

1 **National Register Bulletin 38: Guidelines for Evaluating and Documenting**

2 **Traditional Cultural Places**

3 **October 27, 2022**

4

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2  
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30 [DATE]

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1   **PREFACE**

2

3   The National Register of Historic Places is the official Federal list of buildings, structures, objects, sites,  
4   and districts significant in American history, architecture, archeology, engineering, and culture. These  
5   contribute to an understanding of the historical and cultural foundations of the Nation.

6

7   The National Register includes:

8

- 9       • All prehistoric and historic units of the National Park System
- 10      • National Historic Landmarks, which are places recognized by the Secretary of the Interior as  
11       possessing national significance
- 12      • Places significant in American, State, or local history that have been nominated by State Historic  
13       Preservation Officers, Federal agencies, and others, and have been approved for listing by the  
14       National Park Service.

15

16   By Federal law, National Register listing assists in preserving historic places in several ways:

17

- 18       • Recognition and appreciation of historic places and their importance
- 19       • Consideration in planning Federal and Federally assisted projects
- 20       • Making property owners eligible for Federal tax benefits
- 21       • Consideration in decisions to issue surface coal mining permits
- 22       • Qualifying preservation projects for Federal grant assistance.

23

24   The Historic Sites Act of 1935 (Public Law 74-292) established the National Historic Landmarks Survey  
25   The National Historic Preservation Act of 1966 (Public Law 89-665) authorized the National Register of  
26   Historic Places, expanding Federal recognition to historic places of local and state significance. The  
27   National Park Service in the U.S. Department of the Interior administers both programs. Regulations for  
28   these programs are found at 36 CFR Part 60, National Register of Historic Places, and 36 CFR Part 65,  
29   National Historic Landmarks Program.

30

1 Neither listing in the National Register nor designation of a place as a National Historic Landmark places  
2 any Federal restrictions on what an owner may do with their property up to and including demolition,  
3 unless the property is involved in a project that receives federal assistance.

4

5 The National Register is administered by the National Park Service. Nominations for listing historic  
6 places come from State Historic Preservation Officers (SHPOs), Federal Preservation Officers (FPOs), for  
7 places owned or controlled by the United States Government, and Tribal Historic Preservation Officers  
8 (THPOs), for places on Tribal lands. Places are also determined eligible for listing at the request of  
9 SHPOs, TPOs and Federal agencies. While SHPOs, FPOs, and TPOs nominate places for National Register  
10 listing, local government, and private individuals and organizations, typically initiate the process and  
11 prepare the necessary documentation. A professional review board in each state considers each place  
12 proposed for listing and makes a recommendation on its eligibility. Communities having a certified local  
13 historic preservation program also make recommendations to the SHPO on the eligibility of places  
14 within their community.

15

16 The National Register Program in Washington, D.C., issues guidance to assist anyone seeking to prepare  
17 a nomination. A series of “bulletins”—typically 50 to 100 pages of text and images—address a variety of  
18 topics, such as *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*  
19 and *National Register Bulletin 16a: How to Complete the National Register of Historic Places Form*.  
20 Bulletins have been issued to provide guidance on evaluating specific place types, such as *National*  
21 *Register Bulletin 13: How to Apply the National Register Criteria to Post Offices* and *National Register*  
22 *Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places*. Likewise, this  
23 document—*National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional*  
24 *Cultural Places*—addresses the very specific place type of “traditional cultural place.” It provides a  
25 framework for understanding how traditional cultural places—TCPs—may meet the criteria for inclusion  
26 in the National Register.

27

28

1 **I. INTRODUCTION**

2

3 The National Register of Historic Places—referred to as the “National Register” throughout this  
4 publication—is the nation’s official list of buildings, structures, objects, sites, and districts significant in  
5 American history, architecture, archeology, engineering, and culture. The National Register was formally  
6 established by the National Historic Preservation Act of 1966, 54 U.S.C. §§ 300101, *et seq.* (NHPA).

7

8 The National Register includes many types of historic places, reflecting the diversity of the nation's  
9 history and culture. A “traditional cultural place” —“TCP,” for short—is a building, structure, object, site,  
10 or district that is eligible for inclusion in the National Register for its significance to a living community  
11 because of its association with cultural beliefs, customs, or practices that are rooted in the community’s  
12 history and that are important in maintaining the community’s cultural identity.

13

14 TCPs have been listed and recognized as eligible for listing in the National Register since its inception in  
15 1966, but it was only in the 1980s that attention began to be given to them, and only in 1990 that the  
16 term “traditional cultural property” was coined. While nominations that were written before this  
17 document was first published in 1990 do not use the specific term, they often identify and describe what  
18 today would be considered a National Register-eligible TCP. (Figure 1, Medicine Wheel/Medicine  
19 Mountain.)

20

21 The original *TCP Bulletin* was published in 1990 in response to the 1980 amendments to the National  
22 Historic Preservation Act. These amendments directed the Secretary of the Interior to study ways of  
23 preserving and conserving the intangible elements of our cultural heritage such as arts, skills, folklife,  
24 and folkways, and to recommend ways of preserving, conserving, and encouraging the diverse  
25 traditional prehistoric (pre-colonial), historic, ethnic, and folk cultural traditions that inform and express  
26 our American heritage.<sup>1</sup> The *TCP Bulletin* was developed to provide guidance for determining whether  
27 places associated with these intangible cultural practices—places that might have traditional cultural  
28 significance—are eligible for inclusion in the National Register. It was intended to help Federal agencies,

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<sup>1</sup>The word “prehistoric” is generally defined as meaning “before recorded or written history.” It is not intended to suggest an absence of history or to diminish past cultures or events. Throughout this document, “pre-colonial”—meaning before European colonization of the North American continent and nearby islands—will be used in place of “pre-historic.”

1 state and Tribal historic preservation officers (SHPOs/ THPOs), certified local governments (CLGs), Native  
2 American Tribes, Native Hawaiian organizations, and others who might wish to nominate such places to  
3 the National Register or who might need to consider a place’s eligibility for the National Register as part  
4 of a Federal undertaking. It was designed to be used in conjunction with other National Register  
5 guidance—notably, *National Register Bulletin 15: How to Apply the National Register Criteria for*  
6 *Evaluation* and *National Register Bulletin 16a: How to Complete the National Register of Historic Places*  
7 *Form*—when preparing nominations to the National Register or documentation for a National Register  
8 eligibility determination.

9  
10 The *TCP Bulletin* was also responsive to the American Indian Religious Freedom Act of 1978 (AIRFA).  
11 AIRFA requires the National Park Service, like other Federal agencies, to evaluate its policies and  
12 procedures with the intent of protecting the religious freedoms of American Indians, Alaska Natives, and  
13 Native Hawaiians. Experience suggested National Register policies and procedures at that time may have  
14 been misunderstood to exclude historic places of religious significance to Indigenous Peoples from  
15 inclusion for the National Register. This may have resulted in the exclusion of these places from the  
16 potential protections afforded by the NHPA for Federal actions and Federal property management,  
17 resulting in their destruction or impeding access to them.

18  
19 In 1992, Congress again amended the NHPA, this time to acknowledge that places of traditional religious  
20 and cultural importance to Native American Tribes or Native Hawaiian organizations may be determined  
21 to be eligible for inclusion in the National Register. This amendment also recognized Tribal Historic  
22 Preservation Officers (THPOs) as having authority and responsibilities (like State Historic Preservation  
23 Officers) for historical and cultural resources for Tribal lands.

24  
25 To minimize the likelihood of such misinterpretation, the 1992 and 1998 issues of the *TCP Bulletin* gave  
26 special attention to places of traditional cultural significance to Indigenous Peoples, and to discussing the  
27 place of religion in the attribution of such significance. The emphasis on Indigenous Peoples in these  
28 versions of the *TCP Bulletin* was not intended to imply that *only* Indigenous Peoples ascribe traditional  
29 cultural value to historic places. Like people the world over, Americans of any cultural or ethnic  
30 background may have places to which they ascribe traditional cultural significance, and those places that  
31 meet the National Register criteria may be nominated for listing, or recognized as eligible for listing, in  
32 the National Register. For example, Saint Augustine Catholic Church and Cemetery in Natchitoches



1 Parish, Louisiana, is a district that was listed in the National Register in 2014 for its significance in the  
2 lifeways of the Cane River Creole of Color community. (Figure 2, Saint Augustine Catholic Church and  
3 Cemetery.)

4  
5 This most recent revision of the *TCP Bulletin* represents a continuation of the National Park Service’s  
6 responsibility to issue guidelines to ensure the National Register includes all places significant in  
7 American history, architecture, archeology, engineering and culture. There is no change from previous  
8 versions of the *TCP Bulletin* in the definition of a TCP or how one is identified, documented, and  
9 evaluated for inclusion in the National Register.

10  
11 The intent of this revision is to include plain language, additional examples, and expanded discussions on  
12 acknowledging community-provided information and respecting confidentiality. While it is difficult to  
13 write a single document for multiple audiences, the hope is that this document can be used by both  
14 professional preservationists and community members to identify, document, and potentially have listed  
15 in the National Register places of traditional cultural significance.

16  
17 **Key Concept**

18 People of any cultural or ethnic background may have buildings, structures, objects, sites, and districts to  
19 which they ascribe traditional cultural significance. Places that meet the National Register criteria may  
20 be nominated for listing, or recognized as eligible for listing, in the National Register.

21

1 **II. WHAT IS A TRADITIONAL CULTURAL PLACE?**

2

3 The National Register of Historic Places is the nation’s official list of districts, sites, buildings, structures,  
4 and objects significant in American history, architecture, archeology, engineering, and culture. As such, it  
5 is an authoritative guide to be used by Federal, Tribal, state, and local governments; public and private  
6 organizations; and members of the public to identify what places should be considered for protection  
7 from impairment or destruction.<sup>2</sup>

8

9 The National Register includes many types of historic places, reflecting the diversity of the nation's  
10 history and culture. Table 1 provides definitions and examples of common property and resource types.  
11 Just as a courthouse is a “building,” a ship a “structure,” a fountain an “object,” a garden a “site,” and a  
12 college campus a “district,” a traditional cultural place may be a church (building), shrine (structure),  
13 special rock (object), vernacular landscape (site), or urban neighborhood (district).

14

15 **A traditional cultural place (TCP) is a building, structure, object, site, or district that may be eligible for**  
16 **inclusion in the National Register for its significance to a living community because of its association**  
17 **with cultural beliefs, customs, or practices that are rooted in the community’s history and that are**  
18 **important in maintaining the community’s cultural identity.**

19

20 This section discusses the meaning of “traditional cultural places” in National Register practice.

21

22 There are many definitions of the word "culture," but in the National Register program, the word is  
23 understood to mean the beliefs, customs, and practices—including traditions, lifeways, arts, crafts, and  
24 social institutions—of a community, be it a Native American Tribe, Native Hawaiian organization, or  
25 another cultural or ethnic group. Places significant in culture have always been potentially eligible for  
26 inclusion in the National Register—recall that the National Register is the nation’s official list of places  
27 significant in history, architecture, archeology, engineering, and *culture*—so places associated with a  
28 community’s beliefs, customs, or practices may be eligible for inclusion in the National Register.

29

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<sup>2</sup> 36 C.F.R. § 60.1, 60.2.

1 One kind of cultural significance a place may have, and that may make it eligible for inclusion in the  
2 National Register, is *traditional* cultural significance. "Traditional" in the context of "traditional cultural  
3 place" refers to the shared beliefs, customs, and practices of a living community that have been passed  
4 down through several generations, whether through spoken or written word, images, or activities. Places  
5 eligible for inclusion in the National Register are typically 50 or more years old, and so a *traditional* place  
6 that has been valued by a community for at least 50 years—in other words, over multiple generations—  
7 may be eligible for inclusion in the National Register.

8  
9 The NHPA and National Register regulations use the term "historic properties" to refer collectively to  
10 buildings, structures, objects, sites, and districts eligible for inclusion in the National Register, and the  
11 1998 *TCP Bulletin* used the term "traditional cultural properties." However, some traditional  
12 communities have objected, and continue to object, to the word "properties" because to them it implies  
13 a commodification of their heritage. In this updated edition of the *TCP Bulletin*, the term "traditional  
14 cultural *places*" is used both to avoid any such implication and to be consistent with the NHPA's  
15 terminology in establishing the National Register of Historic *Places* (emphasis added).

16  
17 The following are places that may possess significance as a traditional cultural place:

- 18     ▪ a landscape or geographic feature—with or without evidence of human modification or other  
19         activity—whose existence is important to a community because of its place in the community's  
20         knowledge about its origins, its cultural history, or the nature of the world;
- 21     ▪ a rural area whose organization, buildings, and structures, or patterns of land use, reflect the  
22         cultural traditions practiced and valued by its long-term residents over generations; or
- 23     ▪ an urban or suburban neighborhood that is the traditional home of a particular cultural  
24         community that reflects its beliefs and practices, and where a community has traditionally  
25         conducted economic, artistic, spiritual, or other cultural practices its members think important in  
26         maintaining their collective historic identity.

27  
28 The following are examples of places that possess significance as a traditional cultural place:

- 29     ▪ a landscape feature: Medicine Bluffs, Oklahoma, a site listed in 1974 (Figure 3);
- 30     ▪ a rural area: Green River Drift Trail, Wyoming, a district listed in 2013 (Figure 4); and
- 31     ▪ an urban neighborhood: Tarpon Springs Greektown, a district listed in 2014 (Figure 5).

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The words “community” and “group” are used interchangeably throughout this *Bulletin* to refer to people whose traditional cultural values are associated with one or more places. Some communities (for example, Federally recognized Native American Tribes and Native Hawaiian organizations) are formally defined, while others are not. In the context of a TCP, the community or group that values a place (1) must have existed in the past and (2) must be comprised today of living people who share beliefs, customs, or practices that have existed over generations. This is not to say that a place must have been in continuous use by that group; it does not. This nation’s long history of displacement of Indigenous Peoples and minority communities may have resulted in physical dislocation from a place, but the place may continue to be of significance to a group. This issue is further discussed at Section VII, at “Identifying the Period of Significance.”

Traditional cultural values are central to the way a community of people defines itself, and maintaining these values is vital to maintaining a community’s sense of identity. The *places* to which traditional cultural value is attributed are “traditional cultural places.” Damage to or infringement upon these places may be deeply offensive to, and even destructive of, a community that values them. It is important that TCPs be considered carefully in planning activities that might affect them, or affect how people access and use them.

TCPs may be hard for one who is from outside the community to recognize. For example, a sacred site may simply look like a mountain, lake, or stretch of river or ocean. A culturally important urban neighborhood may look like any other group of buildings. An area where culturally important economic or artistic activities are carried out by a traditional community may look like any other wooden structure, grassy field, or deep forest. As a result, such places may not readily come to light when routine archeological, historical, or architectural surveys are done. The existence and significance of culturally significant places can be understood first and foremost by learning from the people who live in, use, or value the area. This traditional knowledge is an independent line of evidence provided by the people—the experts—who are the authorities in their culture and the connection that culture has to a place. The subtlety with which the significance of these places may be expressed makes it easy for an outsider to overlook or misinterpret them. (Figure 6, Turtle & Shark; Figure 7, Coso Hot Springs.)

**Seven Essential Characteristics of a National Register-Eligible Traditional Cultural Place**

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To be considered eligible for inclusion in the National Register, a traditional cultural place must have all of the following characteristics:

- 1) The place must be associated with and valued by a living community.
- 2) The community that values the place must have existed historically, and continue to exist in the present.
- 3) The community must share beliefs, customs, or practices that are rooted in its history and held or practiced in the present.
- 4) These shared beliefs, customs, or practices must be important in continuing the cultural identity and values of the community.
- 5) The community must have transmitted or passed down the shared beliefs, customs, or practices, including through spoken or written word, images, or practice.
- 6) These shared beliefs, customs, or practices must be associated with a tangible place.
- 7) The place must meet the criteria for listing in the National Register of Historic Places
  - A place must have significance: it must be important in a community’s history, architecture, archeology, engineering, or culture
  - A place must have integrity: it must retain the ability to convey its significance.

The concepts of significance and integrity, in National Register practice, are discussed in detail at Section VI, “Evaluating TCP Eligibility.”

Again, a place does *not* have to have been in continual use by a community to be valued by that community as a place important to their beliefs, customs, and practices, and to be potentially eligible for inclusion in the National Register. For example, Ocmulgee Old Fields, Georgia, was determined eligible for listing in 1997 (east/west boundary DOE in 1999) under Criterion A for its cultural and historical significance to the Muscogee (Creek) Nation, whose ancestors were forced to abandon the place when they were relocated in the early 19th century, but who still revere it as their ancestral homeland.

**Example**

Bohemian Hall and Park in Queens, New York, is a building that was listed in the National Register in 2001 at the local level of significance with a period of significance of 1910 to the present under Criterion A for its historic association with the cultural life and traditions of New York City’s Czech immigrants and

- 1 Criterion C for embodying the distinctive characteristics of early twentieth-century meeting hall design
- 2 serving social, cultural, and recreational needs. (Figure 8, Bohemian Hall and Park.)
- 3

TCP Essential Characteristics	Bohemian Hall and Park Nomination <sup>3</sup>
1) The place must be associated with and valued by a living community.	“At ninety years old, Bohemian Hall continues to be a home for Czech people—a connection to Czech and Czech-American traditions, and a place to participate actively in those traditions.”
2) The group/community that values the place must have existed historically, and the same community must continue to exist to the present.	“Bohemian Hall is an authentically vital connection to New York’s Czech enclaves of the nineteenth and early twentieth century..... As the embodiment of the collective experience of several generations of Czech immigrants, and with most of its early traditions intact, Bohemian Hall and Park represent a kind of cultural continuity rare in New York City. ....Bohemian Hall remains a lively center for Czech culture and is a destination for Czechs and Czech Americans throughout the metropolitan region. Seven annual events draw hundreds of former residents of New York’s Czech neighborhoods, as well as new immigrants and other Slavic citizens of the city.”
3) The community must share cultural beliefs, customs, and practices that are rooted in its history and held or practiced today.	“Since its construction in 1910 by the Bohemian Citizens Benevolent Society, Bohemian Hall and Park have been home to several New York City Sokol clubs, a Czech language school, Slavic drama and choral groups, and a European-style beer garden. Its beer garden is the last in the city; its Czech School is the last of its kind here; and its <i>Sokol</i> hall is one of only two remaining in New York City.”
4) These shared cultural beliefs, customs, and practices must be important in continuing the cultural identity and values of the community.	“The Hall’s survival and revival over several generations is connected to patterns of Czech immigration to the United States. Each new wave of immigrants, varying in number, character and influence, and with a need to socialize with like kind, has brought a new energy to Bohemian Hall and Park.”
5) The community must have transmitted or passed down the shared cultural beliefs, customs, and practices including through spoken or written word, images, or practice.	“The revival of Bohemian Hall on behalf of new Czech immigrants — particularly during the early 1990s — is a self-conscious approach to cultural heritage, but is no less an authentic and organic act of community than the creation of Czech-American culture in the nineteenth century.”

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<sup>3</sup> Source: National Register nomination form for Bohemian Hall and Park, NR Ref. 01000239, research and text by Laura Hansen for Place Matters, Section 8, pp. 1, 18.

TCP Essential Characteristics	Bohemian Hall and Park Nomination <sup>3</sup>
6) These shared cultural beliefs, customs, and practices must be associated with a tangible place.	“While the Czech community of Astoria has dwindled over the past 40 years, Bohemian Hall remains a lively center for Czech culture and is a destination for Czechs and Czech Americans throughout the metropolitan region.”
7) The place must satisfy the criteria—the eligibility requirements—for listing in the National Register of Historic Places.	“Bohemian Hall and Park in Astoria, Queens County, New York, are significant under Criterion A for their association with events in the history of Czech and other Slavic immigrants; for their association with ethnic heritage and the social history of New York City; and for their association with the history of recreation, as home to Sokol organizations for ninety years. The hall is architecturally significant under Criterion C for embodying the distinctive characteristics of early twentieth-century meeting hall design serving social, cultural, and recreational needs. The beer garden is important as the only surviving landscape design of its type in New York City.”

1  
 2 The National Register of Historic Places, being by definition a list of *places*, is not the appropriate tool for  
 3 recognizing cultural resources that are *only* intangible, such as craft practices, dance forms, or  
 4 storytelling. Still, *places* where these intangible cultural practices take place may be eligible. The National  
 5 Register lists tangible, physical places that meet the National Register criteria for evaluation—  
 6 significance and integrity—described by Federal regulations at 36 C.F.R. § 60.4 (reproduced in this  
 7 *Bulletin* in Appendix I). This bulletin provides guidance on the application of those regulations to physical  
 8 cultural resources—buildings, structures, objects, sites, and districts—and does not address intangible  
 9 cultural resources that are not associated with tangible resources.

10  
 11 Still, some qualities that give such places significance are *intangible*, such the feeling of a particular  
 12 period of time. For example, the experience of viewing the sunrise over Nantucket Sound contributes to  
 13 the Sound’s eligibility for the National Register. (Figure 9, Nantucket Sound.) Such qualities—or “aspects,”  
 14 to use the National Register term—should not be ignored in evaluating places that may be eligible for  
 15 inclusion in the National Register. Tangible places and their intangible aspects must be considered  
 16 *together*. The National Register’s seven aspects of integrity—location, setting, design, materials,  
 17 workmanship, feeling, and association—may be applied with a good deal of flexibility, as discussed in  
 18 detail in Section VII “Evaluating TCP Eligibility.”

19  
 20 This document encourages its users to address the intangible cultural values that may make a place  
 21 eligible for listing in the National Register in an evenhanded way that reflects responsible research and

1 engagement, carefully avoiding ethnocentric preconceptions or personal biases. The traditional  
2 knowledge of those who value a place is an independent line of evidence provided by the people—the  
3 experts—who are the authorities in their culture and the connection that culture has to the place.

4

5

#### **Key Concepts**

6 A traditional cultural place (TCP) is a building, structure, object, site, or district that may be eligible for  
7 inclusion in the National Register because (1) it is SIGNIFICANT to a living community because of its  
8 association with beliefs, customs, or practices that are rooted in the community's history and that are  
9 important in maintaining the community's cultural identity and (2) it retains its ability—its INTEGRITY—  
10 to convey its significance .

11



1 **III. TERMINOLOGY**

2

3 This *TCP Bulletin* is intended for anyone—from professional preservationists to the general public—  
4 interested in preparing a National Register nomination for a TCP. However, terminology common in  
5 National Register practice may not be familiar to all readers. This section provides some definitions.

6

7 **Listing vs. “Eligible for Listing”**

8

9 A place may be listed in the National Register or, for a variety of reasons, not actually listed but found  
10 “eligible for listing.” For example, if a private property owner objects to the listing of their property, the  
11 Keeper of the National Register may still determine that the place satisfies the criteria for listing—that it  
12 has both significance and integrity—and therefore it is “eligible for listing.” If the place is at least  
13 “determined eligible,” a Federal agency will be required to consider the effects of their actions on the  
14 place before the agency may fund, license, or pursue a project which will affect the property. Federal  
15 undertakings are discussed in greater detail at Section IV “Planning and Protection.”

16

17 Because it is cumbersome to repeatedly write (and read) “listed in or eligible for listing in the National  
18 Register,” for purposes of this bulletin, “included” or “inclusion” will be used to convey both “listing,” and  
19 “eligible for listing.”

20

21 **Prehistoric vs. Historic**

22

23 The word “prehistoric” is generally defined as meaning “before recorded or written history.” It is not  
24 intended to suggest an absence of history or to diminish past cultures or events. “Prehistoric” appears in  
25 both the National Register’s enabling legislation—the National Historic Preservation Act—and its  
26 regulations. However, it is a word that has gained some negative associations. Throughout this  
27 document, “pre-colonial”—meaning before European colonization of the North American continent and  
28 nearby islands—will be used in place of “prehistoric.”

29

30

1           **“Ethno-“ Terms**

2  
3 Several words beginning with "ethno" are used repeatedly in this document. All of these terms are  
4 derived from the Greek *ethnos*, usually translated to mean a “people,” “multitude,” or "nation," and are  
5 widely used in the study of anthropology and related disciplines.

6  
7           **Ethnography** is the study of a culture of particular communities of people through sustained,  
8 direct engagement with community members during which the researcher observes and, to the  
9 extent appropriate, participates actively in cultural practices.

10  
11           **Ethnohistory** is the study from an ethnographic perspective of historical data including, but not  
12 necessarily limited to, documentary data—including maps, photography, paintings,  
13 environmental and landscape studies, archeological materials, and museum collections—  
14 pertaining to a community.

15  
16           **Ethnocentrism** means viewing the world and the people in it only from the point of view of one's  
17 own culture and being unable to sympathize with the feelings, attitudes, and beliefs of someone  
18 who is a member of a different culture.

19  
20 It is particularly important to understand, and seek to avoid, ethnocentrism in the evaluation of TCPs.  
21 Most European American academic and scientific disciplines emphasize objective observation of the  
22 physical world not only as possible but as desirable as a sound basis for making statements about a  
23 culture. However, there may be nothing objectively observable to the outsider about a place regarded as  
24 spiritually powerful by Indigenous Peoples. (Figure 10, Pahuk; Figure 11, Lawetlat’la (Mt. St. Helens).)  
25 There is no way to objectively determine whether this power exists, but belief in it may be deeply  
26 meaningful to the community.

27  
28 For example, an Indigenous community’s position that its ancestors emerged from the earth at the  
29 beginning of time may contradict European American science's position that the group's ancestors  
30 migrated to North America from Asia. But this position does not diminish the significance of the  
31 locations to those who value them. An ethnocentric view would be to say, "Whatever the Native  
32 American Tribe says about this place, I can't see anything here, so it is not significant," or "Because

1 certain schools of thought argue that this community's ancestors came from Siberia, the place where  
2 they say their ancestors emerged from the Earth is of no significance." A place thought to have  
3 traditional cultural value must be evaluated from the point of view of those who attribute significance to  
4 them. This is not to say that a community's assertions about the significance of a place cannot be  
5 subjected to critical analysis—and a National Register nomination must be adequately documented and  
6 technically and professionally correct and sufficient<sup>4</sup>—but they should not be rejected based on the  
7 premise that the beliefs they reflect are inferior to or conflict with those of an outside evaluator. (Figure  
8 12, Mount Tonnachau.) Inclusion in the National Register respects but does not validate the beliefs that  
9 are memorialized in the documentation.

10

11

### **Key Concept**

12 Places believed to have traditional cultural value must be evaluated from the point of view of those who  
13 attribute significance to them. The traditional knowledge of those who value a place is an independent  
14 line of evidence provided by the people—the experts—who are the authorities in their culture and the  
15 connection that culture has to the place

16

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<sup>4</sup> 36 C.F.R. § 60.3(i).

1 **IV. IDENTIFYING and DOCUMENTING TCPs**

2 A potential National Register-eligible TCP is often first identified by those who value a place. For  
3 preservation professionals seeking to identify potential TCPs—for example, agency historic preservation  
4 offices routinely conduct surveys (or refresh older surveys) of potentially historic places—the first step  
5 should be simply to ask about them and to be open to what people may volunteer. The people who  
6 value a traditional cultural place are the most authoritative experts on that place; if they offer  
7 information about such places, it should be respectfully received and prioritized over other sources.  
8 Some TCPs are well known to the residents of an area. For example, it was widely understood long  
9 before it was listed in the National Register in 1973 that Chinatown in Honolulu, Hawaii, was a place of  
10 cultural importance to the city's Chinese American community. (Figure 13, Chinatown Historic District.) It  
11 remains so, even though as of this writing the district has not been formally documented as a TCP  
12 (although an update of the 1973 nomination is underway).

13  
14 The work of identifying and evaluating potential National Register-eligible TCPs is not limited to  
15 professional historians. A TCP may be readily identified by members of the community who value the  
16 place. For those outside the community—for example, local jurisdictions have a responsibility to survey  
17 their city, town, or county—the best way to identify a TCP is through thoughtful, collaborative discussion  
18 and research with community members. For Federally-recognize Tribes, this includes formal  
19 government-to-government consultation.

20  
21 This section discusses recommended practices for identifying and documenting TCPs.

22  
23 **Establishing the Level of Effort**

24  
25 Any effort to identify historic buildings, structures, sites, objects, and districts in a geographic area—  
26 whether urban, suburban, or rural—should include a reasonable effort to identify potentially National  
27 Register-eligible TCPs. What constitutes a "reasonable" effort depends in part on the likelihood that such  
28 places may be present. Knowledge of an area's history, ethnography, and contemporary society is  
29 important information. Another indicator is what people in and around the area say about it. Do people  
30 talk about the area, or the places within it, in a way that suggests traditional cultural associations? If so,  
31 this should be accepted and explored.

32

1 The day-to-day activities of a land managing agency may have little potential to affect TCPs, but if there  
2 is an activity that will take place in an area or affect a resource significant to a traditional community, the  
3 potential for effect may be high and the level of effort to address historical and cultural resources should  
4 likewise be high. For example, mining ore in an area where a Native American Tribe gathers medicinal  
5 plants or constructing a building in an area that Native American Tribe's religious practitioners associate  
6 with traditional beliefs may disrupt those activities, which are often essential to cultural perpetuation.  
7 (Figure 14 and 15 X'unaxi (Indian Point).)

8

### 9 **Conducting Background Research**

10

11 Conducting background research into what is already known about the area's history, sociology, and  
12 folklife should provide clues as to what kinds of places may be important and who may know about  
13 them. Published and unpublished materials on the historic and contemporary composition of the area's  
14 social and cultural communities should be reviewed; this material can often be found through the  
15 libraries of local universities or other academic institutions, local museums, and historical societies.  
16 Anthropologists, folklorists, and other specialists who have studied the area should be consulted. The  
17 State Historic Preservation Officer, Tribal Historic Preservation Officer, and any other official agency or  
18 organization that concerns itself with matters of traditional culture—for example, a state folklorist or a  
19 state Native American commission—should be contacted for recommendations about sources of  
20 information and about groups and individuals to contact.

21

### 22 **Engaging with Traditional Communities**

23

24 Whether the work is being done by professional preservationist or a community member, an important  
25 step in identifying any kind of historic place is to engage with experts on the area and on the types of  
26 places under consideration. In the case of TCPs, this means those individuals and groups who may  
27 attribute traditional cultural significance to the study area or places within it. The need for community  
28 participation is critical. Efforts should be made to identify groups that may have long-established cultural  
29 connections with the area involved, and with individuals who are knowledgeable about these  
30 connections. These groups and individuals include not only Indigenous communities and their traditional  
31 authorities, but all people who may be concerned about the area's cultural significance.

32

1 People who now live far from the area may ascribe cultural value to it. These groups may be difficult to  
2 locate and confer with, but a reasonable effort should be made to do so. For example, a Native  
3 American Tribe that was relocated in earlier times may retain deep cultural associations with its  
4 ancestral territories or former resettlement locations. (Figure 16, Ocmulgee Old Fields; Figures 17 and  
5 18, Ballast Island.) Multiple groups may attribute significance to a single place. In these cases, all of these  
6 groups should be contacted.

7  
8 Having reviewed available background information, the next step—if it has not already been initiated—is  
9 to contact knowledgeable people directly. Traditional knowledge is an independent line of evidence  
10 provided by the people—the experts—who are the authorities in their culture and the connection that  
11 culture has to a place. Some communities have official representatives, for example, an urban  
12 neighborhood association. In other cases, leadership may be less officially defined, and establishing  
13 contact may be more complicated. SHPOs and THPOs can be helpful in identifying points of contact, but  
14 may not be fully informed and authoritative about all potentially interested groups. The assistance of  
15 historians, ethnographers, sociologists, folklorists, and archeologists or others who may have conducted  
16 research in the area or otherwise worked with its communities may be necessary to find ways of  
17 contacting and conferring with such groups in ways that are both effective and consistent with their  
18 systems of leadership and communication.

19  
20 In some cases, a community’s current political leadership may be resistant to discussing traditional  
21 matters. As a result, it may be necessary to adjust the scope of the research to ask only for enough  
22 information to confirm a place meets the criteria for potential inclusion in the National Register, and  
23 nothing more. Alternatively, it may be necessary to seek knowledgeable parties outside of a  
24 community’s official structure. When working with Tribal governments, this may only be done with the  
25 full knowledge and cooperation of the Tribe’s officials.

26  
27 In most cases, it is appropriate to ask leaders to identify members of the community who are  
28 knowledgeable about traditional cultural matters, and treat these parties as a respected network of  
29 advisors. In other cases, when a community’s leaders are adamant about not discussing such matters, it  
30 is important for those outside the community to respect that position and not view it as a challenge to  
31 overcome. Revealing information that should not be revealed can have serious consequences to a  
32 community’s practices, lifeways, and health.

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If there is serious animosity between the community’s contemporary leadership and its traditional experts, however, such cooperation may not be possible, and efforts to confer with traditional experts may be actively opposed. Where this happens, and it is necessary to proceed with the identification and evaluation of places—for example, where this work is being done in connection with review of a Federal undertaking—negotiation and mediation may be necessary to overcome opposition and establish mutually acceptable ground rules for consultation.

Oral histories are recognized sources for informing National Register nominations. Since knowledge of traditional cultural values may not always be shared readily with those outside the community, knowledgeable people should be interviewed in ways that are familiar and sensible to them. The information solicited may play special and important roles in the culture of those from whom it is solicited, and the community may have rules (often unwritten) governing its transmittal. In some communities, traditional information is regarded as powerful, even dangerous. It is often believed that such information should be transmitted only under particular circumstances or to particular kinds of people. In some cases, information is regarded as a valued community resource for which payment is in order, while in other cases offering payment may be offensive. Sometimes information may be regarded as a gift, whose acceptance obligates the receiver to reciprocate in some way.

It may not always be possible to obtain information in a manner those being consulted might prefer; when it is not, the interviewer should clearly understand that they may be asking those interviewed to violate or adjust their cultural norms. The interviewer should try to keep such requests to a minimum, and should understand that people may be reluctant to share information under conditions that are not fully appropriate from their point of view.

Thoughtful and respectful engagement may require using languages other than English, conducting meetings in ways consistent with local traditional practice, and including support from people with skills in cross-cultural communication. Sometimes, interviews are conducted where TCPs are located; other times, they may be conducted in formal meetings or conferences, or hearings (*e.g.*, a community or Tribal council meeting or a Tribal pow wow) or in less formal settings (*e.g.*, a Native Hawaiian luau, or a neighborhood gathering in someone’s home).

## 1           **Inspecting and Documenting Places**

2  
3 Identifying TCPs involves not only conferring with knowledgeable people, but also inspecting and  
4 recording places identified as significant by such people. Whether the work is done by a professional  
5 historian or community member, or an interdisciplinary team or community group, it is important to  
6 work with traditional experts to inspect places they identify as significant. In some cases, such places  
7 may not be discernible as such to anyone but a knowledgeable member of the community that  
8 attributes significance to them. In such cases, it may be impossible even to find the relevant places, or  
9 locate them accurately, without the aid of community experts.

10  
11 Even where a place is readily discernible to the outside observer, visiting the place with a traditional  
12 expert may help that expert recall additional information for a more complete record. Site visits may also  
13 allow traditional experts an opportunity to identify and discuss the particular character-defining features  
14 that constitute significant aspects of a particular place (*e.g.*, quiet, viewsheds, plant materials,  
15 architectural features, landscape elements, or the presence of spiritual power). Site visits may also help  
16 to assess boundaries.

17  
18 Proper ways to approach the place should be discussed with knowledgeable advisors before undertaking  
19 a field visit. If the place in question has religious significance or spiritual connotations, it is important to  
20 ensure that any visit is carried out in a culturally attuned manner. In some cases, ritual purification is  
21 necessary before a place can be approached, or spirits must be appeased along the way. Some  
22 communities forbid visits to such locations by people outside of the community, or other culturally-  
23 based reasons. Taking of photographs or using electronic recording equipment may not be appropriate.

24  
25 If making the location of a place known to the public would be culturally inappropriate, or compromise  
26 the integrity of the place or its associated cultural values (*e.g.*, by encouraging tourists to intrude upon  
27 the conduct of traditional practices), when the National Register nomination is prepared, the "Not for  
28 Publication" box on the form should be checked. This indicates that the reproduction of locational *or*  
29 *other sensitive information*, should be restricted in accordance with the provisions of the National  
30 Historic Preservation Act (specifically, "Section 304"—so called for its former reference number—now  
31 found at 54 U.S.C. § 307103) or the Archeological Resources Protection Act (ARPA) (which applies to  
32 Federal or Native American lands). Information restricted in accordance with NHPA Section 304 may not



1 be reproduced or otherwise publicly released without the permission of the Keeper of the National  
2 Register acting on behalf of the Secretary of the Interior. (Figure 19, National Register Registration Form;  
3 Figure 20, restricted file cover sheet; Figure 21, NHPA Section 304 language.) If the information pertains  
4 to a place on Federal land that is an “archeological resource” as defined in ARPA, and if a Federal land  
5 manager responsible for administering the property believes that releasing the information could lead to  
6 loss or destruction of the resource, then ARPA provides that the Federal land manager may consider the  
7 information to be confidential, without consulting the Keeper of the National Register.

8  
9 Likewise, if the documentation being provided for a Keeper’s Determination of Eligibility is submitted  
10 using the National Register Registration Form and restriction of the documentation from public access is  
11 required, the “Not for Publication” box on the form, at “Section 2. Location,” should be checked. If the  
12 form is not being used, but the same protection is being sought, the documentation that is submitted  
13 should be very clearly labeled “Not for Publication.”

14  
15 Confidentiality of information provided via the National Register nomination form is discussed further at  
16 Section VI.

17

### 18 **Reconciling Sources**

19  
20 Sometimes, there is a difference between historical documentation and the information shared by  
21 contemporary community members. The most common kind of discrepancy occurs when ethnographic  
22 and ethnohistorical documents do not identify a place as playing an important role in a community’s  
23 traditions and culture, while contemporary community members say the place *does* play such a role. On  
24 the other hand, documentary sources may indicate that a place does have cultural significance while  
25 contemporary sources say it *does not*. In some cases, too, contemporary sources may disagree about the  
26 significance of a place. For example, two or more communities may regard a place as significant for  
27 different reasons, or one community may view it as significant while another does not. Or a traditional  
28 community may view a place as significant—or insignificant—while outside authorities or individuals  
29 hold different opinions. Why is this?

- 30
- 31 a) The historical record is inherently incomplete. Some communities, groups, areas, and
  - 32 topics have received much more attention than others.

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b) Ethnographic and ethnohistorical documents reflect the research interests of those who produced them. The fact that a book or paper does not identify a place as culturally important may mean only that the individual who prepared the document had research interests that did not involve the identification of such places.

c) Some kinds of TCPs are regarded by those who value them as the center or source of spiritual or other power, or as having other characteristics that make people reluctant to talk about them. Such places are not likely to become known unless someone makes a very deliberate effort to obtain information on them, or unless those who value them have a reason for revealing the information, for example, a concern that the place is in some kind of danger of damage or destruction.

Because TCPs are often known only within the community that values them, and even intentionally kept secret, it is not uncommon for them to be unearthed or revealed only when something threatens them, for example, when a change in land use is proposed in their vicinity. The sudden revelation by representatives of a community which may also have economic or political interests in a proposed change can lead to charges that the cultural significance of a place has been invented only to obstruct or otherwise influence those planning the change. This may sometimes be true, but it also may be that until the change was proposed, there simply was no reason for those who value the place to reveal its existence or the significance they ascribe to it. Or, particularly where a community has long been separated from its traditional lands, the community may know that significant places exist in a general area but have lost access to information on their specific locations. In such a case, when the opportunity arises to go out and find cultural places, members of the community may be able to do so.

Where historical or other sources identify a place as having cultural significance, but contemporary sources say that it lacks such significance, the interests of the contemporary sources should be carefully examined. Economic interests, personal bias, and institutional racism all may be at work. For example, individuals who have economic interests in the potential redevelopment of an area may be strongly motivated to deny its cultural significance. Or individuals who regard traditional beliefs and practices as backward and contrary to the modern interests of a community that once attributed significance to a place may feel justified in saying that such significance has been lost, or that it was never attributed to

1 the place. Likewise laws, regulations, and policies—such as “redlining,” a discriminatory practice in which  
2 services, such as home mortgages or infrastructure improvements, are withheld from residents in  
3 neighborhoods with significant numbers of racial or ethnic minorities—may have created conditions  
4 that, to the casual observer, have diminished or damaged a place, causing some to say its significance  
5 has been lost. On the other hand, it may be that the significance attributed to the place when the  
6 documents describing its significance were prepared has since been lost.

7  
8 Similar considerations must be made when attempting to reconcile contemporary sources. An individual  
9 or community may say that a place has traditional cultural significance, but another says that it does  
10 not. There may be disagreement about the nature or extent of a place's significance or to whom it is  
11 significant; the motives and values of the parties; or the cultural constraints affecting each. In all of  
12 these situations, these positions should be carefully considered, but the views of all those involved must  
13 be given due consideration.

14  
15 In general, the views of those who ascribe cultural value to a place should be prioritized; after all, it is  
16 they who value it, and therefore are the most authoritative about its significance. Where this simple  
17 standard cannot be applied, then the only reasonably reliable way to resolve discrepancies among  
18 sources is to review a wide enough range of information, and confer with a wide enough range of  
19 experts, to minimize the likelihood either of inadvertent bias or of being deliberately misled. Authorities  
20 consulted in most cases should include experts within the community that may attribute cultural value  
21 to a place and appropriate specialists in ethnography, sociology, history, and other relevant disciplines.

22  
23 **Key Concept**

24  
25 Identifying TCPs involves conducting background research, conferring with communities, conducting  
26 field inspections, and reconciling source information—exactly the sort of work that is done when  
27 identifying any historic place. There may be a difference between historical documentation and the  
28 information shared by contemporary community members. The traditional knowledge of those who  
29 value a place is an independent line of evidence provided by the people—the experts—who are the  
30 authorities in their culture and the connection that culture has to a place. In general, the knowledge of  
31 those who attribute cultural value to a place should be prioritized; after all, it is they who value it, and  
32 therefore are the most authoritative about its value.

1 **V. EVALUATING TCP ELIGIBILITY**

2

3 Whether a place is known, found during a routine survey work, or identified through Federal agency  
4 consultation, it must be evaluated according to the National Register criteria for evaluation in order to  
5 reach conclusions about whether it is eligible for inclusion in the Register. This section discusses the  
6 process of evaluation as a series of sequential steps.<sup>5</sup>

7

8 **Step One: Ensure that the Property or Place Under Consideration is a Physical Thing or**  
9 **Location**

10

11 The property or place evaluated must be a physical thing or location—that is, it must be a building,  
12 structure, object, site, or district. Construction by human beings is a necessary attribute of buildings and  
13 structures, but districts, sites, and objects do not necessarily have to be the products of, or contain, the  
14 work of human beings in order to be eligible for the National Register.

15

16 For example, the National Register defines a "site" as "the location of a significant event, a pre-colonial  
17 or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished,  
18 where the location itself possesses historic, cultural, or archeological value regardless of the value of any  
19 existing structure." (36 C.F.R. § 60.3(l).) A place may be defined as a "site" as long as it was the location  
20 of a significant historical event or cultural activity, regardless of whether the event or activity left any  
21 evidence of its occurrence. Depending on its size, its features, and its associations, a culturally significant  
22 natural landscape may be classified as a site, as may any location where significant traditional events,  
23 activities, or observances have taken place. (Figure 22, Maka Yusota (Boiling Springs), Minnesota.)

24

25 A natural feature such as a rock or a tree may be an eligible object or site if it is associated with a  
26 significant tradition or event. Sleeping Buffalo Rock in Montana, listed in 1996 as an object, is one  
27 example (Figure 23), as is the Creek Council Tree Site in Oklahoma, listed in 1976 as a site. (Figure 24).

28

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<sup>5</sup> The National Register criteria for evaluation is found at 54 U.S.C. § 302101 and 36 C.F.R. §60.4, and reproduced at Appendix I. Further guidance on application of the criteria for evaluation can be found in *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*.

1 A concentration, linkage, or continuity of such sites or objects, as well as buildings or structures,  
2 comprising a culturally significant entity may be classified as a district. (Figure 25, Tarpon Springs  
3 Greektown Historic District.) Very large landscapes and linear places, such as traditional travel routes,  
4 are often classified as districts. For example, the Green River Drift Trail was listed for its significance as a  
5 TCP with reference to the State of Wyoming’s “Ranches, Farms, and Homesteads in Wyoming, 1860-  
6 1960” multiple property documentation effort. The Drift is a livestock drive route that represents the  
7 local ranching community’s multi-generational, traditional practices and patterns of land use. (Figure 26,  
8 Green River Drift Trail, Wyoming.)

9

## 10 **Step Two: Evaluate the Significance According to the Criteria**

11

12 Once the property or place to be evaluated has been determined to be a physical thing or a location, it is  
13 evaluated against the four basic criteria for evaluation described in the National Register regulations at  
14 36 C.F.R. § 60.4, namely Criteria A (events), B (person or persons), C (design or construction), and/or D  
15 (yielding, or likely to yield, information important in prehistory or history). If the place meets one or  
16 more of the criteria, it may be eligible. If it does not, it is not eligible.<sup>6</sup>

17

## 18 **Understanding the Historic Context**

19

20 The significance of a place can be understood only when it is evaluated within its historic context.  
21 Historic contexts are those patterns or trends in history by which a place is understood and its meaning  
22 (and ultimately its significance) within history or prehistory is demonstrated. The historic context for a  
23 TCP is grounded in the importance of the place from the unique cultural perspective of a community.

24

25

26

27

28

- Who or what is the traditional community?
- How do its members define themselves and how have they been identified by others? What do the community’s members share in terms of beliefs, practices, or activities?
- How long have they shared these cultural characteristics, and have these changed over time?
- How do these cultural characteristics differentiate them from members of the wider public?

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<sup>6</sup> This section draws heavily on *National Register Bulletin 15: How to Apply the National Register Criteria*, pp. 11-24, applying to TCPs the guidance provided in that *Bulletin*.

- 1 • What are the physical resource types associated with their traditional culture? How important  
2 are the physical places to maintaining cultural identity?

3  
4 **Criterion A: Association with Events That Have Made a Significant Contribution to the**  
5 **Broad Patterns of Our History**

6  
7 TCPs are most often found eligible for the National Register under Criterion A, association with “events  
8 that have made a significant contribution to the broad patterns of our history.”<sup>7</sup> The word “our” in this  
9 criterion refers to the community to which the place has traditional cultural significance, and the word  
10 “history” includes traditional oral history as well as recorded history. For example, Mt. Tonaachaw on  
11 Moen Island in Chuuk, Federated States of Micronesia, discussed at Figure 12, is listed in the National  
12 Register in part because of its significance in the establishment of Trukese society.

13  
14 Since traditional cultural significance is derived from the role a place plays in a community’s historically  
15 rooted beliefs, customs, and practices, places may have significance under Criterion A if they are  
16 associated with events, or a pattern of events, significant to the cultural traditions of a community.  
17 “Events” can include specific moments in history or a pattern of events reflecting a broad pattern or  
18 theme. For example, the long-standing participation of an ethnic group in an area’s history, reflected in a  
19 neighborhood’s buildings, streetscapes, or patterns of social activity, constitutes such a pattern of  
20 events, as does a community’s long-standing interactions with a landscape’s natural environment.  
21 Tarpon Springs Greektown Historic District, discussed at Figures 5 and 25, is one example. Ordinarily, a  
22 community’s account of its traditions should be taken as authoritative; the community, after all, is the  
23 most expert about its own beliefs. If for some reason it is necessary and appropriate to understand the  
24 community’s account or beliefs more fully, then the place’s perceived association with significant events  
25 may be clarified by doing additional research. The kinds of research most often undertaken for TCPs  
26 include ethnographic, ethnohistorical, and folklore studies, as well as historical and in some cases  
27 archeological research. Often the community itself may carry out such research, and, if the nomination is  
28 being prepared by a preservation professional, the community should be encouraged and assisted as  
29 needed to do so. Alternatively, agency representatives or outside experts may be engaged to do  
30 research, but this should be done only in close coordination with the community.

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<sup>7</sup> 36 C.F.R. § 60.4(a).

1  
2 Sometimes, though, just when a traditional event took place may be unclear; in such cases, it may be  
3 impossible, and to some extent irrelevant, to document with certainty that the place in question existed  
4 when the traditional event occurred. For example, events as recounted by Native Americans, Hawaiians,  
5 and Pacific Islanders may have occurred in a time before the creation of the planet as demonstrated by  
6 the geological record. As long as the events are rooted in the history of the community, and by tradition  
7 associated with the place, the association should be accepted. (Figure 27, Spirit Mountain.)

8  
9 **Criterion B: Association with the Lives of Persons Significant in Our Past**

10  
11 Under Criterion B, a place can be eligible for the National Register if it is “associated with the lives of  
12 significant persons in our past.”<sup>8</sup> Again, the word “our” should be interpreted with reference to the  
13 community that regards the place as traditionally important. The word “persons” can refer to a physical  
14 human being whose existence in the past can be documented from historical, ethnographic, or other  
15 research, as well as an ancestor or spirit who features in the traditions of a group. However, Criterion B is  
16 intended to be applied to a place associated with a *specific* person—or ancestor or spirit—not a general  
17 group like “the ancestors.” For example, Tahquitz Canyon in southern California is included in the  
18 National Register in part because of its association with Tahquitz, a Cahuilla spirit being who figures  
19 prominently in the Tribe’s traditions and is said to occupy an obsidian cave high in the canyon. (Figure 28,  
20 Tahquitz Canyon, California.) Still, if the significance of a place rests in the cumulative importance of  
21 prominent people associated with that place, the place may be eligible for the National Register but  
22 under Criterion A for its association with events that have made a significant contribution to the broad  
23 patterns of our history.

24  
25 The association between place and person must be a significant one from the standpoint of those who  
26 value the place. For example, in the case of Tahquitz Canyon, the fact that Tahquitz may have been seen  
27 in a particular location might or might not make that location significant; significance is linked to the  
28 consequences of his having been there, as those consequences are understood and valued by the  
29 Cahuilla in whose cultural traditions Tahquitz figures.

30

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<sup>8</sup> 36 C.F.R. § 60.4(b).

1 **Criterion C: Design or Construction Characteristics**

2  
3 Places may be eligible for the National Register under Criterion C that (1) express the distinctive  
4 characteristics of a type, period, or method of construction, (2) represent the work of a master, (3)  
5 possess high artistic values, or (4) represent a significant and distinguishable entity whose components  
6 may lack individual distinction.<sup>9</sup> Each of the four parts of this criterion is discussed separately, below.

7  
8 **Criterion C(1): Embodiment of the Distinctive Characteristics of a Type, Period,**  
9 **or Method of Construction**

10  
11 This sub-criterion applies most often to places that have been constructed, or contain constructed  
12 things—that is, buildings, structures, or built objects—such as a neighborhood that has traditionally  
13 been occupied by a particular ethnic group. The neighborhood may display particular housing styles,  
14 gardens, street furniture or ornamentation distinctive of the group. For example, the Chinatown Historic  
15 District in Honolulu, discussed at Figure 13, is significant for the central role it has played in the lives of  
16 several different Asian communities in Honolulu as reflected in its buildings and structures.

17  
18 **Criterion C(2): Representative of the Work of a Master**

19  
20 A place may be considered significant under Criterion C(2) if the place is identified in tradition or  
21 suggested by scholarship to be the work of a traditional master builder or artisan, even though the  
22 precise identity of the individual may not be known. As of this writing, in 2022, no TCP has yet been  
23 included in the National Register for its significance as the work of a master.

24  
25 **Criterion C(3): Possesses High Artistic Values**

26  
27 “High artistic values” may be expressed in many ways, including areas as diverse as community design,  
28 engineering, and sculpture. A place may be eligible for the National Register for its high artistic values if  
29 it so fully expresses an aesthetic ideal valued by a group for traditional cultural reasons.<sup>10</sup> For example, a

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<sup>9</sup> 36 C.F.R. § 60.4(c).

<sup>10</sup> *National Register Bulletin 15 “How to Apply the National Register Criteria,”* p. 20.



1 petroglyph or pictograph site venerated by a Native American Tribe, or a building whose decorative  
2 elements reflect a local ethnic group’s distinctive modes of expression, may be viewed as having high  
3 artistic value *from the standpoint of the group*. (Figures 29 and 30, Our Lady of Mount Carmel Grotto,  
4 New York.)

5

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

8

9 A place may be regarded as representing a significant and distinguishable entity, even if many of its parts  
10 appear to lack individual distinction to the casual observer. These parts, when considered together, may  
11 represent a larger entity of traditional cultural importance—in other words, a district.

12

13 A TCP may be a district if it possesses a significant collection of buildings, structures, sites, or objects  
14 united historically by intentional plan, physical development, or traditional beliefs, customs, and  
15 practices. For example, within the Tonto National Forest there is a 4,000-plus acre area comprised of a  
16 diversity of natural and cultural features that an outside observer may not recognize as a meaningful  
17 collection of tree groves, rock formations, varied terrain, and archeological sites. However, this place—  
18 Chi'chil Bildagoteel (Oak Flat)—is the ancestral homeland and a sacred place to the Western Apache.  
19 (Figure 31, Chi'chil Bildagoteel.) Likewise, some deeply venerated places in Hawai'i, Samoa, and  
20 Micronesia are natural features, such as rock outcrops and tree groves; these are indistinguishable  
21 visually (at least to the outside observer) from other rocks and trees, but they figure importantly in  
22 chants embodying lessons about traditional history. As individual objects they may be said to “lack  
23 distinction” as National Register-eligible objects, but when considered together, they may be significant  
24 in the areas’ histories.

25

26 Many TCPs are landscapes with many components—hills, springs, rock outcrops, plant communities,  
27 former habitation sites—and may be considered districts under Criterion C, although they are usually  
28 eligible under Criterion A as well, and they may be classified as sites rather than districts, particularly if  
29 they are comprised mostly of natural resources. For example, Doe-Kag-Wats, located on the Port  
30 Madison Indian Reservation in Washington state, is comprised of a salt marsh, freshwater marsh, sand  
31 spit, tidal flat, and woodland habitat encompassing over 300 acres. (Figures 32 and 33, Doe-Kag-Wats.)

32

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

2  
3 Places that have traditional cultural significance often have already yielded, or have the potential to  
4 yield, important information through archeological investigations.<sup>11</sup> For example, studies of Kaho'olawe  
5 Island in Hawai'i were conducted in order to clarify its eligibility for inclusion in the National Register.  
6 This work provided important insights into Native Hawaiian traditions and into the history of twentieth  
7 century efforts to revitalize traditional Hawaiian culture. The Kaho'olawe Island Archeological District  
8 was listed in the National Register in 1981. (Figure 34, Kaho'olawe Island Archeological District.) But,  
9 generally speaking, a TCP's history of yielding or potential to yield information based on archeological  
10 investigation is secondary to its association with the traditional history and culture of the group that  
11 attributes value to it. Criterion A—association with events that have made a significant contribution to  
12 the broad patterns of our history—may be the better choice.

13  
14                   **Step Three: Determine Whether Any of the Criteria Considerations Make the Place Ineligible**

15  
16 Certain kinds of places are not usually eligible for listing in the National Register: religious places, moved  
17 places, birthplaces and graves, cemeteries, reconstructed places, commemorative places, and places  
18 achieving significance within the past fifty years. However, these places may be eligible for listing if, in  
19 addition to being eligible under one or more of the four criteria and possessing integrity, they meet  
20 special requirements, called “Criteria Considerations.”<sup>12</sup> In applying the National Register Criteria  
21 Considerations to potential TCPs, it is always important to be sensitive to the cultural values involved,  
22 and to avoid ethnocentric bias.<sup>13</sup>

23  
24                   **Criterion Consideration A: Religious Places**

25  
26 The fact that traditional history and culture may be discussed in spiritual terms does not make places  
27 associated with traditional beliefs, customs, and practices ineligible for inclusion in the National Register.  
28 A religious place, according to National Register regulations, requires additional explanation for

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<sup>11</sup> 36 C.F.R. § 60.4(d).

<sup>12</sup> 36 C.F.R. § 60.4 “Criteria Considerations” (a)-(g).

<sup>13</sup> This section draws heavily on *National Register Bulletin 15: How to Apply the National Register Criteria*, pp. 25-43, discussing the guidance provided in that *Bulletin* in the context of TCPs.

1 nomination to avoid any appearance of judgment by the government about the merit of any religion or  
2 belief. Criterion Consideration A was included among the National Register Criteria for Evaluation to  
3 avoid historical significance being determined on the basis of religious doctrine, not to exclude any place  
4 having religious associations.

5  
6 In many traditional societies, including most Native American Tribes, and Native Hawaiian and other  
7 Pacific Island communities, the clear distinction made by many European Americans between religion  
8 and the rest of culture does not exist. As a result, places that have traditional cultural significance are  
9 regularly discussed by those who value them in terms that have spiritual connotations.

10  
11 Simply because TCPs are used for purposes that are definable as “religious” in European American terms  
12 does not automatically make them ineligible for inclusion in the National Register. For example, Inyan  
13 Kara Mountain, a National Register-listed district in the Black Hills of South Dakota, is significant in part  
14 because it is the home of spirits in the traditions of the Lakota and Cheyenne. (Figure 35, Inyan Kara  
15 Mountain.) Kootenai Falls in Idaho, part of Kootenai Falls Cultural Resource District determined eligible  
16 for listing in 1982, has been used for centuries as a vision questing site by the Kootenai Tribe. The Helkau  
17 Historic District in northern California, determined eligible for listing in 1981, is a place where traditional  
18 spiritual practitioners go to make medicine and commune with spirits.

19  
20 Excluding a TCP for religious associations without careful and thoughtful consideration can result in  
21 discriminating against the people who value it, effectively denying the legitimacy of the community’s  
22 history and culture. The histories of Native Americans, Alaskans, Hawaiians, and Pacific Islanders are  
23 likely to reflect beliefs in spiritual beings and events that European American culture categorizes as  
24 religious, although the people involved may not even have a word in their languages for “religion.” To  
25 hold that a place of historical and cultural importance is not eligible for the National Register because its  
26 significance is expressed in terms that to the European American observer appear to be “religious”  
27 would be ethnocentric. With respect to Native Americans and Hawaiians, it is expressly contrary to the  
28 language of the National Historic Preservation Act, which provides that places of traditional religious and  
29 cultural importance to a Tribe or Native Hawaiian organization may be eligible for inclusion in the  
30 National Register.<sup>14</sup>

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<sup>14</sup> NHPA, U.S.C. § 302706.

1  
2 The fact that a place is used by a community for spiritual purposes, such as seeking visions or offering  
3 prayers, should not by itself be taken to make the place ineligible for the National Register. Nor should  
4 the fact that the place is described by a community in terms that are classified by an outside observer as  
5 "religious" be taken to disqualify it. These activities and expressions may reflect traditional beliefs that  
6 are central to the continuation of traditional cultural customs and practices. Similarly, the fact that a  
7 community that values a place describes it in spiritual terms, or comprises a group of traditional spiritual  
8 practitioners, does not automatically exclude the place from inclusion in the National Register. For  
9 example, Our Lady of Mount Carmel Grotto on Staten Island in New York was listed in the National  
10 Register in 2000, in part, for its association with Staten Island's multi-generational Italian American  
11 Catholic community. (Figure 36, Mt. Carmel Grotto detail.) Likewise, Saint Augustine Catholic Church and  
12 Cemetery in Natchitoches Parish, Louisiana, is historically and culturally significant to the area's Cane  
13 River Creole of Color community and was listed in the National Register in 2014. (Figure 37, St. Augustine  
14 Catholic Church and Cemetery.)

15  
16 **Criterion Consideration B: Moved Places**

17  
18 A property that has been moved from its historically important location is not usually eligible for  
19 inclusion in the National Register because location and setting are important aspects of integrity—recall  
20 that integrity is the ability of a place to convey its significance—and because one purpose of the National  
21 Register is to encourage the preservation of historic places as living parts of their communities. This  
22 Criterion Consideration is rarely applicable to TCPs; in most cases, the TCP is a site or district which  
23 cannot be moved. Even where a culturally and historically significant building, structure, or object can be  
24 relocated, maintaining it on its original site is often crucial to maintaining its importance in traditional  
25 culture, and if it has been moved, many traditional authorities may regard its significance as lost.

26  
27 However, a cultural resource may be moved and still retain its significance to a community. Sleeping  
28 Buffalo Rock, for example, is a powerful spirit helper important to several Northern Plains Tribes. (Figure  
29 38, Sleeping Buffalo Rock.) Stones invested with powerful forces are deeply regarded in many native  
30 cultures and stories of sacred rocks are widespread. Despite repeated relocation, Sleeping Buffalo Rock  
31 remains important to ongoing traditional cultural practices of Native Americans.

1 It may be possible to relocate a culturally and historically significant building, structure, or object and still  
2 retain its significance, provided the historic and present orientation and general environment—its  
3 setting—are carefully planned for and executed in the move. At Lake Sonoma in California, for example,  
4 the U.S. Army Corps of Engineers relocated a number of boulders containing petroglyphs having artistic,  
5 archeological, and traditional cultural significance to protect them from flooding by a soon-to-be-  
6 constructed dam. The work was done in consultation with members of the local Pomo Tribe, and did not  
7 destroy the significance of the boulders to the Tribe.

8  
9 Where a property is naturally portable, moving it does not destroy its significance provided it remains  
10 located in a historically appropriate setting. For example, a traditionally important canoe would continue  
11 to be eligible as long as it remained in the water or in an appropriate dry land context, for example, in a  
12 boathouse. However, if that canoe were placed in a museum, it would be out-of-context and would not  
13 have integrity of setting. An object may also retain its significance if it has been moved historically. For  
14 example, totem poles were moved from one Northwest Coast village to another in early times by those  
15 who made or used them and would not have lost their significance by virtue of the move.

16  
17 **Criterion Consideration C: Birthplaces and Graves**

18  
19 A birthplace or grave of a historically significant person is not usually eligible for inclusion in the National  
20 Register. A person significant in the past usually is recognized in the National Register by a place (or  
21 places) associated with their *productive* life's work. However, if the birthplace or gravesite of a historical  
22 figure is significant for reasons other than its association with them, or if there is no other extant place  
23 associated with that person, the place may be eligible. If the significance of a place rests in the  
24 cumulative importance of prominent people associated with that place, the place may be eligible for the  
25 National Register under Criterion A for its association with events that have made a significant  
26 contribution to the broad patterns of history and Criterion Consideration C “birthplaces and graves” for  
27 its association with the traditional origin of a group of people.

28  
29 **Criterion Consideration D: Cemeteries**

30  
31 A cemetery is not ordinarily eligible for inclusion in the National Register unless it derives its primary  
32 significance from graves of persons of transcendent importance, from age, from distinctive design, or

1 from association with historic events. Many TCPs contain cemeteries, however, and the presence of  
2 cemeteries does not detract from and indeed may contribute to their significance. Likewise, there may  
3 very well may be hundreds of people interred at locations of conflict—such as massacre sites—and these  
4 places may be National Register-eligible TCPs because for many Indigenous Peoples, places where  
5 ancestors have died are sacred sites and thus places of great cultural significance.

6  
7 Evidence of traditional burial practices—often inherent in burial locations, orientation of graves, and the  
8 design of grave markers—may make a strong case for the exceptional nature of the place and, therefore,  
9 the place’s eligibility for listing in the National Register. For example, Tahquitz Canyon in California  
10 (discussed at Figure 28) was listed in 1972 for its significance to the Cahuilla Nation because it contains a  
11 number of burial places that are of great importance to the Cahuilla people. The fact that they are  
12 present did not render the Canyon ineligible; on the contrary, as evidence of the long historical  
13 association between the Cahuilla and the Canyon, the burial places contribute to the Canyon’s  
14 significance. For the Wampanoag Tribes in Massachusetts, there is an area within Nantucket Sound  
15 (determined eligible for listing in 2010) considered a traditional burial place that contributes to the  
16 district’s overall significance as a TCP. The fact that a TCP is or contains a cemetery should not  
17 automatically be presumed to make the place ineligible for the National Register.<sup>15</sup>

#### 18 19 **Criterion Consideration E: Reconstructed Places**

20  
21 A reconstructed place—new construction that reproduces the form and detail of a building or structure  
22 that has vanished, as it appeared at a specific period in time—is not ordinarily eligible for inclusion in the  
23 National Register unless it is accurately reconstructed in a suitable environment and presented in a  
24 respectful manner as part of a restoration master plan, and when there is no other extant building or  
25 structure with the same association. For example, on the island of Kaho’olawe, listed in 1981 as the  
26 Kaho’olawe Island Archeological District (discussed at Figure 34), individuals involved in the revitalization  
27 of traditional Hawaiian culture and religion on the island have over the past several decades  
28 reconstructed the cultural and religious structures that had been destroyed by the U.S. military’s long  
29 use of the island as a target range. As an older nomination focused on archeological sites, this listing is

---

<sup>15</sup> See *National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places* for further guidance.

1 ripe for updating to recognize Kaho'olawe's significance as a TCP. The reconstructed buildings and  
2 structures may be eligible for consideration as resources that contribute to the significance of the place.

3

4 **Criterion Consideration F: Commemorative Places**

5

6 Places constructed to commemorate a traditional event or person cannot be found eligible for inclusion  
7 in the National Register based on association with that event or person alone. Monuments and markers  
8 are not typically directly associated with the event or with the person's productive life, but serve as  
9 evidence of a later generation's assessment of the past. To be eligible for inclusion in the National  
10 Register, a commemorative property generally must be over fifty years old and must possess significance  
11 based on its own value, not on the value of the event or person being memorialized. For example, the  
12 Atantano Shrine in Guam commemorates important civic achievements by Spanish administrators living  
13 and working on the island c. 1521 to 1898. (Figures 39 and 40, Atantano Shrine.) However, the shrine  
14 subsequently gained significance both as a link to the area's earliest historic times and as the location of  
15 an annual nine-day traditional religious festival that dates to before World War II. The continuing use  
16 and maintenance of the shrine attests to the significance of the shrine to the local people. These  
17 activities serve to keep alive the local knowledge of impact of the events commemorated by the shrine,  
18 furthering the traditional cultural function of the shrine and providing continuity into modern times.

19

20 **Criterion Consideration G: Places that Have Achieved Significance Achieved Within the**  
21 **Past 50 Years**

22

23 Places that have achieved significance only within the past 50 years are not eligible for inclusion in the  
24 National Register unless sufficient perspective exists to determine that the place is exceptionally  
25 important and will continue to retain that distinction in the future. If a place has come to be significant  
26 to a community for its beliefs, customs, or practices only within the past 50 years, it cannot be  
27 considered a *traditional* cultural place.

28

29 However, the fact that a place may have gone unused for a long period of time, with use beginning again  
30 only recently, does not necessarily make it ineligible for the National Register. For example, Ocmulgee  
31 Old Fields in Georgia, discussed at Figure 16, holds historical and cultural significance to the Muscogee of  
32 Oklahoma. The Muscogee had no choice but to physically abandon the area upon their forced relocation

1 by the Federal government in the early nineteenth century, but the Tribe still reveres the site as their  
2 ancestral homeland. The Ocmulgee Old Fields were determined eligible for listing in the National  
3 Register in 1997 and again in 1999 (east/west boundary determination) under Criteria A and D for its  
4 historical and cultural significance to the Muscogee.

5

#### 6 **Step Four: Consider the Place’s Integrity**

7

8 Integrity is the ability of a place to convey its significance. To be included in the National Register, a place  
9 must not only be shown to be *significant* but it also must have historic *integrity*. The evaluation of  
10 integrity is a subjective judgment, but it must always be grounded in an understanding of a place’s  
11 physical features and how they relate to its historic significance.

12

13 The National Register criteria for evaluation recognize seven aspects, or qualities, that in various  
14 combinations define the overall integrity of a place: location, setting, design, materials, workmanship,  
15 feeling, and association.<sup>16</sup> Historic places either retain integrity (that is, their ability to convey their  
16 significance) or they do not. To retain historic integrity, a place will always possess several, and often  
17 most, of the aspects. Determining which of these aspects are most important to a particular place  
18 requires knowing why, where, and when the place is significant. For example, “design” and  
19 “workmanship” is irrelevant to a TCP like Doe-Kog-Wats (discussed at Figures 32 and 33) that is  
20 comprised of natural features.

21

22 The following section discusses seven aspects—five physical and two non-physical—and explains how a  
23 combination of any or all aspects combine to present “integrity.”<sup>17</sup>

24

#### 25 **Assessing the Physical Aspects of Integrity**

26

27 **“Location” is the place where the historic property was built or the place where the historic event**  
28 **occurred.** Most TCPs have integrity of location by virtue of being in their traditional locations. (Figure 41,  
29 Ballast Island.) Others—for example, traditional watercraft—may not have specific locations, so integrity

---

<sup>16</sup> 36 C.F.R. § 60.4.

<sup>17</sup> See *National Register Bulletin 15: How to Apply the National Register Criteria*, pp. 44-49, for more in-depth discussion of each aspect of integrity.



1 of location is not an issue. Still others may not occupy their original location but still have locational  
2 integrity, for example, traditional plant gathering that was relocated from one place to another because  
3 plant distributions have changed due to changing climatic conditions, or traditional fishing that was  
4 moved from one location to another because of sea level rise or reservoir construction. Generally, in  
5 these situations, locations should be in the same vicinity as the historic location and retain several other  
6 aspects of integrity.

7  
8 **“Setting” is the physical environment of a historic place.** Integrity of setting may be critical to the  
9 significance of a TCP, particularly where the place itself (for instance a building, a rock outcrop, or a  
10 pond) is relatively small but its values relate to the surrounding physical, visual, auditory, or olfactory  
11 environment. (Figure 42, Ch’ichu’yam-bam (Soda Rock ).) Just how critical depends on the views of those  
12 who value the place; they may, for example, very much dislike the fact that the place’s surroundings have  
13 been encroached upon by development, but still treasure the place itself.

14  
15 **“Design” is the combination of elements that create the form, plan, space, structure, and style of a**  
16 **place.** Integrity of design is relevant to TCPs that someone designed, for example, buildings, structures,  
17 and rock art sites. “Design” may include organization of space, scale, proportions, and ornamentation. A  
18 TCP’s design may reflect traditional historic functions and technology, as well as aesthetics. For example,  
19 the Tarpon Springs Greektown Historic District features residential and commercial places that retain  
20 culturally identifiable elements such as specific paint schemes, common landscaping forms, and  
21 functional design characteristics consistent with long-held traditional practices handed down from  
22 generation to generation. (Figure 43, Tarpon Springs Greektown Historic District.) For TCP districts  
23 significant primarily for their historic associations, design may concern more than just individual  
24 buildings, structures, and objects; it may also apply to the way in which such resources are related to  
25 each other and the surrounding landscape.

26  
27 **“Materials” are the physical elements that were combined or deposited during a particular period of**  
28 **time and in a particular pattern or configuration to form a historic place.** Integrity of materials  
29 generally means that the place should be made of whatever has traditionally made it up, for example,  
30 soil and plants in the case of a relatively natural landscape site, or wood, stone, or other building  
31 materials in the case of a building or structure. Changes in materials may be consistent with the evolving  
32 nature of traditional building patterns and have little or no effect on traditional values ascribed to a

1 place, or group of properties, by the traditional community. For example, the recent use of aluminum  
2 siding or artificial veneer stone for buildings where traditional forms and materials, such as brick, persist  
3 would not necessarily create a lack of integrity of materials. (Figure 44, Baltimore East/South Clifton Park  
4 Historic District.) While it is literally the nature of natural landscapes to evolve over time, the  
5 fundamental characteristics and most important physical aspects of those landscapes should remain  
6 intact. (Figure 45, Rice Bay.) The relative importance of integrity of materials should always be assessed  
7 according to the perspectives of the traditional community.

8  
9 **“Workmanship” is the physical evidence of the crafts of a particular culture or people during any given**  
10 **period in history or prehistory.** Integrity of workmanship, like integrity of design, relates to those places  
11 that show deliberate human intervention—places that have been built or modified by intentional human  
12 action. (Figure 46, Our Lady of Mount Carmel Grotto.) It is the evidence of human labor and skill in  
13 constructing or altering a building, structure, object, or site.

#### 14 15 **Evaluating Integrity of Feeling and Association**

16  
17 Two aspects of integrity—feeling and association—are non-physical; that is, they are beyond what is  
18 perceptible to the physical senses.

19  
20 **“Feeling” is a place’s expression of the aesthetic or historic sense of a particular period of time.** It  
21 results from the presence of physical features that, taken together, convey the place’s historic character.  
22 Does the place evoke a sense of Tribal spiritual life? Or is the place so changed that it feels spiritually  
23 dead to the community that once valued it?

24  
25 **“Association” is the direct link between an important historic event, or person and a historic place.** A  
26 place retains association if it is the place where the event or activity occurred and is sufficiently intact to  
27 convey that relationship. Is the place associated with important cultural beliefs, customs, or practices?  
28 Or might other places serve the same purpose?

29  
30 Only those who themselves value a set of cultural traditions can say what feelings a place evokes, or  
31 whether a place is associated with them as a community. Evaluating whether a place has integrity of  
32 feeling and association involves exploring two questions:

- 1 (1) Does the place have an essential relationship to traditional cultural beliefs or practices?  
2 (2) Does the relationship with the place endure, despite any alterations, in the view of those  
3 who value it?  
4

5 **Is the Relationship Essential?**  
6

7 Evaluating how essential the relationship is between a place and the beliefs or practices that may give it  
8 significance involves understanding how the community that holds the beliefs or carries out the  
9 practices views the place. If the place is known or likely to be regarded by a traditional cultural group as  
10 important in maintaining or passing on a belief, or to the performance of a practice, the place can be said  
11 to have an “essential relationship” with the belief or practice.  
12

13 For example, imagine two groups of people living along the shores of a lake: each group practices a form  
14 of water immersion to mark an individual's acceptance into the group and both carry out this practice in  
15 the lake. One group, however, holds that this ritual is appropriate in any body of water that is available;  
16 the lake happens to be available, so it is used, but another lake, a river or creek, or a swimming pool  
17 would be just as acceptable. The second group regards this ritual *in this particular lake*, as critical to its  
18 acceptance of an individual as a member. Clearly the lake is *essential* to the second group's practice, but  
19 not to that of the first.  
20

21 **Does the Relationship Endure?**  
22

23 A place may retain its traditional cultural significance for a community even though it has been  
24 substantially altered. For example, De 'ek wadapush (Cave Rock) in Nevada, listed in the National Register  
25 in 2017, continues to be regarded as a sacred place of extraordinary spiritual power to the Washoe  
26 people despite modern intrusions—notably, a double-bore vehicle tunnel and, for a time, sport rock  
27 climbing—that have diminished the landscape and affected practitioners' access. (Figure 47, De 'ek  
28 wadapush.) Likewise, changes brought about by natural events may impact a place without diminishing  
29 its integrity. For example, Lawetlat'la (Mt. St. Helens), listed in 2013, continues to be a place of  
30 traditional activities despite the dramatic change in its appearance by the enormous crater created  
31 during the eruption of May 18, 1980. (Figure 48, Lawetlat'la.)  
32

1 A place can lose its integrity of feeling or association through changes to the physical environment where  
2 the place is located (its “setting,” discussed above) or through intentional abandonment by the  
3 community that once valued it. The integrity of a place must be considered from the perspective of  
4 traditional practitioners; if in their opinion its integrity has *not* been lost, it has retained integrity. For  
5 example, a location used by a Native American Tribe for traditional vision questing may not retain its  
6 significance for them if it has come to be surrounded by housing tracts or shopping malls, or if the Tribe  
7 no longer values vision questing among its traditions.

8  
9 Because feeling and association depend on individual perceptions, their retention alone is never  
10 sufficient to support eligibility of a place for the National Register. However, even if a place has lost  
11 integrity as a TCP, it may retain integrity with reference to some other aspect of significance. For  
12 example, a place whose cultural significance has been lost because its associated community no longer  
13 exists may still retain archeological deposits and be significant under National Register Criterion D for its  
14 information potential. A neighborhood whose traditional community no longer attributes significance to  
15 it may contain buildings of architectural importance and be significant under Criterion C for design or  
16 construction.

17  
18 **Key Concept**

19  
20 An assessment of a potentially National Register-eligible TCP must be based on an understanding of the  
21 significance of the place as well as the physical and non-physical aspects that characterize and convey  
22 the perspective of the traditional community that values the place.

23  
24

1 **VI. DOCUMENTING TCPs FOR THE NATIONAL REGISTER**

2

3 Historic places possessing significance to communities as TCPs are documented in order to make it  
4 possible to manage them, regulate impacts on them, and where desirable, interpret them for the public.

5 This section discusses the process of documenting TCPs for the National Register, and addresses  
6 common challenges in doing so.

7

8 Typically, these questions should be answered in developing documentation:

9

10     ▪ **What** is the place in National Register terms: is it a building, structure, object, site or district?  
11         And what further describes the place (*e.g.*, temple, hill, neighborhood, trail, lake, grove)?

12

13     ▪ **Where** is the place is (general and specific geographic location)?

14

15     ▪ **To whom** is the place culturally significant?

16

17     ▪ **Why** is the place significant, as perceived by those who value it, and **how** does it convey that  
18         significance?

19

20     ▪ **When** is the place significant; that is, what is the time period for which the place holds  
21         significance?

22

23 A completed National Register nomination on Form 10-900, or the documentation developed for a  
24 determination of National Register eligibility, should include a clear representation of the shared beliefs,  
25 customs, and practices that contribute to the place's cultural and historical significance for a community.

26 This documentation should be based on direct engagement with knowledgeable members of the  
27 community, supplemented where necessary and appropriate by systematic research and analysis. The  
28 information may be collected in any number of ways, including audio or video recordings, photographs,  
29 field notes and sketches, and primary as well as credible secondary written records.

30

31

1           **Specific Information Challenges**

2

3   Obtaining and presenting documentation poses several challenges.

4

- 5       ▪ Those who attribute significance to the place may be reluctant to allow its description to be  
6       committed to paper or electronic media, or to be filed with a public agency that may be  
7       compelled to share that information.
- 8       ▪ Documentation involves addressing not only the physical characteristics of the place but  
9       culturally significant aspects of the place that may be visible or knowable only to those in whose  
10      traditions it is significant.
- 11      ▪ Establishing and expressing the place’s period of significance in European American terms may  
12      be difficult.
- 13      ▪ The place’s boundaries may be difficult to define and express in European American terms.
- 14      ▪ Identifying what features of the place’s setting—the larger environment—do and do not  
15      contribute to the place’s character is important to ensure the physical qualities valued by a  
16      community are properly considered in planning or management decisions.

17

18           **Protecting Confidentiality**

19

20   When a place is perceived to have spiritual connotations, or when it is used in ongoing cultural activities  
21   that are not readily shared with outsiders, the members of that community may desire that both the  
22   nature and location of the place be kept secret. There may even be instances where cultural norms limit  
23   who may have access to certain information or the circumstances under which it may be shared. Such a  
24   desire on the part of those who value a place should be respected, but it presents problems if using  
25   National Register information for planning purposes. In simplest terms, a place cannot be protected if  
26   the planners do not know it is there.

27

28   The need to reveal information about something that a cultural system demands be kept secret can  
29   present an distressing paradox for traditional communities. Although members of a traditional  
30   community may be concerned about the impacts, for example, of a construction project on a TCP, it may  
31   be difficult for them to express these concerns to anyone outside their community. These difficulties are  
32   sometimes hard for some to understand, but they should not be ignored, especially for communities

1 that have been negatively impacted by cultural assimilation practices in the past. In some traditional  
2 communities, it is sincerely believed that sharing information inappropriately with outsiders will lead to  
3 injury or death of one's family or group.

4  
5 Information on historic places, including TCPs, may be kept confidential by Federal agencies and other  
6 specified parties under the authority of Section 304 of the National Historic Preservation Act (54 U.S.C. §  
7 307103), provided the Secretary of the Interior (represented by the Keeper of the National Register)  
8 agrees that releasing information might (1) cause a significant invasion of privacy, (2) risk harm to the  
9 historic place, or (3) interfere with the use of a traditional religious site by practitioners. Public access to  
10 information related to Federal places significant under National Register Criterion D (typically applied to  
11 archeological sites) may also be restricted pursuant to the provisions of the Archeological Resources  
12 Protection Act. These limited protections may not always be enough to relieve the concerns of those  
13 who value TCPs but resist releasing information on them. In some cases, these concerns may affect a  
14 community's willingness to nominate places to the National Register at all. Confidentiality concerns may  
15 also affect formal determinations of eligibility; however, a determination may be made by considering  
16 TCPs in a very general way in a planning or land use project, with some very minimal information  
17 retained in the project files. Respecting and protecting confidentiality can usually be accomplished by  
18 recognizing the challenge and collaborating with creativity and flexibility to find a solution.

19  
20 **Documenting Character-Defining Features, and Contributing and Non-Contributing**  
21 **Resources**

22  
23 Documentation describing a TCP should convey not only its historical appearance (if known) and its  
24 current physical appearance, but also how it is viewed by the traditional community or described in the  
25 relevant traditional belief. For example, one of the important characteristics of Mt. Tonaachaw in Chuuk  
26 (Truk), Federated States of Micronesia, is an area called "Neepisaram," which physically looks like an  
27 otherwise unremarkable grassy slope near the top of the mountain. To the traditional community that  
28 values this place, however, it is seen as the ear of a metaphorical octopus identified with the mountain,  
29 and as the home of a warrior spirit/barracuda. However, a nomination of Mt. Tonaachaw would be  
30 incomplete and would fail to capture the significance of the place if it identified this important cultural  
31 location only as a grassy slope near the top of the mountain. (Figure 49, Mt. Tonaachaw.)

1 It is important to include the characteristics of a place that are viewed as important to the traditional  
2 character or use of the area. If a place is important in traditional plant gathering, for instance, what  
3 elements of its landscape and environment are especially valued? Is the location of a base camp  
4 important? The presence of young plants? (Figure 50, Rice Bay.) The identification and description of  
5 these character-defining features—the parts or pieces of the place that individually or collectively  
6 represent the place—is important to ensure a complete National Register nomination.

- 7
- 8 a) What qualities of the place's visual, auditory, and atmospheric settings—including those  
9 qualities that extend beyond the boundaries of the place into the surrounding environment—  
10 contribute to its significance? For example, is the view from or toward the place important? Is  
11 one view more important than another?
  - 12 b) Are there plants, animals, or other communities of creatures that help convey a sense of the  
13 place's character? If so, what are they, how do they contribute, and how are they distributed  
14 over the landscape?
  - 15 c) Does the quality of the place's surface or subsurface water, its air, its sun or wind exposure, or its  
16 view of the sky or the landscape contribute to its significance?
  - 17 d) What beliefs, customs, and practices contribute to the place's character?
  - 18 e) Are there non-defining or non-contributing features that can be changed without affecting the  
19 traditional character of the place? Might it be desirable to remove them?
- 20

21 A nomination should identify both contributing and non-contributing resources.<sup>18</sup> A contributing  
22 resource is a building, site, structure, or object that adds—"contributes"—to the significance of the  
23 place. This is most often relevant to sites and districts. (Figures 51 and 52, Tortugas Pueblo Fiesta of Our  
24 Lady of Guadalupe, New Mexico.) However, a place may be classified as a "building" and have  
25 contributing resources if, for example, there is a primary building and one or more supporting buildings,  
26 structures, or sites within the place's boundary.<sup>19</sup>

---

<sup>18</sup> It is likewise helpful to identify features and resources when pursuing a determination of eligibility for a place to better support consultation in a Federal undertaking.

<sup>19</sup> See *National Register Bulletin 16a: How to Complete the National Register Registration Form* for further guidance on counting resources.



1 Identifying the character-defining features and contributing resources of a TCP may be complicated,  
2 because the features or resources are not always apparent to those outside the traditional community.  
3 A list of character-defining features and contributing resources should be understood to be provisional,  
4 not definitive; that is, nominations and eligibility determination documents are products of their times  
5 and of those who produce them, and may require correction or updating based on new information.  
6

### 7 **Identifying the Period of Significance**

8  
9 Generally, the period of significance is the length of time a place was associated with important events,  
10 activities, or persons, or with a traditional community's beliefs, customs, and practices; or attained the  
11 characteristics which qualify it for National Register listing.  
12

13 In National Register practice, the period of significance is based upon the time when the place made the  
14 contributions or achieved the character on which significance is based, and places that have achieved  
15 significance only within the past 50 years are not typically eligible for inclusion in the National Register  
16 unless sufficient perspective exists to determine that the place is exceptionally important and will  
17 continue to retain that distinction in the future. If a place has come to be significant to a community for  
18 its beliefs, customs, or practices only within the past 50 years, it cannot be considered a *traditional*  
19 cultural place.  
20

21 As discussed at Section II, a place does *not* have to have been in continual use by a community to be  
22 eligible for inclusion in the National Register, and the period of significance for a TCP may be recorded as  
23 extending over an unbroken stretch of time. For example, the Luiseño Ancestral Origin Landscape,  
24 California, is recognized by the Indigenous People of the area as the place of creation and the period of  
25 use for traditional purposes extends back to this time, even though the people that value the place were  
26 forcibly removed from it in contemporary times. (Figure 55, Luiseño Ancestral Origin Landscape.)  
27

28 Since significance to a living community *in the present* is a key characteristic for recognition of a National  
29 Register-eligible place as a TCP, the period of significance of a TCP *extends to the present* and may  
30 continue into the future. However, determining the "starting point" of a period of significance for a TCP  
31 may be challenging. There are two different types of "periods."  
32

1 (1) The period of significance as presented in a National Register nomination may be the period  
2 in which, in tradition, the place gained its significance according to the beliefs of the community  
3 that values it. For example, the nomination for Gold Strike Canyon/Sugarloaf Mountain in  
4 southeastern Nevada and northwestern Arizona, listed in the National Register in 2004, cites a  
5 period of significance of “creation to present.” As expressed through oral histories, several  
6 Tribes’ traditions connect them to this place from time immemorial, a common and important  
7 element in many Native American oral traditions. (Figure 53, Gold Strike Canyon/Sugarloaf  
8 Mountain TCP.) Such periods often have no fixed point in time as it is ordinarily construed in  
9 European American terms. Traditional periods should be presented in their own terms. If a  
10 traditional group says a place was created at the dawn of time, this should be reported in the  
11 nomination or eligibility documentation. For purposes of National Register eligibility, there is no  
12 need to try to establish whether, according to European American scholarship or radiocarbon  
13 age determination, it actually was created at the dawn of time.

14  
15 (2) A second period of significance for some TCPs is the period during which the place has  
16 actually been used for cultural purposes. For example, the nomination for Pascua Cultural Plaza  
17 in Arizona, listed in the National Register in 2004, cites a period of significance of 1921 to the  
18 present. (Figure 54, Pascua Cultural Plaza.) Since 1921, when Pascua Village was officially  
19 established on what was then the northern outskirts of Tucson, the plaza has been the focus of  
20 Yoeme (Yaqui) traditional religious, cultural, and social events. Direct, physical evidence for  
21 cultural use at particular periods in the past may be hard to find, but it is usually possible to fix a  
22 period of use, at least in part, in chronological time.

23  
24 Establishing the period of significance often involves weighing evidence and inference. Interviews with  
25 traditional community members are usually the main sources of information, sometimes supplemented  
26 by the study of historical accounts or by archeological investigations. Based on such data, it should be  
27 possible at least to reach reasonable inferences about whether past generations—reaching back fifty  
28 years, as provided by National Register guidelines for listing or eligibility—used a place for cultural  
29 purposes.

30

1 Because the period of significance of a TCP extends to the present and typically will continue into the  
2 future, aspects of a place that have changed in recent times may themselves be significant if they are  
3 consistent with the traditions that give the place value.

#### 5 **Examples**

- 6 ■ Sleeping Buffalo Rock, listed in the National Register in 1996, has a period of significance of “late  
7 prehistoric to present”
- 8 ■ Bohemian Hall and Park, listed in the National Register in 2001, has a period of significance of  
9 1910—the year of construction—“to the present”
- 10 ■ Lawetlat’la (Mt. St. Helens), listed in the National Register in 2013, has a period of significance of  
11 “myth age to present”

#### 13 **Describing the Boundary**

14  
15 A specific boundary description and justification for any nominated place, including those recognized as  
16 TCPs, must be included in a National Register nomination. For places that are buildings or structures—  
17 like the Pascua Cultural Plaza, Bohemian Hall and Park, or Mount Carmel Grotto—boundaries usually  
18 reflect the full extent of building lots and developed parcels, with boundaries drawn to include the  
19 specific physical place that a community has valued for generations and continues to value to the  
20 present day. For ethnic neighborhoods or rural sites, appropriate boundaries may be defined by the  
21 perspective of the current living traditional community as the area(s) they value.

22  
23 Establishing the boundaries of culturally valued buildings and urban neighborhoods is usually  
24 uncomplicated, but doing so for larger, rural places can present substantial challenges. Often those who  
25 value such a place have never had occasion to think about its boundaries, and boundaries may not make  
26 much sense in the context of their values. (Figure 56, Medicine Wheel/Medicine Mountain.) For  
27 example, much of the significance of the Helkau Historic District in northern California—determined  
28 eligible for listing in 1981 under Criteria A, C, and D for its significance in its ritual use by certain Native  
29 American groups—is related to the fact that it is quiet and presents extensive views. These features are  
30 important to the medicine-making done by traditional religious practitioners in the district. If the  
31 boundaries of the district were defined to include everything visible or audible to someone on the ridge  
32 crest, however, they would take in a substantial portion of California's North Coast Range. Practically

1 speaking, when nominating a place like the Helkau District, boundaries must be defined more narrowly,  
2 even though this may involve making arbitrary decisions. In the case of the Helkau District, the boundary  
3 was finally drawn along topographic lines that included all the locations at which traditional practitioners  
4 carry out medicine-making and similar activities; the travel routes between such locations; and the  
5 immediate viewshed surrounding this complex of locations and routes.

6  
7 Some traditional communities find the very concepts of landholding and boundary setting to be  
8 offensive. In such cases, it may be impossible to achieve agreement on a boundary, and the preparer of  
9 the nomination will find it necessary to set the boundary using his or her best judgment and to provide a  
10 clear justification for the boundary. The justification should also state if the boundary has not been  
11 agreed to by the community that values the place.

12  
13 The physical integrity of the significant historical and archeological resources contained within that area  
14 is an important consideration in drawing a boundary. Changes through time should be taken into  
15 consideration. Even when boundaries are drawn somewhat narrowly, as in the Helkau District example,  
16 the perceived significance of the setting—the surrounding environment—may be an aspect of the  
17 place’s integrity and should be included in the documentation. Information about aspects that are  
18 important to an associated traditional community is critical to understanding the significance of the  
19 place to those who value it. Intrusions, if severe enough, may compromise the place’s integrity.

20  
21 More detailed guidance on how to determine historically appropriate boundaries for a National Register  
22 nomination can be found in *National Register Bulletin 16a: How to Complete the National Register*  
23 *Registration Form, “Guidelines for Selecting Boundaries,”* and *National Register Bulletin 47: Defining*  
24 *Boundaries for National Register Properties.*

25  
26 **Key Concept**

27  
28 Historic places possessing significance to communities as TCPs are documented in order to make it  
29 possible to manage them, regulate impacts on them, and where desirable, interpret them for the public.  
30 As with nominating any place to the National Register, there is a great deal of flexibility in how  
31 information about that place may be presented. Nomination authors should share just enough  
32 information for nominating authorities and NPS to understand the place’s significance and integrity.

1 **VII. COMPLETING THE NATIONAL REGISTER NOMINATION FORM 10-900**

2  
3 The following discussion is organized to correspond to the National Register of Historic Places  
4 Nomination Form (NPS 10-900), which must be used in nominating places to the National Register. To  
5 the extent possible, documentation supporting a request for a determination of eligibility should be  
6 organized with reference to, and if possible using, Form 10-900 as well.

7  
8 Complete instructions and guidance may be found in *National Register Bulletin 16a: How to Complete*  
9 *the National Register Registration Form* as supplemented and updated by additional information, and  
10 photograph and mapping documentation requirements, found at the National Register’s publications  
11 webpage.

12  
13 National Register nominations do not need to be lengthy documents. They are not intended to be an  
14 exhaustive history of a place, with dozens of footnoted references. A nomination simply needs to be  
15 adequately documented and technically and professionally correct and sufficient.<sup>20</sup>

16  
17 **1. Name of Place**

- 18  
19 a. The name given a TCP by its traditional community should be entered as its historic name. Many  
20 places are listed in the National Register in the community’s Native language, followed by  
21 another name in a European American language (*e.g.*, Lawetlat’la (Mt. St. Helens)).  
22  
23 b. Names, inventory reference numbers, and other designations ascribed to the place by others  
24 should be entered under other names/site number.

25  
26 **2. Location**

- 27  
28 a. Whenever possible, for single or small groupings of properties, enter the name and number of  
29 the street or road where the place is located. For larger districts or sites, particularly those  
30 associated with natural features and landforms with no street reference points, provide a

---

<sup>20</sup> 36 C.F.R. § 60.3(i).

1 general notation with reference to nearby topographical features or cities, towns, villages, etc.  
2 Examples include “north shore of Eastwater River, approximately 25 miles southwest of  
3 Cowtown” or “approximately 25 miles due north of Smallville” or “a linear corridor running from  
4 the junction of the northern border of South Dakota and the Missouri River in a generally  
5 southeasterly direction to the village of Pakota, Illinois.”

6  
7 For Federally owned places, also enter the name of the district, forest, reserve, or national park  
8 system property where the place is located.

- 9  
10 b. Mark an "X" in the boxes for “Not for Publication” and “Vicinity” to indicate if the nomination  
11 document includes sensitive information which needs to be restricted from public access in  
12 accordance with the provisions of Section 304 (54 U.S.C. § 307103) of the National Historic  
13 Preservation Act. The Federal Register notice the NPS publishes to alert the public that the place  
14 is being considered for listing will indicate "Address Restricted," giving the nearest city or town—  
15 the “vicinity”—as the place’s location.

16  
17 Locations, information, and images that should be restricted from public disclosure should be  
18 further noted within the nomination, and this is typically done in Sections 7 (place description)  
19 and 8 (significance narrative). Maps and images may also be restricted from public disclosure.

20  
21 While complete information about a place must be provided to the NPS so that the Keeper can  
22 make an informed determination about inclusion of the place in the National Register, the NPS  
23 will withhold as requested information about the location, character, and significance of the  
24 place—including text, maps, and images—from public disclosure.

25  
26 Enter "N/A" in the “Not for Publication” box if there is no reason to restrict information about  
27 the place.

1 **3. State/Tribal/Federal Agency Certification**

- 2
- 3 a. Nominating authorities include Federal Preservation Officers (FPOs), State Historic Preservation
- 4 Officers (SHPOs), and Tribal Historic Preservation Officers (THPOs) or, in the case of a place
- 5 located in more than one jurisdiction, a combination of two or more of these authorities.
- 6
- 7 b. FPOs have certifying authority for nominations of places owned or administered by their
- 8 respective agencies or, pursuant to Section 106 of the NHPA, for determinations of eligibility for
- 9 places involved in Federal undertakings within state jurisdictions or on Tribal lands. Federal
- 10 agency staff—for example, those in regional or local offices, or national forests or national
- 11 parks—cannot be recognized as official nominating authorities for their agencies by the Keeper
- 12 of the National Register unless they have received delegation of authority from their agency’s
- 13 FPO.
- 14
- 15 c. SHPOs have certifying authority only for nominations of places located within their respective
- 16 state jurisdictions that are not Federally owned, and for Tribal lands where the THPO has not
- 17 assumed National Register responsibilities.
- 18
- 19 d. THPOs have certifying authority only for nominations of places located on Tribal lands when they
- 20 have assumed National Register responsibilities. However, THPOs should be invited to sign as
- 21 commenting officials for nominations of places directly associated with Tribal activities, or when
- 22 the Tribe has contributed directly to the nomination process.
- 23

24 In cases where there is no Federally approved Tribal preservation program with a THPO in place

25 who has been delegated as nominating authority by the Tribal government, nominations are

26 processed through the SHPO of the state in which the Tribal lands are located (*i.e.*, the SHPO

27 functions as the nominating authority).

28

29 **4. National Park Service Certification**

30

31 This section is completed by the Keeper of the National Register.

32

1 **5. Classification (Ownership, Category)**

- 2
- 3 a. National Register regulations at 36 C.F.R. Part 60 specify that a resource may be a building,  
4 structure, object, site, or district. “TCP” is not a resource type, but should be noted on the form  
5 at Section 6 “Function or Use.”
- 6
- 7 b. “Building” and “structure” are usually used for single resources or a small grouping, while larger  
8 places are usually classified as a “district” or “site.”
- 9
- 10 c. While the district and site classifications may sometimes be used interchangeably, the use of the  
11 site classification may be more appropriate when the TCP is not marked by human-made  
12 physical features, as in the case of large natural features of landscapes associated with a pre-  
13 European contact and/or a historic event or pattern of events.
- 14
- 15 d. Use of the district classification is usually more appropriate for places that contain a significant  
16 concentration or linkage of buildings, structures, or sites associated with specific traditional  
17 beliefs, customs or practices.
- 18
- 19 e. The resource count should be provided in all nominations and should correspond to the  
20 information provided in the narrative description and inventory lists and maps included in the  
21 Nomination Form.
- 22
- 23 f. The narrative description required in Section 7, as described below, can be used to describe  
24 character-defining features of a place; and
- 25
- 26 g. A nomination for a place that contains many smaller features scattered across a large area can  
27 account for them by designating the entire land area as a contributing site.
- 28
- 29



1 **6. Function or Use**

2

3 a. TCPs should use the categories and subcategories provided in *National Register Bulletin 16a:*  
4 *How to Complete the National Register Registration Form* to the extent possible.

5

6 b. Typically, a TCP should be identified in this section of the form as “Other: Traditional Cultural  
7 Place.”

8

9 **7. Description**

10

11 a. It is usually appropriate to address both visible and non-visible aspects of the place here, as  
12 discussed at section IX “Documenting TCPs.” Visible and non-visible aspects of the place may  
13 also be discussed in the statement of significance at Section 8.

14

15 b. The narrative description in Section 7 should begin with a summary paragraph describing the  
16 general character of the TCP, with subsequent paragraphs providing more detailed discussion of  
17 its contributing and non-contributing resources.

18

19 c. Where possible, avoid providing sensitive information that is likely to require protection from  
20 public access per the provisions of Section 304 of the NHPA (54 U.S.C. § 307103). Nomination  
21 authors should share just enough information for nominating authorities and NPS to understand  
22 the place’s significance and integrity.

23

24 **8. Statement of Significance**

25

26 a. The most current version of the “Areas of Significance” categories and subcategories is included  
27 in this bulletin at Appendix II.

28

29 b. The narrative statement of significance should begin with a summary paragraph specifying the  
30 applicable National Register Criteria for Evaluation, areas of significance, level of significance,  
31 and period of significance. The summary paragraph is also the place to provide a definition of  
32 the traditional community, or communities, associated with the nominated place.

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c. When discussing the significance of the TCP, a well-developed context discussion of the identified themes is extremely useful in conveying the unique aspects of the place’s traditional significance.

d. It is often very useful to provide supporting information regarding the TCP’s significance with quotes or narratives reflecting the voice of the traditional community that values the place. If citing ethnographic studies that are considered confidential, nomination authors should be sure to confer with the appropriate Tribal or community official to obtain permission before quoting the information shared.

**9. Major Bibliographical References**

Where oral sources have been used, append a list of those individuals consulted and identify the locations where field notes, audio or video tapes, or other records of interviews are stored, unless the community has required that this information be kept confidential; if this is the case, that should be noted in the documentation.

**10. Geographical Data**

If it is necessary to discuss the setting of the place in detail, this discussion should be appended as accompanying documentation and referenced in this section.

**11. Form Prepared By**

This section identifies the person or persons who prepared the form and their affiliation. The SHPO, FPO, or the NPS may contact this person if a question arises about the form or if additional information is needed.

1 **“Additional Documentation”**

2

3 If the community that attributes cultural significance to the place objects to the inclusion of  
4 photographs, photographs need not be included. If photographs are not included, provide a  
5 statement here explaining the reason for their exclusion.

6

7

**Key Concept**

8

9 All National Register nominations must be adequately documented and technically and professionally  
10 correct and sufficient. Special care should be taken to work with community leadership to ensure  
11 information that should not be shared outside the community is properly identified as not-for-  
12 publication.

13

14

**1VIII. SUMMARY**

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The National Historic Preservation Act, in its introductory section, establishes that "the historical and cultural foundations of the Nation should be preserved as a living part of our community life in order to give a sense of orientation to the American people." The National Register of Historic Places is a list of those places and things that connect individuals and communities to the complex history of the American experience. Those places may be represented by buildings, structures, objects, sites, and districts, and they may express their significance through their location, setting, design, materials, workmanship, feeling, and association. The purpose of this bulletin is not to introduce a new classification type but rather to assist both the preservation professionals and community members in recognizing, documenting, and evaluating places that always have been potentially eligible for inclusion in the National Register: traditional cultural places.

The places valued by America's communities, be they Native Americans, Native Hawaiians, Pacific Islanders, or other cultural or ethnic groups, merit recognition and preservation. Where these places continue to be living parts of their communities, they may be considered traditional cultural places. Many such places have already been included in the National Register; others have been formally determined eligible for listing in the National Register. The intent of this bulletin is to provide guidance to support the inclusion of many, many more.

1 **GLOSSARY**

2

3 **Advisory Council on Historic Preservation (ACHP)** The ACHP is an independent Federal agency that  
4 promotes the preservation, enhancement, and productive use of the nation's historic resources, and  
5 advises the President and Congress on national historic preservation policy.

6

7 **Consensus determination** A consensus determination of eligibility does not require a formal  
8 determination from the Keeper, nor nomination or listing in the National Register. If a Federal agency  
9 official determines the National Register criteria are met and the SHPO/THPO agrees, the place is  
10 considered eligible for the National Register. A “consensus determination” most often occurs in the  
11 context of a Section 106 consultation.

12

13 **Criteria for evaluation** National Register criteria for evaluating the significance and integrity of a place,  
14 as provided at 36 C.F.R. 60.4 and further explained in guidance issued by the National Register program.

15

16 **Criterion A** Properties eligible for the National Register associated with events that have made a significant  
17 contribution to the broad patterns of our history.

18

19 **Criterion B** Properties eligible for the National Register associated with the lives of persons significant in  
20 our past.

21

22 **Criterion C** Properties eligible for the National Register if they embody the distinctive characteristics of a  
23 type, period, or method of construction, or that represent the work of a master, or that possess high  
24 artistic values, or that represent a significant and distinguishable entity whose components may lack  
25 individual distinction (*e.g.*, a district).

26

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

29

30 **Determined Eligible** A place which has been formally determined eligible for listing—but not actually  
31 listed—in the National Register by the Keeper of the National Register. A “Keeper determination of

1 eligibility” most often occurs when a private owner objects to the listing of their property in the National  
2 Register.

3

4 **Federal Preservation Officer (FPO)** Each Federal agency is required by Section 110(c) of the NHPA to  
5 have an FPO to coordinate the agency’s activities under the National Historic Preservation Act, NHPA,  
6 including the agency’s overall program and policies regarding the agency’s responsibility to take into  
7 account the effects of their undertakings on historic properties (*e.g.*, Section 106 compliance).

8

9 **Federally recognized Tribe** As of this writing in 2022, the U.S. government officially recognizes 574 Indian  
10 Tribes in the contiguous 48 states and Alaska. These federally recognized Tribes are eligible for funding and  
11 services from the Bureau of Indian Affairs, either directly or through contracts, grants, or compacts. See  
12 [www.bia.gov](http://www.bia.gov) for the most current list of Federally recognized Tribes.

13

14 **Keeper** The Keeper of the National Register of Historic Places is the individual who has been delegated  
15 the authority by the Secretary of the Interior through NPS to list properties and determine their  
16 eligibility for the National Register. The Keeper may further delegate this authority to NPS staff.

17

18 **National Historic Landmark (NHL)** An NHL is a nationally significant historic places of high integrity that  
19 possess exceptional value or quality in illustrating or interpreting the heritage of the United States.

20

21 **National Historic Preservation Act (NHPA)** The NHPA, 54 U.S.C. §§ 300101, *et seq.*, which became law in  
22 1966, established national policy governing preservation. The NHPA and its implementing regulations  
23 continue to guide preservation practice.

24

25 **National Park Service (NPS)** The NPS is a Federal agency within the Department of the Interior,  
26 established on August 25, 1916, through the National Park Service Organic Act. The NPS is responsible  
27 for all national parks, most national monuments, and other natural, historical, and recreational  
28 properties with various title designations, as well as the management of preservation assistance  
29 programs such as the National Register and the National Historic Landmarks Program

30

31 **National Register of Historic Places (National Register)** The National Register is the official list of the  
32 nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of

1 1966, the NPS' National Register is part of a national program to coordinate and support public and  
2 private efforts to identify, evaluate, and protect America's historic and archeological resources.

3  
4 **Native American Tribe** Unless otherwise specified, the term "Native American Tribe" as used in this  
5 bulletin means Federally-recognized Indian Tribes, including Alaska Natives, recognized as eligible for the  
6 special programs and services provided by the United States because of their status.

7  
8 **State Historic Preservation Officer (SHPO)** The SHPO is a state governmental official created under the  
9 National Historic Preservation Act. The SHPO's responsibilities include surveying and recognizing historic  
10 properties, reviewing nominations for properties to be included in the National Register, reviewing  
11 Federal undertakings for effects on historical properties, and supporting local preservation efforts.

12  
13 **Section 106** The section of the National Historic Preservation Act which requires Federal agencies to  
14 take into account the effects of their undertakings on historic properties, and give the Advisory Council  
15 on Historic Preservation (ACHP) a reasonable opportunity to comment. "Section 106" is often used as  
16 shorthand to refer to such activity, *e.g.*, "a Section 106 consultation."

17  
18 **Section 110** This section of the National Historic Preservation Act requires federal agencies to establish  
19 their own historic preservation programs for the identification, evaluation, and protection of Federal  
20 historic properties.

21  
22 **Section 304** This section of the National Historic Preservation Act protect sensitive information about  
23 historic properties from disclosure to the public when that disclosure could result in a significant invasion  
24 of privacy or damage to the historic place, or impede the use of a traditional religious site by  
25 practitioners.

26  
27 **Traditional Cultural Place (TCP)** A traditional cultural place (formerly, "property") is a building, structure,  
28 object, site, or district that may be eligible for inclusion in the National Register for its significance to a  
29 living community because of its association with cultural beliefs, customs, or practices that are rooted in  
30 the community's history and that are important in maintaining the community's cultural identity.

1 **Tribal Historic Preservation Officer (THPO)** A THPO is an official appointed by Tribal leadership to  
2 officially represent the Tribe's interests regarding sites of historic and religious significance to the Tribe.  
3 Some Tribes have an agreement with the NPS to take the lead on Historic Preservation Officer  
4 responsibilities on Tribal lands as defined in the NHPA, and some do not. However, all Tribes retain the  
5 same consultation rights in a Section 106 action. Tribes do not need an agreement with the NPS to  
6 appoint a THPO.

7



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31

32 Protection of Historic Properties, 36 CFR Part 800.

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7 form only.

8

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10	100006067	Ballast Island
11	02001611	Baltimore East/South Clifton Park Historic District
12	01000239	Bohemian Hall and Park
13	16000002 R	Chi'chil Bildagoteel (Oak Flat)
14	73000658	Chinatown Historic District
15	78000674 R	Coso Hot Springs
16	76001576	Creek Council Tree Site
17	100000610 R	de 'ek wadapush (Cave Rock)
18	10004076	Doe-Kag-Wats
19	04000935 R	Gold Strike Canyon
20	12001224	Green River Drift Trail
21	73001929	Inyan Kara Mountain
22	81000205 R	Kaho'olawe Island Archeological District
23	13000748	Lawetlat'la (Mt. St. Helens)
24	1400851 R	Luisseño Ancestral Origin Landscape
25	02001703 R	Maka Yusota (Boiling Springs)
26	74001659	Medicine Bluffs
27	69000184	Medicine Wheel-Medicine Mountain
28	DOE	Nantucket Sound DOE
29	DOE	Ocmulgee Old Fields
30	00001276	Our Lady of Mount Carmel Grotto
31	73001074 R	Pahuk
32	01001032	Pascua Cultural Plaza

1	15000353	Rice Bay
2	96000548	Sleeping Buffalo Rock
3	03000963 R	Soda Rock (Ch'ichu'yam-bam)
4	99001083 R	Spirit Mountain
5	14000679	St. Augustine Catholic Church and Cemetery
6	720000246 R	Tahquitz Canyon
7	14000321	Tarpon Springs Greektown Historic District
8	76002210 R	Tonnachau Mountain
9	100001437	Tortugas Pueblo Fiesta of Our Lady of Guadalupe
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1 **APPENDIX I: NATIONAL REGISTER OF HISTORIC PLACES CRITERIA FOR EVALUATION**

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3 Places considered for listing, or eligibility for listing, in the National Register are evaluated for historical  
4 significance and physical integrity. Those criteria are set out in the Code of Federal Regulations, at 36  
5 C.F.R. § 60.4, and reproduced below. Guidance on applying those criteria can be found in *National*  
6 *Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*.

7

8 The criteria applied to evaluate properties (other than areas of the National Park System and  
9 National Historic Landmarks) for the National Register are listed below. These criteria are  
10 worded in a manner to provide for a wide diversity of resources. The following criteria shall be  
11 used in evaluating properties for nomination to the National Register, by NPS in reviewing  
12 nominations, and for evaluating National Register eligibility of properties. Guidance in applying  
13 the criteria is further discussed in the “How To” publications, Standards & Guidelines sheets and  
14 Keeper’s opinions of the National Register. Such materials are available upon request.

15

16 *National Register criteria for evaluation.* The quality of significance in American history,  
17 architecture, archeology, engineering, and culture is present in districts, sites, buildings,  
18 structures, and objects that possess integrity of location, design, setting, materials,  
19 workmanship, feeling, and association and

20 (a) that are associated with events that have made a significant contribution to the broad  
21 patterns of our history; or

22 (b) that are associated with the lives of persons significant in our past; or

23 (c) that embody the distinctive characteristics of a type, period, or method of construction, or  
24 that represent the work of a master, or that possess high artistic values, or that represent a  
25 significant and distinguishable entity whose components may lack individual distinction; or

26 (d) that have yielded, or may be likely to yield, information important in prehistory or history.

27

28 *Criteria considerations.* Ordinarily cemeteries, birthplaces, or graves of historical figures,  
29 properties owned by religious institutions or used for religious purposes, structures that have  
30 been moved from their original locations, reconstructed historic buildings, properties primarily  
31 commemorative in nature, and properties that have achieved significance within the past 50  
32 years shall not be considered eligible for the National Register. However, such properties will

- 1 qualify if they are integral parts of districts that do meet the criteria of if they fall within the  
2 following categories:
- 3 (a) A religious property deriving primary significance from architectural or artistic distinction or  
4 historical importance; or
- 5 (b) A building or structure removed from its original location but which is significant primarily for  
6 architectural value, or which is the surviving structure most importantly associated with a  
7 historic person or event; or
- 8 (c) A birthplace or grave of a historical figure of outstanding importance if there is no  
9 appropriate site or building directly associated with his productive life.
- 10 (d) A cemetery which derives its primary significance from graves of persons of transcendent  
11 importance, from age, from distinctive design features, or from association with historic events;  
12 or
- 13 (e) A reconstructed building when accurately executed in a suitable environment and presented  
14 in a dignified manner as part of a restoration master plan, and when no other building or  
15 structure with the same association has survived; or
- 16 (f) A property primarily commemorative in intent if design, age, tradition, or symbolic value has  
17 invested it with its own exceptional significance; or
- 18 (g) A property achieving significance within the past 50 years if it is of exceptional importance.  
19  
20

1 **APPENDIX II: AREA OF SIGNIFICANCE LEGACY\* AND CURRENT AS OF MAY 2021**

2

CATEGORY (51)	SUBCATEGORY (56)
AGRICULTURE	
AMERICAN INDIAN*	
ARCHEOLOGY-HISTORIC ABORIGINAL	
ARCHEOLOGY-HISTORIC NON-ABORIGINAL	
ARCHEOLOGY-PREHISTORIC	
ARCHITECTURE	
ART	
ASIAN*	See ETHNIC HERITAGE: ASIAN
BLACK*	See ETHNIC HERITAGE: BLACK
COMMERCE	
COMMUNICATIONS	
COMMUNITY PLANNING AND DEVELOPMENT	
CONSERVATION	
ECONOMICS	
EDUCATION	
ENGINEERING	
ENTERTAINMENT/RECREATION	
ETHNIC HERITAGE*	
ETHNIC HERITAGE-ALASKA NATIVE	
ETHNIC HERITAGE-ASIAN	ASIAN INDIAN CAMBODIAN CHINESE FILIPINO HMONG INDONESIA JAPANESE

CATEGORY (51)	SUBCATEGORY (56)
	KOREAN LAOTIAN THAI VIETNAMESE
ETHNIC HERITAGE-BLACK	
ETHNIC HERITAGE-EUROPEAN	AUSTRIAN BASQUE BELGIAN CROATIAN CZECH DANE DUTCH ENGLISH FINNISH FRENCH GERMAN GREEK HUNGARIAN IRISH ITALIAN LITHUANIAN LUXEMBOURGIAN NORWEGIAN POLISH PORTUGUESE ROMANIA RUSSIAN SCANDINAVIAN SCOTTISH SPANISH

CATEGORY (51)	SUBCATEGORY (56)
	SWEDISH SWISS TURKISH UKRAINIAN
ETHNIC HERITAGE-HISPANIC	CARIBBEAN CENTRAL AMERICAN CUBAN DOMINICANS MEXICAN PUERTO RICAN SOUTH AMERICAN
ETHNIC HERITAGE-NATIVE AMERICAN	
ETHNIC HERITAGE-OTHER-ETHNIC	
ETHNIC HERITAGE-PACIFIC ISLANDER	GUAMANIAN OR CHAMORRO NATIVE HAWAIIAN SAMOAN
EUROPEAN*	See ETHNIC HERITAGE: EUROPEAN
EXPLORATION/SETTLEMENT	
HEALTH/MEDICINE	
HISPANIC*	See ETHNIC HERITAGE: HISPANIC
HISTORIC – ABORIGINAL*	See Archeology categories
HISTORIC - NON-ABORIGINAL*	See Archeology categories
INDUSTRY	
INVENTION	
LANDSCAPE ARCHITECTURE	
LAW	
LITERATURE	
MARITIME HISTORY	
MILITARY	

CATEGORY (51)	SUBCATEGORY (56)
NATIVE AMERICAN*	See ETHNIC HERITAGE: NATIVE AMERICAN
OTHER	
OTHER-ETHNIC*	See ETHNIC HERITAGE: OTHER-ETHNIC
PACIFIC-ISLANDER*	See ETHNIC HERITAGE: PACIFIC ISLANDER
PERFORMING ARTS	
PHILOSOPHY	
POLITICS/GOVERNMENT	
PREHISTORIC*	See ARCHEOLOGY: PREHISTORIC
RELIGION	
SCIENCE	
SOCIAL HISTORY	DISABILITY HISTORY LABOR HISTORY LGBTQ HISTORY TRADITIONAL CULTURAL HISTORY WOMEN’S HISTORY CIVIL RIGHTS
TRANSPORTATION	

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\*These areas of significance are not currently used, having been replaced by more descriptive terms, e.g., “ETHNIC HERITAGE-ASIAN” with a number of subcategory options has replaced “ASIAN.”

END TEXT