

The Power of Place: Traditional Cultural Places in the 21st Century

Sherry A. Frear, Chief, National Register of Historic Places/NHL Program

Paul Lusignan, Sr. Historian, National Register of Historic Places

Lisa Davidson, National Historic Landmarks Program Manager

Julie H. Ernstein, Division Chief, Cultural Resources, Interior Region 2

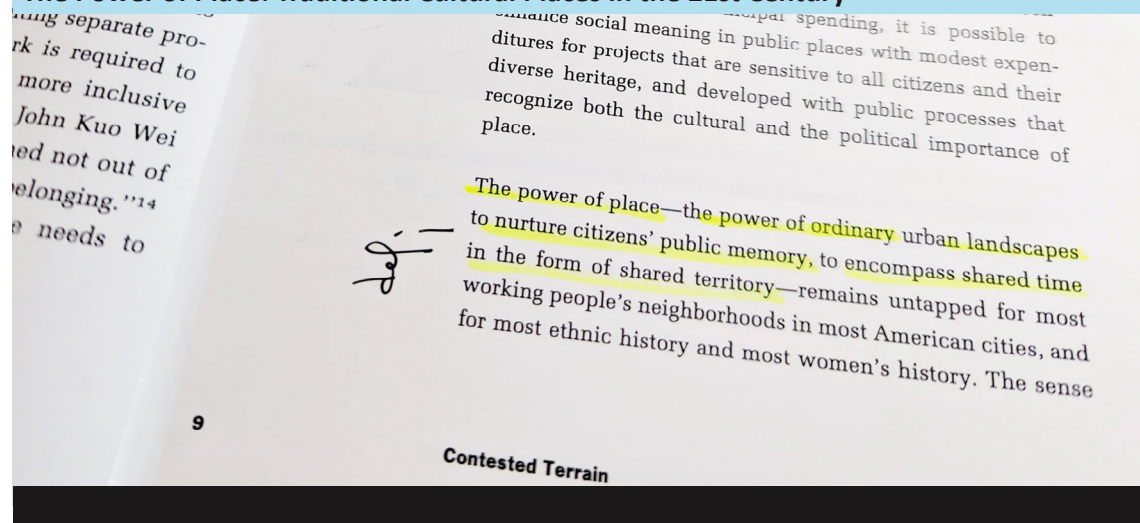


The National Register has relaunched its effort to update the TCP Bulletin last issued in 1998. I have a thirty minute presentation to share with you on questions raised about National Register practice and TCPs over the past two decades, and how we have (hopefully) answered them in the Draft TCP Bulletin issued for comment as of October 27 of this year.

As we move through this presentation, I'll refer to the original bulletin as just that—the “original bulletin”—and I'll refer to the recently released version as the “draft bulletin.”

In closing, I'll provide an update on the National Register and National Historic Landmarks initiatives that I introduced at last year's PastForward conference, initiatives to enhance the diversity of National Register listings and NHL designations.

The Power of Place: Traditional Cultural Places in the 21st Century



#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

The title of this presentation comes from Dolores Hayden's 1997 book, "The Power of Place."

It was my encounter with her book that gave me the words to express what I long thought was true: that the seemingly ordinary places that hold public memory remain unacknowledged for many cultural, ethnic, and identity communities.

Back in the '90s, when I was studying historic preservation and landscape architecture, we called these places "vernacular buildings" and "cultural landscapes." Today, we might call them "traditional cultural places."

Agenda

Context

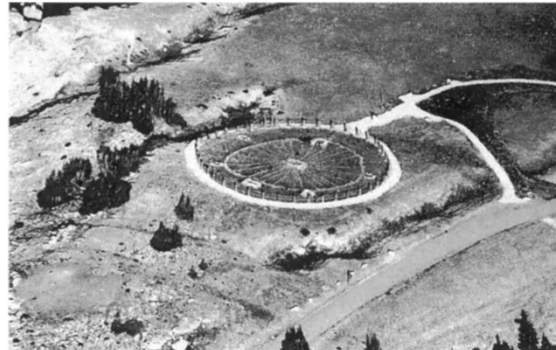
Historical Timeline and Terms

Issues and Analysis

Path to Revision and Reissuance

Program Initiatives Updates

Discussion



Medicine Wheel/Medicine Mountain National Historic Landmark, Wyoming (NR Ref. No. 69000184 R) was designated 1969.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

Here's the agenda for this session.....

First, to set the context for this presentation, I'll do a quick run through of National Register practice.

Next, I'll review the history of the development of the original bulletin, and its revisions in the late '90s.

Then, I'll present some of the issues that have been raised in the decades since about potentially National Register-eligible TCPs, along with an analysis of the changes from the original bulletin to the draft bulletin that address those issues.

Finally, I'll lay out the path to revision and reissuance of the TCP Bulletin.

And along the way, there will be a few pop quizzes.

National Historic Places Act of 1966

The National Register of Historic Places is a list of buildings, structures, objects, sites, and districts significant in American history, architecture, archeology, engineering, and culture.



Ref: 54 U.S.C. § 300101, et seq.

Rendering of Medicine Bluffs, Oklahoma, listed 1974 under Criterion A (events or pattern of events).

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

The National Historic Preservation Act of 1966 authorized the Secretary of the Interior to expand and maintain a National Register of Historic Places of buildings, structures, objects, sites, and districts significant in American history, architecture, archeology, engineering, and culture.

Effects of Listing or Determination of Eligibility

What it does

- Provides formal recognition
- Serves as a planning tool
- Provides eligibility for various grants and tax credits

What it does not do

- Federally prohibit actions by a property owner, including alteration or demolition



Ref: 36 CFR § 60.2c

Saint Augustine Catholic Church and Cemetery, Louisiana, listed 2014 under Criterion A (events or pattern of events).

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

Listing in the National Register brings recognition as well as potential financial benefits.

But listing doesn't guarantee a place won't be altered or demolished.

National Register Listing Requirements

Property Types

- building
- structure
- object
- site
- district

Historic Significance

- Criterion A “event or pattern of events”
- Criterion B “person”
- Criterion C
“architecture/design/construction”
- Criterion D “information potential”
- Criteria Considerations A-G

Physical Integrity

- location
- setting
- design
- materials
- workmanship
- feeling
- association

Ref: 36 CFR § 60.4

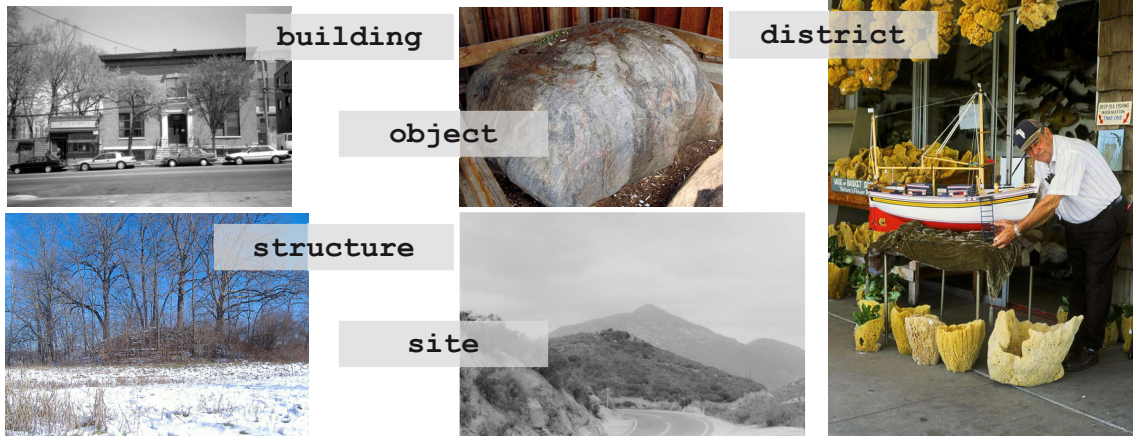
#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

To be listed in the National Register.....

- The resource under consideration must be an actual place or object.
- It must possess historic significance under one or more National Register criteria.
- AND it must retain the integrity to convey that significance, although not all seven aspects need be present.

Property Type Classification



Bohemian Hall and Park (building); Horn Mound (structure); Sleeping Buffalo Rock (object); Tecate Peak (site); Tarpon Springs Greektown Historic District.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

Here are a few National Register-listed TCPs that are representative of the different property types:

Bohemian Hall and Park is listed as a building;

Horn Mound, as a structure;

Sleeping Buffalo Rock, as an object;

Tecate (**teh-KAH-tay**) Peak as a site; and

Tarpon (**taar-pn**) Springs Greektown Historic District as, of course, a district.

National Register Guidance

www.nps.gov/subjects/nationalregister/publications.htm

Such nomination forms must be “adequately documented” and “technically and professionally correct and sufficient.” To meet these requirements, the forms and accompanying maps and photographs must be completed in accord with requirements and guidance in the NPS publication, “How to Complete National Register Forms” and other NPS technical publications on this subject.

60 C.F.R. § 60.3

Screenshot of NRHP publications webpage.

National Register of Historic Places Bulletins

- How to Apply the National Register Criteria for Evaluation (NRB 15)
- How to Complete the National Register Registration Form (NRB 16A) – also see addendum below
- How to Complete the National Register Multiple Property Documentation Form (NRB 16B)
- How to Prepare National Historic Landmark Nominations
- Researching a Historic Property (NRB 39)
- Historic Residential Suburbs: Guidelines for Evaluation and Documentation for the National Register of Historic Places
 - Suburbs bulletin Part 1 (pages 1-72)
 - Suburbs bulletin Part 2 (pages 73-138)
- Guidelines for Evaluating and Registering Archeological Properties (NRB 36)
- Guidelines for Evaluating and Documenting Historic Aviation Properties (NRB 43)
- Guidelines for Evaluating and Nominating Aids to Navigation (NRB 34)
- Guidelines for Identifying, Evaluating, and Registering America's Historic Battlefields (NRB 40)
- Guidelines for Evaluating and Registering Cemeteries and Burial Places (NRB 41) – also see clarification of policy below
- How to Evaluate and Nominate Designed Historic Landscapes (NRB 18)
- Guidelines for Identifying, Evaluating and Registering Historic Mining Properties (NRB 42)
- Guidelines for Evaluating and Nominating Properties That Have Achieved Significance Within the Past Fifty Years (NRB 22)
- How to Apply National Register Criteria to Post Offices (NRB 13)
- Guidelines for Evaluating and Documenting Rural Historic Landscapes (NRB 30)
- Guidelines for Evaluating and Documenting Properties Associated with Significant Persons (NRB 32)
- Guidelines for Evaluating and Documenting Traditional Cultural Properties (NRB 38)
- the National Register is seeking comments on the revised draft of the TCP bulletin
- Nominating Historic Vessels and Shipwrecks to the National Register of Historic Places (NRB 20)
- Defining Boundaries for National Register Properties (with Appendix, Definition of National Register Boundaries for Archeological Properties (NRB 21 & 12)
- How to Improve the Quality of Photographs for National Register Nominations (NRB 23) – also see updated photo policy below

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

To assist in the preparation of nominations, the National Register has issued guidance, most often in the form of "Bulletins

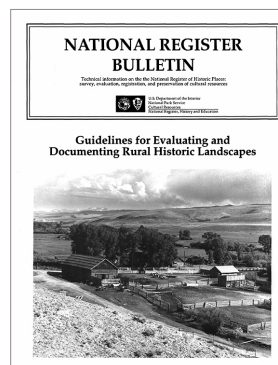
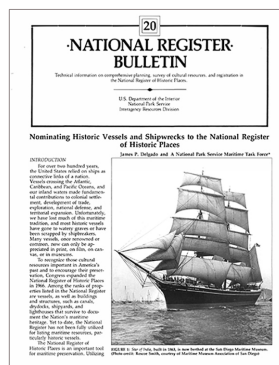
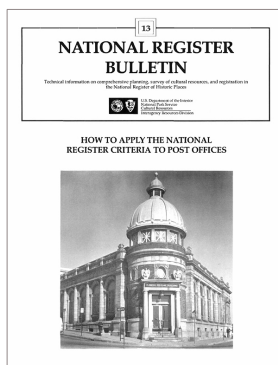
You'll find most of these bulletins, along with other guidance, on our website at the link shown, and pasted into the chat.

www.nps.gov/subjects/nationalregister/publications.htm

National Register Guidance on Property Types www.nps.gov/subjects/nationalregister/publications.htm

Property Types

- building
- structure
- object
- site
- district



Covers of Bulletins 13, 20, and 30, providing guidance on specific types of buildings, structures, and sites.

#PASTFORWARD22

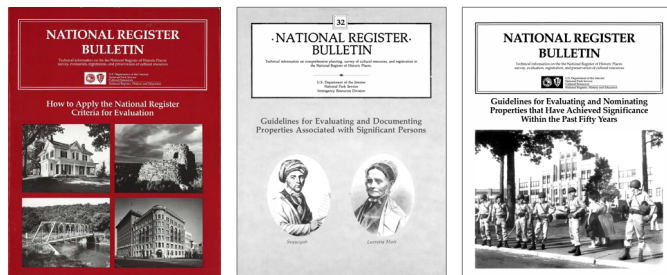
The Power of Place: Traditional Cultural Places in the 21st Century

Here you see examples of guidance for specialized property types such as post offices—which are, of course, buildings—ships (which are structures), and rural landscapes, which may be sites or districts.

National Register Guidance on Criteria

www.nps.gov/subjects/nationalregister/publications.htm

- Bulletin 15: How to Apply the National Register Criteria
- Bulletin 32: Properties Associated with Significant Persons [Criterion B]
- Bulletin 22: Properties that Have Achieved Significance Within the Past Fifty Years [Criterion G]



Covers of Bulletins 15, 32, and 22 providing guidance on criteria.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

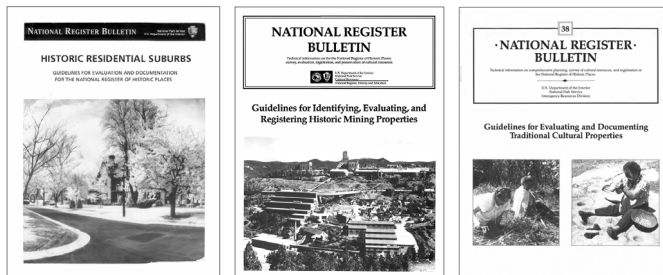
And here you see examples of bulletins issued to provide guidance for applying National Register criteria.

Bulletin 15 is foundational for evaluating and documenting any potentially National Register-eligible place, providing guidance for all Criteria and Criteria Considerations.

Bulletins 22 and 32 provide further guidance for Criterion B, places associated with significant persons; and Criterion Consideration G, places associated with the recent past.

National Register Guidance on Unique Places www.nps.gov/subjects/nationalregister/publications.htm

- Bulletin 46: Historic Residential Suburbs
- Bulletin 42: Historic Mining Properties
- Bulletin 38: Traditional Cultural Properties (Places)



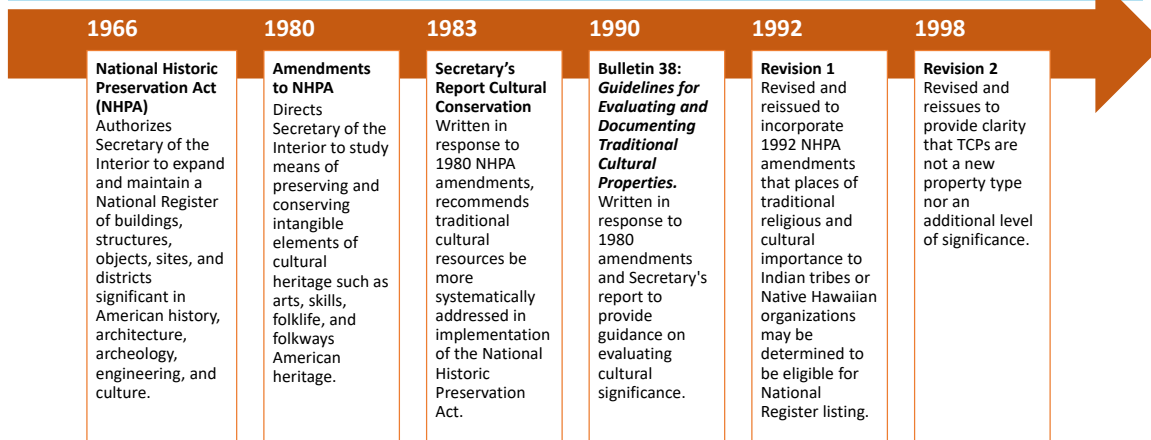
Covers of Bulletins 36, 42, and 38.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

Several bulletins focus on unique places, such as residential suburbs, mining properties, and, yes, traditional cultural places.

TCP Bulletin timeline, historical



#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

The original TCP Bulletin was published in 1990 in response to the amendments to the National Historic Preservation Act. Those amendments focused on preserving and conserving elements of cultural heritage.

The bulletin was revised and reissued in 1992 and again in 1998 to address questions about religious places, property types, and significance.

Pop Quiz

A traditional cultural place—a TCP—is a National Register “property type.”

- ☐ True
- ☐ False
- ☐ Not sure



Washington state.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

And now it's time for our first pop quiz.....

A traditional cultural place—a TCP—is a National Register “property type.”

Is this statement true or false, or are you not sure?

Pop Quiz

A traditional cultural place—a TCP—is a National Register “property type.”

- ☐ True
- ☒ False
- ☐ Not sure



Lawetlat’la (Mt. St. Helens), Washington state, listed 2013 as a site with a period of significance of myth age to present under Criterion A (event/pattern of events).

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

And the answer is..... FALSE.

A “TCP” is NOT a National Register “property type.”

The TCP you see here is Lawetlat’la (**lah-wait-LOT-la**)(in English, Mt. St. Helens), and it is listed in the National Register as a site.

Bulletin 38 “Traditional Cultural Properties”

- A traditional cultural property or place (TCP) is not a property type under the National Register’s regulations.
- A TCP may be a building, structure, object, site, or district.
- A TCP is evaluated for significance and integrity according to National Register criteria at 36 CFR § 60.4 and guidelines provided in Bulletin 15.
- Listings of places of traditional cultural significance have been a part of the National Register since its inception; Medicine Wheel / Medicine Mountain National Historic Landmark was designated in 1969 for its cultural significance to many Tribes.

Text box from Bulletin 15: How to Apply National Register Criteria.

Eligible

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

Not Eligible

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

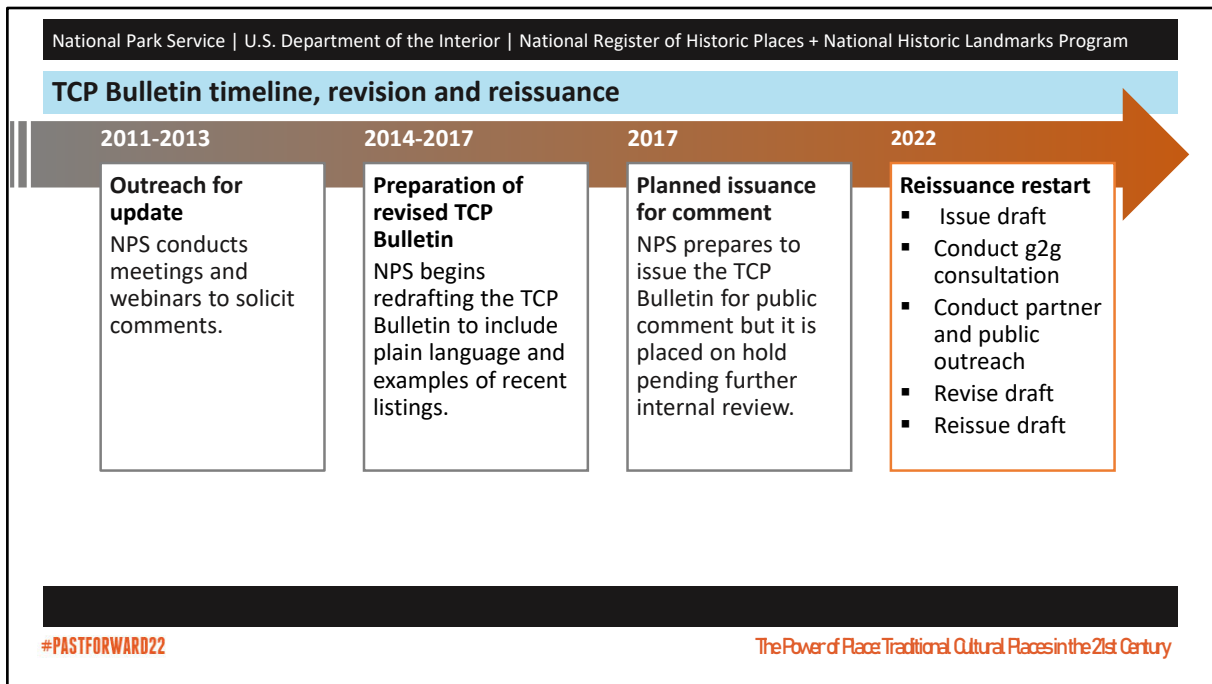
#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

A TCP may be classified as a building, structure, object, site, or district.

For consideration for listing in the National Register, like any place, a TCP is evaluated according to National Register criteria for significance and integrity.

Places of traditional cultural significance have been listed in the National Register since 1969, with the designation of Medicine Wheel / Medicine Mountain as a National Historic Landmark.



In 2011, the National Park Service began work to update the TCP Bulletin. But in 2017, the work was placed on hold.

In 2021, the NPS resumed this work, and with the release of the draft bulletin on October 27, the reissuance process has restarted.

Issues and Analysis

- Definition of “traditional cultural place”
- Applicability of “traditional cultural place”
- Determination of period of significance
- Issue of “continuity of use” by a living community
- Conflicts between historical and contemporary sources
- Assessing integrity



Our Lady of Mount Carmel Grotto, Staten Island, New York (NR Ref. No. 00001276) listed in 2000 as a district under Criteria A and C, and Criterion Consideration A.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

In the decades since the bulletin was last revised, many questions have been asked about nominating TCPs to the National Register, and the recently-released draft bulletin attempts to address those.

In the next series of slides, we'll compare language from the original bulletin to the draft bulletin for a few of the most commonly asked questions.

Definition of “traditional cultural place”

1998 Bulletin

A traditional cultural property, then, can be defined generally as one that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community’s history, and (b) are important in maintaining the continuing cultural identity of the community. (p. 1, col. 3.)

October 2022 Draft Bulletin

A traditional cultural place (TCP) is a building, structure, object, site, or district that may be eligible for inclusion in the National Register for its significance to a living community because of its association with cultural beliefs, customs, or practices that are rooted in the community’s history and that are important in maintaining the community’s cultural identity. (p. 10, lines 15-18.)

#PASTFORWARD22

Analysis: Stylistic changes for clarity; no change in meaning.

The Power of Place: Traditional Cultural Places in the 21st Century

What is a traditional cultural place?

There is no change from the original bulletin to the draft bulletin in how a traditional cultural place is defined as applies to potential National Register eligibility.

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

Definition of “traditional cultural place”: essential characteristics

October 2022 Draft Bulletin

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.

Analysis: New text for clarity; no change in meaning.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

The draft bulletin expands on this definition by providing a list of the essential characteristics of a potentially National Register-eligible TCP.

One, the place must be associated with and valued by a living community.

Two, that community must have existed historically, and continue to exist in the present.

Three, the community must share beliefs, customs, or practices that are rooted in its history and held in the present.

Four, these shared beliefs, customs, or practices must be important in continuing the community’s cultural identity and values.

Five, the community must have passed down the shared beliefs, customs, or practices.

Six, the shared beliefs, customs, or practices must be associated with a tangible place.

And seven, to be listed in the National Register, the place must meet National Register criteria:

- It must have significance: that is, it must be important in a community’s history, architecture, archeology, engineering, or culture.
- And it must have integrity; that is, it must retain the ability to convey its significance.

Pop Quiz

Only Native American places can be listed in the National Register as TCPs.

- ☐ True
- ☐ False
- ☐ Not sure



Wyoming.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

Before we continue..... It's time for another pop quiz.....

Only Native American places can be included in the National Register as TCPs.

Is this statement true or false, or are you unsure?

Pop Quiz

Only Native American places can be listed in the National Register as TCPs.

☐ True

☒ False

☐ Not sure



Green River Drift Trail, Wyoming (NR Ref. No. 12001224) listed 2013 as a district with a period of significance of 1896 to the present under Criterion A (events/pattern of events).

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

This statement is FALSE.

Here you see the Green River Drift Trail in Wyoming and it was listed in 2013 as a district. This 58-mile long corridor played a significant role in the development of the ranches in the Upper Green River Valley, where member ranches still use the main trail and its spurs to move cattle.

Applicability of TCPs

1998 Bulletin

The fact that this Bulletin gives special emphasis to Native American properties should not be taken to imply that only Native Americans ascribe traditional cultural value to historic properties, or that such ascription is common only to ethnic minority groups in general. Americans of every ethnic origin have properties to which they ascribe traditional cultural value, and if such properties meet the National Register criteria, they can and should be nominated for inclusion in the Register. (p. 2, cols. 1, 2)

October 2022 Draft Bulletin

The emphasis on Indigenous Peoples in these versions of the TCP Bulletin was not intended to imply that only Indigenous Peoples ascribe traditional cultural value to historic places. Like people the world over, Americans of any cultural or ethnic background may have places to which they ascribe traditional cultural significance, and those places that meet the National Register criteria may be nominated for listing, or recognized as eligible for listing, in the National Register. (p. 8, lines 27-32.)

#PASTFORWARD22

Analysis: Stylistic changes for clarity; no change in meaning.

The Power of Place: Traditional Cultural Places in the 21st Century

Like people the world over, Americans of any cultural or ethnic background may have places to which they attribute traditional cultural significance, and those places that meet the National Register criteria may be nominated for listing, or recognized as eligible for listing, in the National Register.

Determination of period of significance

1998 Bulletin

[T]here are often two different kinds of "periods." One of these is the period in which, in tradition, the property gained its significance..... The second period that is often relevant to a traditional property is its period of use for traditional purposes. (p. 17, col 3; p. 18, col. 1.)

October 2022 Draft Bulletin

(1) The period of significance as presented in a National Register nomination may be the period in which, in tradition, the place gained its significance according to the beliefs of the community that values it..... (2) A second period of significance for some TCPs is the period during which the place has actually been used for cultural purposes. (p. 50, lines 1-3, 15-16.)

#PASTFORWARD22

Analysis: Stylistic changes for clarity; no change in meaning.

The Power of Place: Traditional Cultural Places in the 21st Century

Another question frequently asked over the years has been, how is the period of significance determined?

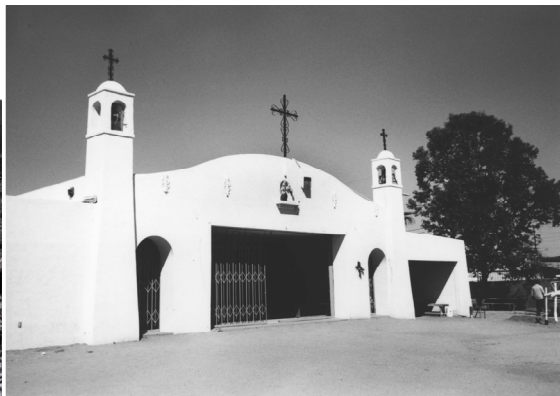
As in the original bulletin, the draft bulletin provides two different kinds of periods of significance for a National Register nomination:

- The period of significance may be the period of time in which the place gained its significance according to the beliefs of the community that values it.....
- Or the period of significance may be for the period of time during which the place has actually been used for cultural purposes.

Determination of period of significance, con't



Gold Strike Canyon / Sugarloaf Mountain TCP, Arizona / Nevada listed in 2004, as a district with a period of significance of creation to the present under Criteria A (events or pattern of events) and C (design).



Pascua Cultural Plaza, Arizona, listed in 2004 as a site with a period of significance of 1921 to the present under Criterion A (events or pattern of events).

Additional examples added.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

Again, the passage of time since the original bulletin was issued has allowed for the inclusion in the draft bulletin of many listings to provide examples for guidance.

On the left is a listed TCP with a period of significance determined by when the place gained its significance according to the beliefs of the community that values it. In the traditions of the several Tribes that value Gold Strike Canyon / Sugarloaf Mountain, “creation to the present” is the period over which they conducted traditional cultural practices at numerous and specific locations here. On the right is a listed TCP with a period of significance determined by the time period over which the place has actually been used for cultural purposes. Pascua (**PAS-kwa**) Plaza has served as the location for ceremonial activities of the Yoeme (**yo-EM-may**) community since Pascua (**PAS-kwa**) Village was founded in 1921. The period of significance then is 1921 to the present.

Common to both these TCPs, and indeed to many TCPs, is the fact that the period of significance extends into the present. Recall the definition of a TCP: it is a place that may be eligible for inclusion in the National Register for its significance to a living community because of its association with cultural beliefs, customs, or practices that are important in maintaining the community’s cultural identity. So it follows that if a place is important in the continuity of a community’s cultural identity, the period of significance continues into the present. But that idea of “continuity” has raised questions over the years....

Pop Quiz

To be eligible for inclusion in the National Register as a TCP, a place must have “continuity of use” by the traditional community that values it.

- ☐ True
- ☐ False
- ☐ Not sure



California.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

So let's consider this issue.....

To be eligible for inclusion in the National Register as a TCP, a place must have been in continual use by the traditional community that values it.

Is this statement true or false, or are you not sure?

Pop Quiz

To be eligible for inclusion in the National Register as a TCP, a place must have “continuity of use” by the traditional community that values it.

☐ True

☒ False

☐ Not sure



The Luiseño Ancestral Origin Landscape, California, listed in 2014 as a district with a period of significance of creation to the present under Criteria A, B, C, and D.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

This statement is FALSE.

The Luiseño (**lu SEN yo**) Ancestral Origin Landscape in California was listed in 2014 as a district with a period of significance of creation to the present. It's recognized by the Indigenous People of the area as the place of creation and the period of use for traditional purposes extends back to this time, even though the people that value the place were forcibly removed from it. Although they did not have access to it in contemporary times, they maintained their cultural traditions associated with the area even as it was taken over by other governments and privatized.

Issue of “continuity of use” by a living community

- The TCP Bulletin did not and does not use the phrase “continuity of use.”
- No place need have been in continuous use by a living community to be valued by that community as a traditional cultural place and to be potentially eligible for National Register listing.
- But the significance of a place in the continuity of a community’s cultural identity is an essential characteristic of a TCP.



Ocmulgee Old Fields, Georgia (NR DOE) determined eligible for listing in 1997 (east/west boundary DOE in 1999) under Criterion A (event or pattern of events).

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

A place may indeed be important in the continuity of a community’s cultural identity, despite that community’s inability to access the place for some period of time.

Here you see Ocmulgee Old Fields in Georgia, determined eligible for listing in 1997 for its cultural and historical significance to the Muscogee Nation. The Muscogee had no choice but to physically abandon the area upon their forced relocation by the Federal government in the early nineteenth century. But they never forgot this place. They revere it as their ancestral homeland and it is as significant now as it was then to the Muscogee’s cultural identity.

Conflicts between historical and contemporary sources

1998 Bulletin

In general, the only reasonably reliable way to resolve conflict among sources is to review a wide enough range of documentary data, and to interview a wide enough range of authorities to minimize the likelihood either of inadvertent bias or of being deliberately misled. Authorities consulted in most cases should include both knowledgeable parties within the group that may attribute cultural value to a property and appropriate specialists in ethnography, sociology, history, and other relevant disciplines. (p. 9, col. 2)

October 2022 Draft Bulletin

In general, the views of those who ascribe cultural value to a place should be prioritized; after all, it is they who value it, and therefore are the most authoritative about its significance. Where this simple standard cannot be applied, then the only reasonably reliable way to resolve discrepancies among sources is to review a wide enough range of information, and confer with a wide enough range of experts, to minimize the likelihood either of inadvertent bias or of being deliberately misled. Authorities consulted in most cases should include experts within the community that may attribute cultural value to a place and appropriate specialists in ethnography, sociology, history, and other relevant disciplines. (p. 27, lines 15-21.)

Analysis: Reiterates traditional knowledge as acceptable source; no change in meaning.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

Questions have been asked about how to resolve conflicts between historical and contemporary sources about the significance of a place.....

In documenting any place—be it a place significant for its role in cultural identity or a house significant for its architecture—a nomination preparer may encounter conflicts between historical and contemporary accounts, between what is documented in books and what the community shares about it.

Both the original and draft bulletins stress that traditional knowledge is an independent line of evidence provided by the people who are the authorities in their culture and the connection that culture has to a place.

Conflicts between historical and contemporary sources, con't

1998 Bulletin

Sometimes, however, the actual time a traditional event took place may be ambiguous; in such cases it may be impossible, and to some extent irrelevant, to demonstrate with certainty that the property in question existed at the time the traditional event occurred. For example, events recounted in the traditions of Native American groups may have occurred in a time before the creation of the world as we know it, or at least before the creation of people. [A]s long as the tradition itself is rooted in the history of the group, and associates the property with traditional events, the association can be accepted. (p. 11, col. 2)

October 2022 Draft Bulletin

Sometimes, though, just when a traditional event took place may be unclear; in such cases, it may be impossible, and to some extent irrelevant, to document with certainty that the place in question existed when the traditional event occurred. For example, events as recounted by Native Americans, Hawaiians, and Pacific Islanders may have occurred in a time before the creation of the planet as demonstrated by the geological record. As long as the events are rooted in the history of the community, and by tradition associated with the place, the association should be accepted. (Figure 27, Spirit Mountain.) (p. 31, lines 2-7.)

#PASTFORWARD22

Analysis: Stylistic changes for clarity; no change in meaning.

The Power of Place: Traditional Cultural Places in the 21st Century

However, this is NOT to say that thorough, thoughtful research and documentation is irrelevant in preparing a nomination.

Recall that National Register regulations require that a nomination must be “adequately documented” and “professionally and technically correct and sufficient” and that remains true whether the place is a TCP or an architectural gem of a house. In these passages, the same example provided in both the original and draft bulletins demonstrates the important connection between traditional history, traditional associations, and a traditional cultural place.

Conflicts between historical and contemporary sources, example

- The period of significance—creation to present—for Spirit Mountain has been defined by the Tribes that attach significance to this place.
- It was not necessary to cite geological data to substantiate that the place existed 4.5 billion years ago, nor to provide paleoanthropological evidence to demonstrate homo sapiens evolved here.
- The ethnographic information supporting this nomination is a Tribal compromise to document the significance of the place without revealing sensitive traditional information.



Spirit Mountain, Nevada, listed in 1999 as a site with a period of significance of creation to the present under Criteria A and B, and Criteria Considerations A and C.

Additional example added.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

A specific example is included in the draft bulletin.....

This image shows Spirit Mountain in Nevada, a site associated with the creation stories of several Tribes. The mountain continues to serve an essential role in their traditional cultural practices and beliefs.

Tribal members shared information on the significance of this place with the understanding that they could not provide detailed information because of its extreme spiritual sensitivity. Nevertheless, the nomination is well-documented with both historical and contemporary sources, including oral histories.

Assessing integrity

1998 Bulletin

In the case of a traditional cultural property, there are two fundamental questions to ask about integrity. First, does the property have an integral relationship to traditional cultural practices or beliefs; and second, is the condition of the property such that the relevant relationships survive? (p. 10, col. 1)

Integrity of relationship (p. 10, col. 1)

Integrity of condition (p. 10, col. 2)

October 2022 Draft Bulletin

Evaluating whether a place has integrity of feeling and association involves exploring two questions:

- (1) Does the place have an essential relationship with traditional cultural beliefs or practices?
- (2) Does the relationship with the place endure, despite any alterations, in the view of those who value it? (p. 42, lines 31-32 and p. 43, lines 1-3.)

Is the relationship essential? (p. 43, line 5)

Does the relationship endure? (p. 43, line 21)

#PASTFORWARD22

Analysis: Stylistic overhaul for clarity, no change in meaning.

The Power of Place: Traditional Cultural Places in the 21st Century

Over the years, many questions have been raised about how to assess a place's integrity.....

The original bulletin's use of the phrase "integrity of relationship" has been misunderstood as adding an eighth aspect of integrity to the seven existing aspects of location, setting, design, materials, workmanship, feeling, and association.

In the draft bulletin, "integrity of relationship" has been reframed as "is the relationship essential?" (The same question could have been asked as "is the relationship integral" but using this closely related "I"-word risks the same confusion.) Likewise, "integrity of condition" has been restated as "does the relationship endure?" to provide guidance in assessing whether a traditional community's relationship with a place endures despite changes to the place.

Pop Quiz

This is an image of a National Register-listed TCP.

- ☐ True
- ☐ False
- ☐ Not sure



Oklahoma.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

And now for our final pop quiz.....

This is an image of a National Register-listed TCP.

Is this statement true or false, or are you unsure?

Pop Quiz

This is an image of a National Register-listed TCP.

- ☐ True
- ☐ False
- ☐ Not sure



Oklahoma.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

As you think about your answer, consider this photo from 1976.

Pop Quiz

This is an image of a National Register-listed TCP.

- ☒ True
- ☐ False
- ☐ Not sure



For any building, structure, object, site, or district, integrity is the ability of a property to convey its significance.

Integrity is based on significance:
why, where, and when a property is important.

From Bulletin 15: How to Apply the National Register Criteria, pp. 44, 45.

Creek Council Tree Site, Oklahoma, listed in 1976 as a site for its historical and cultural significance to the Muscogee Nation.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

This statement is TRUE.

The Creek Council Tree Site in Oklahoma was listed in 1976 as a site for its historical and cultural significance to the Muscogee Nation. Members of the Tribe arrived in the vicinity in 1836 after their forced relocation from their homeland in the southeast by the Federal government. They chose the site of this magnificent Oak as the gathering place for Tribal business, ceremonies, feasts, and games. Despite the visual intrusion of modern development, the place continues to be significant to the Muscogee Nation, whose members hold an annual celebration here to mark their arrival here.

Many thanks to Felicity Good, Historic Preservation Planner in the Tulsa, Oklahoma Planning Office, for this recent image!

Assessing integrity: new examples



Left, De 'ek wadapush (Cave Rock)(courtesy ACHP); right, Lawetlat'la (Mt St. Helens).

October 2022 Draft Bulletin

For example, De 'ek wadapush (Cave Rock) in Nevada, listed in the National Register in 2017, continues to be regarded as a sacred place of extraordinary spiritual power to the Washoe people despite modern intrusions—notably, a double-bore vehicle tunnel and, for a time, sport rock climbing—that have diminished the landscape and affected practitioners' access. ...Likewise, changes brought about by natural events may impact a place without diminishing its integrity. For example, Lawetlat'la (Mt. St. Helens), listed in 2013, continues to be a place of traditional activities despite the dramatic change in its appearance by the enormous crater created 30 during the eruption of May 18, 1980. (p. 43, lines 24-31.)

Additional examples added.

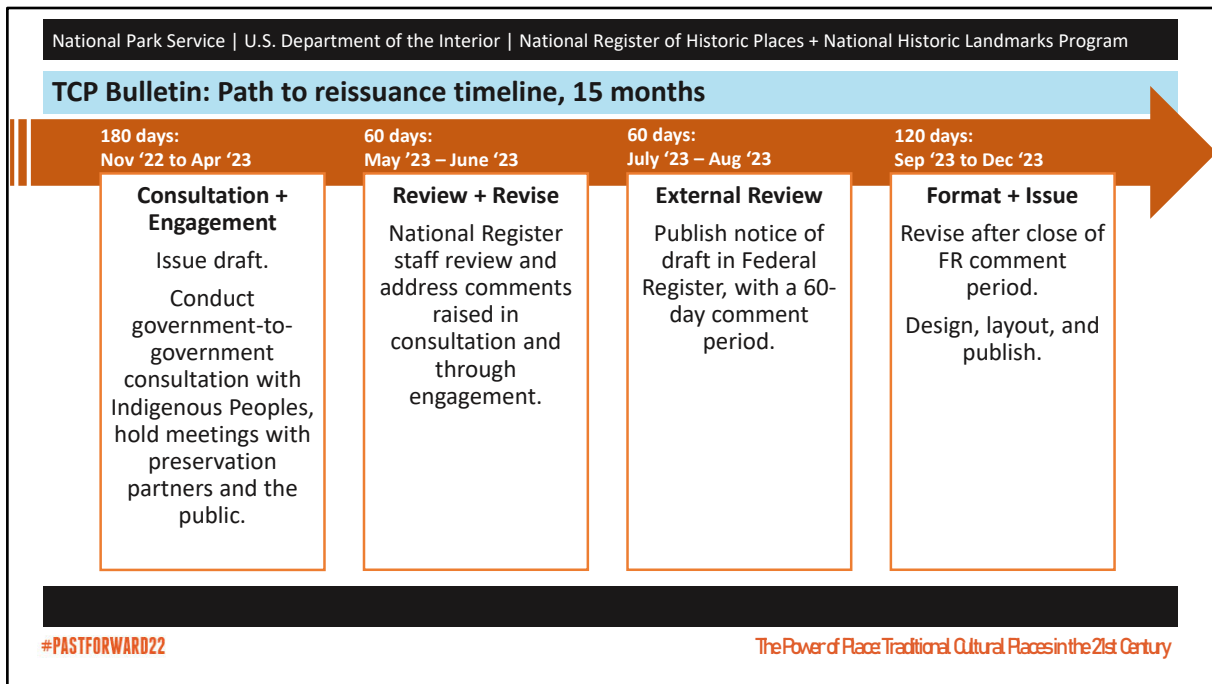
#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

And again, the passage of time since the original bulletin was issued has allowed for the inclusion in the draft bulletin of many more examples of National Register-listed TCPs addressing the issue of integrity.

On the left is De 'ek wadapush (**Cave Rock**) in Nevada. Listed in the National Register in 2017, it continues to be regarded as a sacred place of extraordinary spiritual power to the Washoe (**waa-show**) people despite the intrusions of a double-bore vehicle tunnel and, for a time, recreational rock climbing.

On the right we again see Lawetlat'la (**lah-wait-LOT-la**)(Mt. St. Helens). Listed in 2013, it continues to be a place of traditional activities despite the dramatic change in its appearance created by the enormous crater from the 1980 eruption.



Let's take a look now at the proposed path to reissuance of the TCP Bulletin.....

We've developed a 15 month schedule, aiming for issuance by December 2023.

The schedule assumes 6 months to conduct partner and public outreach, and government-to-government consultation with Native American Tribes, Native Hawaiian Organizations, and Alaska Native Corporations.

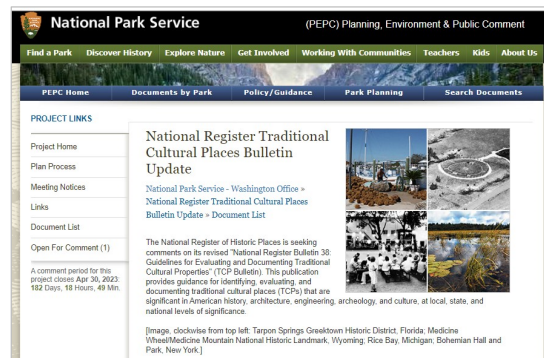
TCP Bulletin: Path to reissuance

The National Register of Historic Places is now seeking comments on the revised "National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties."

The draft bulletin may be downloaded, and comments submitted, at parkplanning.nps.gov/TCPBulletin

Comments may also be submitted

- via email to nr_tcp@nps.gov
- via mail to
National Register of Historic Places
1849 C Street, NW
Mail Stop 7228
Washington, D.C. 20240
ATTN: Draft TCP Bulletin



Planning, Environment & Public Comment (PEPC) TCP Bulletin website.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

The draft bulletin can be downloaded from the NPS Planning, Environment, and Public Comment website at the link shown here, and pasted in the chat.

This is also where we'll be posting the consultation and outreach schedule. We anticipate conducting those session via Zoom, and we'll be posting information on this site later this month.

Comments may be made via this site, or by email to the address shown here. You may also mail comments to us in Washington, D.C.

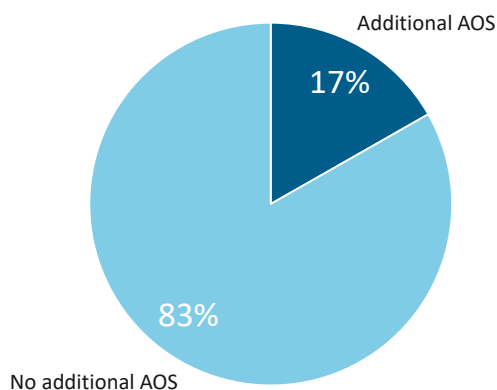
parkplanning.nps.gov/TCPBulletin

NRHP + NHL Program Updates

Area of Significance (AOS) validation project

Review of stratified random sample of pre-2013 listing nomination forms for possible additional area(s) of significance related to underrepresented populations (*i.e.*, women, minority groups, cultural and ethnic communities, differently abled individuals/groups, and LGBTQ+ individuals/groups).

- ≈ 3,500 of 98,000 listings have been reviewed
- 17% of those would benefit from the addition of at least one more Area of Significance



Preliminary analysis of Area of Significance validation for nominations reviewed as of 09/30/2022.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

Before I end this presentation, I'd like to update you all on the initiatives I introduced at last year's PastForward conference.....

In March, the National Register program began evaluating older listings to identify potential additional areas of significance related to cultural, ethnic, and identity groups.

As discussed at last year's conference, the area of significance categories have evolved and expanded in the decades since the National Register was formally established in 1966. This project's goal is to identify potential additional area(s) of significance for older listings, and work with partners and the public to update those nominations.

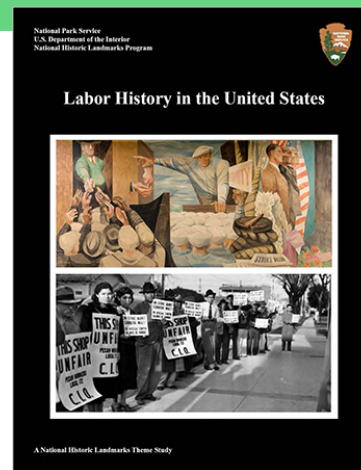
We anticipate publishing the results of this work in 2023.

NRHP + NHL Program Updates

Updated guidance and new guidance

www.nps.gov/subjects/nationalhistoriclandmarks/recent-theme-studies.htm

www.nps.gov/subjects/nationalregister/publications.htm



Pages from BPR, Issue 1; cover, NHL Labor Theme Study.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

This year has seen the release of several guidance documents.....

The NHL Program has released theme studies on labor history and Cold War history. Remember that NHL theme studies can provide context for National Register nominations not only at the national level of significance, but at the local and state levels, as well. These and other recent theme studies are available at the NHL website at the links shown here, and pasted into the chat.

In September, the National Register Program released the inaugural issue of the *Best Practices Review* to provide guidance on frequently raised questions about National Register practice. This first issue addresses evaluating non-historic exteriors. Future issues, to be released quarterly, will address counting structures in historic districts, developing additional documentation for existing listings, and using oral history in nominations.

www.nps.gov/subjects/nationalhistoriclandmarks/recent-theme-studies.htm

www.nps.gov/subjects/nationalregister/publications.htm

NRHP + NHL Program Updates

Expanded Sample Nominations

Coming soon.....

Sample-Nominations-Integrity

Criterion A examples - integrity

Winders Motor Sales Company in Ohio
Reference number: 100004542
Area of Significance: Commerce
Period of Significance: 1916-1925
Despite alterations, the building's retention of key character-defining features as an automobile dealership and the nomination's strong context made for a successful nomination. The property remains recognizable as an early-20th century automobile dealership and reflects its association with the growing automotive industry of the period.
[Link to file](#)

Winders Motor Sales Company
Photograph by Alan Green, courtesy of Ohio State Historic Preservation Office

Screenshots, new sample nominations page.

#PASTFORWARD22

The Power of Place: Traditional Cultural Places in the 21st Century

Over the past year, we've been building a new sample nominations page, featuring more than 100 nominations on a variety of topics. We anticipate this page going live later this month, although it will always be a work-in-progress as we add new listings.

Sherry Frear
Chief + Deputy Keeper, National Register of Historic Places + National Historic Landmarks Program
sherry_freear@nps.gov

Paul Lusignan
Sr. Historian, National Register of Historic Places
paul_lusignan@nps.gov

Julie H. Earnstein, Ph.D., RPA
Division Chief, Cultural Resources, Interior Region 2 / South – Atlantic-Gulf Region
julie_earnstein@nps.gov

Lisa Davidson, Ph.D.
National Historic Landmarks Program Manager
lisa_davidson@nps.gov

The Power of Place: Traditional Cultural Places in the 21st Century