

Evaluation of National Register Historic Districts Guidance from the New Mexico Historic Preservation Division

Prepared by Steven Moffson
Historian and State and National Register Coordinator
steven.moffson@state.nm.us

*The purpose of this document is to clarify the process of evaluating the eligibility of historic districts by the Historic Preservation Division. State historic preservation offices rely on the National Register bulletins but also from successful practices developed in other states and their own experiences based on their states' unique resources.*¹

Historic districts are among the most widely used but least understood category of properties. As defined, “a historic district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.”² This paper represents HPD’s commitment to be consistent in its evaluations of potential National Register historic districts. It does not remove all subjectivity from the process but minimizes it by providing a common language for professionals in the field. Personal backgrounds, experiences, and education will naturally result in different perspectives. But knowledge of the resource and its historic context should minimize the feeling of unpredictability. Additionally, the National Register has continually evolved since the program’s founding in 1966. Regular listings have provided HPD with the most current thinking on National Register issues.

Importance of Contexts

New Mexico contains a vast number of unique resources; few of which could be characterized as high style and only a small number are addressed in National Register bulletins. That’s why significance can only be understood within a historic context. According to the National Park Service, a historic context is “*an organizing structure for interpreting history that groups information about historic properties which share a common theme, common geographical location, and common time period.*” So how do historic contexts work? The National Register is comparative because it evaluates one resource by comparing it against known examples of the same property type. A homestead can only be understood by comparing it against others from its region and time period. Conversely, some contexts are derived from experience and may not be

¹ This paper is not intended to replace information in the National Register bulletins and other NPS publications. It is intended as a supplement, and if discrepancies are found between this paper and other NPS publications, the existing publications should be considered correct. Comments are welcome and should be directed to the author.

² Citations, unless otherwise stated, derive from *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, (U.S. Government Printing Office, 1991) and *National Register Bulletin: How to Complete the National Register Registration Form*, (U.S. Government Printing Office, 1997).

part of the written record. In New Mexico oral and tribal history may constitute a critical component of historic contexts.

Essentials of the National Register Criteria and Historic Integrity

To be eligible for listing in the National Register, a property—any category of property—must meet the National Register Criteria for Evaluation. These criteria require that a property must be fifty years of age or older and that the property meets at least one of the following criteria:

- A. Property is associated with events, activities, or developments that were important in the past;
or
- B. Property associated with the lives of people who were important in the past; or
- C. Property is significant in the areas of architectural history, landscape history, or engineering;
or
- D. Property has yielded, or is likely to yield information important in history or prehistory.

Significance is “the importance of a property as defined by the National Register criteria in one or more areas of significance.” Areas of significance embrace roughly thirty categories of historic development that include archaeology, agriculture, science, and social history. Significance derives from information about a property that can “relate the property to patterns of history that extend beyond the doorstep or immediate neighborhood. . . . Properties of the same time and place can be compared to determine if a property is unique, representative, or pivotal in conveying the history of a community, state, or the nation.”

The seven aspects of historic integrity are designed to measure the authenticity of a historic property. Historic integrity is “the authenticity of a property’s historic identity, evidenced by the survival of physical characteristics that existed during the property’s historic or prehistoric period.” An assessment of historic integrity can only come after the significance of a property is understood and its character-defining features have been identified. Character-defining features are those physical features that comprise the appearance of historic buildings, which include the overall shape of the building, its materials, craftsmanship, decorative details, and interior spaces and features.³ The National Register definitions of the seven aspects of integrity appear below:

Location: the place where the historic property was constructed or the place where the historic event occurred.

Design: the combination of elements that create the form, plan, space, structure, and style of a property.

³ See Lee H. Nelson, “Architectural Character—Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving their Character.” *Preservation Brief 17*. (Technical Preservation Services, National Park Service, Washington, D.C.), <https://www.nps.gov/tps/how-to-preserve/briefs/17-architectural-character.htm>

Setting: the physical environment of a historic property.

Materials: the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

Workmanship: The physical evidence of the crafts of a particular culture or people during an given period in history or prehistory.

Feeling: a property's expression of the aesthetic or historic sense of a particular time period.

Association: the direct link between an important historic event or person and a historic property.

The National Register lists the seven aspects in order of importance. *This is critical to understand because it is not indicated in the bulletins.* **Location** appears first because the National Register of Historic Places puts a premium on historic places. **Design** is essential for any property to convey its significance. **Setting** is important because the physical environment of a property connects its location to its sense of place. **Materials** and **workmanship** are related so when a property loses its historic materials, it also loses evidence of workmanship. Historic materials are important but they are often lost, and in some cases may be replaced by newer materials which may have their own inherent significance. **Feeling** and **association** are the least considered, but they are important because if a property does not have the ability to create a sense of a time or conjure an association with a historic event, it cannot be considered historic. Conversely, if a property possesses the aspects of location, design, and setting, it will probably also have feeling and association.⁴

Historic Districts—Applying Historic Integrity

Historic districts change over time and seldom retain perfect historic integrity. In fact, most have experienced changes which may represent a new or continued use, but that does not necessarily disqualify them from listing in the National Register. The Mesquite Street Original Townsite National Register Historic District in New Mexico has lost significant numbers of historic houses to infill but retains sufficient historic integrity to remain eligible.

“Condition and historic integrity are two different concepts that play a large role in defining what properties are eligible” for listing in the National Register . . .” Historic integrity is represented by the aspects of integrity whereas “condition is an assessment of the physical state of the property and is usually listed as poor, fair, good, or excellent . . . Poor condition does not make a

⁴ Not all aspects of integrity must be present and one-hundred percent of any one is not required. It is important, however, that the aspects of integrity that represent the property's character-defining features are present. If, for example, the house and studio of an important artist no longer retained the studio, the property would not be eligible for listing. If the house of a significant politician was moved from its original location, it would not be eligible because it no longer retains the location and setting. As its name implies, “place” is an essential concept in the National Register of Historic Places.

historic property ineligible for the National Register, but it does threaten the longevity and viability of that property.”⁵ Charley’s Automotive Service in Grants had not been maintained for decades and was in very poor physical condition and yet it met the National Register Criteria for Evaluation because it maintained a high level of historic integrity. Another way to consider historic integrity is to ask, Would the original property owner recognize his house if he returned today? If the answer is no, it is unlikely the property will contribute to the significance of a historic district.

The **aspects of integrity** are applied differently for historic districts than for individual properties. Individual properties must retain a higher level of integrity because evaluations are based on one, or maybe a few buildings. Historic districts are evaluated as a whole. The National Register states, “historic districts possess a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.” This evaluation is based mostly on the exteriors of buildings and does not include evaluations of interior spaces.

Historic districts comprise **contributing** and **noncontributing resources**. A contributing resource is “a building, site, structure, site, object adding to the historic significance of a property.” Here, the operative word is *adds* which is not defined by the National Register but carries tremendous weight. Must a resource add a lot or a little to be contributing? HPD interprets the word to mean that a resource can be in very poor physical condition and still contribute to the significance of a historic district so long as it maintains historic integrity. “The majority of the components that add to the district’s historic character, even if they are individually undistinguished, must possess integrity.” Buildings that may possess just enough historic integrity to contribute include facades of mostly destroyed buildings, provided they appear as buildings and not ruins.

Understanding the Period of Significance in Historic Districts

The National Register defines period of significance as the “span of time in which a property attained the significance for which it meets the National Register criteria.” Period of significance is tied to areas of significance so the period of significance may be as narrow as a single year or span millennia. A commercial historic district, for example, may be eligible for both architecture and commerce. The period of significance for architecture may begin when the street plan was established and end with the completion of the last historic building. The theme of commerce, on the other hand, may begin with the town’s founding and extend to the fifty-year end date because commerce continues to the present. Periods of significance must correspond to areas of significance and must be bracketed by contributing resources.

⁵ Megan Borthwick, “What’s the Difference Between “Integrity” and “Condition” and Why Does it Matter?” (Historic Hawai’i Foundation, 2014), <https://historichawaii.org/2014/12/19/whats-the-difference-between-integrity-and-condition-and-why-does-it-matter/>

Defining Significant Concentrations of Historic Resources

The National Register is clear: “historic districts must contain a significant concentration of historic resources.” But what is a significant concentration? There is no one answer and it may be different depending on the historic context in which the district is evaluated. A significant concentration is measured against the resources that comprise the historic district. A historic downtown may have had one-hundred buildings during its most prosperous period, with only sixty historic buildings remaining. Sixty buildings may be enough to merit a significant concentration of resources. However, to be eligible, the surviving buildings must include representative styles and types and individually distinguished buildings that convey the significance of the downtown.

Historic districts may be vastly different, but each must contain a concentration of historic resources that convey the significance of the district. Identifying a historic district, therefore, is not simply counting resources; one must understand which ones convey significance. Districts may include thousands of acres in agricultural and hundreds of contributing properties; downtowns with scores of buildings; and a small mill that comprises four functionally related resources: the mill, dam, reservoir, and miller’s house. The mill comprises a significant concentration of resources because it represents the essential elements of the historic mill complex. But the loss of one or more of these resources would jeopardize its eligibility as a historic district. Smaller historic districts are more fragile because their eligibility may rest upon only a handful of historic resources.

The Challenges of Rural Historic Districts

Landscapes can be important elements of a historic district but are often overlooked because there may be a lack of visible human activity.⁶ In New Mexico, mountains, river valleys, bosque, canyons, mesas, meadows, cultivated fields, rangeland, grass plains, and vast deserts all have the potential to contribute to historic districts or constitute the entirety of a historic district. Broad open landscapes may appear to be the antitheses of a concentration of resources, but they may include cultural associations and should not be dismissed. Some landscapes may appear as natural features but may have once served important cultural uses for both ancient and historic populations. These large expanses of land may be essential to understand traditional land-use patterns. Rural Historic Districts, such as the Guadalupita-Coyote Rural Historic District, is an agricultural historic district that stretches nine-miles along the Coyote Creek in Mora County. Rural Historic Districts are an important mechanism for documenting large, rural landscapes. Expansive landscapes are challenging and almost always require a historic context to understand the centuries of cultural values embedded in the landscape.

Linear historic districts, such as acequias, railroad lines, roads, and trails, may appear in either rural or urban settings. They are difficult to identify because they often include vast distances with resources separated by space, so they may not appear to contain a significant concentration of resources. If they are a singular and do not include additional resources, they are

⁶ “National Register Bulletin: “Guidelines for Evaluating and Documenting Rural Historic Landscapes,” (U.S. Government Printing Office, 1989; revised 1999)

characterized as structures. Alternatively, railroad lines or rail corridors may include switching stations, crossings, tipples, mail drops, and depots and should be considered historic districts.

Evaluating Common and Rare Property Types in Historic Districts

Some property types are described as ubiquitous because so many examples are known to exist.⁷ If they meet the National Register criteria, they all may be eligible. Consider, for example, similar-appearing bungalow houses, one of the most popular house forms in the early 20th century. Similarly, better examples of a property type do not disqualify lesser examples of the same property type, so long as the lesser examples meet the National Register criteria. It is the same with rare surviving examples of a property type. The “rarity and poor condition of surviving examples may justify accepting a greater degree of alteration, provided that enough of the property survives for it to be a significant property.” Spanish mission churches in New Mexico are a finite resource constructed between 1598 and 1821. San Miguel Church in Socorro, among the last mission churches built in New Mexico, suffered varying losses of its historic design, materials, and workmanship. It was listed in the National Register, in part, because it is a rare surviving resource.

The Infinite Variety of Historic Districts

Historic districts are unique among categories of historic properties because they may draw their importance entirely from resources that lack individual distinction. The Hubbell Trading Post in Arizona was listed in the National Register in 1966, with additional documentation prepared in 2002, which illustrates life at the trading post and the interactions between the Hubbell family and Navajos. These additional structures, which may lack individual distinction include the barn, blacksmith shop, corral, shed, bunkhouse, and smaller, domestic outbuildings. The Hubbell Trading Post is a historic environment composed of a variety of buildings, structures, and sites whose unity derives visually from their spatial organization and their unified appearance.

Historic districts, such as the Mesa Prieta Petroglyphs and the Santa Fe Historic District, are clear examples of historic districts because they comprise familiar property types in the form of historic buildings, sites, structures, and objects. Ranches, farms, downtowns, commercial strips, college campuses, public parks, office parks, governmental complexes, and railroad facilities, and some archaeological sites are examples of historic districts.

Some historic districts may not be perceived as historic because the resources are small in number and represent unusual or uncommon property types. “The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties.” This is true of several historic districts in Georgia with exceptionally small numbers of historic resources: the Acworth Beach and Bath House encompasses a large geographic area with only two historic

⁷ Barbara Wyatt, “Evaluating Common Resources for National Register Eligibility,” A National Register White Paper, April 9, 2009.

resources, the beach and bathhouse; the Pine Mountain Gold Mine is a wooded site composed of scattered pipes, vats, and pits; and Rocksprings Shotgun Row Historic District comprises only six small houses on one acre of land. In each of these examples, large and small, the historic district derives its importance from being a unified entity even though it is often composed of a wide variety of resources.

Remember

HPD strives for consistency and endeavors to be predictable in its determinations of eligibility. This is predicated on understanding the importance of historic contexts and the National Register criteria. The National Register bulletins, it must be understood, provide guidance to fifty states and U.S. Territories so they often fail to capture the challenges of rural landscapes and rare and common property types in New Mexico. Research and fieldwork are imperative. And finally, there is an infinite variety of historic districts, and all of which have one thing in common: though different, they all draw their significance not from one or two important buildings but from a concentration of resources that may lack individual distinction.