

## ABSTRACT

Title of Thesis: ETHNIC MINORITY HERITAGE VALUES  
AND U.S. HISTORIC PRESERVATION  
SIGNIFICANCE POLICY

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The reasons for the preservation of historic properties related to ethnic minority groups have been much discussed in the historic preservation field. However, there are factors that are still of concern as many of these properties are often overlooked. This merits a discussion of what constitutes importance to an underrepresented group that falls outside of traditional historic preservation policy and processes in terms of assessing and evaluating their significance. United States historic preservation public policies and processes concerning historic significance should reflect the changing attitudes and shifts in thinking about heritage and history, as well as the dynamic nature of communities themselves. The year 2016 marks the fiftieth anniversary of the National Historic Preservation Act. As historic preservation goes forward into the next fifty years, the United States will become a different nation in composition, but is still one nation by acknowledging that all citizens have a contribution to make to its collective historic narrative.

Ethnic minority groups are now demanding a more flexible, inclusive form of historic preservation; one that is not as primarily focused on architecture or integrity, but focused on what is valued and culturally significant to the communities in which those historic properties are located. The National Register of Historic Places itself is flexible and accommodating in what properties may be listed, but more creative approaches, interpretations, and uses of the criteria, guidance, and processes—including the incorporation of more ethnographic techniques—have become necessary. As the United States prepares for a majority-minority shift in 2050, who decides what is significant or relevant—historic preservation practitioners or ethnic minority communities themselves? By actively implementing steps to become more truly inclusive, we can help to assure that the significance of historic properties and valued places of meaning to all of its citizens will be effectively considered.

Subject Headings: Significance; diversity; ethnic minority; National Register of Historic Places; National Historic Preservation Act; integrity; historic preservation; underrepresented groups; public policy; state historic preservation office; bias; community; cultural mapping; culture; designation; evaluation; historic context; identification; National Park Service; African American; Black; Asian American; Pacific Islander; Latino; Hispanic; Native American; ethnography



ETHNIC MINORITY HERITAGE VALUES AND U.S. HISTORIC  
PRESERVATION SIGNIFICANCE POLICY

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Thesis submitted to the Faculty of Goucher College in partial  
fulfillment of the requirement for the degree of  
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For Alex and Dominic

## ACKNOWLEDGEMENTS

“Perhaps to lose a sense of where you are implies the danger of losing a sense of who you are.”

–Ralph Ellison, *Invisible Man*

This thesis is truly a testament to perseverance. To my husband Delonté, who believes in me and this dream I have, I thank you and I am so glad that you are still here with us all to see the end result. Thank you to my family and friends who have been so incredibly supportive. I would also like to thank my historic preservation colleagues who took time out of their busy schedules to allow me to pick their brains about this very important topic. Your insights and thoughts were invaluable. Dr. John H. Sprinkle, Jr., I learned so much from you during my independent study. Thank you for giving me a better understanding of the National Register of Historic Places and the National Park Service’s history. To my long-suffering thesis committee: Dr. de Teel Patterson Tiller, Dr. Richard Wagner, and Dr. Rachel Donaldson, thank you so very much for your unwavering commitment, understanding, and determination to see this project through. Thank you Ancestors for guiding my path. I thank you all.



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## CHAPTER I EYE OF THE BEHOLDER

United States historic preservation public policies and professional practices concerning historic significance should reflect the changing attitudes and shifts in thinking about heritage and history. This treatise will examine how the concept of historic significance can effectively capture the heritage values of ethnic minority groups. Anthropologist Joseph Tainter has written extensively about the concept of historic significance and how it is based on the assumption that significance is an intrinsic and objective quality that historic sites either possess or lack.<sup>1</sup> The assumption that historic significance is an objective quality is challenged by the fact that there is a certain measure of subjectivity involved in its assessment and evaluation. This subjectivity is oftentimes attributed to the training, biases, and knowledge of the historic preservation professional practitioner making the evaluation.

Tainter also believes that this may mean that significance can vary between individuals, groups, and communities as well as become subject to change over time. For the purposes of this thesis, “community” will be used in an expanded sense in reference an overall ethnic minority group, rather than a local sense as one would use similar to the term “neighborhood.” Historic significance should not be considered wholly objective, inherent

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<sup>1</sup> Tainter discusses this at length in *A Companion to Archeology*, as well as in his earlier article written with G. John Lucas, "Epistemology of the Significance Concept," as published in *American Antiquity* (1983): 707-719.

or immutable.<sup>2</sup> He asserts that if the historic “significance we assign to a site can change or be viewed differently by individuals or whole groups, then to use significance evaluations to decide whether to protect a site is clearly inappropriate.”<sup>3</sup>

This statement emphasizes the need for historic preservation as currently practiced in the United States to adapt and change its approach to policies regarding determination of historic significance. If significance of a site is considered not to be constant, unchanging, and fixed, then evaluations can change as well. This, in turn, supports the notion that significance is a product of time and the viewpoint of evaluators.

The concept of historical significance can change, mostly due to the reinterpretation of sources, new questions, or because of generational interests.<sup>4</sup> Like Tainter, John Sprinkle, Jr., Bureau Historian of the U.S. National Park Service, acknowledges that the concept of historical significance is culturally constructed, may be subjective and illustrates the conventional historic preservation wisdom of its time.<sup>5</sup> This is derived from four core “concepts” underlying how historic significance is now determined in United States public policies. First, a property must be rooted in time, place, and tangible/physical integrity. Second, significance and integrity (the physical condition of a site) are linked, a property must have materiality. Third, as significance underpins historic preservation policy and its processes, a property must have historic or design significance in order for it to be

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<sup>2</sup> *Ibid.*

<sup>3</sup> Tainter, “American Cultural Resource Management.” *A Companion to Archaeology* (2004): 448.

<sup>4</sup> John H. Sprinkle, Jr., *Crafting Preservation Criteria: The National Register of Historic Places and American Historic Preservation* (New York: Routledge, 2014), 209.

<sup>5</sup> Sprinkle, *Crafting Preservation Criteria*, 207.

considered eligible for the National Register and related property inventories. The fourth, as previously discussed, is that significance can change. However, if one accepts the idea that the concept of significance has changed and evolved throughout the history of our nation's historic preservation policies and historic preservation practice, so must these core philosophical beliefs that underpin how we view significance.

#### Statement of Hypothesis

Cultural significance, rather than design or historical significance, is not currently a factor in the professional practice of historic preservation in the United States. As the population of the United States shifts to a majority-minority demographic around 2040, the cultural heritage of ethnic minorities, rather than their history or architecture, may be of primary importance.

The U.S. Census Bureau projects that 42% of the population will be a member of a minority group, with the portion of the population that is White expected to decrease.<sup>6</sup> By 2044, the United States will become a plurality nation with more than half of all Americans projected to belong to a minority group and no race or ethnic group is projected to have greater than a 50% share of the nation's total population. Also, by 2060, nearly one in five of the nation's total population will be foreign born.<sup>7</sup>

What implications do these projections have for historic preservation and its professional practices and public policies? Due to this predicted change in the United States' demographics, the field of historic preservation, its practitioners, and participants

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<sup>6</sup> Jennifer Ortman and Christine Guarneri, *United States Population Projections: 2000-2050* (U.S. Census Bureau, 2009).

<sup>7</sup> *Ibid.*, 2.

will need to reassess the very tenets of not only its practice and the philosophy and rationale behind how historic preservation policies operate and how they affect those of the local policies modeled upon them.

In order to understand how determinations of historic significance can effectively capture the heritage values of ethnic minority groups, we have to ask and understand a few key questions: Who are we referring to as “ethnic minority groups” or “diverse communities?” What are those heritage values in the first place? Is there a place in the historic significance evaluation process for local or ethnic minority community input?

One of the first questions that many historic preservationists need to ask themselves is how they evaluate the significance of historic places within an ethnic minority community and how that evaluation aligns with what that community values. The core of historic preservation’s mission is to preserve the tangible material culture of our past and to interpret history, but what is meant by that? *Whose* history is being referred to and who gets to say? What criteria are used in this interpretation and can the input of the community itself hold equal, if not more, weight? Historic preservation public policies and professional practices have widely acknowledged Western European antecedents derived mainly from England, such as a focus on integrity and linear time.<sup>8</sup> We see this in how properties are evaluated with an emphasis on architectural merit or being rooted in time through an historic association with a specific person or event. In recent years, legitimate questions

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<sup>8</sup>A major influence was British art critic and social thinker John Ruskin, who stated in his 1849 *The Seven Lamps of Architecture* that he felt a structure—particularly in its original, if not ruined, state—acted as a memorial attesting to its namesake community’s history and cultural memory and its significance was in its original materials and layers. This type of Romantic viewpoint helped to contribute to thinking on integrity and materiality in direct contrast to France’s Eugène Viollet-le-Duc, who championed restoration (what we would now consider re-creations) as a means of preserving significant structures that would otherwise be lost.

have arisen about the relevance of these policies and practices to communities whose ancestors came from Africa, the Pacific Rim, Central and South America, the Middle East, and Central Asia.

Efforts have been made over recent years by well-intentioned historic preservation professional organizations and public policy makers at the federal, state, and local levels to become more inclusive and mindful of ethnic minority historic sites and their significance to their respective communities and to the nation.<sup>9</sup> However, if we were to examine current historic preservation's public policies on defining historic significance, they may not necessarily reflect this inclusiveness. There are factors that are still of concern as many of these historic and prehistoric properties places may be overlooked or misinterpreted, leading to a continuing underrepresentation of resources important to diverse communities.

The National Register of Historic Places itself does not reflect the current ethnic or racial diversity of the United States, let alone the emerging minority majority nation. The National Trust for Historic Preservation's 2011-12 Annual Report<sup>10</sup> asserted that only 3% of the total number of National Register of Historic Places listings were identified as representing the history of African American, Asian or Hispanic/Latino story. However, this percentage is disputed as the National Register database does not currently enable

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<sup>9</sup> Diversity and inclusion efforts have ranged from the National Trust for Historic Preservation's Diversity and Colodny Scholars programs to lectures and workshops at the local level. At the federal and state levels we have seen summits and panels to establish initiatives to identify ethnic minority sites and properties for designation. These types of efforts show that the historic preservation field is trying to be more responsive to the need for outreach and inclusion to ethnic minority communities, but more still needs to be done in terms of actual representation of ethnic minorities in decision-making positions.

<sup>10</sup> National Trust for Historic Preservation, *2011-12 Annual Report*, accessed November 28, 2012, [http://www.preservationnation.org/who-we-are/annual-report-and-tax-returns/NTHP\\_AR11-12\\_final.pdf](http://www.preservationnation.org/who-we-are/annual-report-and-tax-returns/NTHP_AR11-12_final.pdf), 27



accurate statistics about ethnic associations. Despite efforts made, this underrepresentation may reflect historic preservation's own Eurocentric history.

As our country becomes more multicultural, historic preservation must become more mindful of what is of historic significance to all of our citizens and of value to ethnic minority communities if it is to be relevant to all. Voices and histories that were once denied or silenced may now be heard. Inclusion is not to the detriment of other groups or instrumental in creating divisiveness, but aids in contributing to the collective history of our nation. A *New York Times* article discussed the struggle of the African American community in Savannah, Georgia, whose history has been poorly documented, to have local sites of relevance to their community recognized. Emails by a respected community leader to the Georgia Historical Society requesting historical markers have gone unheeded.<sup>11</sup> This type of oversight contributes to negative perceptions of historic organizations and historic preservation in minority communities. It also merits a discussion of what constitutes relevance to a community that falls outside of traditional historic preservation policy practices in terms of determining their significance.

Traditionally, when we state that a historic property, place or site has historic significance, it is understood to mean that it has importance for its historic association, design, or information value; the property's association with significant events or persons in history; or its historical and/or cultural value. Therefore, we must first examine how the United States established historic preservation's practices and public policies in the mid-20<sup>th</sup> century. As historic places or sites must be evaluated using one of these policies, this

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<sup>11</sup> Ron Stodghill, "Savannah, Both Sides," *New York Times*, October 3, 2014, [http://www.nytimes.com/2014/10/05/travel/savannah-both-sides.html?\\_r=0](http://www.nytimes.com/2014/10/05/travel/savannah-both-sides.html?_r=0).

treatise will analyze how these processes were developed, amended, and updated; as well as what types of historic properties are captured, how they affect the evaluation process, and how those evaluations and decisions are determined.

The National Historic Preservation Act (NHPA) of 1966, passed as part of President Lyndon B. Johnson's Great Society, built upon two earlier laws (the Antiquities Act of 1906 and the Historic Sites Act of 1935) and established the widely-recognized National Register of Historic Places, its criteria, and processes for determining historic significance. The NHPA was also the first time "local significance" was articulated in federal public policy. These federal public policies, first created in 1906, expanded in the 1930s, changed further in the 1960s, and amended in the 1990s, remain the basis for historic significance public policies and professional practice standards at the national, state, local, and tribal levels nationwide a century later. Our notion of what is important in American history has changed greatly over that time, including a greater need for inclusiveness and recognition of our nation's diverse history.

In light of these issues, this treatise will analyze the following hypothesis: Do current U.S. historic preservation public policies and professional practices developed over a period of 100 years to determine historic significance effectively capture ethnic minority community heritage values? This treatise will show that current historic preservation significance public policies and processes do not always recognize the significance of ethnic minority historic resources. It will also explore developing or recommending changes to these public policies that could more effectively benefit ethnic minority communities and reflect their heritage values. These findings will give insight into how current historic preservation public policies and professional practices work or do not work

in regards to ethnic minority resources and their communities.

### Research Methods

Data, records, literature, and findings by others related to this thesis topic through the use of repositories and official online resources were analyzed and interpreted. This treatise is supported by examining journal articles and authoritative studies related to diversity and ethnic minority community values; federal, state, and local policy documents and legislation regarding historic resource evaluation and significance; and demographic studies and projections. Books, articles, academic theses and dissertations, and case studies were also utilized.

It was also necessary to look beyond history and historic preservation at other related disciplines, such as anthropology and ethnography. Research for this thesis was supplemented by also conducting personal interviews with expert authorities such as former Keeper of the National Register of Historic Places Carol Shull, current Keeper Stephanie Toothman, archeologist and consultant Thomas F. King, National Park Service bureau historian John H. Sprinkle Jr., director of the Global Heritage Fund Vince Michael, and other historic preservationists (Appendix III) in order to gain further insight into the history of our nation's historic significance policies, their intent and their effects. If there were deficiencies regarding a particular research strategy or direction, these resource individuals were available for further information, clarification, or guidance requests.

Research was also incorporated from an independent study with John H. Sprinkle, Jr. conducted in 2015. This study examined the major historic preservation public policies that have informed the historic preservation field's methods of evaluation as well as its resulting professional practices, exploring their history and the rationale behind their

respective creation. This would include the Antiquities Act of 1906, the Historic Sites Act of 1935, the National Historic Preservation Act of 1966, the National Register of Historic Places, the Secretary of the Interior’s “Standards for Archaeology and Historic Preservation.” The independent study research component helped to provide a fuller understanding of these important policies that have shaped our current thinking regarding significance.

### Scope and Context of Research

This thesis will examine current historic preservation public policies and practices for defining and determining historic significance based on the National Register of Historic Places criteria for evaluation<sup>12</sup>, how they were developed, how they are currently being used, and how they address ethnic minority values. This thesis will not go deeply into concepts such as treatment, unless it is directly related to the structure or site’s ability to be evaluated for historic significance or integrity. It will also not go deeply into how the National Register criteria are used in Section 106 (of the NHPA) reviews, federal tax incentives programs, grant programs, compliance with the National Environmental Protection Act (NEPA), or similar state and local government laws, regulations, and procedures.

The focus of this thesis is on ethnic minority communities, whose sites are underrepresented within the historic preservation field. The LGBTQ community is also an underrepresented group that faces similar challenges with the historic preservation significance practices related to the concept of significance. While the research and findings

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<sup>12</sup> *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, 1995.

from this thesis will be applicable to the LGBTQ community and other underrepresented groups (such as women and working-class laborers) in helping to identify and recognize properties of cultural and community significance to them as well, the focus of this thesis is examining significance as it relates to non-White ethnic minority communities.

### Overview

Chapter II will discuss how the concept of historic significance has been shaped by and is integral to historic preservation's practices and policies, as well as the interrelationship between historic significance, integrity, and historic context. The chapter will also analyze its antecedents and how the concept of significance has evolved through shifts within the historic preservation field itself. The policies that guide significance and the considerations and criteria that it affects, as well as the practices and processes that use it as the foundation for determining a property's eligibility will also be examined.

The United States is a very different place than it was in 1966 at the creation of the NHPA and the National Register. Chapter III will examine how the concept of significance has changed over time and broadened due to research interest, generational and demographic changes.

Since place holds meaning of identity and memory for a community, historic preservationists also face challenges in interacting with the minority communities whose resources may not meet thresholds of significance or importance as interpreted by the majority community. For historic preservationists to be able to discuss why the recognition, evaluation, and designation of the resources of ethnic minorities is important, Chapter IV presents a summary of the heritage values of a number of ethnic minority groups in the United States and how these may differ from "mainstream" population concern. It also

outlines underlying forces that act as current barriers to their historic preservation efforts.

Chapter V discusses inclusive approaches in which historic significance is perceived, evaluated, or determined by examining value-based approaches that take community and cultural concepts of significance into account. Chapter V also addresses how to integrate historic significance and integrity with “community significance.”



## CHAPTER II THE IMPORTANCE OF SIGNIFICANCE

### Introduction

In order to understand how the significance of an ethnic minority community's historic properties are effectively evaluated and determined in U.S. historic preservation public policy and professional practice, we must first examine how this nation arrived at these concepts and how they evolved. Arguably, the most important historic preservation concept fundamental to protecting historic places in the United States is determining a property's historic significance. The concept is oftentimes key to providing a property legal protections and benefits, including zoning, technical assistance, and economic benefits such as tax breaks and grants. To receive these through the public and private sectors, a property must be determined first as historically significant and eligible for inclusion in a state, local, or national inventory listing such as the National Register of Historic Places or a similar state or local government list or database.

When a historic place or site is said to be historically significant, the word itself can carry different connotations for historic preservation practitioners, planners, and elected officials or to a community or the public. In the vernacular, significance simply means important. For professionals, significance is a more nuanced term with associated qualities, and experience has shown this to be even more so for minority communities. These conflicting definitions manifest in how properties that minority communities recognize as historically significant may not necessarily match what government or private historic preservation programs recognize. To minority communities, a property is considered



significant as it is important to them de facto. To the historic preservation practitioner, planner, or elected official, the property is significant only if it meets certain standards, processes, and criteria. Determining historic significance is largely the product of the evolution of U.S. historic preservation laws, standards and criteria.

This chapter will discuss how the historic significance concept as practiced today within the public policy and professional arena has been shaped by and is integral to historic preservation's processes and policies. This chapter will also analyze its antecedents and how the concept has evolved through shifts within the historic preservation field itself. The policies that guide determinations of historic significance and the considerations and criteria that it affects, as well as the practices and processes that use it as the foundation for determining a property's eligibility, will also be examined.

### Defining Historic Significance

When we state that a historic property, place or site has historic significance, it is understood by historic preservation practitioners, professionals, and elected officials to mean that the property has associative importance because of its architectural, historical, or information value; or association with significant events or persons. Significance is the most important concept contributing to a historic resource's identification, evaluation, and protection. It is the philosophical concept that underpins academic pedagogy, public policy, and professional standards for historic preservation nationally.

Historic significance as determined at all levels of government and in the private sector derived from the four criteria for significance for listing in the National Register of Historic Places developed and promulgated by the United States National Park Service. These apply uniformly to districts, sites, buildings, structures and objects. How a property

or site is valued by its respective cultural group is also important, but does not currently exist per se as a factor in how significance is determined in the four criteria already cited. Historic significance is distinctly different from cultural significance as it can be argued that all historic properties have a form of cultural significance, but not all properties or sites have cultural significance to a particular group. This is especially important as it relates to how a property or site might be assigned a higher value within a community due to its use within the community or inclusion within traditions, folkways, or cultural practices of the group. As a result, a property or site might be more valued for its cultural significance than its design significance meeting the four National Register criteria.<sup>13</sup>

Determining significance is based on scholarship, typically historic, ethnographic or anthropological. Historic preservation practitioners make these differentiations as a form of creating order for, managing inventory of, or drawing attention to historic properties in order to document and/or protect them. But it is not always clear to laypersons or the general public at large how this is done. For practitioners, significance is a multilayered concept with associations and interrelationships with other elements that are all integral in the evaluation of a property's significance.

#### The Elements of Evaluation

Historic context and integrity are considered integral to the evaluation process for historic significance as both are integral elements used to determine a historic property's eligibility and help to further an understanding of a property's significance.

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<sup>13</sup> This concept is what underpins *National Register Bulletin 38*, which will be discussed in Chapter V.

## Historic Context

One of the first elements considered in evaluating a property's significance is its historic context. Historic context is the patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning within history or prehistory made clear. Historic context is composed of its relevant geographical area, history of associated historical themes or subjects, and a specific time frame.<sup>14</sup> In relation to its design significance, a property's context also give us better understanding about its relationship to other related places or things, such as its rarity or commonality of type.<sup>15</sup>

Properties do not stand alone existing in a vacuum. Historic context tells us where and how a property "fits" into history and how important it is to history as a whole at the national, state, or local level. As used in the planning process, historic contexts helps identify significant properties. At the state level, historic contexts are often incorporated into state historic preservation plans. At the local level, historic contexts are included in survey used to identify and evaluate properties for local planning purposes and inclusion in local property inventory lists or registers and in local interpretive and educational programs.

<sup>16</sup> For instance, the California Office of Historic Preservation developed a National Register

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<sup>14</sup> Barbara Wyatt, National Park Service, "National Register White Paper: The Components of a Historic Context," April 9, 2009, accessed March 20, 2016, [http://www.nps.gov/nr/publications/guidance/NR\\_workshop\\_3-11-09/White\\_paper\\_on\\_historic\\_context\\_4-09.doc](http://www.nps.gov/nr/publications/guidance/NR_workshop_3-11-09/White_paper_on_historic_context_4-09.doc).

<sup>15</sup> National Park Service, "History in the National Park Service: Themes & Concepts," accessed October 14, 2015. <http://www.nps.gov/nhl/learn/themes/ThematicFramework.pdf>, 1-2. Historic context also underpins the Park Service's thematic framework used as a way to evaluate historic properties and districts, first adopted in 1936. It was originally conceived as a conceptual administrative tool structuring the inventory survey and showing the progression of American history. Influenced by social movements and new methods and research borrowed from other disciplines, it was revised in 1996 to try to be more inclusive and reflect a changing America.

<sup>16</sup> NPS, *Themes*, 3. The eight thematic categories of the framework's structure look at larger patterns of U.S. history, grouped around three building blocks of people, time, and place—

of Historic Places context statement about Latinos in Twentieth Century California, outlining the history and contributions of the Latino community and acting as a framework for the designation of properties and utilizing multiple property submissions (MPS).<sup>17</sup> As the broader historic contexts have already been written and researched, this eases the evaluation of new nominations of properties associated with the MPS' subject (in this example, "Latinos in Twentieth Century California") or its four associated historic contexts ("Making a Life," "Making A Living," "Making a Nation," and "Making a Democracy," that have their own sub-contexts).<sup>18</sup> As significance is justified within a property's historic context, it is highly important that practitioners are able to properly evaluate within it.<sup>19</sup>

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creating an interconnection among the eight themes. Although the framework acts as guidance for the evaluation of properties for listing in the National Register or for National Historic Landmark (NHL) designation, its themes are not limited to the federal level and inform preservation at the state, regional, and local level as well.

<sup>17</sup> California Office of Historic Preservation, *Latinos in Twentieth Century California: National Register of Historic Places Context Statement* (California State Parks, 2015): 146.

<sup>18</sup> *Ibid.*

<sup>19</sup> Historic contexts are multidimensional and multiple contexts may be used for an individual site. For example, in archeological reports, the historic context discussion includes a "culture history" or "historical and archeological background" to aid in the site's evaluation. This culture history can factor into the determination of its cultural significance. According to archeologists Donald Hardesty and Barbara Little's *Assessing Site Significance: A Guide for Archaeologists and Historians* (New York: Altamira Press, 2009), 18, historic context can have two related meanings: First, it can be understood as an organizing structure for interpreting history that groups information about historic properties that share a common theme. Second, historic context can be interpreted as those patterns or trends by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within prehistory or history is made clear. By examining the common theme of the grouping that it is a part of, we are then able to see how it fits into the larger puzzle of our broader historic narrative. This allows a resource that on its surface seems to have a narrow focus, to be seen as part of a bigger contributing picture. This, in turn would create the opportunity for more properties to be included as a result of being a part of this larger theme, trend, or pattern.

## Integrity

The relationship between historic significance and integrity is also an important concept in current historic preservation policies. Like binary stars, the two elements are in constant orbit as they pull on one another and affect how the other behaves. When a property is said to be historically significant, it must also have physical integrity.

Integrity is, simply, a property's current physical condition compared to what it looked like during the time period in which it was historically significant.<sup>20</sup> In other words, how much has it changed over the years? Integrity tells us about the present physical condition of a property and to what extent is it unchanged or altered from its historic state.<sup>21</sup> The policy goal in demanding physical integrity is to ensure that most of the property survives intact to the present to convey to the viewer what it looked like historically. Evaluating the integrity of a property depends upon the National Register criteria it is to be associated with. Sites listed under National Register Criteria A or B whose historic significance are predicated upon their association with persons or events have a different relationship to integrity than those under Criterion C, where design significance is paramount.

### The Evolution of the Historic Significance Concept in the United States

To discuss the future of significance to historic preservation in the United States, we

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<sup>20</sup> National Park Service Cultural Resources, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, 44.

<sup>21</sup> The seven qualities that define integrity are location, design, setting, materials, workmanship, association, and feel. One or more of these aspects must be stated in the Statement of Significance in the nomination form. As current preservation practices operate, no amount of significance matters if you do not have integrity as a property has to possess several—if not, most—of its seven aspects of integrity for the property to retain its physical integrity as this conveys its significance.

should understand its evolution and how we arrived at how it is done today. The concept of historic significance in the United States evolved from 19<sup>th</sup> century Western European thought about the need for commemoration. For example, the early historic preservation efforts of the Mount Vernon Ladies Association to save Mount Vernon commemorates one of the nation's Founding Fathers. The historic property was meant to inspire, with the *who* and *when* associated with it being of more importance than the property's physical materiality. Antiquarian William Sumner Appleton, in the 1910 statement of purpose of the Society for the Preservation of New England Antiquities (now Historic New England), began changing that philosophical approach by setting forth criteria to emphasize preserving historic structures that were "architecturally beautiful or unique, or have special historical significance."<sup>22</sup> This early emphasis on a property's significance being linked to its architectural merit would be revisited in the decades to come.

Early national historic preservation laws such as the Antiquities Act of 1906<sup>23</sup> give the President the authority to designate national monuments for "the protection of historic

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<sup>22</sup> Charles B. Hosmer, *Presence of the Past: A History of the Preservation Movement in the United States Before Williamsburg* (New York: G.P. Putnam's Sons, 1965), 12.

<sup>23</sup> National Park Service, Office of Legislative and Congressional Affairs, "Title 54 of the U.S. Code: Background and Guidance," accessed November 2, 2015, <http://www.nps.gov/history/laws/title54guidance.pdf> and NPS Cultural Resources, Partnerships and Science, "Notes on Title 54 of the United States Code 'National Park Service and Related Programs,'" accessed November 2, 2015, <http://www.nps.gov/history/laws/title54notes.pdf>. When Public Law 113-287 was signed into law on December 2014, system-wide and individual park laws were compiled into two parts as its old codification, U.S. Code Title 16, had become too large and disorganized. This also meant that previous statutes including the Antiquities Act, Historic Sites Act, and National Historic Preservation Act were repealed from Title 16 and re-enacted in Title 54 and their popular names removed. Although we can continue to refer to them by their former popular names, it is suggested that we use "commonly known as" to reference them as such. For the purposes of this thesis, I will be using the laws' former popular names.

and scientific interest.”<sup>24</sup> The Antiquities Act of 1906 was the first time that historic preservation was stated as being a duty of the federal government, and the Historic Sites Act of 1935 (54 U.S.C. 320101) declared it national policy to “preserve for public use historic sites, buildings, and objects of national significance for the inspiration and benefit of the people of the United States.”<sup>25</sup> Thus, by the first third of the 20<sup>th</sup> century, the concepts of *historic* and *significance* entered into public duties at the federal level.

The Historic Sites Act authorized the National Park Service to conduct a National Survey of Historic Sites and Buildings (Historic Sites Survey) to identify nationally significant historic buildings and sites.

The 1930s also saw one of the first major shifts in historic preservation philosophy. In 1931, the city of Charleston, South Carolina became the nation’s first local community to adopt a historic zoning ordinance, creating the nation’s first historic district based upon a local historic significance. This *tout ensemble* approach proposes that a historic area’s significance is derived from its *entirety*, not just individual buildings.<sup>26</sup>

### The National Historic Preservation Act of 1966

Signed into law by President Lyndon B. Johnson in 1966, the National Historic Preservation Act (NHPA) was shaped by three major influences. The first was the result of

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<sup>24</sup> The White House, “Fact Sheet: President Obama Designates New National Monuments,” accessed December 7, 2015, <https://www.whitehouse.gov/the-press-office/2015/07/10/fact-sheet-president-obama-designates-new-national-monuments>. Its legacy is still being felt as President Barack Obama has used it during his administration to establish or expand 19 national monuments, including ones related to ethnic minority notables such as César Chávez, Harriet Tubman, and the Buffalo Soldiers.

<sup>25</sup> *National Historic Sites Act of 1935*

<sup>26</sup> Robert E. Stipe, Ed., *A Richer Heritage: Historic Preservation in the Twenty-First Century*. (Chapel Hill: Univ. of North Carolina Press, 2003), 7.

a 1966 report, *With Heritage So Rich*, that asserted that the federal government should have an active role in the preservation of its history. The second influence was a shift towards consideration of local significance. The third was the increased focus on architecture (design) as part of a property's significance following the lead of Charleston, South Carolina and other cities at the time like Boston, New Orleans, and Monterrey.<sup>27</sup> Increased focus on a property's physical condition also made integrity an even more important factor in evaluating a property's significance at that time.

The NHPA's preamble states that "the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people." Thus, it adds two other important concepts: that of culture and of community.

#### The National Register of Historic Places

The NHPA directed the Secretary of the Interior to "expand and maintain a National Register of Historic Places composed of districts, sites, buildings, structures, and objects significant in American history, architecture, archaeology, engineering, and culture."<sup>28</sup> Over time the concept of significance evolved, which is reflected in the types of resources listed. Originally the focus was on "high style" architecture. Since the late 1960s, vernacular forms of architecture as well as natural resources were deemed significance and added to the National Register. Even so, architecture (designated under Criterion C) is still one of the most often-used National Register criteria (Appendix I) when determining

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<sup>27</sup> James A. Glass, "The National Historic Preservation Program, 1957-1969," PhD diss., Cornell University, 1987, 29.

<sup>28</sup> *National Historic Preservation Act of 1966*, §101.



eligibility, as it is relatively easy to assess a property based upon its architectural significance and integrity.<sup>29</sup> If more obvious examples of architectural excellence are evaluated as significant, this means that less obvious examples, such as properties whose significance is more difficult to understand to non-community members, are more likely to fall between the cracks. This is where historic context can be somewhat useful in uncovering a property's hidden significance that may be more obscure than its design.

The National Register sets forth the concept of significance as the basis for evaluating historic properties and since the late 1960s, most United States local communities adopted the criteria of the National Register in evaluating locally significant properties. As the model of the National Register's criteria of significance was adopted, local communities oftentimes modified the National Register's form to suit their specific needs and historic properties. This suggests that the concept of significance has flexibility.

#### 1992 Amendments

The NHPA was amended in 1992 to establish Tribal Historic Preservation Offices (THPOs), giving Native Americans more self-determination in what they consider significant and of value to their communities. Under Section 101(d), the 1992 amendments also established that "properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization may be determined to be eligible for inclusion on the National Register."<sup>30</sup> This legislation was doubtless influenced by the 1990 National Register *Bulletin 38* guidance regarding Traditional Cultural Properties (TCPs), one of the

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<sup>29</sup> John H. Sprinkle, Jr. (National Park Service Bureau Historian, in discussion with the author, 2015). Sprinkle refers to Criterion C as the easiest criterion to list under due to it being "low-hanging fruit" due to time and financial pressure constraints of those doing the evaluations.

<sup>30</sup> *National Historic Preservation Act of 1966*, as amended (1992), §101(d).

first major significant policy breakthroughs on significance and integrity since the 1960s as it created a different way of evaluating culturally significant properties. A TCP is a property eligible for the National Register based upon its associations with the cultural practices, traditions, and beliefs of a living community (Appendix II). A TCP must still fit National Register criteria, but as the National Register is not oriented towards what are considered intangible qualities, it must still be a physical property. TCPs, and similar inclusive approaches, will be discussed in more detail in Chapter V. These developments in the evolution of the historic preservation field are important as they affect how the cultural significance of a property or site will be evaluated and determined.

### Conclusion

The National Register will never be completed as new properties are added and existing ones re-evaluated. The standards and guidance developed in the late 1960s have provided flexibility over time. As Carol Shull, former Keeper of the National Register says, “There is always new scholarship and research. History never stops.”<sup>31</sup> Her statement is in accordance with the previous assertion that there is—as was intended in its creation—flexibility and broadness of the language and criteria of the NHPA. How we assess historic significance and eligibility needs to be re-assessed, especially if the historic preservation field is going to continue to try to become more inclusive of properties of the underrepresented and the communities that value them.

The National Register interprets a segment of United States history though the

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<sup>31</sup> Carol Shull (former Keeper of the National Register of Historic Places), in discussion with the author, September 16, 2015.

properties represented within it.<sup>32</sup> If the National Register is to reflect a broader history in terms of a diversity of properties, it needs to continue to have properties identified that have cultural significance to a community or cultural group—if only at the state and local levels. The identification of significant historic properties at the local level can reveal previously untold histories and “trickle up,” helping to redefine broader themes and the historic narrative at the national level. At the national level, we have to reassess how we look at our history collectively, or how we look at history *period* and what it means to all of us as Americans. As the National Register reflects properties deemed significant to America at large, it is very important that it better reflects all of the citizens whose history it represents.

2016 is the 50<sup>th</sup> anniversary of the NHPA and the National Register’s creation. This matters as the significance of many of those properties, as we re-examine their untold histories and historic contexts, would also change with time, along with the associations for which they were nominated. This updating process using other qualities of cultural and community history would create a fuller story of a property that could apply across the board to many underrepresented groups, such as women, LGBTQ, and the poor.

There are always new properties being added, new stories about our collective national history to be told, and new ways that history is thought about. The act of being listed or designated acts as a form of validation for the property being included, an acknowledgement of its place in history and its significance. As a historic site or structure is not located within a vacuum, it is part of a greater cultural group or community and that property’s cultural significance should be considered as part of the evaluation process, an

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<sup>32</sup> The Park Service’s history program, as outlined in the Qualey Memo, was seen as being a tool for education through interpretation. When seen in this light, the themes in its framework act as an easy way to inform the public.

approach that will be discussed in Chapter V. The use of multilayered background information within the historic context discussion can also aid in reflecting and revealing this community significance.

The following chapter will discuss significance in a changing nation, as the United States is a very different place than it was at the creation of the National Register. It will examine how significance can change over time and how that affects our definition and determinations of significance. The next chapter also discusses the evolution of the historic preservation field and its relationship to and interactions with ethnic minority groups, as well as an overview of how those cultural groups view material culture and place.



## CHAPTER III SIGNIFICANCE IN A CHANGING NATION

### Introduction

Fifty years later, the United States is a very different one from when the National Historic Preservation Act was signed into law in 1966. The nation's changing demographics will likely affect how we continue to define, view, and determine historic significance and evaluate historic properties. As our country becomes more ethnically diverse, historic preservation must become more mindful of what is of value to minorities. The historic preservation field must ask itself the tough questions related to historic significance that will be crucial to its future and how it will be perceived by the changing minority-majority culture of the United States.

One of the first questions that historic preservationists will need to ask is how to evaluate the significance of historic places within a non-Caucasian ethnic community and how that action aligns with what that community identifies as being of value. At the core of historic preservation's mission is to preserve and interpret history; but, what is meant by that in terms of *whose* history is being referred to, who determines it, and the criteria used in its interpretation? Stephanie Toothman, Keeper of the National Register of Historic Places, recognizes this challenge when she states that

There are different types of significance. There needs to be an independent verification of time, date, and place, but in terms of it being meaningful to the community? There's a lot more range there—particularly for local communities. If a community thinks a property is associated with an important story to them, then it is significant.<sup>33</sup>

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<sup>33</sup> Stephanie Toothman (Keeper of the National Register of Historic Places), in discussion with the author, September 21, 2015.

During research interviews conducted for this thesis, the following sentiments were consistently expressed by interviewees: significance is often in the eye of the beholder, and a resource is significant because an ethnic group believes it to be.

As discussed in Chapter II, historic preservation public policies and professional practices have widely acknowledged Western European antecedents. In recent years, questions have been posed about their relevance to ethnic communities whose ancestors came from Africa, Asia, Central and South America, the Middle East, and the Pacific Rim. This chapter will discuss the current forces affecting the concept of historic significance: how it can change over time, and the effect of bias and subjectivity.

#### Generational Significance

The very act of identifying and recognizing sites as important or significant, says historian David Lowenthal, gives them value and marks them as “tangible vestiges in the form of natural features and human artifacts that enhance knowledge gained through memory and history.”<sup>34</sup> He states that the value each generation places on the past and its artifacts changes. As the interests of those determining historic significance changes from generation to generation in terms of what they value, this presents another consideration in terms of how we view and evaluate significance: What each generation values is different, and this means that each generation’s concept of [historic] significance also changes.<sup>35</sup> As

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<sup>34</sup> David Lowenthal, *The Past is a Foreign Country* (Cambridge: Cambridge University Press, 1985): 238.

<sup>35</sup> We can also see these changes reflected within the context of the Park Service’s thematic frameworks as patterns of historic recognition that respond to events or themes within an era. Themes or interests in site recognition or designation can also be driven by demographics or politics (or both), leading to their promotion or rejection. This combination of demographics and greater political influence can be seen in the increase in the designation of sites related to the

the historic property registers, inventories of historic properties and sites are listings of historically significant properties, it can be proposed that the types of properties to be included would change as well.

There is more flexibility to the National Register than is commonly thought as it was designed to accommodate change over time. It was meant to accommodate additions to its listings and the criteria were intended to allow for the integration of state and local properties and sites.<sup>36</sup> John H. Sprinkle, Jr. describes the National Register as both a “stationary and a continually changing representation of a culturally constructed consensus of those places that embody the historical themes, persons, and events that are important to each generation.”<sup>37</sup> This duality suggests that the National Register’s flexibility will allow listings of historic properties not traditionally considered in the past. It also opens up change in terms of how we evaluate them for significance.

Sprinkle also examines the notion that significance and physical integrity are cultural constructs illustrating the conventional historic preservation wisdom of their time. “As research questions about the past change frequently, and thus what constitutes a significant site will also change through time,” Sprinkle says. “For each generation of historians, certain sites were viewed as relevant or necessary to illustrate the full scope of American history.”<sup>38</sup> Thus the concept of historic significance changes as each generation

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Latino community thanks to the efforts of former Secretary of the Interior Kenneth Salazar and that community’s increasing political power.

<sup>36</sup> John H. Sprinkle, Jr., *Crafting Preservation Criteria: The National Register of Historic Places and American Historic Preservation* (New York: Routledge, 2014): 38.

<sup>37</sup> Sprinkle, *Crafting Preservation Criteria*, 207.

<sup>38</sup> *Ibid.*, 40.



reinterprets sources and ponders new questions. This would pose the interesting question whether registers or inventories should also reflect generational interests and beliefs of those who prepare the nominations and assess the site to evaluate its significance as well as the community for whom the site or place has importance.

### Culture and Implicit Bias

In order to discuss what a cultural group values and how that affects significance evaluations, we must first define culture, a shared set of learned beliefs and behaviors that distinguishes one ethnic group from another. Culture is an analytical creation *of* one group of people *about* other people, used to help them make sense out of people and groups that believe and behave differently than themselves.<sup>39</sup> Inclusion implies that there is an outsider or underrepresented group that needs to be considered by the majority. When American culture is referred to as “mainstream,” it must be acknowledged that this nation *has* a mainstream culture, but there are ethnic communities with special concerns and issues in addition to the national culture. Typically, mainstream American culture is understood to mean the culture and embodied values of the dominant, majority population: White and predominately of Western European heritage. As their group still make up the majority of this nation’s demographic, that majority culture has strongly influenced the history and values that set the standard for what we consider to be American culture and what is historically significant within it. Thus the historic resources of ethnic minority communities typically are judged within these majority-determined standards and criteria to be recognized.

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<sup>39</sup>Larry L. Naylor, “Culture and Cultural Groupings,” in *Cultural Diversity in the United States*, ed. Larry Naylor (Westport, CT: Bergin & Garvey, 1997), 3.

One factor in the rise of the historic preservation movement in the 19<sup>th</sup> and early 20<sup>th</sup> century in the U.S. was a reaction to increased immigration and ethnic and class social integration.<sup>40</sup> Preservation efforts then, were seen as a means to help new immigrants assimilate. Patriotic organizations such as the Daughters of the American Revolution (DAR), for instance, were active in historic preservation because the organization viewed historic buildings as a "unifying focus for national pride and patriotism in a nation of immigrants,"<sup>41</sup> the very immigrants from which they set themselves apart and excluded with their lineage-based membership requirements. At the same time, it was expected as a public policy of the government itself that immigrants and members of ethnic racial cultural groups such as Native Americans needed to assimilate and conform to what were considered "American" ideals and values. Anthropologist Kimberly Martin states that an "assimilation" perspective calls on racial and ethnic minorities to become like those who control and dominate the major institutions of society, and the majority defines the cultural values and beliefs that are to be emulated.<sup>42</sup> If the majority is defining cultural beliefs and values, as applied to historic preservation, this means that they are defining the standards of what is historically significant as well.

This tendency to use one's own cultural group as a qualifying reference standard reflects the concept of "implicit" or "unconscious biases" that are beyond our control and

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<sup>40</sup> Diane Barthel, "Historic Preservation: A Comparative Analyses." *Sociological Forum* 4, No. 1 (1989): 96.

<sup>41</sup> Aileen de la Torre, "An Analysis of African American Participation", 20.

<sup>42</sup> Kimberly Martin, "Diversity Orientations: Culture, Ethnicity, and Race," in *Cultural Diversity in the United States*, ed. Larry Naylor (Westport, CT: Bergin & Garvey, 1997), 87. There is a significant body of literature on the assimilationist nature of early historic preservation.

activate involuntarily. According to the Kirwan Institute for the Study of Race and Ethnicity, implicit biases arise outside of our conscious awareness, meaning that they do not necessarily align with our declared beliefs or reflect stances we would endorse.<sup>43</sup> Although everyone possesses them—ethnic minorities included—they have real-world effects on behavior and beliefs when acted upon by a majority population as there is a tendency to favor one’s own group due to familiarity.

Diversity consultant Howard Ross identified ten ways that unconscious bias operates in our world. Three of these: diagnosis bias, value attribution, and priming effect, can be seen in the way that we evaluate for historic significance. *Diagnosis bias* is the propensity to label people, places or things based on our first impression. The second, *value attribution*, is the inclination to infuse a person or things with certain qualities based on initial perceived values. *Priming effect* is the implicit tendency to respond to something based on expectations created by a previous experience or association.<sup>44</sup> Thus, according to implicit bias theory, the inherent biases of the majority population would favor places and things particular to the history of their cultural group. In the case of historic preservation, the majority of its practitioners and decision-makers are White, reflecting the majority population. Those inherent biases are manifested through the determination as historically significant those properties perceived as important or related to the majority population.

Implicit biases also illustrate the less than benign nature of the generational

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<sup>43</sup> Cheryl Staats, Kelly Capatosto, Robin A. Wright and Danya Contractor, “State of the Science: Implicit Bias Review 2015,” Kirwan Institute for the Study of Race and Ethnicity, Ohio State University, accessed October 20, 2015, <http://kirwaninstitute.osu.edu/wp-content/uploads/2015/05/2015-kirwan-implicit-bias.pdf>, 63.

<sup>44</sup> Staats, “Implicit Bias,” 56.

significance that has influenced historic preservation policies and processes. This is where the structural prejudices of the field continue to be perpetuated. The generation that created historic preservation processes and policies were coming from an era in which ethnic minorities were not greatly considered. Although the guidance and criteria allow for flexibility, those who were *executing* the evaluations using them were also affected by these and their inherent biases.

While diversity is a commonly accepted concept today, this was not always the case. Public intellectuals in the post-WWI era such as Horace Kallen and Randolph Bourne examined how America was not the proverbial “melting pot.”<sup>45</sup> When Nathan Glazer and Daniel Patrick Moynihan first approached a publisher for their 1963 study of New York City immigrants that resulted in the concept of “ethnic minority,” they were turned away and told that their subject matter was too sensitive.<sup>46</sup> Now, over fifty years later as our nation and what we consider to be American culture is changing to reflect its multicultural composition, an interest in ethnic groups has become critical to the future of the field of historic preservation. The inclusion of the histories and places of value and significance to a

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<sup>45</sup> Kallen, who coined the term “cultural pluralism,” stated in his 1916 essay “Democracy vs. the Melting Pot” that ethnic groups were more likely to act as autonomous units perpetuating their own culture within American society. Bourne, influenced by Kallen’s work, argued in his July 1916 *The Atlantic Monthly* article, “Trans-National America,” that the melting pot was a “failure,” and assimilation should not be encouraged, espousing multiculturalism. Bourne said “America shall be what the immigrant will have a hand in making it, and not what a ruling class, descendant of those British stocks which were the first permanent immigrants, decide that America shall be made.”

<sup>46</sup> Tyson Gibbs, “Portrait of a Minority,” *Cultural Diversity in the United States*, ed. Larry Naylor (Westport, CT: Bergin & Garvey, 1997), 91. In his 1998 book *We Are All Multiculturalists Now*, Glazer has misgivings about his earlier findings in *Beyond the Melting Pot: The Negroes, Jews, Puerto Ricans, Italians, and Irish of New York City* and the rise of multicultural thinking, policies, and educational curricula in the United States.

particular racial-ethnic group or ethnic minorities as a whole does not mean this is done at the expense of the exclusion of others, but that we will be able to tell a more complete and nuanced story of our American culture.

No one ethnic group is monolithic and there are differences such as nationality, tribal affiliation, culture, and thought/opinion within each group. For the purposes of this thesis, “ethnic minority groups” will refer to the main characteristics of racial-ethnic communities: White, Black/African American, Hispanic, American Indian/Alaska Native, and Asian American/Pacific Islander. This thesis will use the terms “Latino” rather than “Hispanic” and “Native American” rather than “American Indian/Alaska Native” within this thesis for those respective cultural groups.<sup>47</sup> One’s sense of how they are perceived as a member of an ethnic group can change as there is a fluidity of self-identity and self-identification.

Within the next 40 years, the United States will undergo a significant cultural shift, with the size of the minority population (particularly Latinos) increasing to the point that collectively they will represent the numeric majority. According to the US2010 Project at Brown University, by the mid-21<sup>st</sup> century, ethnic minorities as a total are projected to

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<sup>47</sup> My personal preference is to use the terms “Native American” and “Latino” in referring to those respective racial-ethnic groups per conversations and interactions with interviewees and within literature. Both terms will be used in this thesis. Although it could be used to identify Indigenous cultural groups in the U.S. such as Native Hawaiians and some Pacific Islanders as well, “Native American” in this thesis refers to “American Indians” and “Alaska Natives.” The U.S. Census uses “Hispanic” and “Latino” interchangeably, but there is much debate within the cultural group itself as some cultural group members view “Hispanic” as a direct link to Spanish roots or language use. Also, there is increased use of the more gender-neutral term “Latinx” as well. The OMB’s Directive No. 15 formally categorizing U.S. ethnic minority groups is not without its detractors, given the nature and fluidity of the categories themselves and how persons self-identify.

equal non-Hispanic Whites in number.<sup>48</sup> The racial-ethnic structure in this nation continues to be dominated by Whites, who currently make up an average of over 70% of metropolitan and rural populations.<sup>49</sup> White-majority communities remain the norm, but White-dominant (all-White) places are much less common now than in the past than they were thirty years ago.<sup>50</sup> As a result, "older whites who have watched the 30-year increase find themselves having to adjust their notion of America, sometimes reluctantly."<sup>51</sup> By 2040, this demographic change will become more evident, with it being our country's new reality by 2060.<sup>52</sup>

### Diversity Community Identity

When a historic site has importance, it is often because it has meaning of significance to a community who identifies with it. As our nation changes, it must be

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<sup>48</sup> Lee, Barrett, John Iceland and Gregory Sharp, "Racial and Ethnic Divide Goes Local: Charting Change in American Communities Over Three Decades", US2010 Project, Brown University, Accessed November 29, 2012, <http://www.s4.brown.edu/us2010/Data/Report/report08292012.pdf>, 2. "Non-Hispanic" is only used here as it is the official U.S. Census designation for this study. Factors contributing to this demographic shift are attributed to a higher fertility (and birth) rate, youthful age structures, intermarriage, and shifts in racial-ethnic identity, as well as a steady stream of immigrants. Another factor was the removal of immigration quotas based on national origins due to the Immigration and Nationality Act of 1965.

<sup>49</sup> Lee, "US2010 Project", 8.

<sup>50</sup> *Ibid*, 11.

<sup>51</sup> *Ibid*, 20.

<sup>52</sup> *Ibid*, 19. Diversity tends to be greater in communities that have large populations, are located in coastal or Southern border states, and feature a substantial foreign-born presence. The US2010 project states that a decline in all-White cities, suburbs, and small towns is clearly underway and incumbent residents of diversity communities worry whether newcomers of a different race or ethnicity will harm local institutions and cultural cohesion, as reflected in common values, religious traditions, and language. Ideally, both newcomers and incumbents should support policies that incorporate all groups into the fabric of community life.

acknowledged that the minority-majority ethnic cultural groups will have an effect on how place is viewed as their concept of it may be different from what has been the traditional way it has been identified in the historic preservation field. Sociologists Lee Cuba and David Hummon state that from a social psychology perspective, place significance arises because “places, as bounded locales, imbued with personal, social, and cultural meanings, provide a significant framework in which [community] identity is constructed, maintained, and transformed.”<sup>53</sup> The community believes that place identity answers the question “Who am I?” by countering “Where am I?” or “Where do I belong?”<sup>54</sup> This question of “Where?” is also answered by the sites that the community holds dear and views as significant to them, as the connection to those historic resources; or lack of them, to the community reflects what they value.

Architecture professor Coleman Jordan states that “space, like language, is socially constructed; and like the syntax of language, the spatial arrangements of our buildings and communities reflect and reinforce the nature of gender, race, and class relations in society. Our stories and identities need to be recovered and told—both through language and spatial constructs.”<sup>55</sup> The spaces within a community, and the structures that are a part of it, hold the identity, both past and present, of that community. Discovering this identity, whether through its historic context or archeological record, can be key to assessing and evaluating

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<sup>53</sup> Lee Cuba and David Hummon, “A Place to Call Home: Identity with Dwelling, Community, and Region,” *The Sociological Quarterly* Vol. 34, No. 1, Spring 1993, 112.

<sup>54</sup> *Ibid.*, 112.

<sup>55</sup> Coleman A. Jordan, “Autobio-graphic Space: Reconciling African American Identity with the (In)Visible Past,” in “Places of Cultural Memory: African Reflections on the American Landscape,” National Park Service, “Places of Cultural Memory Conference Proceedings,” 35, <http://www.nps.gov/history/heritageinitiatives/pubs/AFR.pdf>.

its historic significance. Douglas Appler, holder of the Abell Endowed Chair in Historic Preservation at the University of Kentucky, supports this as he believes this reinforces the idea of place telling a community's story and history, saying:

One way of exploring the relationship between historic preservation and social justice is to recognize that preservation plays a major role in determining what pieces of the past will be available for study or use in the future. If the history of a particular group is wiped from the landscape, its past can't be explored or recognized to the same degree as that of another group whose history is left in place and remains standing.<sup>56</sup>

This statement also demonstrates implicit bias within our field. If a majority group determines what is considered historically significant, then there is distinct possibility of the omission of the histories of the underrepresented groups and what they find significant. This is often because the majority group does not know what historic context to look for in order to evaluate or identify those resources.

As one's self-identity can be fluid, the term "heritage values" is also a changeable concept. In general, it is understood to mean the values that a group has as a whole; how their history and heritage are collectively important. Heritage conservation consultant Ned Kaufman identifies these values as being ones that "incorporate the historical narratives, traditions, memories and associations that informs a community's sense of place"<sup>57</sup> and notes the questions that have resulted from the disconnection between the historic preservation profession and ethnic groups such as "How should preservationists balance the

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<sup>56</sup> Douglas Appler, "The 6th Annual Historic Preservation Symposium: New Voices, Current Needs," University of Kentucky College of Design, accessed May 22, 2015, [http://www.uky.edu/design/index.php/events/description/the\\_6th\\_annual\\_historic\\_preservation\\_symposium\\_-\\_new\\_voices\\_current\\_needs/past](http://www.uky.edu/design/index.php/events/description/the_6th_annual_historic_preservation_symposium_-_new_voices_current_needs/past).

<sup>57</sup> Ned Kaufman, *Place, Race, and Story: Essays on the Past and Future of Historic Preservation* (New York: Routledge, 2009), 2.



competing claims of disparate sites and divergent values recognized by culturally diverse groups?”<sup>58</sup> One way that historic preservationists can do this is by recognizing that there are intangible qualities ascribed to many places of importance to ethnic minority groups.

All ethnic minority groups have places with intangible qualities that can contribute to the difficulty in recognizing them as places of importance as historically significant. Cultural geographer Yi-Fu Tuan states that, “many places, profoundly significant to particular individuals and groups, have little visual prominence. They are known viscerally, as it were, and not through the discerning eye or mind.”<sup>59</sup> A building may now be currently located on a site that once had great meaning to that group. Oral histories within a community can perpetuate their importance. It is the *meaning* behind why it is of value to a particular group.

Current historic preservation policies and professional practices do not generally recognize intangible qualities, although they are possible for the National Register listing.<sup>60</sup> Laura Dominguez, preservation coordinator of the Los Angeles Conservancy and co-chair of Latinos in Heritage Conservation when discussing historic preservation efforts in San Francisco’s Mission District and Calle 24 stated, “We’re not designating Carnival, but the route. We’re not designating the language, but the language school site itself. It is about

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<sup>58</sup> Kaufman, *Place, Race, and Story*, 3.

<sup>59</sup> Yi-Fu Tuan, *Space and Place: The Perspective of Experience* (Minneapolis: University of Minnesota Press, 1977), 162.

<sup>60</sup> National Register criteria for evaluation, under Code for Federal Regulations, 36 CFR 60.4, states “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.”

showing that these are places that contributed to San Francisco's culture (Figure 1).<sup>61</sup> By looking at how intangible aspects of heritage and culture manifest and intersect in the built environment, historic preservationists can incorporate those qualities into resource identification and evaluation.



Figure 1. Mural in the Mission District, San Francisco [Carol Highsmith/Library of Congress, 2009]

In *The Power of Place*, urban historian Delores Hayden writes about place memory and its importance:

Place memory encapsulates the human ability to connect with both the built and natural environments that are entwined in the cultural landscape. It is the key to the power of historic places to help citizens define their public pasts: places trigger memories for insiders, who have shared a common past, and at the same time places often can represent shared pasts to outsiders who might be interested in knowing about them in the present.<sup>62</sup>

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<sup>61</sup> Laura Dominguez (preservation coordinator of the Los Angeles Conservancy and co-chair of Latinos in Heritage Conservation), in discussion with the author, November 18, 2015.

<sup>62</sup> Delores Hayden, *The Power of Place: Urban Landscapes as Public History* (Cambridge, MA: MIT Press, 1997), 46.

Although place memory acts as this “trigger” for insiders, the very nature of the structures within that cultural landscape are often assessed and evaluated for historic significance based upon standards that deal very much with the physical, not the intangible. Many ethnic minority historic resources are considered vernacular in nature, meaning that they are not “high style” architecturally and are thus unassuming. Architectural historian Dell Upton and anthropologist John Michael Vlach state that “change is the nature of the vernacular; vernacular buildings and vernacular landscapes are always changing. For one thing, spatial needs change.”<sup>63</sup> As the spatial needs of the resource’s community changed, the structures constantly changed with them. The vernacular nature of these sites or structures contributed to a lack of expectations that they should *not* be altered, thus affecting their integrity, eligibility, and how they are evaluated for historic significance.

Ned Kaufman defines “ethnic heritage” as not just what immigrants bring with them, but also how groups adapt to new conditions here.<sup>64</sup> In her thesis examining the historic preservation of Latino historic and cultural resources, National Trust Field Officer Sehila Mota Casper states that the “thriving spatial density of Latino communities are interconnected through traditional lifeways of language, family, religion, and customs—mimicking the cultural landscape patterns of Latino motherlands. Without a doubt, Latino enclaves, known as *barrios*, nurture communities and a transcontinental and new Latino

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<sup>63</sup> Dell Upton and John Michael Vlach, “Introduction,” in *Common Places: Readings in American Vernacular Architecture*, Eds. Dell Upton and John Michael Vlach (Athens: The University of Georgia Press, 1986), xx.

<sup>64</sup> Kaufman, Ned and Antoinette Lee. “Cultural Heritage Needs Assessment Project: Phase I” project statement for the NPS, 2004, 8.

identity throughout America’s landscape.”<sup>65</sup>

In Los Angeles, Wyvernwood, the city’s first large-scale garden apartment complex, constructed in 1939 influenced by Ebenezer Howard’s Garden City movement, is facing demolition and redevelopment (Figure 2). The majority of the residents of this close-knit community are Latino and the open space design of its central green spaces not only facilitated the community by acting as a gathering place, but as areas to celebrate and maintain traditions.<sup>66</sup> Wyvernwood’s current community not only values it for its 1939 historic significance, but also for its deeper meaning and as it allows them to maintain their traditions.



Figure 2. Support for Wyvernwood Apartments, Los Angeles. The sign states “I support the preservation and renovation of Wyvernwood.” [Flora Chou/Los Angeles Conservancy, 2013]

Wyvernwood’s current community is very different from its original residents and illustrates how cultural groups within the built environment can change as new groups

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<sup>65</sup> Sehila Mota Casper, “From Theory to Practice: Contextualizing Latino Conservation Practices” (master’s thesis, Savannah College of Art and Design, 2014), 66.

<sup>66</sup> “Wyvernwood Garden Apartments,” LA Conservancy, <https://www.laconservancy.org/locations/wyvernwood-garden-apartments>, accessed November 19, 2015.

move in and adapt it to their own needs. This turnover within a neighborhood or district is not a new phenomenon within the U.S, but it is one that, as historic preservationists, we must be mindful of going forward as we must continue to nurture community involvement as stewards of their historic resources. In the case of Wyvernwood, the current community continues to use it as a place of gathering and cultural transmission. What happens when the community has moved on?



Figure 3. Friendship Arch, Chinatown, Washington, D.C. [Carol Highsmith/Library of Congress, c. 1986]

This is what happened to the former ethnic enclave of Washington, D.C.’s Chinatown historic district—now a gentrified retail and entertainment area (Figure 3). Chinatown’s dwindling Chinese residents number only a few hundred as the community largely moved to Maryland and northern Virginia and created new “ethnoburbs” after the 1968 riots. “Without the people, it [Chinatown] becomes just a fake tourist spot. The ethnoburbs might be creating their own new ways of preserving culture. Do we *need* to reconnect them?”<sup>67</sup> The question has now become a matter of what group is the district is

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<sup>67</sup> “Evolution, Gentrification and Preservation of D.C.’s Chinatown,” presentation by Xinqian Qiu and Fanglan Chen, National Trust for Historic Preservation PastForward Conference,

being preserved for, and what groups see it as just physical space? Are the historic resources still important to the original group that left? The historic significance of the Chinatown historic district has not changed, but how it is now valued by the Chinese American community has.

African Americans have demonstrated how the significance of historic sites change by being vocal about what is *not* significant to them. In 2015, in light of the outcry over what these commemorative monuments represent, controversial historic sites in New Orleans related to the Confederacy, such as Lee Circle, the Battle of Liberty Place Monument, and the P.G.T. Beauregard Monument, are currently being re-evaluated for removal or relocation.

Heather Youckton, Chehalis tribal member, gives another example of how cultural memory can affect what is considered *not* significant to a community. When 19<sup>th</sup> century White settlers arrived in what is now Grand Mound, in Washington State, they claimed its highest point where the Chief's longhouse was located and burned it down, erecting their own building. The Chehalis tribe currently owns the land and are in the process of constructing a new longhouse on that site. Youckton noted, "The historic significance of that 19<sup>th</sup> century building qualified it for National Register listing, but because of how it got there...we burned it down."<sup>68</sup> Like the Confederate monuments in New Orleans, this demonstrates what is not of historic significance to the community due to past racially-motivated injustices.

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November 6, 2016.

<sup>68</sup> Heather Youckton (Chehalis tribal member), in discussion with the author, November 16, 2015.

## Conclusion

The forces that can broaden our views on historic significance, such as generational significance, implicit bias, and demographic shifts are important factors in how we evaluate it. As our nation's demographics change, we will continue to see this fluidity of change within neighborhoods and the built environment. As a field, historic preservation will have to be more flexible in terms of how we consider the built environment in relationship to those who are currently utilizing it. The historical significance and its structures as valued by its original community may not have changed, but the community that valued and utilized them can. What can also change is how a historic resource's significance can be challenged due to outcry from a community over what it represents. While it can be argued that history has ugly, painful aspects, it challenges historians and historic preservation as a field to re-evaluate if we wish to continue to commemorate that pain in the form of a historic resource at the expense of the community who reviles it.

If place holds such meaning for identity and memory for a community, then historic preservationists will also face challenges in terms of interacting with the ethnic communities whose resources are to be preserved and determined as being historically significant. For historic preservationists to be able to discuss why the recognition, evaluation, and designation of the historic resources of ethnic minorities is important, we must look at what those racial-ethnic groups value themselves and better understand the underlying forces that motivate or act as barriers to their historic preservation efforts.





## CHAPTER IV ETHNIC MINORITY HERITAGE VALUES

### Introduction

This chapter will examine ethnic minority groups in the United States; what historic resources are seen as historically significant to their respective groups and their relationship to current historic preservation policies and practices. These diverse groups are complex and composed of many nationalities, cultures, and languages, often within the same ethnic minority cultural group. Due to these complexities, it is important to acknowledge that in addition to the literature, this thesis speaks from personal experiences and those of interviewees. There are differences not only among the cultural groups, but within, and from person to person. As such, this thesis seeks to find and discuss general commonalities of experience and values.

Although there are expected variations within each cultural group, examining how each generally views its relationship to historic significance and their historic, cultural or built heritage, can help to contribute to a better understanding of their views about historic preservation. It can also help historic preservationists to understand the deeper meanings, including intangible aspects, involved with evaluating the historic significance of ethnic minority historic resources.

### Ethnic Minority Groups Significance

Ethnic minority communities do historic preservation work, although that is not always what they call it. In general, ethnic minority groups see their history-related work as

conserving not just their built environment, but their culture or heritage itself. What is of value to these diverse communities is often at odds with standards and processes the historic preservation field currently uses to evaluate properties for historic significance. By examining not only the types of properties of significance to the respective ethnic groups, but *why* they are important, will help in understanding what is valued.

### Black/African American

African Americans were the largest minority group in the nation until recently surpassed in population by Latinos and they have long been vocal about having their achievements and history officially recognized and commemorated with sites associated with significant historic figures and events. Due to African Americans' legacy of enslavement and many of their ancestors' forced arrival in the United States, the past patriotic philosophy underlying many historic sites is problematic as their inspirational "nation of immigrants" quality oftentimes does not resonate as strongly. Despite this painful past, historic sites related to enslavement are considered of high historic significance and value to African Americans. This displacement and loss of ancestral homelands and memory due to enslavement has also created a connection with their African heritage through intangible traditions as seen in the retention of vestiges of African dialects, foodways, crafts, and music.<sup>69</sup>

For African Americans, historic and cultural significance are intertwined and highly outweigh design significance, especially as African American built heritage is often found in small, unadorned, or vernacular structures that are not as grand or visually impressive as

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<sup>69</sup> "Global Connections," Gullah Geechee Cultural Heritage Corridor, accessed April 22, 2016. <http://gullahgeecheecorridor.org/index.php/our-history-and-culture/our-story/global-connections>

traditionally recognized places such as the homes of political leaders or wealthy industrialists.<sup>70</sup> Urban renewal and repeated migrations, such as during the Great Migration of African Americans from the rural South to opportunities in the North from 1910 to 1970,<sup>71</sup> destroyed or led to the abandonment of many rural African American communities and their historic resources in the South. As these structures or sites were, or are, often compromised in terms of their integrity, it affects their eligibility due to the resource's inability to physically convey its importance during the period of historic significance. In such cases, we must look to its historic context or the community itself in order to better evaluate them. Places of community interaction and activism, such as barbershops and beauty parlors, restaurants, community centers, fraternal organizations, and especially churches, are valued in the African American community, but can be overlooked due to humble or highly changed appearance. Brent Leggs, Senior Field Officer for the National Trust and adjunct faculty at the University of Maryland, states that:

African Americans care deeply about preservation because they care about history and have preserved places on an informal basis. We don't have a cultural ethic around preservation in the formal sense in the Black community and look extensively to other institutions to have our history recognized. It is important to commemorate our history through the built environment. It is about equity and reconstructing identity.<sup>72</sup>

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<sup>70</sup> Brent Leggs, Kerri Reelman, and Byrd Wood, *Preserving African American Historic Places*, (National Trust for Historic Preservation, 2012), 4.

<sup>71</sup> The Schomburg Center for Research in Black Culture, "The Great Migration," accessed September 3, 2016, <http://www.inmotionaame.org/migrations/landing.cfm?migration=8>. Millions of African Americans left the rural South in search of opportunities in the North. They were particularly attracted to industrial centers and major cities such as Chicago, Detroit, and New York City.

<sup>72</sup> Brent Leggs (senior field officer, National Trust for Historic Preservation), in discussion with the author, December 9, 2015.

For African Americans, history—and the built environment that is a part of that history—may be used to contribute to the reclamation of identity and an acknowledgment of cultural presence. For example, this determination to commemorate a minority group’s history through the built environment led to an effort on the part of the predominately African American town of Fairmount Heights, Maryland, to designate a historic district. Located just outside of Washington, D.C., with a population of roughly 1,500 residents, the town was one of the city’s first African American streetcar suburbs. Local residents and the mayor identified culturally significant structures such as social gathering places like Charity Hall and the deteriorating Old Fairmount Heights Elementary School as being important to their community.

It took dedicated residents twenty-four years to create the Fairmount Heights’ historic district, which was listed in the National Register in 2011. It was important to the town to have their properties identified and recognized, which motivated the designation effort. The delay in the district’s designation process was due to a combination of lack of financial resources and knowledge of historic preservation policies and practices within the community itself. As the town lacked a dedicated historic preservation group or board, there was (and still is) no ordinance or process in place for the continued maintenance of its historic properties. In addition, economics acts as a driving force in the ability to restore and maintain properties and their integrity in many ethnic minority communities, who oftentimes resort to using whatever affordable materials are available.

“We will always be a historic town,” said former town mayor Lillie Thompson Martin. “We just need people to join in and tell the story.”<sup>73</sup> This quote—and the town’s

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<sup>73</sup> Lillie Thompson Martin (former mayor, Town of Fairmount Heights), in discussion with the

determination—underscores how African Americans recognize the historic significance of the resources within their community and see themselves as their stewards.

### Latino

The American Latino community has now surpassed African Americans as the nation's most populous minority.<sup>74</sup> United by a common language, but diverse in terms of heritage and nationalities, the Latino community is comprised of persons from Central and South America and the Caribbean. As such, this makes trying to define them as a monolithic cultural group difficult, but according to the Park Service report *Hispanic Reflections*, there are common points of confluence: Spanish language heritage, genetic and cultural creolization, and a common history of national liberation from Spanish rule.<sup>75</sup> There is also a strong faith tradition that has been traditionally tied to Catholicism. The concept of transnationalism is also important as many Latinos still maintain very strong ties to their home countries. Festivals and celebrations, such as Las Posadas, Carnival, or the procession of Our Lady of Guadalupe, reflect these homeland connections.

For the Latino community, design significance is not as important as cultural significance. In a 2011 *Washington Post* article, former Secretary of the Interior Kenneth Salazar, who is of Mexican American heritage, discussed the necessity for more Latino-

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author, April 2014. In 2014, I created a preservation plan for the town.

<sup>74</sup> “Facts to Figures: Hispanic Heritage Month, Sept. 15-Oct. 15,” United States Census Bureau, accessed May 12, 2015, [http://www.census.gov/content/dam/Census/newsroom/facts-for-features/2014/cb14ff-22\\_hispanic.pdf](http://www.census.gov/content/dam/Census/newsroom/facts-for-features/2014/cb14ff-22_hispanic.pdf).

<sup>75</sup> Brian D. Joyner, National Park Service Cultural Resources, *Hispanic Reflections on the American Landscape: Identifying and Interpreting Hispanic Heritage*, 2009, 21.

themed national parks and sites:

I think that when you look at the way Americans most understand the history of Latinos in this country, a lot of it is being told now through the lens of what's happening with the immigration debate. While that's an important debate that has security and moral implications, in my view, there's also a huge history of Latinos in the United States that's never been told.<sup>76</sup>

Salazar's statement reflects how the historical narrative of a cultural group can shape the current understanding of that group's history. This creates even more of the need for that narrative to change. That same year, to try to rectify this untold history, the U.S. Department of the Interior, the Park Service, and the National Park Foundation hosted the La Paz Forum to discuss how American Latino heritage could be better integrated into the story of America. In response to the Forum's recommendations, the Park Service created the American Latino Theme Study to provide historic contexts on various aspects of Latino history and identify missing links; recommend potential NHL designations, and expand interpretation at existing Latino heritage sites.<sup>77</sup> Like African Americans, Latinos are now in a position to assert themselves politically about the need for more sites related to Latino experience.

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<sup>76</sup> Ed O'Keefe, "Ken Salazar urges more Latino-themed national parks, sites," Washington Post, October 11, 2011, accessed May 28, 2015, [http://www.washingtonpost.com/politics/ken-salazar-urges-more-latino-themed-national-parks-sites/2011/10/11/gIQAVvWgdL\\_story.html](http://www.washingtonpost.com/politics/ken-salazar-urges-more-latino-themed-national-parks-sites/2011/10/11/gIQAVvWgdL_story.html).

<sup>77</sup> National Park Service, *A Report on the American Latino Heritage Initiative*, 2012, 2.



Figure 4: U.S. Court House and Post Office, Los Angeles [NARA, 1940]

The efforts of the Park Service’s forums and studies led to the identification and designation of sites such as the Hispanic Society of America Complex in New York City and the U.S. Court House and Post Office (Court House for the Central District of California) in Los Angeles, California (Figure 4)—an important site of Mexican American civil rights history—was designated as National Historic Landmarks in 2012. Also designated was the César E. Chávez National Monument at Nuestra Señora Reina de la Paz in Keene, California, which served as the headquarters for the United Farm Workers of America.<sup>78</sup> These recent efforts imply that with population growth and increased political power, an underrepresented group can have more determination in influencing governments to identify and evaluate sites important to their heritage, leading to their designation.

### Asian American

Similar to the challenge of trying to describe the historic complexities of the Latino community in one term, it is also difficult to do so with the Asian American community.<sup>79</sup>

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<sup>78</sup> U.S. Dept. of the Interior, “Interior Designates 27 New National Landmarks,” accessed May 20, 2015, <http://www.doi.gov/news/pressreleases/Interior-Designates-27-New-National-Landmarks.cfm>.

<sup>79</sup> “Asian American” is a term that came out of the 1960s civil rights movement and used to describe a cultural group of many nationalities with heritage from that geographic region.

Among Asian Americans one finds long-established communities that have been here for generations, as well as new immigrants. Older, established Asian American communities such as Chinese, Japanese, and Filipino Americans have become more static and have been making way for newer communities from South Asia such as Indian, Vietnamese and Cambodian Americans.<sup>80</sup> Since 1980, the size of the Asian American community tripled<sup>81</sup> becoming the fastest growing, with half of new immigrants now coming from Asia instead of Latin America.<sup>82</sup>

In the 19<sup>th</sup> century, legislation actively discriminated against Asian immigrants, limiting where they could live and own land or homes. This contributed to the creation of ethnic enclaves such as Chinatowns, Little Tokyos, Little Manilas, and Koreatowns that acted as important central spaces of cultural transmission for its residents.<sup>83</sup> These enclaves were important for not only maintaining traditions, but for transitioning and surviving in a new country. This connection to one's homeland can be very strong and Tuan describes it as "a homeland has its landmarks, which may be features of high visibility and public significance, such as monuments, shrines, a hallowed battlefield or cemetery. These visible signs serve to enhance a people's sense of identity; they encourage awareness of and loyalty to place."<sup>84</sup> Places of familiarity from the old, such as night markets or language

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<sup>80</sup> Brian D. Joyner, National Park Service Cultural Resources, *Asian Reflections on the American Landscape: Identifying and Interpreting Asian Heritage*, 2005, 20.

<sup>81</sup> Lee, "Ethnic and Racial Divide," 5.

<sup>82</sup> "Facts to Figures: Changing Face of New Residents," United States Census Bureau, accessed May 12, 2015, [http://www.census.gov/content/dam/Census/newsroom/facts-for-features/2015/cb15-ff07\\_graphic.pdf](http://www.census.gov/content/dam/Census/newsroom/facts-for-features/2015/cb15-ff07_graphic.pdf).

<sup>83</sup> *Ibid.*, 14.

<sup>84</sup> Tuan, *Space and Place*, 159.



schools, helped to perpetuate culture once transplanted in the new.

Despite their strong sense of place, there are cultural differences in how structures within that place are viewed by American citizens of Asian descent. Some Asian cultures do not place as much importance on historic buildings. This has created some difficulty in documenting and preserving places of Asian American heritage as sites frequently bear no markers or may represent contested space within rural and urban landscapes.<sup>85</sup> This should not, by any means, be taken to mean that the Asian American community does not value sites of importance and experience to them. The Manzanar National Historic Site in California represents the 120,000 Japanese American citizens who were interned in relocation camps during WWII.<sup>86</sup> Poems written by detained Chinese immigrants at the Angel Island immigration facility in San Francisco Bay still cover its walls, tangible reminders of their transient presence. Cultural and historic significance outweighs design significance in the Asian American community; however, design significance does factor in relation to traditional ethnic enclaves such as Chinatowns, as they reflect the design aesthetics of that community as adapted to Western-style structures.<sup>87</sup>

Asian and Pacific Islander Americans in Historic Preservation (APIAHiP) Chair Michelle Magalong states that “the Asian American community has a lot of historical societies and weekend historians, but they don’t call themselves ‘preservationists.’ In the larger sense, do they know the word ‘preservation?’ It’s not seen as relevant or applicable

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<sup>85</sup> *Ibid.*, 13.

<sup>86</sup> National Park Service, “Manzanar National Historic Site,” accessed May 24, 2015, <http://www.nps.gov/manz/learn/historyculture/people.htm>.

<sup>87</sup> Antoinette Lee, “The Social and Ethnic Dimensions of Historic Preservation,” in *A Richer Heritage*, Ed. Robert Stipe, 396.

to our community. We are doing our own work and a lot of our communities have been doing really good work saving places for a long time.”<sup>88</sup> Magalong’s sentiment echoes that of the efforts within ethnic minority cultural groups, who see themselves as stewards doing historic preservation work without specifically calling it “historic preservation.”

### Native American

Native Americans are affiliated with 566 federally-recognized (and likely an equal number of non-federally recognized) sovereign tribal nations.<sup>89</sup> Native Americans have a complex relationship with historic preservation due to intangible tribal cultural and spiritual beliefs, sovereign nation status, and important archeological sites. Princess Johnson, a Neets’aii Gwich’in tribal member in Fairbanks, Alaska, expressed how the concept of “historic preservation” is very different in her culture: “We don’t even *have* a word for ‘preservation.’ I’d be curious...if I went to my Elders, would there be an Indigenous term for that?”<sup>90</sup> For Native Americans, like other ethnic minority groups, the concept of historic preservation itself is more nuanced.

Historic preservation has long been concerned with resources related to Native American heritage, especially archeological sites. The first federal historic preservation law, the Antiquities Act of 1906, was created in an effort to try to protect Native American sites such as Colorado’s Mesa Verde cliff dwellings from looting.<sup>91</sup> According to

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<sup>88</sup> Michelle Magalong (chair, Asians and Pacific Islanders in Historic Preservation (APIAHiP)), in discussion with the author, December 8, 2015.

<sup>89</sup> National Congress of American Indians. *Tribal Nations and the United States: An Introduction*, 2015, 9.

<sup>90</sup> Princess Johnson (Neets’aii Gwich’in tribal member), in discussion with the author, June 8, 2015.

<sup>91</sup> Tyler, *Historic Preservation*, 31-32.

archeologist Kimball Banks, “historic preservation issues, particularly those concerning Native American archeology, are no longer the exclusive domain of archaeologists and cultural resource managers. Managers no longer have the luxury of operating in a vacuum, of answering only to themselves, the professional community, and their bosses. They now have to be responsive to the Native American community.”<sup>92</sup> The desecration of these sites and the dispersal of their cultural artifacts inform Native Americans’ relationship to historic preservation practice and the cultural resources management field at large. For Native Americans, controlling access to and study of their cultural resources is a matter of self-determination.

Historic preservation, as understood by Native peoples, is different from historic preservation as ordinarily practiced by federal, state and local governments. Chehalis tribal member Heather Youckton states:

For me, culture isn’t stagnant or preserved in time. It lasts and changes. It is what is inside of you and goes everywhere that you go. It is a living culture, so a building may not be as important as the spawning ground for fish being lost to climate change. Preservation is the spiritual work that lasts for our seven generations, beyond NHPA. Things that’ll not be important today, but for our grandchildren’s grandchildren. The definition of preservation in our culture is way beyond the tangible things in the NHPA. It’s in our spirit. It’s who we are.<sup>93</sup>

This more fluid way of thinking about culture must be considered and taken into account in addition to “traditional” historic preservation that is focused on the built

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<sup>92</sup> Kimball Banks, “Native Americans and Historic Preservation: An Introduction,” *Plains Anthropologist*. 44, No. 170, Memoir 31 (1999): 1. Much of the preservation-related activity involving state governments and tribes is associated with state laws concerning looting, desecration, and Native American graves, such as the Native American Graves Protection and Repatriation Act (NAGPRA), enacted in 1990.

<sup>93</sup> Heather Youckton (Chehalis tribal member), in discussion with the author, November 16, 2015.

environment when evaluating Native American historic resources for significance.

Leonard Forsman, chairman of the Suquamish Tribe in northwest Washington State, states that from a tribal perspective historic significance has meaning and value that is based upon a combination of traditional values that still have contemporary relevance. “Significance comes from original, pre-Contact value systems that incorporate themselves into a more community-based interpretation of tribal identity. There might be a place that has an origin story association. That has more meaning to us. I think of places as a ceremony that survived or a new ceremony. In the Indian community, the written word doesn’t have as much power as the spoken word. That is a challenge for us.”<sup>94</sup> This sentiment regarding the written word is understandable given the legacy of Native Americans’ contentious relationship with the Federal government and its policies of assimilation, genocide, breaking treaties, and the desecration of sacred sites.<sup>95</sup>

There is a genuine concern about protecting the locations of those spiritual sites and site inventories maintained by federal, state, and local governments are seen as public information that do not protect them, but make them vulnerable.<sup>96</sup> Locations are often considered secret and only known by individuals such as religious or cultural leaders or those who have the knowledge and permission to interact with them properly. Some Native

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<sup>94</sup> Leonard Forsman (chairman, Suquamish tribe), in discussion with the author, November 18, 2015.

<sup>95</sup> This contention and concern can be seen in the example of efforts to halt the construction of the Dakota Access Pipeline, which has led to the destruction of sites sacred to the Standing Rock Sioux Tribe. “The Tribe has particular expertise in the identification and protection of sites that are important to the Tribe’s own culture,” says Jon Eagle, Jr., Standing Rock Sioux THPO. <http://nativenewsonline.net/currents/standing-rock-sioux-tribe-reasserts-dapl-destroyed-sacred-places/>.

<sup>96</sup> National Park Service, *Keepers of the Treasures: Protecting Historic Properties and Cultural Traditions on Indian Lands*, May 1990, 70.

Americans are, with reason, nervous about joining the national historic program authorized by the 1992 amendments to the NHPA and concerned that if they accept federal money, they will be “forced to abandon their own standards and policies, particularly regarding the confidentiality of certain information categories.”<sup>97</sup> Another concern of Native Americans is that due to forced federal removal and relocation policies to reservations, sites of tribal historic significance are often located in distant ancestral lands. The removal route itself can represent places of significance as well<sup>98</sup> and can be commemorated in the form of connected sites as done with the Trail of Tears National Historic Trail (Figure 5).



Figure 5. National Park Service Trail of Tears National Historic Trail stamp [Lawana Holland-Moore, 2014]

Forsman provides an anecdote regarding how you never know what will be significant to community members, including natural resources such as rocks, fish runs, viewsheds, and landscapes, which may be National Register-eligible as sites. In 2009, the Suquamish Nation hosted the 20<sup>th</sup> anniversary of the Tribal Canoe Journey, a Pacific Northwest multi-tribal event. As preparations were being made, a non-Native worker moved a large rock in the water. “One of our Elders came down and asked ‘Why did you

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<sup>97</sup> National Park Service, *Keepers*, 14.

<sup>98</sup> *Ibid.*, 19.

move that rock? It had been there forever.”” Although that rock was not considered significant, Forsman states that there are other rocks significant to the community as they are believed to have been transformed by a supreme being called The Changer.

For Native Americans, cultural significance is more important as historic significance is relative, if not more fluid, and design significance might not be a consideration at all—especially as natural resources and more intangible qualities are taken into account. This consideration of more intangible resources and qualities also challenges historic preservationists to think differently about historic resources and how they are evaluated. The connection to the land and ancestors, a more holistic way of thinking about time and culture, and the importance of cultural traditions in Native Americans’ involvement in historic preservation and determining significance are also shared by their Indigenous counterparts, Pacific Islanders.

### Pacific Islander

Pacific Islanders include Native Hawaiians (‘Ōiwi/Kanaka), Chamorro (from Guam and the Commonwealth of the Northern Mariana Islands), Samoans, and Tongans. They are often included within the cultural grouping of “Asian American and Pacific Islander.” Since Pacific Islanders are considered to be indigenous cultural groups (Native peoples), they have a number of commonalities with Native Americans.<sup>99</sup> Similar to Native Americans, significance for Pacific Islanders is found in intangible cultural traditions such as oral histories, navigational lore, chants, family connections, and the connection to the land and one’s ancestors. For example, places important in Native Hawaiian oral traditions and

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<sup>99</sup> National Congress of American Indians, *Tribal Nations and the United States*, 2014, 11.

history, the *meles* referred to as “*Wahi pana*,” are told about where important mythic, legendary, and human events occurred.<sup>100</sup> Pacific Islanders, like Native Americans, value cultural significance more than historic or design significance due to a similar sense of intangible cultural traditions being more important. Historic significance is important in how it relates to the cultural practices and the connection to land and the ancestors.



Figure 6. Pelekane Beach, Pu'ukohola Heiau NHS, Hawai'i, constructed by Kamehameha I [NPS, 1999]

Archeological sites have significance for Pacific Islanders, not just for the information about the past they hold, but for their connection to the ancestors as well. *Latte* sets, parallel rows of capped stone pillars that acted as supports for pre-contact residences, are significant to modern Chamorro. Examples of these are the House of Taga, seen on the flag of the Commonwealth of the Northern Mariana Islands, and the Hila'an Complex in Guam. In Hawai'i, pre-contact sites include spiritual places such as *heiau* (temples) like Kapukapuakea Heiau in O'ahu or Pu'ukoholā Heiau National Historic Site in Hawai'i

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<sup>100</sup> Alan Downer (administrator and deputy SHPO, Hawaii State Historic Preservation Division), in discussion with the author, March 30, 2016.

(Figure 6). These were destroyed upon the colonial abolition of the Hawaiian religion in 1819. Many of these pre-contact sites are also significant as they are related to or mentioned in the chants and mythology of their respective peoples.

Pacific Islanders share common histories and painful pasts of overthrow and colonialism, discrimination, and dislocation. The Micronesian islands of CNMI and Guam are U.S. territories with properties and sites in the National Register. Native Hawaiians do not have a sovereign government similar to federally-recognized Native American tribes, so they do not have a recognized legal framework for protection and interacting with federal, state, or local governments.<sup>101</sup> Their concerns are addressed by state and local historic preservation agencies and organizations. Historic preservation officials in all three locations have had similar challenges in that cultural resources are often located on private property or in more remote areas. Families or respected elders (*kapuna* in Hawai'i) are often reluctant to share locations of burial sites as they feel they are *kapu* (sacred) and should not be disturbed.<sup>102</sup>

Similar to Native Americans, Pacific Islanders share the concern that public recognition of these sites will bring desecration and they struggle to find a balance between secrecy and protection through historic preservation. Also like Native Americans, there is concern about access and gatherings to trails, pathways, landscapes, and sacred sites for ongoing cultural practices. Another challenge is that families see themselves as the protectors of these cultural resources. In Guam, for example, what would normally be

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<sup>101</sup> Hawai'i Historic Preservation Division, "*I ka wā ma mua ka wā hope*—Hawai'i State Historic Preservation Plan: October 2012 to October 2017," accessed December 2, 2015, <http://historichawaii.org/wp-content/uploads/2014/05/Hawaii-Preservation-Plan-2012-2017.pdf>, 14.

<sup>102</sup> *Ibid*, 14.



considered “looting” elsewhere is seen as “salvaging” artifacts bulldozed or discarded by property owners. They are then displayed in front of homes to showcase cultural pride, despite laws prohibiting these actions.<sup>103</sup> This is considered in opposition to official historic preservation laws, but the community sees it differently as they view themselves as stewards of their own historic resources. “Guam has been practicing preservation for 4,000 years,” says Joe Quinata, chief program officer of the Guam Preservation Trust. “We just started labeling it ‘preservation.’”<sup>104</sup>

### Commonalities

While there are differences in the types of resources that are significant to respective ethnic minority groups, there are also commonalities. While design (architectural) significance is appreciated and each diverse community has design aesthetics particular to that group, design is not nearly as important as cultural significance. However, places and sites are important to many minority communities. Due to their shared histories of immigration and discrimination, ethnic enclaves and places such as Chinatowns and *barrios* are also very valued in Asian American and Latino communities as they were important to the maintenance of culture in a new country. In the Latino community, their neighborhoods are a “kind of valued cultural and social space”<sup>105</sup> that according to National Trust Program

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<sup>103</sup> Guam Historic Preservation Division, “*Na’ Nina’ etnunen Línahyan Ni’ Manmaloffan—Connecting the Community to the Past: A Comprehensive Historic Preservation Plan for Guam, 2007-2011*,” accessed December 3, 2015, <http://historicguam.org/PDF/FINALGuamHistoricPres26oct07.pdf>, 25.

<sup>104</sup> Joe Quinata (chief program officer, Guam Preservation Trust), in discussion with the author, November 4, 2015.

<sup>105</sup> Mota Casper, 50. Mota Casper was citing Lawrence Herzog’s essay “A Globalization of the Barrio: Transforming of the Latino Cultural Landscapes of San Diego, California” in *Hispanic Space, Latino Places: Community and Cultural Diversity in Contemporary America* (Austin: University of Texas Press, 2004): 105.

Officer Sehila Mota Casper, requires a “broader view for the people occupying the built environment being assessed.”<sup>106</sup>

Across all minority groups examined is the importance of culturally significant communal gathering places. We see examples of this with the significance of plazas and open spaces to the Latino community, buildings containing associations and other immigrant assistance organizations in the Asian American community, barber shops and benevolent associations within the African American community, and ceremony sites for Native Americans and Pacific Islanders. Spiritual sites, which can also act as gathering places, are also considered significant by all ethnic minority cultural groups. Examples include ceremonial locations and routes for Native Americans and Pacific Islanders, the Gundwara Singh Sikh Temple in Stockton, California or Mother Bethel African Methodist Episcopal Church in Philadelphia.

#### Significance and Ethnic Minority Resources

The legal and professional practices and processes that the historic preservation field uses have become more standardized over the last fifty years, especially in how historic significance is defined, as state and local processes take their cue from the national programs. There are certain elements that are not as clearly defined when it comes to the evaluation and recognition of sites of importance to ethnic minorities and how *they* view significance.

#### Integrity and Ethnic Minority Resources

Cultural geographer Yi-Fu Tuan believes that the experiences of those who

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<sup>106</sup> Mota Casper, 51.

occupied an area are what makes that place significant to them.<sup>107</sup> This sentiment is reflected by the Park Service’s Brian Joyner. He states that the “significance of a location does not necessarily lie in the physical space itself, but in how the space was used. What happened in these places also gives them historic value.”<sup>108</sup> For ethnic minority communities, the integrity of the property is often less important than what the property means to them as a resource’s cultural significance can outweigh its design or historic significance. A resource’s historic context is there, but needs further research and scholarship to uncover its historic significance. This is more evident at historic resources whose integrity may be considered lost or compromised, causing its significance to be determined through other means.



Figure 7. Abyssinian Meeting House, Portland, Maine [Abyssinian Restoration Project, 2011].

An example of this is the Abyssinian Meeting House in Portland, Maine.

Constructed by free African Americans between 1828-1831, its structure had been

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<sup>107</sup> Brian D. Joyner, National Park Service Cultural Resources, *African Reflections on the American Landscape: Identifying and Interpreting Africanisms*, 2003, 14.

<sup>108</sup> *Ibid.*, 15.

significantly altered making evidence of its earliest history hard to find (Figure 7). Its integrity was considered severely compromised and it took extensive research using non-destructive methods such as a laser scan of the structure to understand its changes over time. “We need to limit our focus on integrity for the National Register. It is also a matter of our community being able to access those types of experts in order to overcome those kinds of obstacles,” Leggs said.<sup>109</sup> The property’s rich, but hidden, layers of historic evidence is considered more important than its integrity.

The Meeting House was listed at the state level of significance in the National Register in 2006 under Criterion D (information potential). The above-ground church structure is considered significant due to being the oldest meeting house associated with African Americans in Maine. Due to the structure’s state, however, Criterion D was used because the undisturbed, below-ground archeological site information of the lot that it sits upon has the potential to round out the understanding of Portland, Maine’s African American community.<sup>110</sup> This was a creative use of the significance criteria and the Meeting House’s criterion choice reflects and supports the earlier assertion that an archeological approach to evaluating historic context and integrity can be useful for and implemented at ethnic minority historic sites with compromised integrity.

Documenting and preserving early places of Asian American heritage has also been difficult given the limitations Asian Americans traditionally had in selecting their location,

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<sup>109</sup> Brent Leggs (senior field officer, National Trust for Historic Preservation), in discussion with the author, December 9, 2015.

<sup>110</sup> “National Register of Historic Places Registration Form: Abyssinian Meeting House,” Section 8, p. 2, National Park Service, accessed December 11, 2015, <http://focus.nps.gov/pdfhost/docs/NRHP/Text/05001612.pdf>.

combined with their view that does not place as much significance on the structure itself.<sup>111</sup> Joyner suggests that a site or building does not need to bear the outward markings of an ethnic group to be significantly influenced by a group<sup>112</sup> and states that “documentation of enclaves and a greater sensitivity to ephemeral culture is needed, not just for Asian ethnicities, but also for all of the nation’s diverse communities.”<sup>113</sup> A place can act as a constant, but as diverse communities have been affected by transience, even those enclaves have been subject to change. Hayden describes Los Angeles as functioning as more than “just a series of enclaves...with each group’s unique experiences contributing to a larger set of common urban themes.”<sup>114</sup> This description reflects how the enclaves themselves, as sources of culture, contribute to the larger history of the community. Their significance is not just due to their association with a particular ethnic minority group, but how their historic context is also representative of our collective national history.

Historic resources within these places, as with other ethnic minority communities’ historic sites, are often compromised due to alteration or destruction, thus compromising their integrity and design significance. Michelle Magalong, Chair of APIAHiP, states:

Our communities aren’t like ‘Don’t touch that window! Don’t change that sconce!’ It’s such a nonexistent term or value. Our community in times of need or shelter doesn’t think ‘I can’t modify or modernize those things.’ That is, *if* we were able to own those structures. For many Asians, we couldn’t own land or titles. Also, given our history of displacement and transience, it’s such an irrelevant concept. Why would we have wanted to maintain a shack or renovate it?<sup>115</sup>

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<sup>111</sup> Joyner, “Asian Reflections,” 16-17.

<sup>112</sup> *Ibid.*, 39.

<sup>113</sup> *Ibid.*, 20.

<sup>114</sup> Hayden, *Power of Place*, 95.

<sup>115</sup> Magalong, discussion, December 8, 2015.

Many ethnic communities alter structures and sites because it does not occur to them *not* to. Hence, these alterations result in the property's integrity becoming compromised in the traditional view.

Vince Michael argues that historic preservationists “must get away from or restrict integrity as an ideal and look more closely at Criterion A and B. As there is hidden heritage that has been deliberately erased or destroyed, we need to bring in more intangible heritage and use ‘authenticity’ instead. We need a different approach.”<sup>116</sup> Authenticity implies a true representation of what is significant to the community itself. What *they* themselves identify as important. If there is a use of integrity as the “ideal” to convey historic significance, then by default the architectural fabric and/or the lack of it will be more highly considered than the community significance or the property's elements of intangible heritage valued by its cultural group. Like Michael, Gonzaga University professor Raymond Rast argues that:

Although the means of measuring integrity continue to serve the need of architectural preservation, they often fail to meet the needs of historic preservation, the preservation of archaeological sites, the preservation of traditional cultural properties, and the preservation of intangible heritage. The means of measuring integrity also often fails to meet the needs of a preservation movement seeking diversity on its lists and in its rosters.<sup>117</sup>

Rast suggests that incremental changes to properties should be reflected and integrity should be a continuum, that is, a sliding scale. He asserts that the current means of measuring integrity often fails in meeting the needs of a movement seeking diversity. How

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<sup>116</sup> Vince Michael (senior director, Global Heritage Fund), in discussion with the author, September 24, 2015.

<sup>117</sup> Raymond Rast, “A Matter of Alignment: Methods to Match the Goals of the Preservation Movement,” National Trust for Historic Preservation, *Preservation Leadership Forum Journal* 28. No. 3 (Spring 2014): 18-19.

assessments of integrity are implemented archeologically opens up the possibility for a different approach that would actually support his suggestion of a sliding scale. The concept of looking at different evaluation methods is not a new notion. Michael and Rast echo National Register guidance as these different approaches to the criteria are built in. However, practitioners, tend to not pay attention to the National Register's criteria to be broadly applied, possibly due to lack of training or the relative ease of narrow interpretation.

For Native Americans and Pacific Islanders, historic significance is a quality associated with their connection and relationship to the land itself and cultural traditions such as oral traditions and language. As cultural significance has more value, a structure may not hold as much significance as the spiritual site itself or the perpetuation of cultural traditions. For all of the ethnic minority groups, there are intangible qualities related to their respective cultures that must be addressed within the current processes. If those intangible qualities are not connected to a tangible resource, they will not be recognized under current standards and processes.

If we treat a resource as a starting point that allows us to apply multiple layers of meaning and significance to it, it would allow for a more nuanced definition of that property's historic significance.<sup>118</sup> Earlier we examined how this could be accomplished through the use of historic context. It is these multiple layers of historic context that are

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<sup>118</sup> Meringolo, 122. When Verne Chatelain envisioned what significance was in the 1930s, he stated that properties gained significance from their "relationship to other areas, each contributing its part of the complete story of American history" and that nationally significant historic places were unique if they were "points or bases from which the broad aspects of prehistory and American life can best be presented."

critical to informing the evaluation of a site's significance.<sup>119</sup> For example, the African American community of Montclair, New Jersey, held that the Crane House and YWCA was very important and significant to them, although its integrity had been compromised when the structure was moved a mile away from its original location. Similarly, although only three out of the 800 original Japanese American relocation center's structures remain, Manzanar does not lose its significance.<sup>120</sup>

### Minority Participation in Decision-Making

If the assessment and evaluation of the historic significance of resources of ethnic minority groups is essential to their recognition and designation, then we must not only look at the concept of significance and the evolution of its use in the historic preservation field, but at *who* is using it to make those determinations. Beginning in the 1980s, states were establishing special surveys and commissions to better include underrepresented groups as it was clear at the time that their historic resources were not being recognized. A 1990 National Conference of State Historic Preservation Officers (NCSHPO) survey found that many states had established committees to ensure that particular cultural groups were represented.<sup>121</sup> Historian Antoinette Lee states that in order to facilitate increasing minority involvement in historic preservation, several SHPOs formed affiliated advisory committees.

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<sup>119</sup> Kerri Barile states that when interpretations are reduced to a single level, that of subsurface materials only, the perceived significance and integrity of the site are also dramatically reduced and the formulation of its historic context is denied. Barile considers this to be a leading threat to sites associated with "people without history" such as members of ethnic minority communities and underrepresented groups such as women and servants.

<sup>120</sup> National Park Service, Manzanar National Historic Site, "Frequently Asked Questions," accessed Jun 20, 2015, <http://www.nps.gov/manz/faqs.htm>

<sup>121</sup> *Ibid.*, 111.



One of the first was the Alabama Historic Commission, who established the Black Heritage Council in 1984 to advise the commission and to undertake its own projects. In the late 1980s, the Georgia SHPO organized a Minority Heritage Committee and later a Minority Preservation Network.<sup>122</sup> The Kentucky Heritage Council, the SHPO for Kentucky, has two such heritage commissions. The first, the Kentucky African American Heritage Commission, was established in 1994. Its nineteen governor-appointed members include representatives from the state's major universities, state agencies, community historic preservation organizations and interested citizens. The Commission is tasked with identifying and promoting awareness of "significant African American influences within the historical and cultural experiences of Kentucky." This includes outreach and education efforts as well as administering a grant program.<sup>123</sup>

The Kentucky Native American Heritage Commission was established in 1996 to "recognize and promote Native American contributions and influence in Kentucky's history and culture."<sup>124</sup> Of its seventeen members, sixteen are Governor-appointed in addition to the Tourism, Arts, and Heritage Cabinet Secretary or their designee. Of those seventeen members, eight must be of Native American heritage. The commission consists of representatives from higher learning institutions, archeology, Native American arts, and the public.<sup>125</sup> Similar to its African American counterpart, the Native American Heritage

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<sup>122</sup> Antoinette Lee, "The Social and Ethnic Dimensions of Historic Preservation," in *A Richer Heritage*, Ed. Robert Stipe, 389.

<sup>123</sup> Kentucky Heritage Council, "About the KAAHC," accessed July 12, 2015, <http://heritage.ky.gov/kaahc/>.

<sup>124</sup> Kentucky Heritage Council, "Kentucky Native American Heritage Council: Overview," accessed July 12, 2015, <http://heritage.ky.gov/knahc/>.

<sup>125</sup> *Ibid.*

Commission is responsible for outreach, education, and advocacy programs, but also for the preservation of the cultures, ideals, and artifacts of Native American peoples in Kentucky.

Having representative commission members are important as many members of ethnic minority communities do not identify themselves as historic preservationists. The National Trust conducted two qualitative studies in 2011 that led to their report *Field Guide to Local Preservationists*. They identified two types of historic preservationists:

“preservation leaders,” who consider historic preservation to be their primary cause and are very active in historic preservation activities, and “local preservationists.” Local historic preservationists were considered persons who regularly engage in multiple historic preservation-related activities, such as volunteering and attending town meetings, yet may not consider themselves historic preservationists.<sup>126</sup> Many members of ethnic minority groups could be considered local historic preservationists because they do not necessarily refer to their work as such or realize that is what it is formally considered. Additionally, historic preservation has had a dearth of ethnic minority professionals who are considered qualified by training in the core disciplines or historic preservation’s related fields. Being inclusive by attracting ethnic minority professionals to staffs of historic preservation organizations and their related boards allows organizations to benefit from their perspectives. It is not just a matter of the amount of minority professionals involved, but a rethinking of Eurocentric policies and professional practices prevalent within the historic preservation field.

Professional standards and qualifications need not be a barrier, but the historic preservation field must change its mindset of how its professionals interact with ethnic

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<sup>126</sup> National Trust for Historic Preservation, *Field Guide to Local Preservationists*, 2011, 3.

minority communities and use those policies and standards to evaluate their historic resources. Often historic preservation professionals are seen as outsiders who ignore what is important to the community itself. This sentiment was expressed during interviews with minority historic preservationists: the concern that their communities are being told what is significant instead of being asked what they consider to be important. Further, minority groups should be involved in decision-making, which is not often the case today.

### Conclusion

Former Secretary of the Interior Kenneth Salazar has said that the purpose of recent National Park Service cultural diversity efforts is not to “promote one aspect of our nation’s history and culture over another,” but to “enhance and promote a greater understanding and appreciation of our diverse, complex history.”<sup>127</sup> Inclusion does not have to be perceived as at the expense or exclusion of others as the histories of our various diverse communities help to create a fuller picture of who we are.<sup>128</sup> American history is a sum of its diverse parts, and all of those parts are meaningful and contribute not just to our collective history, but our sense of what comprises American culture. For minority cultural groups, while there are differences among the groups, a commonality that they *all* share is a higher value placed on cultural significance. Cultural significance outweighs design or tests for integrity, and sometimes historic, significance in terms of what resources are of importance.

The evolution of historic preservation from an amateur endeavor to one dominated by laws, regulations, and a cadre of professionals changed the field and how the historic

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<sup>127</sup> Kenneth Salazar, “Imagining A More Inclusive Preservation Program,” National Trust for Historic Preservation *Preservation Leadership Forum Journal* 28. No. 3 (Spring 2014): 3.

<sup>128</sup> Although it sometimes occurs. Witness the removal of four monuments to the South in New Orleans.

significance of historic sites and properties are evaluated and determined. When we examine the professionals behind those decisions, who are predominately White, it can be called into question if the concerns and significance of ethnic minority historic resources are being properly recognized. There is a need for historic preservation professionals, White and minority, to listen to minority communities about what they see as important to be preserved.

Chapter V will discuss inclusive, values-based ways in which historic significance can be perceived, evaluated, or determined through consultation with the community. It will examine values-based methods like cultural mapping that take intangible qualities such as traditions and cultural practices that factor cultural significance into account.



## CHAPTER V INCLUSIVE APPROACHES

### Introduction

As we have seen, what is viewed as historically significant differs by the observer. If a historic place is seen as historically significant by an ethnic minority group, our current professional practices and policies may not always determine it to be eligible for the National Register or a state or local inventory. This suggests that the historic preservation field needs to make a shift to incorporate better community-centered approaches to evaluating significance.

### Envisioning the Community

Kevin Lynch's 1960 seminal *The Image of the City* analyzed the cities of Boston, Jersey City, and Los Angeles for their "imageability," the quality in a physical object that gives it a high probability of evoking a strong image in any given observer.<sup>129</sup> To achieve this, interviews were conducted with city residents to discern how they perceived their physical environments. They were asked to create quick maps or rough sketches as if giving directions, and to record important landmarks or elements along the route.

Lynch states that "every citizen has had long associations with some part of his city, and his image is soaked in memories and meanings"<sup>130</sup> that have historical associations and other meanings. These associations were reinforced by a history, sign or meaning attached

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<sup>129</sup> Kevin Lynch, *The Image of the City* (Cambridge: The MIT Press, 1960): 9.

<sup>130</sup> Lynch, *The Image of the City*, 1.

to an object. Lynch also states that if cities, and by extension, communities or neighborhoods and the historic properties within them, are to be used by many groups of people, then it is important to understand how those groups tend to imagine their surroundings.<sup>131</sup>

Lynch and his colleagues used the concept of mental or cultural mapping, which became popular in the 1960s as a means to understand how humans learn. By asking residents how they saw their cities, Lynch was also able to discover what those residents valued. Landmarks and places of significance to them were sometimes ones that were not obvious to outsiders, but known to or noted by members of the community. As applied to planning and historic preservation, cultural mapping is a way to not only engage a community in the identification of places and properties of historic and cultural significance to them, but also allows professionals to have a better understanding of what is important to various ethnic groups.

### Sacred Structure

In 1980, California landscape architect and sociologist Randolph Hester was hired to develop a community plan for the small town of Manteo, in North Carolina's Outer Banks. Influenced by Lynch's work, Hester and his team surveyed residents, asked them what places were important to them, and created behavioral maps from observing their daily patterns. Further informal and formal communication with residents (such as questionnaires and discussions) brought the realization that oftentimes what the community valued was very different than what "outside" sociologists, historic preservationists, and

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<sup>131</sup> *Ibid.*, 157.

planners thought. The team discovered that the residents' lifestyle and "cultural" landscape were intertwined. The residents' daily rituals had "place specificity" with cultural dependence on places more widespread than reported in interviews or that professional outsiders like planners, archeologists, or historic preservationists understood using the usual policies or professional practices.<sup>132</sup> Residents believed that their valued places, such as a park created from the rubble of the old local high school, a drug store, a restaurant—places where locals interacted with one another—were not ones outsiders or experts would find historically or culturally significant. Manteo's residents were asked to rank places in order of significance. The team then created a weighted, ranked list of significant places called the "Sacred Structure," which acted as the framework for the town's future planning, historic preservation, and development decisions.

Hester's work was groundbreaking in regards to "standard" historic preservation practice as it did not always take into account the concerns or views of a community. Rather, decisions and judgements were to be left to practitioners and professionals schooled in historic preservation criteria for significance, often leaving the community's concerns and values as a second thought—if that. By discovering the places of significance to a community, its professional and community leaders were able to create development and other plans that took those places into account in order to protect them.

The Sacred Structure approach is echoed in Laura Manville's 2011 thesis for the Massachusetts Institute of Technology (MIT), in which she discussed "community preservation" and New Orleans' Big Four public housing. Manville describes community

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<sup>132</sup> Randolph Hester, "The Sacred Structure in Small Towns: A Return to Manteo, North Carolina," *Small Town*, January-February 1990, 8.



preservation as a model advocating the protection of social networks and cultural traditions that, as a practice, would acknowledge and seek out person-centered preservation interventions parallel to bricks-centered preservation interventions.<sup>133</sup> To outsiders, preserving a public housing project of recent vintage and little perceived design value seemed unimportant. But to its former residents, it was *their* community and linked to their own traditions. These ties were just as (or more) important as the historic structures themselves, despite how they were viewed by experts and others from outside of the community.

No matter how humble or unassuming the historic structure or site, this intertwining of lifestyle and traditions is integral to the understanding of community significance and evaluating the historic significance of places of meaning to ethnic minority cultural groups as their needs and concerns might be very different than what is evident to “outsiders.” These hidden or intangible elements figure greatly in the determination of what is important—what is historically significant—to that community. The challenge then becomes how to incorporate those intangibles into what is considered the formal historic significance evaluation and designation process.

#### Reaching Out: Crowdsourcing and “*Con Safos*”

In 2008, the National Trust for Historic Preservation introduced their “This Place Matters” campaign, a public outreach effort that encouraged online crowdsourcing—a then non-traditional method of asking the public to participate online in identifying places of personal significance (Figure 8). Relunched in 2015, the campaign has had over 10,000

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<sup>133</sup> Manville, Laura. “When Did These Buildings Become Historic? Preservation Meets Public Housing in Post-Katrina New Orleans,” master’s thesis, Massachusetts Institute of Technology, 2011, 44.

interactions so far with participants sharing photos and stories across various social media outlets and has served as a model for similar efforts.



Figure 8. National Trust's "This Place Matters" original and current campaign logos [National Trust for Historic Preservation, 2008; Lawana Holland-Moore, 2016]

A similar crowdsourcing campaign is the “East at Main Street” project created by Asian and Pacific Islander Americans in Historic Preservation (APIAHiP) in May 2015 to raise awareness of historic sites of importance to Asian and Pacific Islander communities nationwide by gathering materials related to their historical and cultural contributions.<sup>134</sup> “We wanted to open a conversation and populate it to see where work is happening,” said organization chair Michelle Magalong, who wants the project to not only inform future work, but inform elected officials about places that matter so that if they become threatened, there are materials to back them up.<sup>135</sup> This type of mapping project identifies sites of historic significance by giving the ethnic group a voice in the process. Giving them the ability to do so aids historic preservationists in their own efforts, allowing them to

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<sup>134</sup> Asian and Pacific Islander Americans in Historic Preservation (APIAHiP), “East at Main Street,” accessed May 31, 2015, <http://www.apiahip.org/#!apia-mapping/cbv6>.

<sup>135</sup> Magalong, discussion. The East at Main Street site is located at the following address: <https://www.historypin.org/project/51-east-at-main-street/#!map/index#!/geo:38.210513,-146.926995/zoom:3/>

analyze the findings and use the information for identification and further evaluations. Crowdsourcing efforts such as these have led to better identification and recognition of historic properties and sites of value to communities. Not only are the properties and sites being identified, but it has created momentum for designations and their inclusion in registers and inventory lists.



Figure 9. San Antonio, Texas’ Con Safos campaign logo [courtesy San Antonio OHP]

In San Antonio, Texas, a similar crowdsourcing and cultural mapping project, spearheaded by cultural historian Claudia Guerra, has encouraged participants to identify places of historic significance to them (Figure 9). The campaign, called “Con Safos (c/s),” derives its name from a slang term the Latino community uses to show that “this is protected, don’t mess with it” or “hands off.” Through the use of *platicas* (“talks”) that uncovered the significance of places and their intangible qualities through oral histories, community members were also encouraged to participate in cultural mapping, often drawing their own maps that served to give those stories tangibility (Figure 10).<sup>136</sup>

Guerra examined San Antonio’s criteria for historic designation, which was modeled upon the National Register Criteria for Evaluation, and found those that referred to

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<sup>136</sup> “Con Safos y Pláticas,” presentation by Claudia Guerra, National Trust for Historic Preservation PastForward Conference, November 6, 2016.

culture and significance to the community. Guerra realized that it was a matter of needing to focus on *which* ethnic group interpreted the criteria (Native American, Latino, or African American), what *happened* at a property was more significant than the physical structure. This underscores, once again, that for ethnic minority groups the physical character is oftentimes secondary to the *meaning* of the site or place itself in terms of its historic significance. It is that type of nuance that can be lost without true community consultation.

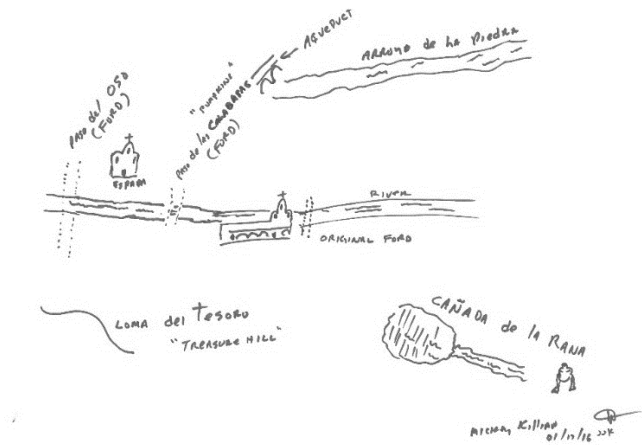


Figure 10. Community-created cultural map, San Antonio [courtesy San Antonio OHP]

One result of the use of cultural mapping and crowdsourcing was the 2015 landmarking of the Delgado Homestead on 4537 Monterey Street, what Guerra calls (with respect) the *Con Safos* House, (Figure 11). It became the first property in San Antonio to be locally landmarked through consideration of social heritage and acts as an example of local community significance. In her designation statement, Guerra noted that 4537 Monterey was a “place that represented an entire people’s cultural heritage. Community, here, doesn’t refer just to a physical place, but to the people and practices that connect to a shared cultural identity and heritage.”<sup>137</sup>

<sup>137</sup> Claudia Guerra, San Antonio Office of Historic Preservation, August 27, 2015, “SA Preservation Stories: Meditations on 4537 Monterey,” accessed March 23, 2016, <https://sapreservationstories.wordpress.com/2015/08/27/meditations-on-4537-monterey>

The *Con Safos* House demonstrates how National Register Criteria A could be used in historic designation by examining its cultural association. Archeologist Barbara Little believes this type of usage is what it was intended for. Little states that “the law does not have to be changed,



Figure 11. 4537 Monterey Street, San Antonio, the “*Con Safos* House” [Courtesy of Claudia Guerra, 1942 and 2015]

but the way that historic preservationists interpret and execute the guidance. It is supported and it is a matter of reclaiming the intent that place is important to people.”<sup>138</sup> The National Register was conceived to be flexible, and should be more flexible again. By examining properties currently in the National Register, this flexibility can be demonstrated.

Guerra was inspired by the Australia’s Burra Charter,<sup>139</sup> which recognizes cultural

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<sup>138</sup> Barbara Little (program officer, National Park Service Office of Cultural Resources), in discussion with the author, April 15, 2016.

<sup>139</sup> Meredith Walker, “The Development of the Australia ICOMOS Burra Charter,” *APT Bulletin* (2014) Vol. 45, No. 2/3, Special Issue on Values-Based Preservation, 12-13 and Australia ICOMOS, “Practice Note: Understanding and Assessing Cultural Significance, version 1,” November 2013, accessed February 21, 2016, [http://australia.icomos.org/wp-content/uploads/Practice-Note\\_Understanding-and-assessing-cultural-significance.pdf](http://australia.icomos.org/wp-content/uploads/Practice-Note_Understanding-and-assessing-cultural-significance.pdf), 7-8. The

significance as equally important to historic significance and is incorporated throughout heritage resource evaluation processes throughout Australia. Guerra has since created an upcoming report on the creation of statements of significance based upon community values and “social integrity,” not materials. “I like the Burra Charter because it allows us to move away from the language that we have been using and think about new words,” Guerra says. “It is about breaking out of the regular framework and doing what is best for the community and the processes that we are trying to employ here is making sure that the people are heard.”<sup>140</sup> This notion of “social integrity,” the diminished importance of materiality, underscores the importance of discovering the significance of a resource by looking at the other values that the community have ascribed to it and should be considered in addition to other evaluation criteria.

#### National Register *Bulletin* 38: Traditional Cultural Properties (TCPs)

The National Register already allows for the designation of culturally significant

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1979 Australia ICOMOS Charter for Places of Cultural Significance, known simply as the Burra Charter (amended in 1999 and revised in 2013), was adapted from the 1964 ICOMOS Venice Charter to suit Australia’s heritage needs and acts as a guidance document for heritage conservation standards and practices throughout Australia. It acts not just as a declaration of the equal importance of the cultural significance, social values, and meaning of a place to a community, but recognizes the multiple aspects of its significance, which include both the tangible and intangible aspects of a place. Practitioners must directly engage the community or cultural group that are the relevant knowledge-holders of that place’s significance. As a process, the Burra Charter mandates community and stakeholder involvement from the beginning of the place’s investigation and significance assessment to the creation of its management plan. This includes the creation of significance statements that act to underpin decisions made regarding the resource by assessments made from “deeper research beyond the mainstream,” meaning the traditions and knowledge gleaned from the resource’s community. Practitioners of the Burra Charter process are challenged to think beyond their “rules of thumb and conventional wisdom,” in order to make evaluations that best serve the community of the resource.

<sup>140</sup> Claudia Guerra (cultural historian, San Antonio Office of Historic Preservation), in discussion with the author, March 24, 2016.

places related to traditional practices and customs, including spiritual sites, gathering sites, plant- and herb-gathering locations, and routes related to ceremonies. Since the National Register does not include intangible resources, they *must* be tied to a tangible resource. Archeologist Thomas F. King suggests that National Register guidance needs clarification as to how to evaluate, recognize, and encourage consultation regarding these resources.<sup>141</sup> To fill this need, King and cultural anthropologist Patricia L. Parker developed National Register *Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties*, one of the most important historic preservation policy changes since the National Historic Preservation Act in 1966.<sup>142</sup> King states that “we had a simple purpose in writing the thing: to get the federal government to attend as carefully to the cultural values of ordinary people as it did to the interests of historians, architects, and archeologists.”<sup>143</sup>

Traditional cultural properties (TCPs) are defined as eligible for inclusion in the National Register or determinations of historic significance because of their association with cultural practices or beliefs of a living community that: a.) are rooted in that community’s history; and, b.) are important in maintaining the continued cultural identity

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<sup>141</sup> Thomas F. King, “Beyond Bulletin 38: Comments on the Traditional Cultural Properties Symposium,” *Traditional Cultural Properties: What You Do and How We Think*, ed. Patricia L. Parker, *CRM* 16 (1993): 60.

<sup>142</sup> Patricia L. Parker, “Traditional Cultural Properties: What You Do and How We Think,” *CRM* 16 (1993): 2. There is debate over the use of “properties” as some cultural groups, such as Native Americans, object to referring to these sites of spiritual and ancestral value and meaning as property that can be owned. The use of the term “traditional cultural places” is being considered. Parker states that the use of the term “properties” is due to “official” usage by federal agencies and those conduct activities related to federal legislation. The term “traditional cultural property” was selected because they can be defined in relatively neutral terms and embrace a full range of properties with cultural values, not just those that are considered “sacred.”

<sup>143</sup> Thomas F. King, “Rethinking Traditional Cultural Places?” *The George Wright Forum* (2009), vol. 26, No. 1: 29.

of the community. The traditional cultural significance of a historic property is thus derived from the role the property plays in a community's continuing and historically rooted beliefs, customs, and practices.<sup>144</sup> Input from, and consultation with, community knowledge-holders is very important to the determination of a TCP's eligibility and takes place throughout the historic significance determination process. In many historic preservation review processes, such as Section 106, NEPA, and surveys, cultural/community consultation usually takes place at a later stage. What King and Parker recommend gives practitioners better insight into the meaning of the resource to the community early on and allows their concerns to be considered as part of the typical research at every step.

Due to being linked to a tangible resource, TCPs are still subject to National Register-based designation mandates meeting at least one of the four Criteria for Listing. The National Register process is based upon how a property fits within a timeline of history, so that is not always applicable to TCPs. Parker explains that "it is the continuity of their significance in contemporary traditions that is important and makes them significant in the past and present simultaneously."<sup>145</sup> Thus a TCP's significance is not reliant upon time, and does not fit within the National Register's period of significance, which is rooted in linear time. Without that association with a particular historic timeline or date, the emphasis on historic significance is lessened.

Although not exclusive to ethnic minority communities, TCPs are most often

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<sup>144</sup> Thomas F. King and Patricia L. Parker, National Park Service, *National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

<sup>145</sup> Parker, "What You Do," 4.



associated with Native American historic resources and places, as National Register policies and procedures can be interpreted in a way that can exclude their places of spirituality, thus hindering or denying them protection. Before serving as Deputy SHPO for the state of Hawaii, Alan Downer helped establish the Navajo Nation’s Historic Preservation Department and served as its Director for 27 years. Downer states that in the early days of setting up the program, the Navajo community was asked to identify particular places that they would like to see preserved on the nearly 28,000 square miles of the tribe’s reservation. Non-Navajo historic preservation professionals expected the community to identify mostly TCPs, with few buildings—as old buildings were mostly federal government buildings that Downer and his colleagues thought would be viewed as monuments to colonialism. They also thought that few archeological sites would be listed due to cultural traditions that saw them as sacred. They were surprised to find that buildings and archeological sites were identified in almost the same numbers as TCPs:

When we asked about sacred sites, we were told over and over again that ‘the entire Dine *bikeyah* (the traditional Navajo homeland), sometimes the entire surface of the earth is sacred, and it would be wrong to think of any place as being more sacred than any other.’ This was almost always followed by ‘but I can tell about places that stories are told about.’ These stories embody Navajo traditional history. Places where important events in the oral history of the Navajo occurred, when other tribes were encountered, where tribes became Navajo, where the Holy Beings admonished the Navajo or gave them ceremonies, etc. These stories almost all occur in mythic times—when the Holy Beings interacted with and participated in the affairs of humans or legendary times when humans had superhuman powers and abilities. In anthropological terms, myth, legend and history all serve the same function. In a society that accepts myth and legend as being as true (often truer) than academic history, these traditions embody the traditional history of the people. The places associated with those traditions are historic places.<sup>146</sup>

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<sup>146</sup> Alan Downer (administrator and deputy SHPO, Hawaii State Historic Preservation Division), in discussion with the author, March 30, 2016.

Downer’s anecdote illustrates the importance of the intangible in the identification and significance of a TCP. By having such a classification, the intangible aspects of a community’s culture—their traditions, oral histories, stories, songs, and cultural practices—can be associated with properties or sites within the required standards and criteria necessary for the National Register by tying it to place. Place is then able to act as a tangible tether for the intangible.

A TCP need not be specific to Native Americans or consist of spiritual or sacred sites. A TCP can also be located anywhere of cultural or historic significance and meaning to a *living* community of any cultural or ethnic minority group. When the African Burial Ground was excavated in 1991 during site preparation for a federal building in Lower Manhattan, over 419 human graves were found (Figure 12). A cemetery for enslaved Africans, traditional burial practices were exercised such as the inclusion of items such as shells, coins, and beads.

In 1993, the African Burial Ground was designated a New York City Historic Landmark as well as a National Historic Landmark by the Secretary of the Interior.<sup>147</sup> After analysis by Howard University, over 10,000 persons participated as the remains were re-interred in a “Rite of Ancestral Return” with over 8,000 handwritten letters from the living. Considered a “sacred space,” by 2006, the African Burial Ground was designated as a National Monument by President George W. Bush under authority of the Antiquities Act of

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<sup>147</sup> Although NHLs are automatically listed in the National Register, the NRHP and NHLs are two different programs with different criteria. NHLs are *solely* of national significance in comparison to NRHP properties, which can be at the local, state, or national level. The African Burial Ground’s TCP status is one that is linked to its eligibility for the NRHP. It is important to remember that TCPs are not a separate category, but a type of resource classification.

1906, the first dedicated to Americans of African descent.<sup>148</sup>



Figure 12. Aerial view, African Burial Ground, Manhattan [National Park Service, 2008]

What made the African Burial Ground also qualify as a TCP? It serves as a place of meaning, with both historical and spiritual significance to a living community—in this case, African Americans. *Bulletin 38* states that “the fact that a property has gone unused for a lengthy period of time, with use beginning again only recently, does not make the property ineligible for the Register,” citing the example of Native American tribes who were forced onto reservations or converted to Christianity.<sup>149</sup> The site’s use does not have to be continued, what is important is the maintenance of the community’s continuing cultural identity.<sup>150</sup> It represents a tangible place that acts as an anchor for, and reclamation of, the intangible connections to a place and to ancestors for a community for whom those

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<sup>148</sup> National Park Service, “African Burial Ground National Monument,” accessed January 24, 2016, <https://www.nps.gov/afbg/index.htm>.

<sup>149</sup> Thomas F. King and Patricia L. Parker, *Bulletin 38*, 18.

<sup>150</sup> *Ibid.*, 1.

connections were lost.

Case Study: Tillie's Corner, St. Louis, Missouri

In 1948, Mrs. Lillie Pearson purchased a grocery store for \$246 dollars in the Jeff VanderLou neighborhood of St. Louis, Missouri, eventually buying all three 19<sup>th</sup> century row houses, along with their 20<sup>th</sup> century storefronts, on a corner lot. Pearson established what would come to be known as “Tillie’s Corner,” a fixture in her community (Figure 13). Like many African Americans, she had left the rural South for opportunities during the Great Migration. After the death of her husband, her business supported her family. Tillie’s Food Shop, until it closed in 1988, supported not only Pearson’s family, but her community as well by providing employment and housing, distributing food for disadvantaged neighbors, and perhaps most importantly acting as a community gathering place.



Figure 13. Mrs. Lillie Pearson in Tillie's Food Shop [Courtesy of Carla Alexander, 1948]

Over time, the neighborhood fell victim to urban blight (Figure 14) and Tillie’s Corner was in need of restoration. After Mrs. Pearson’s death in 2006, her granddaughter

Carla Alexander did not want her legacy forgotten. Alexander began efforts to restore the structures, but the family was unable to secure funding. Thinking that historic preservation tax credits might be key to aiding their restoration efforts, Alexander—along with her husband Miguel—sought to have Tillie’s Corner listed in the National Register. They enlisted the help of historic preservation consultant Karen Bode Baxter, who wrote the nomination, and Dr. Sonia Lee of Washington University at St. Louis, whose students helped to research and document the site.



Figure 14. Tillie's Corner pre-collapse [Courtesy of Carla Alexander, 2002]

Tillie’s Corner was nominated as locally significant under Criterion A for its association with Ethnic Heritage/Black and Commerce as an example of a small, African American- and a woman-owned business. Although established in 1949, the property also met Criteria Consideration G due to a period of significance (1988) that was less than the “Fifty Year Rule” criteria exception. The property’s significance was also tied to its neighborhood’s rise as an African American community in the 1950s, when it was the focus

of community cohesion and activism from the 1960s, through the urban blight and decline of the neighborhood in the 1980s.<sup>151</sup>

Tillie's Corner's nomination was awaiting approval and had been presented to the Missouri state review board for National Register consideration for local significance<sup>152</sup> when a windstorm hit in August 2010, partially collapsing the southernmost building in the complex, which shared a party wall with Tillie's Food Shop. Formal National Park Service decision in the Federal Register of the listing was pending<sup>153</sup> when another storm hit that December and collapsed the center building that contained Tillie's Food Shop itself, destabilizing the remaining north building where the Alexanders lived, causing it to collapse and become condemned by the city (Figure 15).

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<sup>151</sup> Carla and Miguel Alexander, Karen Bode Baxter and Students of Dr. Sonia Lee at Washington University. "National Register of Historic Places Registration Form: Tillie's Corner." Continuation Sheet, Section 8, Unpublished. June 25, 2012.

<sup>152</sup> Stefene Russell, "Remembering Tillie's Corner," *St. Louis Magazine*, January 25, 2013, accessed March 21, 2016, <http://www.stlmag.com/Remembering-Tillies-Corner>.

<sup>153</sup> Betsy Bradley and Ruth Keenoy, "Landmark Designation Petition: Tillie's Corner." St. Louis Planning and Urban Design Agency, 3. Unpublished. 2014.



Figure 15. Tillie's Corner post-collapse [photo: courtesy of Carla Alexander, 2013]

As current policies stood, Tillie's Corner lost its integrity, thereby affecting its historic significance and changing its determination of eligibility as the buildings were a pile of rubble. This posed the question "Could a pile of rubble still have historic significance?" The short answer was "perhaps," based on its present-day cultural significance to the larger community. When the World Trade Center was destroyed in 2001, its collapsed pile and what to do with it afterwards was contemplated: Should it stay? Should it be removed? Was it historically and culturally significant? It was later removed and the current memorial site was constructed upon its footprint. It was never about the rubble itself—it was about the *site* and what "was" there and what it "meant" to the national community. According to the National Register policy, as a site—even in a ruined state—it could possess historic, cultural, or archeological value. For Tillie's Corner, safety and aesthetic issues aside, the community still likely ascribed value to it because it is a site of place memory.

With the Tillie's Corner buildings now lost, the Alexanders' efforts to preserve

Carla's grandmother's legacy seemed lost as well. However, the Alexanders created the Tillie's Corner Historical Project, a nonprofit historic preservation and community advocacy group, which—like her grandmother's shop—acts as a form of community cohesion, enabling others to learn about the history and buildings within their neighborhood. Betsy Bradley, Director of the Cultural Resource Office of the City of St. Louis expounds, stating:

Carla was interested in her grandmother's story initially, but it was never about her grandmother, but the larger story. She is using the historic idea of her grandmother's store in a tangible/intangible way to build community. It is not an official approach to preservation, but one that is a breath of fresh air. They are following in the footsteps of Mrs. Pearson, working in the community to make it better. People don't actively work to create community—that is the heritage that she is continuing. More of a heritage cultural practice and wanting to know more about history and how it affects those in the present, not just to preserve buildings.<sup>154</sup>

By using relationships cultivated during the nomination process, the Alexanders were able to have a new structure (called the “Butterfly” House) constructed on the lot containing their home, office and memorial telling the story of Tillie's Corner. There is also a community garden and plans for an educational expansion. The resource is the site itself, as the current structures (the “Butterfly” House and a 1953 garage addition) are non-contributing. The City of St. Louis landmarked the site in recognition and commemoration of its history and honoring Mrs. Pearson's contributions to the community. It is considered an active, memorializing site.<sup>155</sup>

If we evaluated Tillie's Corner under the eligibility requirements of National

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<sup>154</sup> Betsy Bradley (director of the Cultural Resource Office of the City of St. Louis), in discussion with the author, March 23, 2016.

<sup>155</sup> Bradley, “Landmark Petition,” 14.



Register *Bulletin 38*, would it qualify as a TCP? It has meaning and value to its traditional, living community. By continuing the traditions and legacy of Mrs. Pearson, there is a continuation of community cultural tradition and heritage practices. Community knowledge-holders were consulted via oral history interviews to ascertain its significance. When the city landmarked it, Tillie's Corner as a *place*—a *site*—was recognized. The National Register defines a site as 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.”

Under Step One of the evaluation process in *Bulletin 38* (Appendix II), Tillie's Corner could be treated as a site similar to that of an archaeological site under National Register Criterion D, but from a cultural perspective. The second step would involve assessing the integrity of Tillie's Corner as a place of community gathering, and activism. The third step is that the site must meet one of the National Register Criteria for Evaluation. Tillie's Corner was originally nominated under Criterion A for Ethnic Heritage/Black and Commerce. When the building was lost, it lost not only its “Commerce” association, but its integrity as traditionally interpreted by National Register policies and criteria. Its association with Ethnic Heritage/Black is still relevant. Thus, Tillie's Corner could be eligible as a TCP.

Although the buildings had been lost, Tillie's Corner's connection, importance, and significance to the community was not. “It was important to keep sharing the history,” says Alexander. “To me, significance is everyone's story, not just one person's. Yes, Tillie's Corner is now a landmark, but our story is no more important than the man across the street

telling me about his grandmother being a seamstress. It's a bigger part."<sup>156</sup> As historic preservationists, we must ask ourselves what our goals are: to preserve a structure, or to preserve a community? By considering inclusive approaches and philosophies as outlined in *Bulletin 38* and through the use of ethnographic processes such as cultural mapping, historic preservationists can do both.

### Moving Forward

This thesis demonstrates the need for change in the way historic preservationists think and approach the practices and policies related to ethnic minority resources in five ways. First, the focus on design significance, as mentioned on pages 20-24, must be de-emphasized. This also means that, second, the emphasis on integrity (as seen on pages 63-68) as a standard must also change. Third, page 18 and throughout the thesis demonstrate the need to better incorporate cultural significance. Fourth, the historic preservation field must also grapple with issues of shared authority—who has the “say”—as shown on pages 69-71. Last, historic preservationists must recognize the dynamic nature of communities, and history itself, as demonstrated on pages 29-31 and pages 37-38. As historian David Lowenthal states:

Preservation narrowly construed cannot improvise or adapt to the implacable pressures of change. Seen as part of the process of change, however, preservation takes its place among other fruitful ways of treasuring a heritage. Without a past that is malleable as well as generously preserved, the present will lack models to inspire it and the future will be deprived of a lifeline to its past.<sup>157</sup>

The historic preservation of all historic places is important. It is a process that must

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<sup>156</sup> Carla Alexander (co-director, Tillie’s Corner Historical Project), in discussion with the author, March 3, 2016.

<sup>157</sup> Lowenthal, *The Past is A Foreign Country*, 411.

change and adapt to remain relevant. As a nation, we have a long and laudable history in preserving many of America's most important historic places. As our nation changes, our concept of significance will also change. Historic preservation public policies and professional practices will need to follow suit. It is important that ethnic minority groups be asked to play a larger role in the stewardship of the historic resources of our nation. It is also important that what those groups recognize as significant historic resources will continue to challenge historic preservation to rethink its *modus operandi*. Historic preservation practitioners must alter the philosophies behind those practices. Current historic preservationists and the generation of historic preservationists to follow have an opportunity to shape historic preservation thought and philosophy regarding significance.

### Recommendations

Historic preservation public policies and professional practices in the United States do not need new legislation to achieve change from within. They do need more creative ways of using the guidance, criteria, tools, and resources already in place. The following recommendations suggest ways in which these changes can be achieved.

#### Emphasize the Flexibility of the National Register

The National Register's language is broad and allows a flexible approach to listing properties. Early on, historic sites were oftentimes found historically significant as commemorative sites and structures on those sites sometimes had less than ideal integrity. As professionalism within the field grew, historic preservation practitioners began to focus more on questions of material integrity. The lack of integrity can compromise a property's National Register eligibility, but *not* necessarily its historic significance. Vince Michael and Raymond Rast are two practitioners currently calling for reconsidering questions of

integrity as only one factor in the evaluation process and examining different ways of approaching it depending upon which criteria is being considered. There are not new notions; rather a return to earlier interpretations of the significance criteria, especially when evaluating ethnic minority sites. Historic properties being evaluated under Criteria A (events) and B (persons), or D (information potential) should not necessarily be held to the same evaluation standards for integrity as those associated with Criterion C for design. For example, we should not evaluate a battlefield the same way that we do Mount Vernon. The National Register supports creative uses of its criteria as seen with the examples of the “*Con Safos*” House and Tillie’s Corner.

### Engagement Is Key

Historic preservation work is being done at the local level by ethnic groups themselves, often without calling it “historic preservation.” It is at the local level that relationships between historic preservation practitioners and ethnic groups are built and strengthened. Historic preservation practitioners need to be actively involved with those groups in decision-making as a way of understanding neighborhoods and communities; one that allows decisions to be made involving those who find it important. For ethnic minorities, it is especially important to involve local knowledge-holders and those who feel a vested interest as stewards of their historic resources as there is the potential for omission. Historic preservation, as a field, must continue to do outreach to ethnic minorities and encourage active participation in the historic preservation process. If it has meaning to a group, members of that group should be the ones helping to identify a resource’s significance, complementing the efforts of historic preservation practitioners.

Historic preservation must also dispel perceptions within ethnic minority groups

that it is “not for them.” Through the use of inclusive approaches, historic preservation can dispel these notions, involving the groups in identifying and evaluating the historic significance of the historic resources within diverse communities. It is important to not only engage local groups, but engage more ethnic minority historic preservation professionals and others trained to involve local groups in decision-making. If a practitioner does not know how to involve local groups, it will be difficult for them to determine a resource’s historic and cultural context. Practitioners and ethnic groups must work together to preserve what is important.

### Breaking Routine

Some people interviewed for this thesis expressed that it is hard to change current practices. Oftentimes, a historic preservation professional is not trying to exclude properties, but the policy process or the parameters within them that they use for evaluation are flawed. One interviewee relayed an anecdote about how they overlooked a historic resource significant to the local African American community, a vernacular storefront church. It was much to their chagrin when they realized that it was because they were doing things as they “always had done” and it just did not occur to them to do it otherwise. The historic preservation field must become more community-focused, as well as incorporate some aspects of ethnography into its practices. The National Park Service’s Ethnography Program suggests that “one would have to put his or her thoughts aside and determine how the practice fits into the beliefs, values, rituals, and behaviors of the group who is practicing it. Your thoughts should not be your guide. You want participants to teach you the meanings of their ways and the contexts in which they are practiced.”<sup>158</sup> It will take more

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<sup>158</sup> National Park Service Ethnography Program, “African American Heritage & Ethnography:

time and resources, but basic training in ethnographic methodologies such as cultural mapping, conducting oral histories and interviews, and being familiar with the common knowledge of the community that will further complement and aid in the identification and evaluation of a historic resource's significance, especially those associated with minority groups.

More inclusive, holistic approaches complementary to current practices may challenge its very philosophies as to how historic preservation should be conducted, and what is significant. When seen through the lens of what a minority group values, discoveries are often made that are very different than expected. As seen in San Antonio's *Con Safos* campaign, approaches such as the Burra Charter's *can* be applied here in the United States as well, showing that the integration of social and cultural heritage in historic preservation practice is indeed possible.

#### A Shift in Historic Preservation Thinking

Thomas F. King and Patricia L. Parker's National Register *Bulletin 38* was one of the first national government attempts to understand significant places and events of "traditional" groups. It applied widely accepted ethnographic and anthropologic approaches and practices to historic preservation practices. It showed that the historic preservation field could accept fundamental shifts in practices and policies, one that we must continue today. Ethnic minority groups are now demanding a more flexible, inclusive form of historic preservation; one that is not as primarily focused on architecture or integrity, but focused on what is valued and significant to the living communities in which those historic resources

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Ethnographic Research Center," accessed April 19, 2016, <https://www.nps.gov/ethnography/aah/aaheritage/ERCf.htm>.

are located.

The emphasis on increasing the number of recognized historic sites from ethnic communities is not just an obligation to be inclusive of significant historic sites and properties of underrepresented groups. Nor should it be viewed as a generational pendulum swing in that particular direction. As inclusion becomes more important to the current and next generation of the public and historic preservationists, the historic preservation field and its practices are trying to reflect this much in the same way as it did in the past by recognizing sites related to African American history during the excitement of the U.S. Bicentennial. Inclusiveness should not fall into a trap of being considered similar to a “theme” subject to the whim of the generation that deems it important. If inclusion is institutionalized through the historic preservation process, this would allow it to become a part of standard historic preservation practices instead.

Thomas F. King states that “the distinction between intangible and tangible qualities is overplayed as all heritage values are [ultimately] intangible. Some are more ethereal, some have real property referents or are attached to personal property, but in the end, they are all intangible.”<sup>159</sup> One of the primary shifts in thinking going forward should be the notion that intangible and tangible heritage values are the same. The historic preservation field is one that has become bound, as codified in its policies, that there *must* be a physical focus—a structure, a site, a place. There *must* be integrity, there must be *something*—otherwise, what are we preserving? What the historic preservation field has been seeing is a need to broaden its way of thinking and how it considers historic resources. There is so

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<sup>159</sup> Thomas F. King (archaeologist and historic preservation consultant), in discussion with the author via email, December 1, 2015.

much potential in how the criteria could be used going forward if practitioners are allowed to do so creatively rather than trying to check a particular category's box.

Another shift in thinking is the types of properties that we consider worthy of designation. Historic properties within ethnic minority groups are often vernacular places that may have compromised integrity. Public historian Donna Graves states that it is the connection, rather than the physical attributes or the association with the place. "It becomes about social justice and creating a more accurate way of describing and understanding histories. Without those histories being given their due, we are telling a partial or skewed story."<sup>160</sup> As seen with Tillie's Corner, there is room and opportunity to think differently about a resource in a novel way in terms of how to classify it. The National Register Criteria, and those of property inventories at the local and state level modeled upon it, allow for this broader consideration. Historic preservationists going forward must not suspend, but change, their belief in order to accommodate the needs of communities requiring a different approach.

#### Further Research Suggestions

This thesis is a contribution to a national conversation and emerging narrative that is ongoing and important as we go forward into the next fifty years of the National Historic Preservation Act. As the historic preservation field takes stock of how far it has come, it must acknowledge that there is still work to be done regarding inclusion, consultation, and the concerns of underrepresented groups such as ethnic minorities. More people need to be focusing on this topic and what steps the field can take in its future efforts.

Examining how many properties listed in the National Register and state and local

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<sup>160</sup> Donna Graves (public historian), personal interview with the author, December 21, 2015.



registers and inventories are or could be related to ethnic minority groups would be a prodigious undertaking. As has been shown, until recently the majority of National Register nominations have not been viewed through a multicultural lens. For example, the nomination form for the Ashley River Historic District (1994) in and near Charleston, South Carolina, mentions African American sites (“slave cabins”) only twice in 30 pages.<sup>161</sup> This is also seen in the nomination forms for high-profile sites such as Monticello. Monticello’s nine page-long nomination form, prepared in 1975, is also very spare, typical of earlier nomination forms. Although Thomas Jefferson was a major Virginia slave owner, there are no mentions of this or slavery existing there at all.<sup>162</sup> If the nominations were done today, there would (and should) be more discussion of the contributions and involvement of African Americans at both locations.

Another area to research is how to increase the number of ethnic minority professionals involved in historic preservation at all levels. Historic preservation must actively cultivate not only relationships with ethnic minority groups, but actively encourage them to act as liaisons by becoming more involved professionally and by joining historic preservation review boards, commissions, and other organizations. There is a need for shared authority between historic preservation practitioners and ethnic minority communities, one that has a better balance between who makes the final decisions and who is consulted and has input in the process.

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<sup>161</sup> National Park Service, “National Register of Historic Places Registration Form: Ashley River Historic District,” accessed September 2, 2016, <http://focus.nps.gov/pdfhost/docs/NRHP/Text/05001612.pdf>.

<sup>162</sup> National Park Service, “National Register of Historic Places Registration Form: Monticello,” accessed December 11, 2015, <http://focus.nps.gov/pdfhost/docs/NRHP/Text/05001612.pdf>.

## Concluding Thoughts

More properties will be designated and more communities and individuals will become involved, contributing to our collective history as a nation. The historic preservation field has seen swings of its pendulum that have brought change and will bring more. The Getty Conservation Institute's report on values and heritage conservation states:

Democratization is a desirable development, and it has changed the heritage field: the old canons are questioned; the opinions of specialists are not taken as articles of faith; and heritage decisions are recognized as complex negotiations to which diverse stakeholder bring their own values. New groups have become involved in the creation and care of heritage. Today, heritage is seen as the source of important benefits to society, including stability, understanding, tolerance, recognition of and respect for cultural differences, and economic development.<sup>163</sup>

The historic preservation field will, and should, continue to challenge itself to want to embrace change. It will take time and resources and a shift in thinking, but this is necessary and imperative to its continued success, evolution, and ability to maintain historic resources. As historic preservation goes forward into the next fifty years, the United States will become a different nation in racial and cultural composition, but is still one nation by acknowledging that all citizens have a contribution to make to its historic narrative. By actively implementing steps to become more truly inclusive, we can help to assure that the significance of historic resources and valued places of meaning to all of its citizens will be effectively considered.

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<sup>163</sup> Erica Avrami, Randall Mason, and Marta de la Torre, "Values and Conservation Research Report," The Getty Conservation Institute, 2000. Accessed May 2, 2014, [https://www.getty.edu/conservation/publications\\_resources/pdf\\_publications/pdf/valuesrpt.pdf](https://www.getty.edu/conservation/publications_resources/pdf_publications/pdf/valuesrpt.pdf), 63.



## APPENDIX I NATIONAL REGISTER CRITERIA

The Code for Federal Regulations, 36 CFR 60.4, lists the National Register of Historic Places criteria for evaluation as follows:

“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 of 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 productive life.

(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.”<sup>164</sup>

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<sup>164</sup> 36 CFR 60.4, <http://www.nps.gov/nr/regulations.htm#604>

APPENDIX II  
NATIONAL REGISTER *BULLETIN* 38 EVALUATION  
CRITERIA AND PROCESS

One of the major differences between the standard National Register criteria for evaluation and the criteria used to evaluate TCPs is other intangible qualities and considerations are taken into account.<sup>165</sup> These interpretations of the National Register criteria are more creative and could be applied to non-TCPs as well by practitioners.

<b>Step One: Ensure That the Entity Under Consideration is a Property</b>
<ul style="list-style-type: none"><li>• The entity must be a tangible property: district, site, building, structure, or object</li><li>• A property may be considered a “site” as long as it was the location of a significant event or activity, regardless of whether the event left any evidence of its occurrence.</li><li>• The documentation or oral evidence for the association of the property with traditional events, activities, or observances should be carefully weighed and assessed for properties with no observable evidence of human activity.</li></ul>

<b>Step Two: Consider the Property’s Integrity</b>
<ul style="list-style-type: none"><li>• The property must have integrity of the relationship between a property and the beliefs and practices that give it significance.</li><li>• Integrity of the property must be viewed with reference to the views of traditional practitioners.</li><li>• If a property has lost integrity as a TCP, it may retain integrity with reference to some other aspect of significance.</li></ul>

<b>Step Three: Evaluate the Property with Reference to the National Register Criteria</b>
<i>Criterion A: Association With Significant Events</i> <ul style="list-style-type: none"><li>• The association of a property with significant event, and its existence at the time of the event, must be documented.</li><li>• The actual time an event took place might be ambiguous (for example,</li></ul>

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<sup>165</sup> Thomas F. King and Patricia L. Parker, National Park Service, National Register *Bulletin* 38, Guidelines for Evaluating and Documenting Traditional Cultural Properties

before creation). As long as the tradition itself is rooted in the history of the group, and associates the property with traditional events, the association can be accepted.

*Criterion B: Association with the Lives of Significant Persons*

- The word “persons” may refer to persons whose tangible, human existence in the past can be inferred from historical, ethnographic, or other research
- The word “persons” may refer to gods or demigods who feature in a group’s traditions

*Criterion C (1): Embodies the Distinctive Characteristics of a Type, Period, or Method of Construction*

- Properties that have been constructed or contain constructed entities (buildings, structure, or built objects) must embody the distinctive cultural values of the community in its architecture, landscaping, signage, and ornamentation.

*Criterion C (2): Representative of the Work of a Master*

- A property identified by tradition or through scholarship to be the work of a traditional master builder or artisan

*Criterion C (3): Possession of High Artistic Values*

- A property made up of or containing artwork valued by a group for traditional cultural reasons

*Criterion C (4): Representative of a Significant and Distinguishable Entity Whose Components May Lack Individual Distinction*

- The individual property may lack distinction, but must represent or be an integral part of a larger entity of prime traditional cultural importance.

*Criterion D: History of Yielding, or Potential to Yield, Information Important in Prehistory or History*

- May be an archeological site or one that may provide insight into traditions and culture of a group.
- The property’s potential to yield information is secondary to its association with the traditional history and culture of the group ascribing significance to it.

**Step Four: Determine If Any of the National Register Criteria Considerations Make the Property Ineligible**

*Consideration A: Ownership by a Religious Institution or Use for Religious Purposes*

- In traditional cultures, distinctions made between religion and the rest of culture do not exist.

- Activities conducted on properties used for religious purposes by a traditional group may be expressions of traditional cultural beliefs intrinsic to the continuation of traditional cultural practices.

*Consideration B: Relocated Properties*

- Rarely applied formally to TCPs as in most cases the property is a site or district which cannot be relocated in any event as it traditional authorities would consider its significance lost
- Portable properties (such as canoes) and properties moved historically (such as totem poles) retain their significance
- Relocation can contribute to a property's significance (if associated with tradition)
- Properties may be relocated through careful consideration, planning and execution in consultation with the cultural group

*Consideration C: Birthplaces and Graves*

- The birth or burial may be incidental to or of such cultural importance that its association contributes to the property's larger traditional significance

*Consideration D: Cemeteries*

- A cemetery's major significance may lie with its association to a group's traditional history

*Consideration E: Reconstruction*

- Reconstructions within a TCP do not render it (the property) ineligible

*Consideration F: Commemoration*

- Commemoration may be involved in the use or design of a property if it connects the structures with the traditional history of the group

*Consideration G: Significance Achieved Within the Past Fifty Years*

- A significance ascribed to a property only within the past 50 years cannot be considered traditional.



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