and is available from the National Park Service.

CLG - Certified Local Government.

Culture - A group of people linked together by shared values, beliefs, and historical associations, together with the group's social institutions and physical objects necessary to the operation of the institution.

Cultural Resource - See Historic Resource.

Evaluation - Process by which the significance and integrity of a historic property are judged and eligibility for National Register listing is determined.

Historic Context - An organizing structure for interpreting history that groups information about historic properties that share a common theme, common geographical area, and a common time period. The development of historic contexts is a foundation for decisions about the planning, identification, evaluation, registration, and treatment of historic properties, based upon comparative historic significance.

Historic Integrity - The unimpaired ability of a property to convey its historical significance.

Historic Property - See Historic Resource.

Historic Resource - Building, site, district, object, or structure evaluated as historically significant.

Identification - Process through which information is gathered about historic properties.

Listing - The formal entry of a property in the National Register of Historic Places. See also, Registration.

Nomination - Official recommendation for listing a property in the National Register of Historic Places.

Property Type - A grouping of properties defined by common physical and associative attributes.

Registration - Process by which a historic property is documented and nominated or determined eligible for listing in the National Register.

Research Design - A statement of proposed identification, documentation, investigation, or other treatment of a historic property that identifies the project's goals, methods and techniques, expected results, and the relationship of the expected results to other proposed activities or treatments.

XI. LIST OF NATIONAL REGISTER BULLETINS

The Basics

How to Apply National Register Criteria for Evaluation *

Guidelines for Completing National Register of Historic Places Form

Part A: How to Complete the National Register Form *

Part B: How to Complete the National Register Multiple Property Documentation Form *

Researching a Historic Property *

Property Types

Guidelines for Evaluating and Documenting Historic **Aids to Navigation** *

Guidelines for Identifying, Evaluating and Registering **America's Historic Battlefields**

Guidelines for Evaluating and Registering Historical **Archeological Sites**

Guidelines for Evaluating and Documenting Historic **Aviation Properties**

Guidelines for Evaluating and Registering **Cemeteries and Burial Places**

How to Evaluate and Nominate **Designed Historic Landscapes** *

Guidelines for Identifying, Evaluating and Registering Historic **Mining Sites**

How to Apply National Register Criteria to **Post Offices** *

Guidelines for Evaluating and Documenting **Properties Associated with Significant Persons**

Guidelines for Evaluating and Documenting **Properties That Have Achieved Significance Within the Last Fifty Years** *

Guidelines for Evaluating and Documenting **Rural Historic Landscapes** *

Guidelines for Evaluating and Documenting **Traditional Cultural Properties** *

Nominating Historic **Vessels and Shipwrecks** to the National Register of Historic Places

Technical Assistance

Defining Boundaries for National Register Properties*

Guidelines for Local Surveys: A Basis for Preservation Planning *

How to Improve the Quality of Photographs for National Register Nominations

National Register Casebook: Examples of Documentation *

Using the UTM Grid System to Record Historic Sites

To order these publications, write to: National Register of Historic Places, National Park Service, 1849 C St., NC 400, NW, Washington, D.C. 20240, or e-mail at: nr_reference@nps.gov. Publications marked with an asterisk (*) are also available in electronic form at www.cr.nps.gov/nr.



Planning CHC <chc@lacity.org>

Initial Submission - Barry Building, Historic- Cultural Monument No. 887 CHC-2007-1585-HCM-CC1

1 message

Hill, Kathleen <Kathleen.Hill@alston.com>
To: Planning CHC <chc@lacity.org>

Thu, Jun 11, 2026 at 12:21 PM

Dear Honorable Cultural Heritage Commission –

On behalf of the owner/applicant, 11973 San Vicente LLC, please see the initial submission for Case No. CHC-2007-1585-HCM-CC1 for the June 18, 2026 hearing.

Best regards,

Kathleen

Kathleen A. Hill
Planning Director
ALSTON & BIRD
[350 South Grand Avenue](#)

51st Floor
Los Angeles, CA 90071
+1 213 576 1056 (O)

+1 213 709 1994 (M)
Kathleen.Hill@alston.com

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Initial Submission Letter to Cultural Heritage Commission for Case No. CHC-2007-1585-HCM-CC1**06.11.26.pdf**

401K

ALSTON & BIRD

350 South Grand Avenue, 51st Floor
Los Angeles, CA 90071
213-576-1000 | Fax: 213-576-1100

Edward J. Casey

Email: ed.casey@alston.com

Direct Dial: +1 213 576 1005

June 11, 2026

The Honorable Cultural Heritage Commission
200 North Spring Street, Room 525
Los Angeles, CA 90012
Email: chc@lacity.org

Re: Barry Building, Historic- Cultural Monument No. 887
CHC-2007-1585-HCM-CC1

The Honorable Cultural Heritage Commission:

On behalf of the owner (Owner) of the subject property located at 11973 San Vicente Blvd. and the Barry Building located at that property, I am sending this letter in response to the report prepared by City staff for the meeting of the Cultural Heritage Commission (CHC) on June 18, 2026. In its report, staff recommends that CHC object to the demolition permit for the building, which permit has already been approved by the Department of Building & Safety (DBS), and affirmed by the Building and Safety Commissioners, the Planning Land Use and Management (PLUM) committee of the City Council, and the City Council itself. The staff's recommendation advocating for a further delay to explore the possible relocation of the Barry Building and to seek a third party who may be interested in purchasing the building is contrary to both the law and the facts, as demonstrated below.

First, by way of background, this matter has been ongoing for six years; the City began the preparation of a full Environmental Impact Report in 2020. After preparation of that full EIR, which included a 60-day public comment period. City staff prepared detailed findings (City CEQA Findings under the California Environmental Quality Act (CEQA) concerning matters addressed in the EIR and other reports concerning the economic feasibility of rehabilitating the building. (A copy of those Findings is included in the copy of the DBS determination letter that is included in the CHC staff report.) Those City CEQA Findings were adopted by DBS in June 2025, a decision upheld by the Building and Safety Commissioners, the PLUM Committee, and eventually the City Council in April 2026. **Since the time for any motion to reconsider the City Council decision has now passed (refer to City Council Rule 51), the determinations made in the City CEQA Findings are legally and necessarily binding on all commissions and departments within the City, including the CHC.** Consequently, the CHC cannot make a decision that is contrary to the factual determinations made in the City CEQA Findings.

The EIR examined a range of alternatives, including Alternative 4 that examined the possible relocation of the Barry Building.¹ The City CEQA Findings addressed the feasibility of Alternative 4 at pages 28 to 32 of the Findings. The technical feasibility of Alternative 4 was addressed by a technical expert report prepared by HKA Global. No one submitted an expert report that took a contrary position to HKA.

Alternative 4 examined four different options or scenarios for physically relocating the Barry Building. For numerous reasons, HKA determined that Options 1 and 2 were technically infeasible for the reasons detailed at page 28 of the City CEQA Findings. Based on that expert analysis, the City determined that those two options “were categorically infeasible.” (Refer to page 32 of the Findings.) That determination is binding on the CHC.

With respect to Options 3 and 4, the City CEQA Findings found that “Option 3 proposes partially dismantling the building elements at strategic horizontal locations into 9 total pieces. As noted in HKA’s report, Option 3 presents significant logistical challenges, and also presents high risks to the historical character of the Barry Building. HKA determined that this option, while technically possible, would likely damage and destroy character defining features which will be difficult to restore, eliminating the benefit of preserving the historic characteristics of the building through relocation. Option 4 would dismantle the building into 20 segments. While this option is technically feasible, HKA determined that it would be costly, and that the risks associated with the relocation and reassembly are high.” (City CEQA Findings, page 32.)

Further, in addition to finding that Options 3 and 4 are technically infeasible, the City CEQA Findings also determined that those options “are economically infeasible.” (Findings at page 32.) The associated cost to rehabilitate the building that rendered the on-site alternatives economically infeasible also applies to the relocation alternative, and the relocation alternative has the additional costs associated with disassembling and relocating the building to a new location, while the “value of the preserved building based on total leasable square footage is unlikely to change significantly at a new location.” (Findings at page 32.) Again, these express findings are binding on the CHC.

In light of the binding findings made by the City that relocating the Barry Building is technically and economically infeasible, an objection by CHC to the demolition permit to allow for time to relocate the Barry Building (as the staff report recommends) is legally impermissible. The CHC cannot advocate for more time to try to accomplish an objective that the City (including the City Council) has already determined to be infeasible.

¹ The City determined that the EIR examined a legally adequate range of preservation alternatives. Refer to page 17 of the City CEQA Findings. When the CHC considered the Barry Building on September 5, 2024, the CHC unanimously recommended that the EIR be certified by DBS since it complied with CEQA. That action by CHC is binding on the Commission.

Similarly, to recommend further delay of the demolition permit to try to find a third party to purchase the Barry Building to relocate it to a new site is also contrary to the law and the facts. No third party is going to purchase the building for the purpose of relocating it to a different location when relocating the building is technically and economically infeasible. (Again, by adopting the City CEQA Findings, the City has already determined that physical relocation of the Barry Building is infeasible.) Indeed, the infeasibility of relocating the building explains why no third party in the past six years has approached either the Owner or the City expressing an interest in purchasing the Barry Building to rehabilitate it. And given the nine public notices published by the City concerning the proposed demolition of the building over the past six years, as well as the 10 email notices sent by Los Angeles Conservancy about this matter, 21 notices from neighborhood associations/community organizations, 18 local news articles and significant direct community outreach including door-to-door canvassing and presentations to community and civic organizations of the proposed demolition over the course of many years, ample notice has been provided. (Copies of the notices and related documents referenced in the preceding sentence have been submitted to City staff with this letter.)

For all of these reasons, we respectfully request that the CHC not submit an objection to the demolition permit for the Barry Building.²

Sincerely,

A handwritten signature in blue ink, appearing to read "Edward J. Casey", with a long, sweeping underline.

Edward J. Casey

cc: Ken Bernstein, Division Manager and Principal City Planner Office of Historic Resource with copies of notices and related documents (ken.bernstein@lacity.org)
Melissa Jones, City Planner Office of Historic Resource with copies of notices and related documents (melissa.lim@lacity.org)
Craig Bullock, Planning Director Council District 11 (craig.bullock@lacity.org)

² For disclosure purposes, we inform the CHC that the Owner is prepared to move forward first with lead and asbestos abatement work that will be confined to the interior of the building, which will not affect the character defining features of the building, as determined by the Historic Resources Group. Refer to Exhibit 1 to this letter.

Exhibit 1

HISTORIC RESOURCES GROUP

556 S Fair Oaks Avenue, Suite 101-514
Pasadena, CA 91105

Tel 626-793-2400
historicresourcesgroup.com

MEMO

TO: ALSTON & BIRD

ATTN: EDWARD J. CASEY, SENIOR COUNSEL

FROM: JOHN LOCASCIO, AIA, PRINCIPAL ARCHITECT

RE: BARRY BUILDING, 11973 SAN VICENTE BOULEVARD

DATE: APRIL 24, 2026

Introduction

This memorandum summarizes our review of the proposed interior hazardous materials abatement at the Barry Building located at 11973-11975 West San Vicente Boulevard in the City of Los Angeles. We have reviewed the interior abatement scope for potential impacts to the Barry Building, which is a designated City of Los Angeles Historic-Cultural Monument (HCM #887) and therefore is a presumptive historical resource as defined by the California Environmental Quality Act (CEQA). The City of Los Angeles has approved demolition of the Barry Building, which would materially impair the significance of the Barry Building and thus result in a significant adverse impact on the environment under CEQA. However, this memorandum is limited to review of the interior hazardous materials abatement only.

Interior Abatement Scope

The proposed scope of work, as provided by the Client, consists of asbestos and lead abatement at interior offices, storage rooms, mechanical rooms, restrooms, and other interior spaces as follows:

- Vinyl asbestos floor tile and mastic, vinyl plank and mastic
- Ceiling mastic
- Acoustic ceiling spray
- Plaster walls

- Transite pipes
- Window putty
- Mirror mastic
- Sheet flooring
- HVAC insulation, ducting, and boots
- Vibration dampeners
- Cove base
- Misc. asbestos debris at interior of building
- Damaged drywall
- Decontaminate non-porous items and clean horizontal and vertical spaces
- Scrape loose and flaking lead paint
- Haul all material off site for disposal

Exclusions as follows:

- Exterior abatement, including but not limited to exterior portion of window frames and roof
- Sub surface work.

Potential Impacts

The Barry Building is significant as the former home of Dutton's Bookstore and as an excellent example of mid-20th century International Style architecture. The building's significance is expressed by its exterior features including its rectangular plan, flat roof, central garden courtyard, curving concrete and steel stairs, balconies with steel guardrails, front façade raised on steel pipe columns, unadorned stucco wall planes, horizontal band of windows with sunshades, steel frame windows, floor-to-ceiling grid and louvered windows, and skewed freestanding storefront at the southeast corner. The building's interiors are not distinctive and have been partially altered over time; although some interior features may be original, including vinyl asbestos floor tile, acoustic ceilings, and plaster walls, they are not highly decorative or unusual for a building of the 1950s and do not contribute to the building's overall historic character. The only interior features identified in the Barry Building HCM nomination as character-defining are "high ceilings, full-height glazing, [and] stone floor." These features will not be removed in the abatement scope.

A project with an effect that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.¹ A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.² The state CEQA Guidelines further state that "[t]he significance of an historic resource is materially impaired when a project... [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources... local

¹ CEQA Guidelines, section 15064.5(b).

² CEQA Guidelines, section 15064.5(b)(1).

register of historic resources... or its identification in a historic resources survey.”³

The proposed interior abatement scope would not alter the Barry Building such that its significance would be materially impaired. All extant exterior character-defining features, and the interior character-defining features identified in the HCM nomination, would remain intact after completion of the interior abatement. Therefore, the proposed abatement would not materially alter in an adverse manner those physical characteristics of the Barry Building that convey its historical significance and that justify its designation as a City of Los Angeles HCM, and thus would not result in a significant effect on the environment.

³ *CEQA Guidelines*, section 15064.5(b)(2).

SECONDARY SUBMISSIONS



Planning CHC <chc@lacity.org>

Barry Building

1 message

Amy Richards <amy@showcaller.com>

Wed, Jun 17, 2026 at 9:00 AM

To: chc@lacity.org

I strongly support the granting of the 180-day hold on the demolition permit for the Barry Building.

Let's try to find a better solution for this historic piece of architecture.

Sincerely,

Amy Richards

amy@showcaller.com

626-376-0922



Planning CHC <chc@lacity.org>

The Barry Building

1 message

fretwerk@aol.com <fretwerk@aol.com>
To: "chc@lacity.org" <chc@lacity.org>

Wed, Jun 17, 2026 at 9:46 AM

Dear Folks,

I live at Case Knolls Garden Apartments and lived through the false claims that it had deteriorated so badly that it needed to be demolished. Benign neglect is a rich mans way of getting rid of affordable housing and sucking money out of the City. Developers own our City Council and get their lies confirmed by these spineless deer in the headlight creeps constantly. The City is losing its reputation as a place to live because our City Council bends over for their masters constantly and forget about the citizens who voted them in to their corrupt office. I am shocked that even Ms Raman, whom I voted for, has joined this ignorant greedy cabal to destroy affordable housing for bloated luxury trash apartments that will benefit only the corrupt developer. Please rethink this action. Chase Knolls Garden Apts bounced back but now we face the same bloated rich mans destruction of benign neglect our selves. It is never ending. Money does not die. If its corruption fails it just shrugs and says we'll try again next year to destroy the past. These rich pieces of garbage get their palms greased every day. But there are some projects that they should not be able to touch. Please have the guts and the balls to stand up to these lying money freaks and save the Barry Complex.

Thank You

Barry Cullison

13378 Huston st

Sherman Oaks CA. 01423



Planning CHC <chc@lacity.org>

Save the Barry Building

1 message

Christina Han <starrynite1023@gmail.com>
To: chc@lacity.org

Tue, Jun 16, 2026 at 5:50 PM

Mr. Sanchez, I am writing to urge the Cultural Heritage Commission to grant a 180-day stay of demolition for the Barry Building so to provide additional time for further efforts necessary for the preservation of the building. These efforts include investigating options for relocation, conducting outreach for a potential preservation-minded buyer to purchase the property, facilitating the development of another preservation outcome, or other options as may be presented at the hearing.

Thank You,
Christina H.



Planning CHC <chc@lacity.org>

Barry Building, Brentwood

1 message

Ilean Y. Rogers <ileanyr@gmail.com>
To: chc@lacity.org

Tue, Jun 16, 2026 at 2:54 PM

SAVE THE BARRY BUILDING in Brentwood!!!

Why is it necessary to tear it down?? There can be other sites to build and the historic Barry should remain as a treasure to our past.

Leave this gem alone.

Ilean Rogers
Pasadena



Planning CHC <chc@lacity.org>

Request to Grant 180-day Stay, Barry Building Monument #887

1 message

Jeanette Corcuera <jeanette.corcuera@gmail.com>

Tue, Jun 16, 2026 at 4:31 PM

To: chc@lacity.org, councilmember.park@lacity.org, craig.bullock@lacity.org

Cc: info@laconservancy.org, "news@laconservancy.org" <news@laconservancy.org>

BARRY BUILDING, HISTORIC-CULTURAL MONUMENT NO. 887

CHC-2007-1585-HCM-CC1 Council District: 11 – Park

CEQA: ENV-2019-6645-EIR (SCH#2020110210) Last Day to Act: 6-25-26

Plan Area: Brentwood - Pacific Palisades

PROPERTY ADDRESS: 11973-11975 W. San Vicente Boulevard

Commission Review of Demolition Permit pursuant to Los Angeles Ad

Commissioners,

I strongly urge you to grant the requested 180-day stay of demolition for the Barry Building.

Los Angeles has a long history of losing historic buildings in the pursuit of redevelopment. Too often, we realize the value of these places only after they are gone. Once a Historic-Cultural Monument is demolished, there is no opportunity to reconsider that decision.

I understand the need for housing and responsible development. But the issue before you today is not whether the property should ultimately be redeveloped. The issue is whether every reasonable preservation option has been given a fair chance.

The Office of Historic Resources has identified potential paths forward, including outreach to preservation-minded buyers, adaptive reuse, relocation, and other preservation solutions. Those efforts should be fully explored before demolition is allowed to proceed.

I am also concerned about the message this sends. If historic buildings can be neglected, deteriorate, and then be demolished because preservation has become more difficult, we risk turning demolition by neglect into accepted policy.

A 180-day stay is temporary. Demolition is permanent.

Please grant the stay and allow the time necessary to determine whether this designated landmark can be preserved before it is lost forever.

Thank you.

Jeanette Corcuera,

LA City Resident & LA Conservancy Member

(310) 502-5769

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN
GREGORY T. WITTMANN

Writer's Direct Line: (424) 284-9669
jamie.hall@channellawgroup.com

*ALSO Admitted in Texas

June 16, 2026

VIA ELECTRONIC MAIL

Honorable Barry Milofsky, President
Honorable Members of the Cultural Heritage Commission
City of Los Angeles
200 North Spring Street, Room 1010
Los Angeles, CA 90012
chc@lacity.org

Re: Agenda Item No. 4 — Barry Building, Historic-Cultural Monument No. 887 (Case No. CHC-2007-1585-HCM-CC1); Commission Review of Demolition Permit Pursuant to Los Angeles Administrative Code Section 22.171.15 (June 18, 2026 Hearing). Comment of Angelenos for Historic Preservation Urging the Commission to OBJECT to Issuance of the Demolition Permit and to Impose a 180-Day Stay of Demolition.

Dear President Milofsky and Honorable Commissioners:

This Firm represents Angelenos for Historic Preservation (“AHP”), an unincorporated association of residents, design professionals, and preservation advocates, in connection with the proposed demolition of the Barry Building, Historic-Cultural Monument No. 887 (the “Monument” or “Building”), located at 11973–11975 West San Vicente Boulevard in Brentwood. The Building, a 1951 International Style commercial landmark designed by architect Milton H. Caughey for David Barry, Jr., longtime home of Dutton’s Brentwood Bookstore, and inseparable from the adjacent coral trees of San Vicente Boulevard (Historic-Cultural Monument No. 148) that Mr. Barry himself helped plant — was designated by the City Council in 2007. AHP writes to urge the Commission to do exactly what its own staff recommends: **object to the issuance of the demolition permit under Los Angeles Administrative Code section 22.171.15 and impose the full 180-day stay of demolition.**

The Commission should grant the stay for four independent reasons, each developed below. First, the reuse feasibility study that the Cultural Heritage Ordinance requires before a Monument may be demolished has never been performed and the developer’s environmental impact report is not a substitute for it. Second, this very Commission has already determined, unanimously and on a full evidentiary record, that the asserted justifications for demolishing this

Monument are not supported by substantial evidence. Third, AHP and the Los Angeles Conservancy have filed a verified petition for writ of mandate challenging the City's approval, and a stay is necessary to preserve the status quo so that the Superior Court can decide that case before the Monument is destroyed forever. Fourth, the equities overwhelmingly favor preservation: demolition here is the product of deliberate neglect, the replacement is a vacant dirt lot, and a stay imposes no burden on the owner while opening a realistic, collaborative path forward.

I. The Narrow Question Before the Commission, and Staff's Recommendation.

The matter before the Commission is a referral of a demolition permit under the Cultural Heritage Ordinance. Once such a matter is referred, the Commission has 30 days to object, and the filing of an objection "shall suspend the issuance of any permit for the demolition" of the Monument for a period of "not less than 30 days nor more than 180 days, during which time the Commission shall take all steps within the scope of its powers and duties as it determines are necessary for the preservation of the Monument."¹ The question today is therefore narrow but consequential: whether to preserve the City's ability to save this Monument by pressing pause, or to allow an irreversible demolition to proceed before the ordinance's preservation process can run its course.

The Office of Historic Resources has answered that question. Its Recommendation Report for this item recommends that the Commission (1) "object to the issuance of the demolition permit per Los Angeles Administrative Code... Section 22.171.15," and (2) "adopt the staff report findings."² AHP respectfully urges the Commission to adopt that recommendation in full and to impose the maximum 180-day stay.

II. The Reuse Feasibility Study Required by the Ordinance Has Never Been Performed, and the EIR Is Not a Substitute for It.

This is the heart of the matter, and it is the single most important reason a stay is warranted. Before the City may issue a demolition permit for a designated Monument, the Cultural Heritage Ordinance requires the Commission to base its determination on "[a] report regarding the structural soundness of the building or structure *and its suitability for continued use, renovation, restoration or rehabilitation*" (a report prepared by a licensed engineer or architect who meets the Secretary of the Interior's Professional Qualification Standards (36 C.F.R. Part 61) and is based on the Secretary's Standards for Architectural and Engineering Documentation) in addition to a separate showing of CEQA compliance.³ These are two distinct, independent prerequisites. The reuse-and-

¹ Los Angeles Administrative Code ("LAAC") § 22.171.15. At the end of the first 30 days the Department reports on preservation progress, and the Commission may, but need not, withdraw its objection; absent withdrawal, the stay remains in effect for the full period, and may be extended by the City Council.

² Department of City Planning, Office of Historic Resources, Recommendation Report, Demolition of the Barry Building, Historic-Cultural Monument #887 (Case No. CHC-2007-1585-HCM-CC1), Recommendation Nos. 1–2.

³ LAAC § 22.171.14(b)(1)–(2). The required report must come from "a licensed engineer or architect who meets the Secretary of the Interior's Profession[al] Qualification Standards as

rehabilitation report is a preservation-oriented feasibility analysis by a qualified expert; CEQA compliance is something else entirely.

No such reuse feasibility study has ever been prepared for the Barry Building. The developer never submitted one, and the construction-cost estimates in the record (prepared by the applicant's consultants to support an economic-infeasibility narrative) do not satisfy the ordinance. A contractor's estimate of what it would cost to rebuild the Building is not an independent, qualified evaluation of the Building's suitability for continued use, renovation, restoration, or rehabilitation. The two are not the same, and the ordinance demands the latter.

Nor does the Environmental Impact Report cure the omission. The EIR is a CEQA disclosure document. Its purpose is to inform the public and decision-makers of a project's significant environmental impacts and to analyze a range of alternatives at the environmental-review level. It is not, and was never intended to be, the Cultural Heritage Ordinance's expert reuse-feasibility assessment, and it does not apply the ordinance's preservation standards. Indeed, the EIR did precisely the opposite of an independent feasibility study: it adopted the applicant's own inflated, whole-building reconstruction cost figures, ranging from roughly \$12.8 million to \$17.1 million, as if they were substantial evidence, when the mandatory soft-story retrofit at issue was estimated by AHP's structural expert at approximately \$379,000.⁴ Treating the EIR as though it discharged the ordinance's reuse-study requirement conflates two separate legal obligations and skips a step the City Council expressly built into the law to protect Monuments.

This is exactly why a stay has value. A 180-day stay would give the Commission and the Office of Historic Resources the time the ordinance contemplates "to take all steps... necessary for the preservation of the Monument" — including securing the qualified reuse feasibility study that the law requires but that has never been done. Allowing demolition to proceed now would permanently foreclose that statutory process and reward the very party that bypassed it.

III. The Commission Has Already Found, Unanimously, That the Record Does Not Support Demolition of This Monument.

The Commission is not writing on a blank slate. On September 5, 2024, after a full hearing on this Building, the Commission voted 5-0 to recommend that the Department of Building and Safety *not* adopt a Statement of Overriding Considerations, finding (consistent with the staff report) that the benefits asserted by the property owner were not supported by substantial evidence

established by the Code of Federal Regulations, 36 CFR Part 61," and be "based on the Secretary of the Interior's Standards for Architectural and Engineering Documentation."

⁴ See Angelenos for Historic Preservation submissions to the PLUM Committee and City Council, dated Feb. 17, 2026 (Council File No. 25-1518), including the analysis of David Cocke (Structural Focus) validating an approximately \$379,000 soft-story retrofit estimate from Alpha Structural, Inc., and the line-item cost analysis and adaptive-reuse pathways of preservation architect Fran Offenhauser. Available at https://cityclerk.lacity.org/onlinedocs/2025/25-1518_misc_1_02-17-26.pdf and https://cityclerk.lacity.org/onlinedocs/2025/25-1518_misc_2_02-17-26.pdf

and that none of them outweighed the significant, unavoidable impact of losing the Monument.⁵ That determination echoed the Commission’s longstanding position on this very Building, first expressed in 2009 and reaffirmed in 2012, that “[a]ny concerted effort to purposefully demolish a Historic-Cultural Monument for a replacement project is unacceptable,” that “[p]ursuing the demolition of the Barry Building imperils the over 1,000 Historic-Cultural Monuments in the City of Los Angeles and sets a dangerous precedent,” and that the Building “can be integrated into a new development.”⁶

The Commissioners reached that conclusion with eyes open to the engineering claims now being recycled to justify demolition. Two Commissioners who are themselves architects examined the applicant’s seismic narrative and found it overstated, observing that this is an ordinary “wood stud and stucco box” that is “extremely easy to retrofit” with “some sheer walls,” and openly questioning how the applicant could “justify \$12 million worth of work.” The Department of Building and Safety nonetheless certified the EIR and adopted a Statement of Overriding Considerations over the Commission’s contrary recommendation. Imposing a stay now is fully consistent with the Commission’s own repeated, unanimous judgment that this Monument should be preserved.

IV. A Stay Is Necessary to Preserve the Status Quo Pending Judicial Review.

AHP and the Los Angeles Conservancy have filed a Verified Petition for Writ of Mandate in Los Angeles County Superior Court challenging the City’s approval of the demolition.⁷ The petition raises serious legal defects that go to the heart of the approval, including, among others, that: (i) the EIR violates CEQA by refusing to analyze preservation alternatives that would incorporate the Building into a larger development on the applicant’s commonly controlled adjacent parcels (the “whole of the action”), by adopting the applicant’s flawed economic-infeasibility baseline as if it were substantial evidence, and by failing to analyze cumulative impacts to the intertwined coral trees (HCM No. 148); (ii) the City abandoned tribal cultural resources consultation required by Assembly Bill 52, contrary to *Koi Nation of Northern California v. City of Clearlake* (2025) 109 Cal.App.5th 815;⁸ (iii) no reuse feasibility study compliant with Los Angeles Administrative Code section 22.171.14(b) was ever prepared; (iv) the

⁵ See Transcript of Cultural Heritage Commission Regular Meeting, Agenda Item No. 4 (Sept. 5, 2024); Cultural Heritage Commission Letter to the Department of Building and Safety, dated Sept. 17, 2024.

⁶ Cultural Heritage Commission communications to the Department of City Planning (Apr. 19, 2011; reaffirmed June 7, 2012), quoted in the Office of Historic Resources Recommendation Report for this item.

⁷ *Angelenos for Historic Preservation and Los Angeles Conservancy v. City of Los Angeles*, et al., Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief, Los Angeles County Superior Court (2026). The characterization of the claims herein is a summary; the petition controls.

⁸ *Koi Nation of Northern California v. City of Clearlake* (2025) 109 Cal.App.5th 815, as cited in the Verified Petition.

Department of Building and Safety lacked authority to serve as the CEQA lead agency certifying the EIR; and (v) the City Council acted without jurisdiction when it denied AHP's appeal and approved the project after its mandatory deadline to act had expired by operation of law.

A 180-day stay costs the City nothing, preserves the Court's ability to grant effective relief, and squarely serves the Commission's statutory mandate to take all steps necessary to preserve the Monument. AHP is prepared to seek a temporary restraining order and preliminary injunction if necessary to prevent demolition during the litigation, but the Commission can make that step unnecessary by exercising the very authority the ordinance gives it and granting the stay now.

V. The Equities Strongly Favor a Stay; Demolition by Neglect Should Not Be Rewarded.

Finally, the equities are not close. The Building is not being demolished to make way for housing or any other project. The approved result is a vacant dirt lot, which improves nothing and, as the Commission has previously observed, becomes its own attractive nuisance. The Building's deteriorated condition is the consequence of more than a decade of deliberate vacancy and deferred maintenance by an owner who, having failed to demolish the Building through redevelopment in 2009–2013, then declined to perform the modest mandatory retrofit. Rewarding that strategy with a demolition permit would set precisely the "dangerous precedent" the Commission has warned against, endangering more than 1,000 Monuments citywide.

A stay is also the constructive path. The owner has stated on the public record an intent to sell. A 180-day stay creates a structured window for the City, the current owner, and a preservation-minded buyer to transfer the property and integrate this restored landmark into a sensitive, context-appropriate development. This would be a genuine win-win that lets the owner exit, gives the neighborhood a revitalized streetscape rather than a fenced eyesore, and upholds the integrity of the Cultural Heritage Ordinance. The targeted retrofit work is feasible and far less costly than the applicant's figures suggest.⁹

VI. Conclusion.

For the reasons above, AHP respectfully urges the Commission to: (1) object to the issuance of the demolition permit under Los Angeles Administrative Code section 22.171.15 and adopt the staff report findings; (2) impose the full 180-day stay of demolition; and (3) direct staff and the Office of Historic Resources to use that period to take all steps necessary to preserve the Monument, including requiring a reuse feasibility study that complies with Los Angeles Administrative Code section 22.171.14(b). Doing so will honor the Commission's own unanimous prior determinations, give effect to the preservation process the City Council wrote into law, and protect the Court's ability to adjudicate the pending litigation before this irreplaceable Monument is lost forever.

Thank you for your consideration of this matter. I may be contacted at jamie.hall@channellawgroup.com if you have any questions, comments, or concerns.

Cultural Heritage Commission
June 16, 2026

Sincerely,

A handwritten signature in blue ink, reading "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" and last name "Hall" clearly legible, and "T." as a small middle initial.

Jamie T. Hall



Planning CHC <chc@lacity.org>

Please save the Barry Building from demolition.

1 message

cowenkj@aol.com <cowenkj@aol.com>

Wed, Jun 17, 2026 at 12:19 AM

To: "chc@lacity.org" <chc@lacity.org>

This building is an absolute treasure of mid century architecture. Please save it from demolition, so that future generations may admire and learn from it.

Thank you,

Kimberly Cowen



Planning CHC <chc@lacity.org>

INVOKE 180-DAY STAY of BARRY BUILDING!!

1 message

mia baccala <miabaccala@gmail.com>

Tue, Jun 16, 2026 at 3:45 PM

To: chc@lacity.org

To Bryan Sanchez and the Cultural Heritage Commission:

Please invoke a 180-day Stay of the Iconic Barry Building in Brentwood. It is an architectural gem, a piece of Los Angeles history, that adds precious character to the area.

I agree with the LA Conservancy's assertion that it would set a very dangerous precedent that neglect as a means of justifying demolition is rewarding and lucrative.

Thank you for your time and consideration!

--



— **Mia Baccala**

Saving humanity, one "Scalarious" tale at a time
347-846-3880

Now in **The Library of Congress**, y'all! That is unless our Petty-AF POTUS hears what I said about him and plucks my [NPR StoryCorps podcast interview](#) outta there like a french fry from his Happy Meal.

Speaking of insecure males, this 5-min story [Old Maid's Revenge](#) on an online dating fiasco, told live for KCRW and **Hollywood Foreign Press Affiliate**, **The Moth**, is totally (and scalariously) true!



Planning CHC <chc@lacity.org>

DO NOT DESTROY THE BARRY BUILDING! (HCM #887)

1 message

D'Orsogna, Maria R <dorsogna@csun.edu>

Wed, Jun 17, 2026 at 9:11 AM

To: "chc@lacity.org" <chc@lacity.org>

Cc: Councilmember Park <councilmember.park@lacity.org>, "craig.bullock@lacity.org" <craig.bullock@lacity.org>

To the Los Angeles Cultural Heritage Commission,

To Tracy Park (I helped raise money for you!)

To Craig Bullock

I strongly urge the Commission to grant a 180-day stay of demolition for the Barry Building (Historic-Cultural Monument #887) at your June 18 hearing.

The Barry Building is a designated Historic-Cultural Monument that represents an irreplaceable part of Los Angeles' architectural and cultural heritage. Allowing its demolition before all preservation alternatives have been fully explored would undermine both the purpose and credibility of the City's historic preservation program.

The circumstances surrounding this case raise concerns that extend far beyond a single building. Across Los Angeles, historic properties are too often allowed to sit vacant and deteriorate through years of neglect, only for their resulting condition to be cited as justification for demolition. This pattern effectively rewards demolition by neglect and creates a dangerous precedent for other designated landmarks throughout the city. Historic designation must mean more than recognition on paper; it must provide meaningful protection when preservation challenges arise.

The Office of Historic Resources has correctly recommended a 180-day delay to allow additional time to pursue preservation solutions, including identifying a preservation-minded buyer, evaluating relocation options, and exploring other alternatives that could save this landmark. These are reasonable and responsible measures that deserve a full opportunity to succeed before demolition is considered.

Moreover, the Los Angeles Conservancy and Angelenos for Historic Preservation have filed litigation challenging the City's approval of demolition. Given the significance of the legal and public policy issues involved, it would be premature and irresponsible to allow demolition to proceed while viable preservation options remain available and while important questions regarding the City's actions are still being examined.

Once the Barry Building is demolished, it is gone forever. The loss would be irreversible. A 180-day stay, by contrast, imposes only a temporary delay while creating a meaningful opportunity to preserve a landmark that contributes to the historic character and identity of Los Angeles.

I respectfully ask the Commission to uphold its responsibility as steward of the City's historic resources and vote to grant the full 180-day stay of demolition. Doing so will demonstrate that Los Angeles remains committed to protecting its historic landmarks and will send a clear message that demolition by neglect cannot become the default outcome for our shared cultural heritage.

Sincerely,

6/17/26, 9:48 AM

City of Los Angeles Mail - DO NOT DESTROY THE BARRY BUILDING! (HCM #887)

Maria R D'Orsogna, PhD



Planning CHC <chc@lacity.org>

Barry Building

1 message

Mel Scott <melscottca@gmail.com>

Tue, Jun 16, 2026 at 5:25 PM

To: chc@lacity.org, councilmember.park@lacity.org, craig.bullock@lacity.org

Dear Representatives and Officials,

As a former landlord and commercial investor, I understand the importance of improvement and community growth. But it cannot be at the expense of our city's soul. There is no replacing these sites once gone. And there is no excuse for allowing companies and/or developers to let properties rot and then "accidentally" catch fire or tumble to the ground. Enough. Stop it.

--

Mel Scott
310-925-3914
[LinkedIn](#)

"You can follow advice, you can follow your best plan, you can follow the rules and you can even follow others, but in the end you can't really follow anything but your heart." -- Reyna Clare



Planning CHC <chc@lacity.org>

Brentwood Landmark

1 message

Randy Bailey <baileymfti@gmail.com>
To: chc@lacity.org

Tue, Jun 16, 2026 at 5:10 PM

There is NOTHING valuable about this complex. It was and is a bad use of space. There are MANY downtown Los Angeles properties that need out attention. The Clark, Garfield, and many others. Let's wake up to the renovation costs (Lead base paint, asbestos, underrated electrical and plumbing, parking (to list a few), and all the substandard properties in accordance to engineering after the Northridge earthquake. I have worked on a few (Green Acres), Disney, Bonita Granville, and many more. Eight of my homes were burnt to the sand on PCH this year.

Met Lofts

Randy Bailey, BA, MA, Counseling

Master's Degree in Marriage and Family Therapy

Neighborhood Counseling Center

Supervised by Alan Rudolph MFT #13530

Direct: (818) 339-8023

E-mail: BaileyMFTI@gmail.com

Websites: <https://www.randybaileytherapist.com/>

<https://www.psychologytoday.com/us/therapists/randy-bailey-los-angeles-ca/240579>

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Planning CHC <chc@lacity.org>

Barry Building - Please grant the 180-day stay

1 message

Russell Kehl <rkehl@structuralfocus.com>

Tue, Jun 16, 2026 at 4:09 PM

To: chc@lacity.org

Cultural Heritage Commissioners,

Designed in 1951 by renowned architect Milton H. Caughey, the Barry Building is a rare surviving commercial masterpiece of California Modern architecture, featuring floating second-story pilotis, cantilevering curved staircases, and a central garden courtyard. The landmark is deeply tied to Brentwood's identity; its developer, David Barry, Jr., personally championed and planted the designated historic Coral Trees lining the San Vicente median (HCM # 148).

I strongly urge you to grant a 180-day stay of demolition for the Barry Building. The building was designated Los Angeles Historic-Cultural Monument #887 for a reason. That should mean something.

Thank you very much for your time.

Russell

Russell Kehl, S.E.**Principal, President****Structural Focus**

19210 S. Vermont Ave., Bldg. B, Suite 210

Gardena, CA 90248

Office. 310.323.9924 | Direct. 310.323.9113, x12

Email. rkehl@structuralfocus.com | structuralfocus.com**STRUCTURAL
FOCUS**Celebrating **25 YEARS** of Structural Excellence

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Planning CHC <chc@lacity.org>

Save the Barry Building

1 message

Cory Buckner <planspace@gmail.com>
To: Planning Chc <chc@lacity.org>

Tue, Jun 16, 2026 at 9:47 PM

I strongly support saving the Barry Building. Not only is it a fine example of California post war modernist commercial architecture but it has cultural significance in once housing Dutton's Bookstore, a cultural mainstay for those of us living in the Brentwood Community.

Cory Buckner, Architect and Author of Crestwood Hills: The Chronicle of a Modernist Utopia

--

Cory Buckner, Architect
www.corybuckner.com
310-293-1998



Planning CHC <chc@lacity.org>

Public Comment regarding the 11973 San Vicente Boulevard Project / Opposing Demolition of Historic-Cultural Monument #887REQUEST FOR IMMEDIATE STAY1 message

Eva <eamar57@gmail.com>

Mon, Jun 15, 2026 at 8:37 PM

To: chc@lacity.org, planning.custodianofrecords@lacity.org, bryan.sanchez@lacity.org, planning.figcounter@lacity.org, Ken Bernstein <ken.bernstein@lacity.org>

Cc: Martha Carasco <marthacarrasco2@yahoo.com>, maria Palma <mpalma@ubirevera.com>

I request that this correspondence be made a permanent part of the official administrative record for this case.

To the Members of the City Council / Planning Commission,

As a community organizer and advocate deeply committed to the integrity of Los Angeles's historic neighborhoods and localized safety plans, I am writing to strongly oppose the total demolition of the Barry Building (HCM #887).

The effort to save the Barry Building is inextricably linked to a systemic crisis we are witnessing across the city—from the equine-preserved spaces of the San Fernando Valley to the historic corridors of West Los Angeles. Time and again, the City allows short-sighted decisions to hollow out our communities, trading irreplaceable cultural assets for speculative, vacant dirt lots, while ignoring the cumulative strain on our infrastructure.

We cannot separate cultural preservation from public safety. While the developer pushes for total demolition under the guise of uncommitted future growth, the City is failing to look at the broader regional picture. The Barry

Building sits immediately adjacent to a Very High Fire Hazard Severity Zone (VHFHSZ). San Vicente Boulevard is not just a commercial street; it is a vital, frontline evacuation artery for thousands of hillside residents. Under **Assembly Bill 747**, the City has a statutory obligation to ensure that our General Plan Safety Elements comprehensively analyze evacuation route capacity and viability under real-world emergency scenarios. To approve projects that could drastically alter density or compound traffic congestion at this specific choke point, without a rigorous, cumulative evacuation capacity study, is an unacceptable safety risk. We have seen this exact disregard for fire traps and evacuation times in project fights across the city, including the MorningStar development in Granada Hills, where vulnerable and non-ambulatory populations are placed directly in harm's way.

Furthermore, we must look at the strict preventative mandates of the law. Under **Section 301.2 of the Los Angeles Fire Code**, the developer is bound to rigorous permitting processes for any actions or alterations that change the occupancy, safety infrastructure, or inherent fire risk of this location. Because this site sits directly on a critical ingress/egress corridor for an adjacent Very High Fire Hazard Severity Zone, the City and the Fire Marshal cannot treat this as a standard zoning checkbox. Section 301.1 explicitly prohibits the creation of any layout or "arrangement" that increases fire or life hazards.

Demolishing a low-density, open-air historic landmark to clear the path for un-analyzed, high-density growth at a major bottleneck violates the very spirit of these fire safety ordinances.

Request for Immediate Stay

Given the severe public safety implications and the unresolved questions regarding evacuation capacity and fire code compliance, **I formally request an immediate stay on any demolition permits, site clearance, or land-use modifications for 11973 San Vicente Boulevard.**

This stay must remain in effect until a comprehensive, independent evaluation of the project's impact on emergency evacuation routes (pursuant to AB 747) and a full determination of fire hazard compliance (pursuant to Los Angeles Fire Code 301.1 and 301.2) have been conducted and made available for full public review.

True win-win development is possible. Just as we fight to preserve the community fabric and historical assets like Sunshine Ranch, the Barry Building can and should be preserved through a hybrid site model or adaptive reuse. Utilizing the City's Adaptive Reuse Ordinance protects our history while ensuring that any adjacent future infill development is scaled responsibly to the actual evacuation constraints of the neighborhood.

I urge the City to uphold the Barry Building's Historic-Cultural Monument status, enforce proper CEQA review

that rejects piece-mealed project planning, and honor its safety obligations under AB 747 and the LA Fire Code. Stop treating our neighborhood safety and architectural legacy as disposable commodities.

Thank you,

Eva Amar, eamar57@gmail.com

Community Stakeholder and Organizer



Planning CHC <chc@lacity.org>

Barry Building

1 message

Kathleen Bergstrom <kathleenb@pacbell.net>
To: chc@lacity.org

Tue, Jun 16, 2026 at 2:51 PM

I hope this historic building will be saved. Meanwhile, I hope you grant a 180- day stay of demolition.



Planning CHC <chc@lacity.org>

RE: Barry Building, 11973 San Vicente Blvd. ... Public Comment in Support for 180-Day Stay of Demolition – Barry Building (HCM #887) – June 18 Agenda, Item 4

1 message

Ziggy Kruse <ziggykruse2005@yahoo.com>

Mon, Jun 15, 2026 at 11:47 PM

Reply-To: Ziggy Kruse <ziggykruse2005@yahoo.com>

To: Planning CHC <chc@lacity.org>

Cc: Ken Bernstein <ken.bernstein@lacity.org>, Melissa Jones <melissa.jones@lacity.org>, Lambert Giessinger <lambert.giessinger@lacity.org>, Councilmember Park <councilmember.park@lacity.org>, "star.parsamyan@lacity.org" <star.parsamyan@lacity.org>, Michael Amster <michael.amster@lacity.org>, Bob Blue <bob.blue@live.com>, Ziggy Kruse <ziggykruse2005@yahoo.com>

Subject: Public Comment in Support for 180-Day Stay of Demolition – Barry Building (HCM #887) – June 18 Agenda, Item 4

Dear Mr. Sanchez and CHC Commissioners,

Please find attached our formal submittal urging the Commission to invoke its authority under LA Administrative Code Section 22.171.15 to trigger a 180-day stay of demolition for the Barry Building.

A 180-day stay is not a delay mechanism—it is a practical, administrative tool to achieve a collaborative resolution based on three critical realities:

- **The Problem is Maintenance, Not Engineering:** The building's current state is a result of long-term deferred maintenance, not irreversible failure. While it requires a mandatory soft-story seismic retrofit of its South Wing—a feature its successful sister property next door does not share—independent expert analysis confirms this structural challenge is entirely solvable.
- **The Owners Intend to Divest:** The current ownership has stated on the public record an intent to sell. A 180-day stay provides the precise operational window needed to facilitate a transition of the property to buyers prepared to adaptively reuse and restore this mid-century landmark.
- **A Balanced Win-Win:** Granting the stay allows the current owners to sell, gives the neighborhood relief from a fully vacant eyesore, and upholds the integrity of the Cultural Heritage Ordinance by ensuring neglect is not rewarded with a demolition permit.

We respectfully urge the Commission to grant the full 180-day stay, turning a decade of dormancy into a story of renewal. Thank you for your service.

Sincerely,
Ziggy Kruse Blue and Bob Blue



2026-06-15_Public Comment Submittal for 06-18-2026 CHC Hearing, Agenda Item 4_Final.pdf
1075K

**Robert Blue & Sieglinde Kruse Blue
Los Angeles, CA 90049**

bob.blue@live.com

ziggykruse2005@yahoo.com

June 15, 2026

VIA EMAIL ONLY

To: Los Angeles Cultural Heritage Commission

Email: chc@lacity.org

**Subject: Public Comment for the June 18, 2026 Meeting of the
Cultural Heritage Commission (CHC), Agenda Item 4,
Support for 180-day stay to Prevent the Demolition of
the Barry Building, HCM #887, CHC-2007-1585-HCM-CC1
CEQA: ENV-2019-6645-EIR (SCH#2020110210)**

Dear Commissioners,

Los Angeles is currently at a profound preservation crossroads. In recent years, the city has successfully championed historic protections for iconic landmarks, drawing widespread global support and highlighting a fundamental truth: when a site achieves historic status, its value belongs to the entire cultural landscape.

Your upcoming decision regarding the Barry Building (Historic-Cultural Monument No. 887) presents a unique opportunity to honor that cultural landscape while facilitating a collaborative, positive outcome for all parties involved. We are writing to ask the Commission to exercise its full authority under Los Angeles Administrative Code Section 22.171.15 to trigger a 180-day stay on the demolition permit, providing the crucial time needed to achieve a win-win solution.

The Visionary Legacy of David Barry, Jr.

The Barry Building is a mid-century architectural treasure well worth saving on its own merit. Completed in 1951 and designed by notable architect Milton Caughey, this striking International Style building, with its iconic open courtyard, was commissioned by David Barry, Jr., who maintained his personal real estate office right inside the structure.

Mr. Barry was a neighborhood visionary whose deep passion for botany fundamentally shaped the local landscape. We ask that the Commission consider his lasting contributions:

- He was the driving force who established the famous Coral Trees in the San Vicente Boulevard median, which is Historic-Cultural Monument No. 148.



BEAUTIFYING SAN VICENTE, 1949. Once the tracks were removed, the median strip on San Vicente Boulevard was functional but not beautiful. A grant from the Los Angeles Beautiful program allowed visionary residents to plant 5 miles of coral trees starting at the Soldiers' Home. The trees' red flowers enliven the street every spring, and their twisted shape is the icon for Brentwood. This group is ceremoniously planting one of the coral trees. (Courtesy of the Brentwood Historical Society.)

- Just West and adjacent to the Barry Building, he founded the legendary California Jungle Gardens nursery.



PAST PRESIDENTS

The International Palm Society is proud to recognize the leaders who have helped us become the largest society of palm enthusiasts in the world! Learn more about these former presidents below.

1962-64 DAVID BARRY, JR., CALIFORNIA



Considered the "grand old dad" of California palm people, David Barry's hobby later became the legendary nursery California Jungle Gardens, in Brentwood. There he introduced many new palms (including *Jubaeopsis caffra* and several species of *Chamaedorea*), as well as other tropical plants, to cultivation. For many years he administered the International Palm Seed Exchange Service (editor's note: not the IPS seedbank). Additionally he founded the International Bromeliad Society and served as its second president.

Mr. Barry graduated from Stanford University (majoring in natural sciences) and worked in real estate.

- Through this nursery, he introduced numerous rare tropical plants and exotic palms to cultivation.

The Barry Building serves as the physical, architectural anchor of a legacy that gave Brentwood its unique green character. Its structural bones and historical significance remain intact today, waiting to be revitalized.

Demolition by Neglect, "Sister" Property, and the Retrofit Realities

Just East and adjacent to the Barry Building stands a sister property at 11969 San Vicente Blvd, designed by the exact same architect, Milton Caughey, and built just one year prior in 1950 for another member of the Barry family. The continued, successful use of this neighboring building serves as living proof that these mid-century structures are inherently enduring,

functional, and highly adaptable.



While we acknowledge that the Barry Building requires a mandatory soft-story seismic retrofit of its South Wing, a specific structural feature not shared by its sister property, this remains an eminently solvable challenge. The stark operational difference between these two adjacent properties highlights what preservationists refer to as Demolition by Neglect. The Barry Building's current state is a consequence of long-term deferred maintenance, not an inherent flaw in its design.

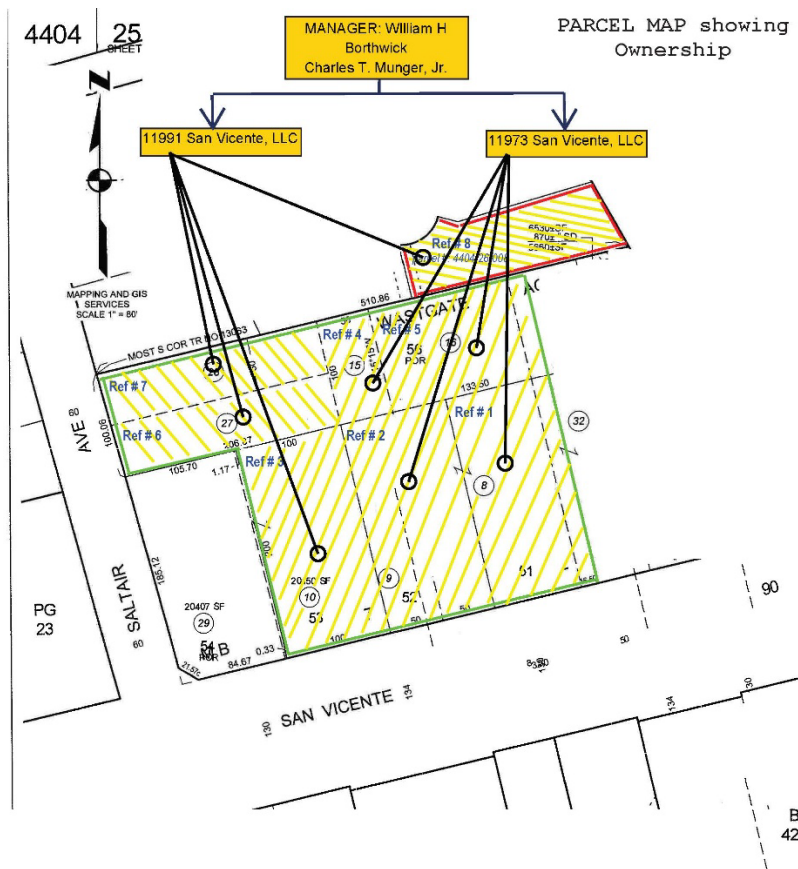
During the September 5, 2024, CHC hearing, Commissioners thoroughly discussed the issue of Demolition by Neglect. You can review the video recording of those deliberations directly via this link:

https://www.dropbox.com/scl/fi/ghif84dab4zmvl4cdzrph/2024-09-05-Excerpt-from-CHC-Hearing_incl.-Deliberation.mp4?rlkey=fumm93n8uq5hodgx6vbwjgbo1&st=pholmqmn&dl=0

Earlier during the same hearing, Commissioners Barron and Milofsky, drawing on their own extensive architectural expertise, challenged the inflated cost estimates used to justify demolition.

Furthermore, Commissioner Milofsky pointed out that the owners of the Barry Building also control the surrounding parcels. Looking at the site holistically, the required upgrades are a fraction of the broader real estate portfolio potential,

making preservation highly viable.



Expert Rebuttals and Viable Restoration Alternatives

The skepticism displayed by the Commissioners was validated by the February 17, 2026, submissions to the PLUM Committee and City Council (Council File No. 25-1518), where Angelenos for Historic Preservation (AHP) presented rigorous analysis from leading structural and preservation experts. These formal submittals directly dismantled the inflated cost estimates put forth by the applicant and provided clear restoration alternatives that should have been analyzed by the City.¹

- **Targeted Structural Costs:** David Cocke of Structural Focus, an undisputed engineering authority who served on the Mayor's Technical Task Force that originally developed the City's Soft-Story Ordinance, fully validated an estimate of

¹ Part 1 of 2: Angelenos for Historic Preservation Challenges to EIR and SOC
https://cityclerk.lacity.org/online/docs/2025/25-1518_misc_1_02-17-26.pdf

Part 2 of 2: Angelenos for Historic Preservation Challenges to EIR and SOC
https://cityclerk.lacity.org/online/docs/2025/25-1518_misc_2_02-17-26.pdf

approximately \$379,000 from Alpha Structural, Inc. This figure represents the narrow, targeted cost of the mandatory soft-story seismic retrofit portion for the South Wing of the Barry Building.

- **Comprehensive Financial Breakdown:** Prominent Historic Preservation Architect Fran Offenhauser of Offenhauser/Mekeel Architects expanded on these findings by providing a complete, line-item cost analysis to the public record. Her independent evaluation exposed severe shortcomings in the applicant's baseline numbers, clarified the broader market-entry expenditures, and outlined practical, cost-effective adaptive reuse pathways to safely modernize the building and return it to active use.

With accurate cost forecasting and the right stewardship, the Barry Building can be safely retrofitted.

A Win-Win Solution is Within Reach: The 180-Day Stay as a Practical Mechanism for a Collaborative Resolution

The current dormancy of the Barry Building is a source of frustration for the surrounding community and preservationists alike; a fully vacant, boarded-up landmark on a prime corridor benefits no one. However, the demolition of an official Historic-Cultural Monument should never be treated as a remedy for long-term deferred maintenance.

The applicant has previously stated on the public record an intent to divest from the property. This stated objective provides the Commission with a distinct and viable path forward. Utilizing the Commission's authority to grant a 180-day stay of demolition does not impose an unwanted operational burden on the current owners; rather, it establishes a structured, critical window to facilitate a transition of ownership to an entity prepared to restore this asset.

Invoking Los Angeles Administrative Code Section 22.171.15 creates a balanced, productive outcome for all stakeholders:

- **For the Current Ownership:** It allows them to proceed with their intended sale, leveraging the property's prime Westside location while transitioning out of the responsibilities of the site.

- **For Future Stewardship:** It provides preservation-minded buyers and adaptive-reuse developers the necessary time to finalize proposals that integrate this mid-century landmark into a broader, modern project design.
- **For the Westside Community:** It replaces a long-standing neighborhood eyesore with a thoroughly restored, active, and architecturally significant streetscape.
- **For the City of Los Angeles:** It upholds the integrity of the Cultural Heritage Ordinance, preventing a damaging administrative precedent where neglect is rewarded with a demolition permit.

The preservation of our architectural history does not require the displacement of modern economic progress; rather, the Barry Building can serve as the anchor for a vibrant, context-sensitive development. We respectfully urge the Commission to grant the full 180-day stay, providing the essential operational window needed to transform a decade of stagnation into a collaborative success story of historic renewal.

Sincerely,

Robert Blue

Robert Blue

Sieglinde Kruse Blue

Sieglinde Kruse Blue



Planning CHC <chc@lacity.org>

Barry Building

1 message

Rory Cunningham <MrRoryofHollywood@ca.rr.com>
To: chc@lacity.org

Sun, Jun 14, 2026 at 3:21 PM

Dear Esteemed Commissioners,

Please vote for the 180 day stay of demolition of the Barry Building. Allowing this HCM to be demolished will weaken not only the protections that HCMs have been designated to protect from adverse alterations and demolitions, it will also weaken your authority as Cultural Heritage Commissioners as it will show that all a developer has to do is manipulate you bit by bit in order to destroy what your commission was appointed to uphold.

Please allow every avenue for success to prevail and vote for the stay of demolition for the Barry Building.

Respectfully,

Rory Cunningham
Owner of HCM 892, the B. H. HISS Residence
215 S. Manhattan Place,
Los Angeles, CA 90004

DAY OF HEARING SUBMISSIONS



Planning CHC <chc@lacity.org>

Barry Building

1 message

Adam B <abregman71@gmail.com>
To: "chc@lacity.org" <chc@lacity.org>

Thu, Jun 18, 2026 at 6:40 AM

Dear Commission,

I am writing to ask you to protect the Barry Building from demolition. This was the former home of Dutton's Books and is one of the last architecturally significant commercial buildings in Brentwood. I can barely recognize the Westside of my youth. A majority of the architecturally significant commercial buildings have been demolished, many in the '80s and '90s. Please preserve one of the last ones.

Sincerely,
Adam Bregman



Planning CHC <chc@lacity.org>

for today's 10am meeting

1 message

FM FM <fmradiointhe70s@gmail.com>
To: Planning CHC <chc@lacity.org>

Thu, Jun 18, 2026 at 10:03 AM

Am I allowed to email the CHC to ask them to allow the STAY of demolition for the Barry Building?

I hope ALL the City employees hear the cries of the Constituents

We want the Barry Building to remain
We do not want it demolished

WITH NO PLAN AT ALL

We are SICK of the demolition by NEGLECT

We need more accountability put upon the owners

I will never be an owner

I am suffering as a renter - given no respect
Harassed

Please do the right thing!

We are watching these decisions

- Constituent



Planning CHC <chc@lacity.org>

URGENT - Barry Building

brian@1301pe.com <brian@1301pe.com>

Thu, Jun 18, 2026 at 9:45 AM

To: "chc@lacity.org" <chc@lacity.org>, "councilmember.park@lacity.org" <councilmember.park@lacity.org>, "Star.Parsamyan@lacity.org" <Star.Parsamyan@lacity.org>, "michael.amster@lacity.org" <michael.amster@lacity.org>

Dear Councilmember Park, Chief of Staff Paramyan and Field Deputy Amster

I am writing to you to continue to lend my support in protection of the Barry Building in Brentwood, California (Historic-Cultural Monument #887). The Barry Building is at 11973 San Vicente Boulevard and the project/case numbers CHC-2007-1585-HCM and ENV-2019-6645-EIR. It was commissioned by its owner David Barry and designed by architect Milton Caughey (1911-1958) and completed in 1951. It is one of the few mid-century modern commercial buildings to gain such status. It was identified by the Los Angeles Cultural Heritage Commission as being a well-preserved and notable example of the California-style modern design until the current owner has purposefully done everything in their power to neglect and thus damage this important part of Los Angeles cultural heritage.

The Barry Building is a Historic-Cultural Monument (HCM) and it needs to be vehemently protected. I am writing you to encourage you to protect and support one of the few historical buildings we have on the westside of Los Angeles. The dubious owners have used demolition by neglect ever since evicting the tenants to circumvent historic preservation protections. There are viable preservation alternatives to demolition that must be fully required to not only preserve but now should be sensitively restored to its glory. If demolition is approved, the city will have awarded the owners for their bad behavior and set a precedent for future developers in the city. This kind of business practice is already happening around the city, and it needs to be stopped. You hold the cards here, let's not let ill-intentioned behavior win out. We need to send a message that the history of the city matters and that it is possible to have development and historical buildings at the same time. If they didn't want to save this building, they should have not purchased it. Saving this building will make Brentwood and other communities with historic buildings more interesting places to live in and visit. We have plenty of brand-new shopping developments, what we need is more education around why these buildings matter and how they will add to a sense of place. Please don't let this building be destroyed!

Under the California Environmental Quality Act (CEQA), the city is required to deny projects that have a feasible alternative. In this case, there are clear preservation alternatives that had been presented in the previous project proposals. It seems clear to the community that the owners are playing a waiting game and neglecting this important beautiful building. Shame on them! Please don't reward this kind of business practice.

Why do we save the Brady Bunch house which is about pop culture but not the Barry Building which has HCM standing since 2007 but we don't hold the owner to respect the law?

I'm saying this all again because once the building is demolished it will not be there to save, to admire, to enjoy by the community. There will be an empty lot, an eyesore, a place for homeless encampment, for crime. A restored building would again be the gem it was for the community! Do not allow demolition! Do not set a precedent!

Thank you!

Kind regards,

Brian D. Butler

12342 Montana Ave. #2, Los Angeles



Planning CHC <chc@lacity.org>

LA Conservation efforts re: the Barry Building

1 message

Barbara Johnson <librarybaj@gmail.com>
To: chc@lacity.org

Wed, Jun 17, 2026 at 7:45 PM

Sirs,

Los Angeles has been infamous for allowing our history and heritage to be destroyed. It is time to reexamine that trend. I am a voter, and a native Angeleno. So much of the landscape of my youth is gone, and the sense of LA has changed. Let's try something different.

The Barry Building is at a critical moment. This Thursday, June 18, at 10:00 a.m. the Los Angeles Cultural Heritage Commission will consider whether to grant a 180-day stay to prevent demolition of this designated historic landmark.

The Los Angeles Conservancy and Angelenos for Historic Preservation have filed a lawsuit challenging the City of L.A.'s approval to demolish the building. The case reflects a broader concern across Los Angeles preservation policy: when historic places are intentionally left vacant to deteriorate, demolition is too often presented as the only viable solution.

I am asking you to grant a 180-day stay of demolition for the Barry Building. You can demonstrate that Angelenos expect stronger safeguards for the city's historic places and that demolition by neglect should not be rewarded. As a lifetime resident and retired Public Librarian, I feel strongly about this. You may be sure it will influence my future political decisions.

Barbara Johnson
Retired Librarian.



Planning CHC <chc@lacity.org>

The Barry Building

1 message

Carron Leon <Carron.Leon@outlook.com>

Wed, Jun 17, 2026 at 2:46 PM

To: "chc@lacity.org" <chc@lacity.org>, "councilmember.park@lacity.org" <councilmember.park@lacity.org>, "craig.bullock@lacity.org" <craig.bullock@lacity.org>

As the Los Angeles Cultural Heritage Commission considers whether to grant a 180-day stay to prevent demolition of this designated historic landmark I strongly urge the Cultural Heritage Commission to grant the 180-day stay of demolition for the Barry Building. Angelenos demand stronger safeguards for our city's historic places and demolition by neglect should no longer be rewarded.

Carron V. Leon

Carron.Leon@outlook.com



Planning CHC <chc@lacity.org>

barry building

1 message

Denise Smith <denise@cosmicmicrotech.com>
To: Planning CHC <chc@lacity.org>
Cc: councilmember.park@lacity.org, craig.bullock@lacity.org

Wed, Jun 17, 2026 at 2:08 PM

I am asking that you all provide a 180-day stay of demolition for the Barry Building. I am not sure why yet again, our historic buildings are so easily demolished. Please help with this request.

Best,

Denise



Planning CHC <chc@lacity.org>

Re: the Barry Building

1 message

alcatrazrock <alcatrazrock@aol.com>
To: chc@lacity.org

Wed, Jun 17, 2026 at 4:41 PM

Dear L.A Cultural Heritage Commission,

I am writing to express my concern for the potential loss of the Barry Building on San Vicente.

I urge you to save this structure, please. Our city has a long history of overlooking the valuable importance of historic building or buildings that simply constitute uniqueness in their design.

The architecture today is pitiful compared to structures from decades past.

I urge you to say this lovely building on San Vicente.

Thank you,

Elena Gordon, MS

Sent from my Galaxy



Planning CHC <chc@lacity.org>

Comments Agenda 4-Barry Building

1 message

Joyce Dillard <dillardjoyce@yahoo.com>

Wed, Jun 17, 2026 at 10:11 PM

To: Cultural Heritage Commission <chc@lacity.org>, Councilmember Traci Park <councilmember.park@lacity.org>

Cc: Star Parsamyan <star.parsamyan@lacity.org>, "michael.amster@lacity.org" <michael.amster@lacity.org>

BARRY BUILDING, HISTORIC-CULTURAL MONUMENT NO. 887
CHC-2007-1585-HCM-CC1 Council District: 11 – Park
CEQA: ENV-2019-6645-EIR (SCH#202011021)

The Cultural Heritage Commission is a function of Planning Department as is the Area Planning Commission and are tasked to perform those functions with appointees who

shall have a demonstrated interest, competence or knowledge of historic preservation. (Los Angeles Charter and Administrative Code Chapter 9, Article 1 City Planning Department, Cultural Heritage Commission and Section 552, Area Planning Commissions Department)

With that required historic preservation background, as a member playing political favoritism is not your function. You are tasked to use that *demonstrated interest, competence or knowledge of historic preservation* to make decisions in the best interest of the citizens, taxpayers and residents of the City. You have given this property that Historic Cultural Monument designation.

Precedent setting is not your task.

We encourage you to adhere to your decision for a Cultural Historical Monument and stay demolition for 180 days under LA Administrative Code Section 22.171.15.

Joyce Dillard
Los Angeles, CA 90031



Planning CHC <chc@lacity.org>

Barry Building

1 message

Jessica Drake <jessica.laura.drake@gmail.com>
To: chc@lacity.org

Wed, Jun 17, 2026 at 5:13 PM

Hi,

I am writing as I am very concerned about the willingness to abolish historical landmark status by neglecting properties. If all a management company needs to do to remove historical landmarks is let them decay there will be absolutely no rent control as soon as they can convince you to condemn all of them.

There IS a better solution. Fix it. Fund the LAHD to make sure it doesn't get this bad in the first place.

I am sick of companies destroying my home.

Channel Law Group, LLP

8383 Wilshire Blvd.
Suite 750
Beverly Hills, CA 90211

Phone: (310) 347-0050
Fax: (323) 723-3960
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III
JAMIE T. HALL *
CHARLES J. McLURKIN
GREGORY T. WITTMANN

Writer's Direct Line: (424) 284-9669
jamie.hall@channellawgroup.com

*ALSO Admitted in Texas

June 17, 2026

VIA ELECTRONIC MAIL

Cultural Heritage Commission
City of Los Angeles
200 North Spring Street, Room 1010
Los Angeles, CA 90012
chc@lacity.org

Re: Agenda Item No. 4 — Barry Building, Historic-Cultural Monument No. 887 (Case No. CHC-2007-1585-HCM-CC1); Response to Applicant's June 11, 2026 Letter, and AHP's Renewed Request for a 180-Day Stay of Demolition (June 18, 2026 Hearing).

Dear President Milofsky and Honorable Commissioners:

This Firm represents Angelenos for Historic Preservation ("AHP") in connection with the proposed demolition of the Barry Building (the "Monument"). We write to respond to the June 11, 2026 letter from applicant's counsel, which contends that because the City Council certified an Environmental Impact Report ("EIR") and adopted a Statement of Overriding Considerations, this Commission lacks authority to stay demolition under Los Angeles Administrative Code ("LAAC") section 22.171.15. That argument misapprehends the independent preservation authority the Cultural Heritage Ordinance confers on this Commission. The Commission's authority is fully intact.

I. EIR Certification Does Not Displace the Commission's Independent Preservation Authority.

CEQA and the Cultural Heritage Ordinance are overlapping and complementary. They both protect the City's historic resources. However, they are not interchangeable, and compliance with one does not establish compliance with the other. CEQA does more than disclose impacts; it embodies a substantive policy that public agencies should not approve projects that significantly damage a historic resource where feasible preservation alternatives exist (Pub. Res. Code § 21002). This is the very analysis AHP contends the EIR failed to perform here. However, the Ordinance imposes independent preservation requirements that go beyond those analyzed in the EIR, including the reuse feasibility study required by LAAC section 22.171.14(b) (which was never prepared as part of the EIR). Certification of the EIR and adoption of a Statement of Overriding Considerations mean only that the City disclosed the Project's impacts and elected to accept the loss of the Monument; they do not compel demolition, impose any deadline to demolish, or repeal these Code provisions. Section 22.171.15 independently provides that the filing of an objection "shall suspend the issuance of any permit for the demolition, substantial alteration or relocation of the Monument" for "not less than 30 days nor more than 180 days, during which time the Commission shall take all steps within the scope of its powers and duties as it determines are necessary for the preservation of the Monument." Nothing in the Ordinance conditions the authority of the Commission and the applicant cites no provision stating that EIR certification removes the ability of the CHC to impose a stay; nor can an internal Council procedural rule divest this Commission of authority the Administrative Code confers. Reading section 22.171.15 to evaporate upon EIR certification would render it a nullity and defeat the Council's evident intent.

II. The Commission's Section 22.171.11 Duties Are Broader Than, and Not Duplicative of, the EIR's Alternatives Analysis.

The stay exists precisely so the Commission can exercise the duties set out in LAAC section 22.171.11, which directs that the Commission “shall take all steps necessary to preserve Monuments,” and that those steps “may include assistance in the creation of civic citizens’ committees, assistance in the establishment of a private fund for the acquisition or restoration of designated Monuments, and recommendation that a Monument be acquired by a governmental agency where private acquisition is not feasible.” The EIR analyzed none of these measures. It did not consider creation of a private acquisition or restoration fund, a citizens’ committee, or public acquisition. These are preservation tools committed uniquely to this Commission. The EIR therefore cannot be treated as a substitute for the Commission’s statutory mandate.

Tellingly, the EIR did not find preservation infeasible. It found the Relocation Alternative (Alternative 4) technically feasible, and the applicant’s own consultant (HKA) concluded that relocation Options 3 and 4 are feasible. The alternatives were set aside based on alleged economic infeasibility. However, economic feasibility depends entirely on who undertakes the work. For example, a preservation-minded buyer, public agency, or a privately funded restoration effort may find restoration feasible where the current owner asserts it is not. A 180-day stay is the mechanism by which those options are tested.

The applicant’s reliance on the HKA report to portray relocation as infeasible is a strawman. AHP’s primary position is on-site adaptive reuse and restoration, not relocation. The only mandatory work is the Phase I soft-story retrofit of the South Wing, a standard engineering fix that AHP’s structural experts (Alpha Structural, Inc., supported by David Cocke of Structural Focus) estimate at approximately \$379,000. This is a small fraction of the applicant’s inflated \$12.8 to \$17.1 million whole-building figures. Restoration is feasible; the asserted “infeasibility” is a product of the applicant’s own deferred maintenance and inflated estimates.

III. The Owner Has Never Marketed the Building, and the “No Buyer” Claim Is Unsupported.

The applicant argues that a stay is futile because no buyer has emerged. But the owner has never listed or marketed the Building for sale, has kept it fenced and boarded, and has not made it readily accessible to prospective buyers and appraisers (except its own). At the same, the applicant has withheld the building drawings and draft HABS documentation. A buyer cannot make an offer on a property it cannot inspect and that is not for sale. The absence of offers reflects the owner’s own conduct, “demolition by neglect.” The stay supplies the structured window needed to market the property and connect a willing seller with a preservation buyer or public agency.

IV. The Stay Reaches the Proposed Interior Abatement.

In a footnote to its letter, the applicant reserves the right to perform interior hazardous-materials abatement during any stay, on the theory that interior work is exempt. AHP objects. The stay suspends permits for “demolition, substantial alteration or relocation” (§ 22.171.15); the Ordinance is not limited to exterior work. Stripping interior plaster, finishes, ductwork, and structural elements is a substantial alteration and a partial demolition of the Monument’s fabric. It is irreversible, destroys the baseline needed for any reuse-feasibility evaluation, and serves no urgent purpose at a vacant, secured building. The Commission should make clear that its stay encompasses all pending and future demolition and substantial-alteration permits, including any interior abatement that removes or destroys interior fabric.

For these reasons, and those stated in our June 16, 2026 letter, AHP respectfully urges the Commission to adopt the staff recommendation, object to issuance of the demolition permit under LAAC section 22.171.15, and impose the full 180-day stay, directing staff to use that period to pursue the preservation steps that section 22.171.11 commits to the Commission.

Thank you for your consideration of this matter.

Sincerely,



Jamie T. Hall



Planning CHC <chc@lacity.org>

THE BARRY BUILDING

1 message

JK <jkmyra@yahoo.com>
Reply-To: jkmyra@yahoo.com
To: chc@lacity.org

Wed, Jun 17, 2026 at 2:50 PM

I support a 180 day stay during which the owner could not demolish this building.

Joseph Kelly
1619 Myra Avenue
Los Angeles, CA 90027

Sieglinde Kruse Blue
Los Angeles, CA 90049
ziggykruse2005@yahoo.com

June 17, 2026

VIA ELECTRONIC MAIL

Cultural Heritage Commission

Email: chc@lacity.org

Re: June 18, 2026 Cultural Heritage Commission Meeting, Agenda Item No.4, The Barry Building (Historic-Cultural Monument No. 887), Case No. CHC-2007-1585-HCM-CC1, Public Comment, and Response to Applicant's June 11, 2026 Letter

Dear President Milofsky and Honorable Commissioners,

This public comment letter is a direct response to the letter sent by applicant counsel Edward J. Casey dated June 11, 2026. The applicant's submission relies on legal intimidation, an aggressive misrepresentation of municipal law, and a transparent attempt to bully this Commission into believing its explicit statutory powers have been nullified by prior city actions.

I urge the Commission to reject these heavy-handed diversion tactics and exercise its full, unassailable authority under Los Angeles Administrative Code (LAAC) Section 22.171.15 to grant the 180-day stay of demolition. Certifying an EIR does not erase, override, or swallow up your independent authority under the LAAC. This Commission's explicit power and obligation to protect the Barry Building remain absolutely intact.

1. EIR Certification Does Not Erase Your Independent Authority

CEQA and the City's Cultural Heritage Ordinance are separate, complementary frameworks. An EIR is merely a disclosure tool; its completion means the City Council accepted the environmental damage of demolition, it does not mandate destruction, nor does it strip this Commission of its explicit powers. Under **LAAC Section 22.171.15**, filing an objection *"shall suspend the issuance of any permit for the demolition, substantial alteration or relocation of the Monument"* for up to 180 days. Nowhere does the Municipal Code state that an EIR certification cancels this authority. To claim otherwise reduces this Commission to a rubber stamp and renders the City's preservation laws meaningless.

2. The Commission's Mandatory Duties Are Broader Than an EIR Analysis

The applicant claims a stay is "futile" because the EIR deemed relocation infeasible. But your duties under LAAC Section 22.171.11 go far beyond what an EIR considers. The Ordinance commands that this Commission *"shall take all steps necessary to preserve Monuments,"* which includes creating civic citizens' committees, establishing private restoration funds, or recommending public acquisition. The EIR evaluated none of these measures. A 180-day stay provides the precise window needed to execute your unique statutory mandate, allow a preservation-minded buyer to step forward, and thoroughly evaluate on-site adaptive reuse.

3. "Infeasibility" is a Product of Owner Neglect, Not Fact

The applicant claims no buyer has emerged over the last six years, yet the owner has kept the building boarded up and fenced, has never listed or marketed the property for sale, and has actively withheld architectural drawings and structural data. A preservation buyer cannot purchase a property that is intentionally hidden from the market. Furthermore, while the applicant claims restoration costs are astronomical, structural experts (Alpha Structural, Inc. and Structural Focus) have confirmed that the mandatory Phase I soft-story retrofit of the South Wing is a standard engineering fix costing approximately \$379,000, a tiny fraction of the owner's inflated figures.

4. The Stay Must Scope the Proposed "Interior Abatement"

In Footnote 2 and Exhibit 1, the applicant discloses an intent to immediately execute extensive interior "abatement," claiming it is exempt because it is confined indoors. This is a transparent attempt to preempt this Commission and secure a back-door gutting of HCM #887.

LAAC Section 22.171.15 covers "substantial alteration" broadly, not just exterior work. Systematically stripping out plaster, drywall, and HVAC infrastructure is an irreversible physical alteration that constitutes partial demolition and intentionally destroys the physical baseline needed for independent engineering audits.

To prevent this destruction from becoming a done deal, will the Commission explicitly clarify that the 180-day stay encompasses all active and pending permits, including interior remediation?

I respectfully ask that a commissioner consider including these safeguards via a simple amendment, such as the one shown below:

"I move to object to the demolition permit, issue a 180-day stay, and clarify that this stay explicitly applies to all interior and exterior abatement, remediation, and structural alteration permits to preserve the physical baseline of the monument."

Conclusion

The law gives you the clear authority, and the obligation, to pause this demolition. Do not let the applicant's counsel rewrite the Los Angeles Administrative Code to strip you of your enforcement powers. I respectfully urge the Commission to object to the permit and grant the 180-day stay so that your unique preservation tools can finally be put to work.

Thank you for protecting all of Los Angeles's historic-cultural monuments.

Sincerely,

Sieglinde Kruse Blue

Sieglinde Kruse Blue



Planning CHC <chc@lacity.org>

DO NOT DEMOLISH BARRY BUILDING

1 message

Kama Hayes <kamahayes@yahoo.com>
Reply-To: Kama Hayes <kamahayes@yahoo.com>
To: "chc@lacity.org" <chc@lacity.org>

Wed, Jun 17, 2026 at 10:41 AM

Hello Cultural Hertiage Commission -

I am writing to urge urge urge you to grant a 180 day stay of demolition for the Barry Building in West Los Angeles.

The bulk of West Los Angeles has very few historic properties, and without even a plan in place it would be criminal to demolish the Barry Building for an empty lot.

We have to send the message to property owners that they can't just do whatever they want, whenever they want. Also, they can't demolish a building by neglect, and we see this all the time.

Please do not allow the Barry Building to be demolished. It's a rare example of period architecture in the neighborhood, and also we don't want to see Los Angeles design history continue to be erased, over and over and over again.

Thank you,
Kama Hayes
Los Angeles, CA 90038

Kama Hayes
Art Department Coordinator | Local 871
DEMETER S5 □tv+
(213) 505-3285 (cell)



Planning CHC <chc@lacity.org>

The Barry Building

1 message

Katherine Wessling <katherine.wessling@gmail.com>
To: "chc@lacity.org" <chc@lacity.org>

Wed, Jun 17, 2026 at 11:51 PM

Dear Officials,

I was born and raised right here in Brentwood and the Barry building has always been a part of my life. It has been a heartache to see it falling into disrepair over these last years, and it will be even a greater heartache if it is torn down. Not only is it of architectural significance, but it is of historical significance to us here in Brentwood as well as to the larger community. It is essential that we preserve our history for ourselves and future generations.

Also, allowing this building to be demolished solely because it was allowed to fall into disrepair would set an awful precedent for every building in the city.

So many of us care for our community and hope that you will do the right thing and keep this building with us.

Sincerely,

Katherine Wessling



Planning CHC <chc@lacity.org>

save the Barry Bldg

1 message

michele johnson <33mich@sbcglobal.net>

Thu, Jun 18, 2026 at 12:15 AM

To: "chc@lacity.org" <chc@lacity.org>

Please save this cool building. There aren't that many historic buildings left and once they're gone, they're gone.

M Johnson



Planning CHC <chc@lacity.org>

Please don't destroy the Barry Building!

1 message

Nancy Beverly <nancybeverly818@gmail.com>

Wed, Jun 17, 2026 at 3:09 PM

To: chc@lacity.org, councilmember.park@lacity.org, craig.bullock@lacity.org

The Barry Building is a historic cultural monument, please don't destroy it. Los Angeles historic places are intentionally left vacant and then they deteriorate ("benign neglect")... and then demolition is offered as a solution.

Let's have a 180 day stay of demolition instead.

The Office of Historic Resources staff recommends this "to provide additional time for further efforts necessary for the preservation of the building... [including] investigating options for relocation, conducting outreach for a potential preservation-minded buyer to purchase the property, facilitating the development of another preservation outcome, or other potential efforts as may be presented at the hearing."

I live at Chase Knolls apartments in Sherman Oaks and we fought super hard to get historic status so that our buildings weren't torn down. Let's not lose another historic monument.

Thank you for listening,
Nancy Beverly

--

Nancy Beverly

<https://www.nancybeverlywriter.com/>

Robert Blue
Los Angeles, CA 90049
bob.blue@live.com

June 17, 2026

VIA ELECTRONIC MAIL

Cultural Heritage Commission

Email: chc@lacity.org

Subject: June 18, 2026 Cultural Heritage Commission Meeting, Agenda Item No.4, The Barry Building (Historic-Cultural Monument No. 887), Case No.CHC-2007-1585-HCM-CC1, Public Comment, and Rebuttal to the Characterization of the Barry Building as a Nuisance Property Response

Dear President Milofsky and CHC Commissioners:

This letter formally rebuts the June 11, 2026 submittal by the applicant's representative, which attempts to mischaracterize Historic-Cultural Monument (HCM) #887, the Barry Building, as an attractive nuisance to justify its demolition. This framing is entirely unsupported by the administrative record and constitutes an erroneous basis for a Statement of Overriding Considerations (SOC).

A detailed submittal on this issue was entered into the record on March 2, 2026, under LA City Council File No. 25-1518 (PDF pages 1-7), available here: https://cityclerk.lacity.org/online/docs/2025/25-1518_PC_PM_03-02-2026.pdf. I incorporate that submittal herein by reference and highlight three critical contradictions to the applicant's claims:

1. Official LAPD Data Contradicts Nuisance Claims

As a local resident, I frequently walk by the Barry Building and have personally observed none of the chronic safety issues alleged by the applicant. Public safety records soundly validate this first-hand observation.

According to official data provided by LAPD Senior Lead Officer Matthew Kirk covering a six-year period from 2020 through February 2026, there were a grand total of only four (4) calls for service at 11973 San Vicente Blvd:

- o A traffic collision in front of the building.
- o A single documented trespass incident.
- o A report of panhandlers outside the property line.
- o An isolated burglary investigation.

Crucially, Officer Kirk explicitly confirmed: *"I had no calls of any vandalisms."* These isolated incidents do not constitute a pattern of criminal activity that would justify the irreversible destruction of a designated landmark.

2. The Owner Cannot Leverage Self-Induced Demolition by Neglect

The applicant is legally entangled in a contradiction of their own making. It is the owner's affirmative legal obligation to maintain and secure the property—a duty they explicitly claimed they are fulfilling in their formal "Maintenance Letter" on file.

Yet, the owner has provided no evidence of routine private security patrols, surveillance, or a central alarm monitoring system. Instead, they admitted to relying passively on their gardener to report a break-in.

The owner cannot responsibly claim they are maintaining the site while simultaneously leveraging the physical impacts of their own intentional vacancy to bypass historic preservation protections. This is classic demolition by neglect.

Our April 20, 2026 submittal (available at: https://cityclerk.lacity.org/onlinedocs/2025/25-1518_pc_04-20-2026.pdf) includes 2016 baseline photos contrasted with 2026 photos that visually prove this neglect. For instance, the open transom windows documented in April remain unsecured and in the exact same open position today, June 17, 2026.

3. Owner Accepted Landmark Designation Without Opposition

The branding of the property as a nuisance property ignores the owner's legal history with the site. As detailed in our April 20, 2026 submittal, when the Los Angeles City Council voted unanimously to grant landmark status to the Barry Building in October 2007, the property owner chose not to oppose the designation.

By failing to contest the monument status in 2007, the owner legally acknowledged that this structure has permanent value as a city landmark. They cannot now retroactively strip those protections by rebranding a vacancy they created and are legally responsible for managing.

In conclusion, the applicant's attempt to brand this landmark as a nuisance property is an unsupported, factually flawed justification to accelerate its destruction. Because official police records show no pattern of chronic disruption, and because the owner's own vacancy and maintenance failures created the current conditions, the applicant must not be rewarded with an expedited demolition.

The structural impacts of intentional vacancy require thorough review, not a rushed wrecking ball. Therefore, we respectfully request that the Commission reject the applicant's arguments and grant the formal 180-day stay of demolition to ensure the protections for HCM #887 are fully upheld.

Sincerely,

Robert Blue

Robert Blue



Planning CHC <chc@lacity.org>

In Support of the 180 stay to prevent demolition of Barry Building

1 message

Sarah Anne Hartzog <sarah.hartzog@gmail.com>

Wed, Jun 17, 2026 at 3:12 PM

To: chc@lacity.org, councilmember.park@lacity.org, craig.bullock@lacity.org

Dear Cultural Heritage Commission and Council Members Park and Bullock,

I am an Angeleno writing in support for the 180 day stay to prevent the thoughtless, wasteful and careless demolition of the Barry Building. For too long, LA County has allowed some of our most valuable history to be demolished by neglect. Until Jan 2025 I was an Altadena resident and know all too well the impact of the erasure of our cherished buildings.

Los Angeles' history is often told in our historic buildings which we are shamefully losing to greed every single day. These buildings they represent our very real rich culture and history and are not part of a fictional story we export to the outside world as a performative nostalgia.

Please do not allow yet another part of our history be demolished.

Thank you,
Sarah Hartzog
Los Feliz