

**National Register Bulletin:
Identifying, Evaluating, and Documenting
Traditional Cultural Places**

DRAFT

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National Park Service

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PREFACE

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

The National Register includes:

- Places significant in national, state, or local history that have been nominated by State Historic Preservation Officers, Tribal Historic Preservation Officers, Federal agencies, and others, and have been approved for listing by the National Park Service
- All precontact and historic units of the National Park System
- National Historic Landmarks, which are places recognized by the Secretary of the Interior as possessing national significance

National Register listing assists in preserving historic places in several ways:

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

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

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

¹ Section 106 of the NHPA requires Federal agencies to consider the effects on historic properties of projects they carry out, assist, fund, permit, license, or approve throughout the country. If a Federal or Federally assisted project has the potential to affect historic properties, a “Section 106 review”—which provides the Advisory Council on Historic Preservation, interested parties, and the public the opportunity to weigh in on these matters before a final decision is made—will take place. For further guidance on the Section 106 process, please contact the Advisory Council on Historic Preservation.

The National Register is administered by the National Park Service (NPS). Nominations for listing historic places typically come from “nominating authorities,” namely State Historic Preservation Officers (SHPOs); Federal Preservation Officers (FPOs) for places owned or controlled by the United States Government; and Tribal Historic Preservation Officers (THPOs) for places on Tribal lands. Places may also be “determined eligible” for listing in the National Register at the request of SHPOs, THPOs, and FPOs, or if a private property owner objects (or in the event of a proposed historic district, a majority of private property owners object) to listing in the National Register. However, local governments, organizations, and individuals initiate the process by preparing the necessary documentation. Typically, a community with a certified local historic preservation program, and a state or Tribal review board, reviews the nomination and makes a recommendation to the nominating authority on its eligibility. The Keeper of the National Register of Historic Places is the individual who has been delegated the authority by the NPS to list properties and determine their eligibility for the National Register. The Keeper may further delegate this authority as they deem appropriate.

The National Register Program in Washington, D.C., issues guidance to assist anyone seeking to prepare a nomination. A series of “bulletins”—publications of 50 to 100 pages of text and images—address a variety of topics.²

- *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (Criteria Bulletin) and *National Register Bulletin: How to Complete the National Register of Historic Places Registration Form* (Form Bulletin) provide foundational guidance for National Register work.
- Several Bulletins have been retired by virtue of the guidance provided within them being collected into the Criteria and Form Bulletins, such as *National Register Bulletin: Improvement of Documentation for Properties Nominated to the National Register* and *National Register Bulletin: Guidelines for Counting Contributing and Noncontributing Resources for National Register Documentation*.
- Bulletins have been issued to provide guidance on evaluating specific place types, such as *National Register Bulletin: How to Apply the National Register Criteria to Post Offices* and *National Register Bulletin: Guidelines for Evaluating and Registering Cemeteries and Burial Places*.

Likewise, this document—formerly titled *National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties*—addresses the very specific place type of “traditional cultural place.” It provides a framework for understanding how traditional cultural places—TCPs—may meet the criteria for inclusion in the National Register.

² Current National Register Bulletins and other guidance documents are available on the National Register website.

I. INTRODUCTION

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

The National Register includes many types of historic places, reflecting the diversity of the nation’s history and culture. In National Register practice, a “traditional cultural place”—“TCP,” for short—is defined as a building, structure, object, site, or district that that may be listed in (or determined eligible for listing 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.

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

National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties (TCP Bulletin) was published in 1990 in response to the 1980 amendments to the National Historic Preservation Act. These amendments directed the Secretary of the Interior to study ways of preserving and conserving the intangible elements of our cultural heritage such as arts, skills, folklife, and folkways, and to recommend ways of preserving, conserving, and encouraging the diverse traditional prehistoric (Indigenous), historic, ethnic, and folk cultural traditions that inform and express our American heritage.³ The TCP Bulletin was developed to provide guidance for determining whether *places* associated with these intangible cultural practices—places that might have traditional cultural significance—are eligible for inclusion in the National Register. It was intended to help Federal, Tribal, state, and local authorities nominate these places to the National Register or consider a place’s eligibility for the National Register as part of a Federal undertaking. It was designed to be used in conjunction with other National Register guidance—notably, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation* (Criteria Bulletin) and *National Register Bulletin: How to Complete the National Register of Historic Places Form* (Form Bulletin)—when preparing nominations to the National Register or documentation for a National Register eligibility determination.

³ National Historic Preservation Act Amendments of 1980, Public Law 96-515, December 12, 1980, Section 502.



Figure 1. Medicine Wheel/Medicine Mountain National Historic Landmark, Wyoming (NR Ref. No. 69000184 R)(restricted) was designated an NHL in 1969 (updated documentation 2011) under NHL criteria 1 and 6 for its significance in Native American religion, ethnic heritage, history, and archeology. Its period of significance is 4770 BCE (6720 BP) to the present. The updated documentation prepared in consultation with multiple tribes expanded the historic district to embrace an integrated complex of natural and cultural features: its archeological features, ancient trail system, and traditional use areas contribute to its primary function and significance as a spiritual and ceremonial center. (U.S. Forest Service)

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

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

To minimize the likelihood of misinterpretation, the 1992 and 1998 issues of the TCP Bulletin gave special attention to places of traditional cultural significance to Indigenous Peoples, and to discussing the place of religion in the attribution of such significance. 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. 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. For example, Saint Augustine Catholic Church and Cemetery in Natchitoches Parish, Louisiana, is a district that was listed in the National Register in 2014 for its significance in the perpetuation of Cane River Creole of Color culture. (Figure 2, Saint Augustine Catholic Church and Cemetery.)

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

The goal of this Bulletin—indeed, of all National Register guidance—is not to limit National Register listings but to assist in recognizing places significant in American history and culture. This revision includes plain language, additional examples, and expanded discussions on the components of a TCP, acknowledging community-provided information, respecting confidentiality, and addressing National Register documentation issues such as level and period of significance, boundaries, and character-defining features. While it is difficult to write a single document for multiple audiences, the hope is that this document can be used by both professional preservationists and community members to identify, document, and have included in the National Register places of traditional cultural significance.



Figure 2. Saint Augustine Catholic Church and Cemetery, Louisiana (NR Ref. No. 14000679) was listed in 2014 as a district at the local level of significance with a period of significance of 1829 to the present under Criterion A and Criteria Considerations A and D for significance in the culture of the Cane River Creole of Color. (Jim Dollar)

Finally, this guidance is premised on a traditional community's desire to nominate a place to the National Register as a place significant to their traditional cultural beliefs, customs, or practices. If a traditional community chooses not to identify or discuss a place, for whatever reason, or is not interested in nominating a place for its traditional cultural significance to them, those wishes should be respected.

Key Concept

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

II. WHAT IS A TRADITIONAL CULTURAL PLACE?

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

A traditional cultural place (TCP) is a building, structure, object, site, or district that may be listed or eligible for listing 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.

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

Understanding the Components of a Traditional Cultural Place

Building, Structure, Object, Site, or District

The National Register includes many types of historic places, reflecting the diversity of the nation's history and culture. Table 1 provides definitions and examples of common property and resource types. Just as a courthouse is a “building,” a ship a “structure,” a fountain an “object,” a garden a “site,” and a college campus a “district,” a traditional cultural place may be a church (building), shrine (structure), rock (object), vernacular landscape (site), or urban neighborhood (district).⁵ 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.

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

⁴ National Register of Historic Places, 36 C.F.R. § 60.1, 60.2.

⁵ Animals, or species of animals, do not fall within one of the types of property that may be listed in the National Register, though they may contribute to a traditional cultural place that may be listed. For further discussion of this issue, see Section IV “Ensure that the Property or Place Under Consideration is a Thing or Location.”

Type	Definition	Examples
BUILDING	A building, such as a house, barn, church, hotel, or similar construction, is created principally to shelter any form of human activity. "Building" may also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn.	houses, barns, stables, sheds, garages, courthouses, city halls, social halls, commercial buildings, libraries, factories, mills, train depots, stationary mobile homes, hotels, theaters, schools, stores, churches
STRUCTURE	The term "structure" is used to distinguish from buildings those functional constructions made usually for purposes other than creating human shelter.	bridges, tunnels, gold dredges, fire towers, canals, turbines, dams, power plants, corncribs, silos, shot towers, windmills, grain elevators, kilns, mounds, cairns, palisade fortifications, earthworks, railroad grades, roadways and paths, boats and ships, railroad locomotives and cars, telescopes, carousels, bandstands, gazebos, aircraft
OBJECT	The term "object" is used to distinguish from buildings and structures those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment.	sculpture, monuments, boundary markers, statuary, fountains
SITE	A site is the location of a significant event, a precontact or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure.	habitation sites, funerary sites, rock shelters, village sites, hunting and fishing sites, ceremonial sites, petroglyphs, rock carvings, gardens, grounds, battlefields, ruins of historic buildings and structures, campsites, treaty signing locations, trails, shipwrecks, cemeteries, designed landscapes, natural features such as waterways and rock formations, land areas having cultural significance
DISTRICT	A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.	college campuses, central business districts, residential areas, commercial areas, large forts, industrial complexes, civic centers, rural villages, canal systems, collections of habitation and limited activity sites, irrigation systems, transportation networks, large landscaped parks, large farms, ranches, estates, or plantations

Table 1. National Register Property and Resource Types, adapted from *National Register Bulletin 16A: How to Complete the National Register of Historic Places Registration Form*. These examples are not exclusive.

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

- a landscape or geographic feature—with or without human modification or other evidence of human activity—whose existence is significant to a community because of its place in the community’s knowledge about its origins, its cultural history, or the nature of the world;
- an archeological site, which may or may not be eligible for its capacity to yield data in a traditional archeological sense, for its significance to a community because of its capacity to convey a community’s relationship to a landscape, or yield knowledge about its origins or its cultural history;
- a rural area whose organization, buildings and structures, or patterns of land use reflect the cultural traditions practiced and valued by its long-term residents over generations;
- an urban or suburban neighborhood that is the traditional home of a particular cultural community, where a community has traditionally conducted economic, artistic, spiritual, or other cultural practices its members believe significant in maintaining their collective historic identity; or
- a building directly associated with the historic and continuing social or cultural activities that are essential to a traditional group's identity or belief system.

The following are National Register-listed examples of places that possess significance as traditional cultural places:

- a landscape feature: Medicine Bluffs, Oklahoma, a *site* listed in 1974 (Figure 3)
- an archeological site: Zuni Salt Lake and Sanctuary, a *site* listed in 1999 (Figure 4)
- a rural area: Green River Drift Trail, Wyoming, a *district* listed in 2013 (Figure 5)
- an urban neighborhood: Tarpon Springs Greektown, a *district* listed in 2014 (Figure 6)
- a building: Bohemian Hall and Park, listed as a *building* in 2001 (Figure 7)

Some TCPs may be readily identified—for example, Chinatowns are often recognizable by their distinctive architecture—while others may be hard for one who is from outside the community to recognize. A place sacred to a community may simply look like a mountain, lake, or stretch of river or ocean. A culturally significant urban neighborhood may look like any other group of buildings. An area where culturally significant 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, these 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, or did so historically. This traditional knowledge is an independent line of evidence provided by the people who value the place; they 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 8, Turtle & Shark; Figure 9, Coso Hot Springs.)



Figure 3. Medicine Bluffs, Oklahoma (NR Ref. No. 74001659) was listed in 1974 as a site for its significance to several regional Tribes. This historical rendering shows the dramatic series of rock bluffs overlooking Medicine Bluff Creek that create a natural crescent-shaped formation over a mile long. Medicine Bluffs is an example of a TCP consisting of a natural landscape without readily apparent human modification or other activity. (Curt Teich & Company)

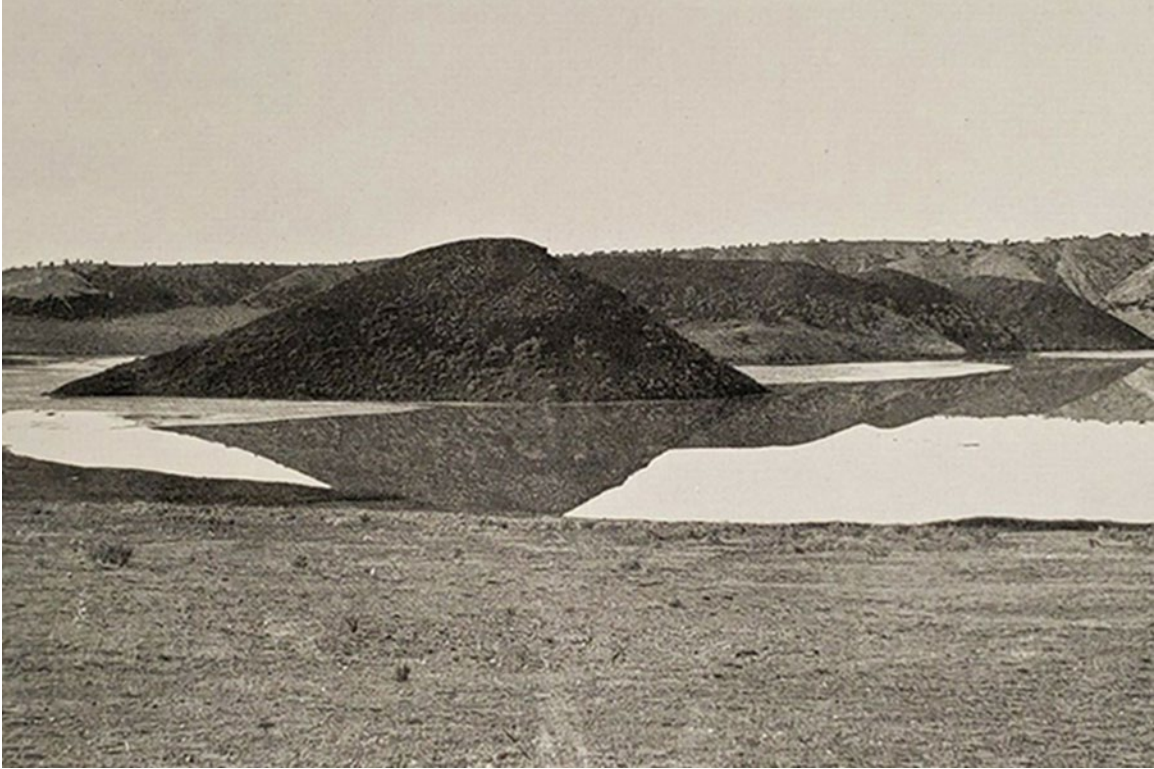


Figure 4. Zuni Salt Lake and Sanctuary, New Mexico (NR Ref. No. 98000238 R)(restricted) was listed in 1999 as a site at the state level of significance with a period of significance of time immemorial to the present under Criteria A and B, and Criteria Consideration A for its significance in the cultural traditions of six Tribes. This historical image is from the *23rd Annual Report of the Bureau of American Ethnology to the Secretary of the Smithsonian Institution, 1901–1902* (1904). (Smithsonian Institution)



Figure 5. Green River Drift Trail, Wyoming (NR Ref. No. 12001224) was listed in 2013 as a district at the state level of significance with a period of significance of 1896 to the present under Criterion A for significance in agriculture and politics/government. It continues to play a pivotal role in ranching in the area as well as in the relationships between Federal land managing agencies and private property owners. The Drift is 58 miles long with 41 miles of spurs. (Wyoming State Historic Preservation Office)

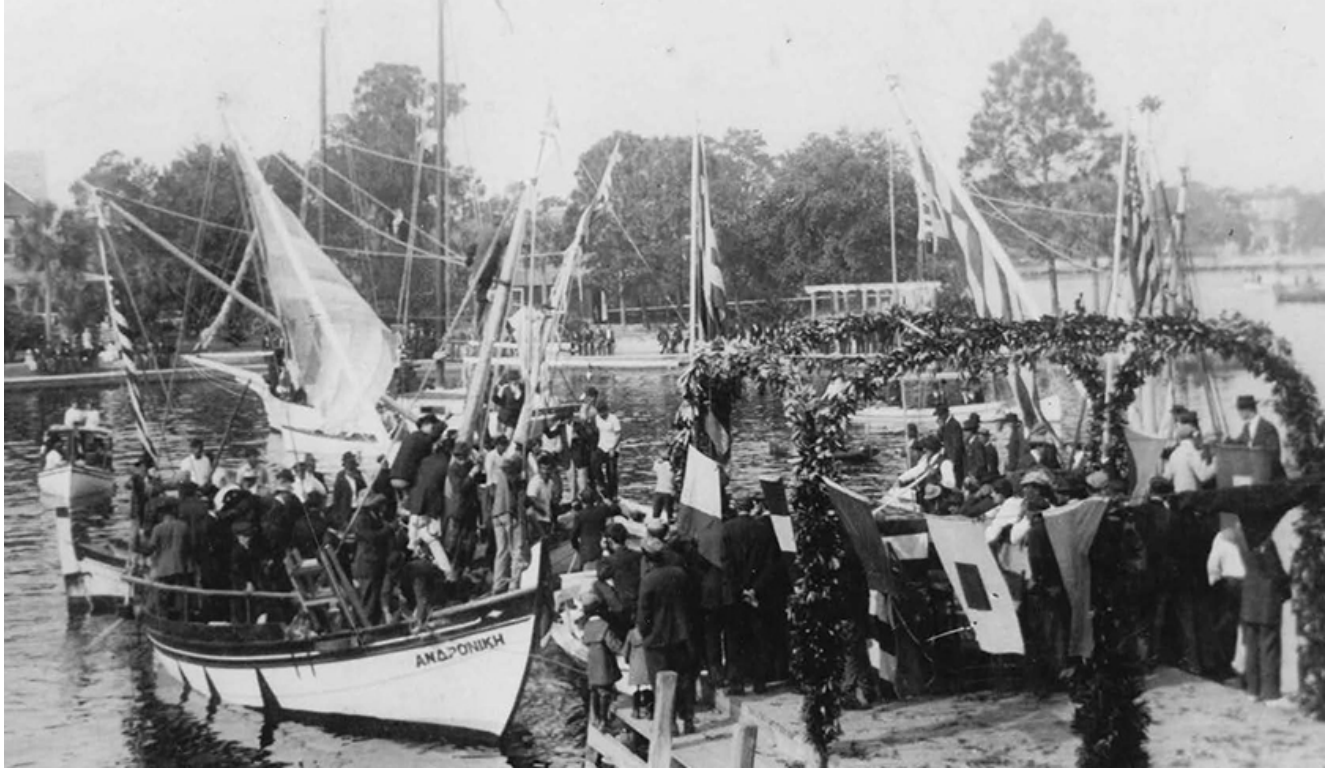


Figure 6. Tarpon Springs Greektown Historic District, Florida (NR Ref. No. 14000321) was listed in 2014 as a district at a state level of significance with a period of significance of 1905 to the present under Criterion A for significance in Greek ethnic history and maritime history. This 1914 image is one of the earliest of an Epiphany celebration in Tarpon Springs. (City of Tarpon Springs)



Figure 7. Bohemian Hall and Park, New York (NR Ref. No. 01000239) was listed in 2001 as a building (with a contributing site) at the local level of significance with a period of significance of 1910 to the present under Criteria A and C for significance in Czech heritage, social history, and entertainment/recreation. This image shows the west façade of the bar building and park wall, along 24th Avenue, looking north. (Martha Cooper)



Figure 8. Turtle & Shark, Tutuila Island, American Samoa (NR Ref. No. 14000925) was listed in 2014 as a site at a state level of significance with a period of significance of c. 1919 to the present under Criterion A as significant for its association with the cultural traditions and history of the American Samoan community. This place is associated with traditional Samoan legends passed down from generation to generation, and traditional songs recalling the story of the Turtle and Shark. It is an example of a culturally significant natural landscape that contains no buildings, structures, or other readily apparent signs of human activity. (Note that the buildings visible in the image are outside the boundary of the listed place.) (Robert Pacheco)



Figure 9. Coso Hot Springs, California (NR. Ref. No. 78000674 R)(restricted) was listed in 1978 as a district for its significance to the Coso, Paiute, and Shoshone as a traditional spiritual and medicinal center. Historically, Native Americans from as far away as Wyoming, Utah and Nevada came to this site for spiritual and medicinal purposes. Around the turn of the 19th century, the place became a therapeutic spa for non-Native Americans. Wooden structures—one can be seen in the background—were built to accommodate the resort’s patrons, and this place is also significant for its c. 1920 heath resort architecture. (California State Department of Parks and Recreation, Office of Historical Preservation)

Living Community

A “living community” in the context of a National Register traditional cultural place is a group that is deeply rooted in American history. It is a group that has contributed to the diversity and richness of the American people and the broad patterns of the nation’s history, and that is differentiated from other types of affiliations by its traditional group identity. “Tradition” implies the passage over time (with relatively little change) of beliefs, customs, practices, language, and other intangible aspects of culture. Traditional group identity may be expressed in indigenous knowledge, religious beliefs, ceremonial practices, dress (daily or ceremonial), or language. Traditional group identity is reinforced by the continuing participation in traditional activities by people who have inherited the knowledge from other group members, as well as previous generations, about how these activities are conducted, and group members derive significant communal and individual meaning from participation in these activities.

A living community associated with a traditional cultural place is distinct from vacationers, surfers, or artists who may claim an affinity through, for example, a shared attachment to camping grounds in Yosemite, a popular surfing spot on the California coast, or the sandy shores of Cape Cod. The values commonly held by individuals belonging to these affinity groups—a love of nature, recreational interests, or valued community ties—are not central, essential, or fundamental to the identity of the individuals belonging to these groups or to the persistence of a traditional culture that has contributed to the richness and diversity of the American people over many generations and in some cases since time immemorial. Unlike a living community associated with a traditional cultural place, an affinity group is fluid, evolving, and, typically, different from one year to the next.

Likewise, a living community in the context of a National Register listed or eligible TCP is typically distinct from a family. Members of a family may identify a house or location as a place where familial values have been transmitted over several generations, for example, an ancestral home or a fishing camp that one family—whether single or extended—has used for many generations for seasonal celebrations or gatherings. Those familial values may be essential to the identity of individuals and reflective of the larger community’s values. However, the National Register is a list of places significant in American—not family—history, architecture, archeology, engineering, and culture. While there are places listed in the National Register that are strongly associated with a single family, such as the Kennedy Compound in Hyannis Port, Massachusetts, these places are listed for the significant contributions of one or more family members to local, state, or national actions or events. A place of traditional value to a family would not typically be considered a National Register traditional cultural place.

However, this is not to say that a living community in the context of a National Register practice cannot be comprised of related individuals. Indeed, a living community typically includes related individuals with familial ties to a place with local or statewide significance. This is especially true for Native American Tribes, Native Hawaiians, and Native Alaskans.

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. For example, Ocmulgee Old Fields, Georgia, was determined eligible for listing in 1997 under Criterion A for its cultural and historic significance to the Muscogee (Creek) Nation, whose ancestors were forced to abandon the place when they were relocated in the early nineteenth century, but who still revere it as their ancestral homeland. Likewise, the evolution of traditional cultural practices over time does not necessarily make a traditional cultural place ineligible for inclusion in the National Register. For example, the annual Powwow at White Eagle Park in Oklahoma, a site recognized as a TCP when listed in 2007 (Figure 10), has grown over the centuries into a multi-day event with large crowds of both Tribal members and the public converging on the campground to watch or participate in the dances.

Additionally, many traditional communities are undergoing a process of rediscovery or affirmation in which traditional practices and their meaning are once again being recognized by the group. A resurgence of interest in "forgotten" or "lost" customs, practices, and even languages is in itself evidence of continuity of traditional values. And while the continuation of traditional practices does not require residence by descendants of an ethnic group, consideration of a place as a traditional cultural place does require that traditional activities continue to occur and that members of the ethnic group participate in them. This issue is further discussed in Section V's subsection "Identifying the Period of Significance."

Cultural Beliefs, Customs, and Practices

There are many definitions of the word "culture," but in National Register practice, the word is understood to mean the beliefs, customs, and practices—including arts, crafts, traditions, lifeways, and social institutions—of a community, be it a Native American Tribe, a Native Hawaiian Organization, or another cultural or ethnic group. Culturally significant places have always been eligible for inclusion in the National Register—recall that the National Register is the nation's official list of places significant in history, architecture, archeology, engineering, and *culture*—so it follows that places associated with a community's beliefs, customs, or practices may be eligible for inclusion in the National Register.

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



Figure 10. White Eagle Park, Oklahoma (NR Ref. No. 07000522) was listed in 2007 as a site at the state level of significance with a period of significance of 1878 to the present under Criterion A as the place of cultural practices of the Ponca Indians for 128 years. The North Area, shown in this image, is the location of public events held during the four-day Ponca Powwow each August. (Mary Jane Warde)

Traditional cultural places enable community members to engage in some sort of meaningful activity that is an essential part of expressing cultural identity. It may be a sedentary, passive activity, such as an individual's solitary vision quest, or it may entail action or a sequence of more active events, such as a seasonal pageant or festival involving food-preparation, storytelling, and traditional arts, dance, or music, or other ways that traditional, and often intangible, aspects of culture are expressed.

Community History and Community Identity

A traditional cultural community's beliefs, customs, and practices are deeply rooted in its past, and continue to define and perpetuate a distinctive cultural identity that contributes to the diversity of America. Intergenerational transmission of culture may include the assignment of special responsibilities and skills to certain families, clans, elders, or individuals, such as roles in leadership, medicinal knowledge and practice, or storytelling.

Traditional cultural values are central to the way a community defines itself, and maintaining these values is vital to maintaining the community's sense of identity. This cultural identity relies upon perpetuation of cultural practices; likewise, cultural continuity relies upon the transmission of cultural beliefs and practices. Some practices may stem from highly significant cultural imperatives, such the visits of tribal members to a venerated mountain or spring. Cultural identity is expressed by a traditional community through its fundamental principles and practices. In contrast to "lifestyle," which may be contingent upon factors such personal wealth, professional choices, or economic conditions, the way of life—or "lifeway"—of a traditional community is at the center of cultural identity and expressed through shared practices and activities that are carried out either individually or collectively.

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

Still, some qualities that give such places significance are intangible, such as feeling and association. For example, the experience of viewing the sunrise over Nantucket Sound contributes to the Sound's eligibility for the National Register. (Figure 11, Nantucket Sound.) Such qualities—or "aspects," to use the National Register term—should not be ignored in evaluating places that may be eligible for inclusion in the National Register. Tangible places and their intangible aspects must be considered together. The National Register's seven aspects of integrity—location, setting, design, materials, workmanship, feeling, and association—may be applied with a good deal of flexibility, as discussed in detail in Section IV "Evaluating TCP Eligibility." Intangible cultural values that may make a place eligible for listing in the National Register should be addressed in a way that avoids personal biases. The traditional knowledge of those who value a place is an independent line of evidence provided by the people who are the authorities in their culture and the connection that culture has to the place.



Figure 11. Nantucket Sound, Massachusetts (NR DOE 2010) was determined eligible for listing in 2010 under Criteria A, B, C, and D. The Sound is an essential component of a larger area important to the ongoing beliefs, customs, and traditions of two Wampanoag tribes in southeastern Massachusetts who identify themselves as “The People of the First Light or Dawn.” Neither boundary nor timeframe was addressed by the Keeper as the issue presented for a decision did not depend upon the spatio-temporal parameters of the place but whether the place met the eligibility requirements of significance and integrity for listing in the National Register. (Sara Mulrooney)

Essential Characteristics of a National Register Traditional Cultural Place

To be listed or eligible for listing in the National Register, a traditional cultural place will have the following characteristics:

- The place must be associated with and valued by a living community.
- The community that values the place must have existed historically and continue to exist in the present.
- The community must share beliefs, customs, or practices that are rooted in its history and held or practiced in the present.
- These shared beliefs, customs, or practices must be important in continuing the cultural identity and values of the community.
- The community must have transmitted or passed down the shared beliefs, customs, or practices, including but not limited to through spoken or written word, images, or practice.
- These shared beliefs, customs, or practices must be associated with a tangible place.
- 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.

If a place does not have these characteristics, it may not be a TCP as that term is defined by the National Register Program; however, it still may be listed or eligible for listing in the National Register for something other than being significant as a TCP. For example, the Cypress Street Schoolhouse in California—a place significant for Hispanic ethnic heritage and social history—was listed in the National Register in 2015 as the location of the earliest civil rights movements in the greater Los Angeles area. (Figure 12, Cypress Street Schoolhouse.) Unlike Medicine Mountain (Figure 1) and the Green River Drift Trail (Figure 5)—both of which are traditional cultural places where traditional activities continue to be practiced by persons belonging to the traditional group—traditional practices are not in evidence at Cypress Street Schoolhouse. This is not a commentary on whether one type of place is more or less significant than another; they simply are significant for different reasons. The concepts of significance, and the integrity to convey that significance, in National Register practice are discussed in detail at Section IV “Evaluating TCP Eligibility.”



Figure 12. The Cypress Street Schoolhouse, California (NR Ref. No. 15000380) was listed in the National Register in 2015 as a building at the local level of significance with a period of significance of 1931 to 1934 under Criterion A for Hispanic ethnic heritage and social history. This schoolhouse was built in 1931 as a segregated elementary school for the Spanish-speaking children of Mexican and Mexican-American citrus workers in the city of Orange, California. This property was nominated under the Multiple Property Documentation form *Latinos in 20th Century California* under the associated context “Latino Struggles for Inclusion.” (Molly Iker)

Example: Bohemian Hall and Park is a traditional cultural place

Bohemian Hall and Park in Queens, New York, is a traditional cultural place that was listed in the National Register in 2001 as a building 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 Criterion C for embodying the distinctive characteristics of early twentieth-century meeting hall design serving social, cultural, and recreational needs. (See Figure 7, Bohemian Hall and Park.)

TCP Essential Characteristics	Bohemian Hall and Park Nomination ⁶
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.”
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.”
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.”
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.”
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.”

⁶ Laura Hansen, “Bohemian Hall and Park,” National Register of Historic Places Registration Form (Washington, DC: US Department of the Interior, National Park Service), Section 8, pp. 1, 18. The quotes included in this table are representative of longer discussions within the nomination.

TCP Essential Characteristics	Bohemian Hall and Park Nomination 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."
<p>The place must meet the criteria for listing in the National Register of Historic Places:</p> <ul style="list-style-type: none"> 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. 	"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."

Example: White Eagle Park is a traditional cultural place

White Eagle Park in Kay County, Oklahoma, is a traditional cultural place that was listed in the National Register in 2007 as a site at the state level of significance with a period of significance of 1878 to the present as the location of cultural practices of the Ponca Indians that are rooted in the community's history and essential to their tribal identity. It is significant under Criterion A as the site of Ponca tribal historical events since their resettlement at this location in 1878, following their forced removal from their Nebraska homeland in 1877; and for its role throughout the twentieth century as the location of the annual Ponca Powwow, which disseminated—and continues to disseminate—elements of Ponca culture to other Tribes, serving as the template for the intertribal powwow contest now practiced nationally. (See Figure 10, White Eagle Park.)

TCP Essential Characteristics	White Eagle Park Nomination ⁷
The place must be associated with and valued by a living community.	"White Eagle Park is the site identified by members of the Ponca Tribe of Indians of Oklahoma as the most important to their culture and identity as a community. Their use of the White Eagle Park site since 1878 is verified both by their oral history and written documentation."
The group/community that values the place must have existed historically, and the same community must continue to exist to the present.	"It is believed the Ponca, who are linguistically Siouan, migrated from the Ohio River Valley onto the Great Plains by way of the Missouri River. They settled eventually in stockade villages near the mouth of the Niobrara River in northeast Nebraska and southeast South Dakota. They were farmers, but by the mid-1700s also used horses and tipis when following the bison herds. The Ponca honored their warriors and fought well when attacked, but they usually lived peacefully with their neighbors, including the French and Anglo-Americans. Unfortunately, in the first half of the nineteenth century better armed Lakota and Pawnee

⁷ Mary Jane Warde, "White Eagle Park," National Register of Historic Places Registration Form (Washington, DC: US Department of the Interior, National Park Service), Section 8, pp. 13, 17-18, 21-22. The quotes included in this table are representative of longer discussions within the nomination.

TCP Essential Characteristics	White Eagle Park Nomination ⁷
	raiders threatened Ponca villages and made hunting and tending crops difficult. Treaties with the United States in 1858 and 1865 defined a Ponca reservation and should have made them more secure. However, the Ponca were shocked to learn the 1868 Treaty of Fort Laramie had granted their reservation to the Lakota. Rather than rectify the situation, Congress appropriated funding to remove the approximately eight hundred Ponca to the Indian Territory by force if necessary.”
The community must share cultural beliefs, customs, and practices that are rooted in its history and held or practiced today.	“Long before their removal to the Indian Territory, the Ponca had developed their own dances, which included the Hethushka, or War Dance, practiced by several Plains tribe. The Ponca were known for their excellence as singers and makers of songs. These songs carried and maintained basic elements of their culture, especially language, history, values, and beliefs. They also, according to Ponca singer and song maker Lament Brown, could bring physical and spiritual healing.”
These shared cultural beliefs, customs, and practices must be important in continuing the cultural identity and values of the community.	“The songs sung around the drum were integral to Plains tribes’ dances and with them underpinned tribal cultures. James H. Howard estimated that as much as one-third of a Ponca’s time in the nineteenth century was spent preparing for or participating in a ceremonial or society dance. According to Clyde Ellis, Plains Indian dances ‘reflected deep ties of fictive and biological kinship, and thus knit together families, bands, and moieties.’ Participating in a dance was a public and personal acknowledgment of one’s identity and membership in the society or community. When federal Indian policy during the late nineteenth and early twentieth centuries attempted to eradicate dancing, the Ponca continued to sing and hold their dances.”
The community must have transmitted or passed down the shared cultural beliefs, customs, and practices including through spoken or written word, images, or practice.	“In addition to songs and ceremonies at the Ponca Powwow, other more mundane activities that took place conveyed the history and culture of the Ponca people, connecting them to pre-removal migratory days. Ponca was still the language spoken around the domino tables and in the family camps. Into the 1990s, the camp crier still walked through the campground, making announcements. Into the 1960s, cattle were brought to the campground and slaughtered. As had been done in pre-removal days, the women butchered the carcasses, using the ancient techniques to prepare the meat for special delicacies and dishes.”
These shared cultural beliefs, customs, and practices must be associated with a tangible place.	“Although in the last half of the twentieth century Ponca people no longer lived in the campground in White Eagle Park, the place still had strong meaning for them—even beyond the Ponca Powwow. It was the place they came to when they were removed from their Nebraska homeland and the place they could always go. Edward Hara recalled, ‘It’s kind of a thing in our family—If we lose everything we can always go to the campgrounds and set up, and that’s our home. Just in the back of our heads that’s...also home.’”
The place must meet the criteria for listing in the National Register of Historic Places:	“White Eagle Park is eligible for the National Register as a traditional cultural place because of its importance to the Ponca people historically and culturally from 1878 to the present. Although the Ponca danced at other grounds in warm weather and at round houses in cold weather,

TCP Essential Characteristics	White Eagle Park Nomination ⁷
<ul style="list-style-type: none"> • 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. 	<p>the arenas at White Eagle Park predated all of them and survived most. Although the Ponca practiced old and new ceremonies at other locations on their lands, no other place had the length of tenure, was used so universally by the Ponca people, or so strongly reinforced their sense of identity as a people. It is eligible under Criterion A because it was the place the Ponca resettled in 1878 after their forced removal to the Indian Territory as part of the federal government's post-Civil War Indian policy. The campground at White Eagle Park provided living space for Ponca people from that time until the middle of the twentieth century, justifying 1956 as the end of the period of significance. As the site of the annual Ponca Powwow in the nineteenth, twentieth, and twenty-first centuries, the impact of White Eagle Park widened even beyond its meaning to the Ponca tribe. It was the place the intertribal contest powwow began. Moreover, it provided the template, based on Ponca Hethuska Society practices, for the modern intertribal powwow that is now practiced by tribes and Indian organizations across the United States.</p> <p>The White Eagle Park site has strongly retained its historical integrity and appearance. By 1938, the second significant date, the other being the arrival of the Ponca in 1878, the only permanent construction had been completed. This included the North Arena sandstone bleachers, the domino tables, and the walling of the spring along with related construction of the gazebo and stairway from the camp areas. It is also evident from newspaper accounts that by 1938 the public version and organizational pattern for the intertribal contest powwow held in the North Arena had been firmly established at White Eagle Park. Even then they kept some ceremonies and activities for the Ponca only in the old South Arena. Photographic documentation of White Eagle Park and the Ponca Powwow in 1947 demonstrates that the look, activities, and meaning of White Eagle Park have changed little in the last five decades."</p>

Example: Dune Shacks of the Peaked Hills Bars Historic District is not a traditional cultural place

In 2007, the Keeper of the National Register determined that the Dune Shacks of the Peaked Hill Bars Historic District (Dune Shacks Historic District) in Massachusetts did not meet the National Register criteria for recognition as a traditional cultural place. By way of background, almost twenty years earlier, the Keeper had determined that the Dune Shacks Historic District was eligible for listing in the National Register for its significance under Criterion A in the development of American art, literature, and theater; under Criterion B for its association with the life of American poet Harry Kemp; and under Criterion C for its architecture. At that time—in 1989—the question of it being a TCP was not raised and not addressed.

In the 2007 decision, the Keeper found that the contemporary groups that associate traditional values with the Dune Shacks Historic District encompass a range of peoples, including long- and short-term

occupants, transient visitors, Provincetown-Lower Cape residents, and other groups beyond the immediate locality, and that as such, the groups that are culturally identified with the Dune Shacks Historic District were historically (and continue to be) fluid, evolving, and different from one year to the next. Nevertheless, the fact that the Dune Shacks Historic District was not identified for its significance as a TCP did not affect the 1989 Determination of Eligibility. The Dune Shacks Historic District was subsequently formally listed in the National Register in 2012, pursuant to a nomination prepared for the National Park Service, for its significance at the local, state, and national levels, with a period of significance of 1921 to 1991, under Criteria A, B, C, and D, and Criterion Consideration G, for its twentieth-century growth as an isolated, coastal retreat developed with distinct, rustic shelters that attracted a creative seasonal colony of summer recreationists and prominent American art, theater, and literary figures, many of whom had strong connections to the Provincetown art community.⁸

Notes on Terminology

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

Listing vs. “Eligible for Listing”

A place may be listed in the National Register or, for a variety of reasons, not actually listed but found to be “eligible for listing.”

- If a private property owner objects, or the majority of private property owners in a proposed historic district object, to the listing of their property, the Keeper of the National Register may still determine that the place satisfies the criteria for listing—that it has both significance and integrity—and therefore it is “eligible for listing.”
- A Federal agency may request of the Keeper of the National Register a Determination of Eligibility (DOE) regarding a potentially historic place affected by their proposed action, such as issuing a permit or building a road. NHPA Section 106 requires that Federal agencies take into account the effects of their undertakings on historic properties, as well as afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on those undertakings. If the place is determined eligible by the Keeper, the Federal agency will be required to consider the effects of their actions on the place before the agency may fund, license, or pursue a project which may affect the property.

⁸ The period of significance for the Dune Shacks Historic District begins in 1920, the approximate construction date of the earliest shack, and extends to 1991, the latest date that a historic property was rebuilt. Jenny Fields Scofield, Kristen Heitert, Virginia H. Adams, and Stephen A. Olausen, “Dune Shacks of Peaked Hill Bars Historic District” National Register of Historic Places Registration Form (Washington, DC: US Department of the Interior, National Park Service, 2011), p. 26.

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

Prehistoric vs. Historic

“History” is the recorded events of the past whereas “prehistoric” is generally defined as meaning “before recorded or written history.” The word “prehistoric” is not intended to suggest an absence of history or to diminish past cultures or events. “Prehistoric” appears in both the National Register’s enabling legislation—the National Historic Preservation Act—and its regulations. However, it is a word that has gained some negative associations. Throughout this document, “precontact”—meaning before contact between Indigenous Peoples and Europeans throughout the North American continent and nearby islands—will be used in place of “prehistoric.”

“Ethno-” Terms

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

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

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

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

It is particularly important to understand, and seek to avoid, ethnocentrism in the evaluation of TCPs. Most European American academic and scientific disciplines emphasize objective observation of the physical world not only as possible but as desirable as a sound basis for making statements about a culture. However, there may be nothing objectively observable to the outsider about a place regarded as spiritually powerful by Indigenous Peoples. (Figure 13, Pahuk; Figure 14, Lawetlat’la (Mt. St. Helens).) There currently is no way to objectively determine whether this power exists, but belief in it may be deeply meaningful to the community.



Figure 13. Pahuk, Nebraska (NR Ref. No. 73001074 R)(restricted) was listed in 1973 for its significance in Pawnee history and culture. This TCP is one of the best preserved places significant to the Pawnee Nation. (Nebraska State Historical Society)



Figure 14. Lawetlat'la (Mt. St. Helens), State of Washington (NR Ref. No. 13000748) was listed in 2013 as a site at the state level of significance with a period of significance of myth age to the present under Criterion A for its significance in Native American heritage. A place of exceptional spirit power, the mountain reflects important traditional cultural beliefs rooted in tribal history, and it is important in maintaining the cultural continuity of the tribal communities that value the place. (Richard McClure)

For example, an Indigenous community's belief that its ancestors emerged from the earth at the beginning of time may contradict European American science's position that the group's ancestors migrated to North America from elsewhere. But this position does not diminish the significance of the locations to those who value them. A place thought to have traditional cultural value must be evaluated *from the point of view* of those who attribute significance to them. This is not to say that a community's assertions about the significance of a place cannot be subjected to critical analysis—a National Register nomination must be adequately documented and technically and professionally correct and sufficient⁹—but they should not be rejected based on the premise that the beliefs they reflect are different from or conflict with those of an outside evaluator. (Figure 15, Mount Tonnachau.)

The extent—or adequacy, to use the regulatory word—of documentation in a nomination depends upon the nature of the place being nominated, as well as the depth and breadth of available information regarding a particular place, community, or property type. For example, a large and nationally significant place valued by many communities typically requires more documentation than a small and locally significant place valued by a single community: the nomination for the 4,080 acre Medicine Wheel/Medicine Mountain National Historic Landmark, discussed at Figure 1, is 68 pages of text; by contrast, the nomination for the locally significant, 57-acre Saint Augustine Catholic Church and Cemetery, discussed at Figure 2, is 19 pages of text. No nomination—whether for a TCP or a post office or a formal garden—is expected to present an exhaustive history of a place but addressing each of the seven characteristics of a TCP is an important step in ensuring that place is adequately documented.

In reviewing a nomination, the Keeper of the National Register is seeking to understand the place and need not be an expert in all cultures to validate the adequacy of documentation; that is, the Keeper is not reviewing a nomination to be convinced of the values held by the community but rather to ensure the nomination as presented meets the regulatory requirement that nominations be adequately documented and technically and professionally correct and sufficient. Inclusion in the National Register respects but does not validate the beliefs that are memorialized in the documentation.

Key Concept

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

⁹ 36 C.F.R. § 60.3(i).



Figure 15. Mount Tonnachau, Moen Island (Truk), Federated States of Micronesia (NR Ref. No. 76002210 R)(restricted) was listed in 1976 as a district at the local level of significance for its significance in precontact and multiple historical periods, as well as its cultural associations. According to Chuukese traditions, this is the location where Sowukachaw, founder of Chuukese society, established his meetinghouse at the beginning of Trukese history. (Trust Territory Historic Preservation Office)

III. IDENTIFYING and DOCUMENTING TCPs

A traditional cultural place is best identified by those who value a place. Some TCPs are well known to a descendant community or the residents of an area. For example, it was widely understood long before it was listed in the National Register in 1973 that Chinatown in Honolulu, Hawaii, was a place of cultural importance to the city's Chinese American community. For those outside the community—for example, local jurisdictions often have a responsibility to survey their city, town, or county—the best way to identify a TCP is through thoughtful, collaborative discussion and research with community members. For Federal entities, this includes government-to-government consultation with Federally-recognized Tribes. In all cases, the people who value a traditional cultural place are the most authoritative experts on that place; if they offer information about such places, it should be respectfully received and prioritized over other sources.

This section discusses recommended practices for identifying and documenting TCPs. This guidance is premised on a traditional community's desire to nominate a place to the National Register as a place significant to their traditional cultural beliefs, customs, or practices. If a traditional community chooses not to identify or discuss a place, for whatever reason, or is not interested in nominating a place for its traditional cultural significance to them, those wishes should be respected.

Additional guidance on identifying and documenting historic places is further detailed in *National Register Bulletin: Researching a Historic Property* (1998).

Establishing the Level of Effort

Any effort to identify historic buildings, structures, sites, objects, and districts in a geographic area—whether urban, suburban, or rural—should include a reasonable effort to identify potential National Register TCPs. What constitutes a "reasonable" effort depends in part on the likelihood that such places may be present. Knowledge of an area's history, ethnography, and contemporary society is important information. Is there a type of place commonly associated with particular traditional communities and their practices, such as stone features or mountain tops? Another indicator is what people in and around the area say about it. Do people talk about the area, or the places within it, in a way that suggests traditional cultural associations? If so, this should be accepted and explored.

The day-to-day activities of a land managing agency may have little potential to affect TCPs, but if there is an activity that will take place in an area or affect a resource significant to a traditional community, the potential for effect may be high and the level of effort to address historic and cultural resources should likewise be high. For example, mining ore in an area where a Native American Tribe gathers medicinal plants or constructing a building in an area that a Native American Tribe's religious practitioners associate with traditional beliefs may disrupt those activities, which are often essential to cultural perpetuation. (Figure 16, X'unaxi (Indian Point).)



Figure 16. X'unaxi (Indian Point), Alaska (NR Ref. No. 16000401 R)(restricted) was listed in 2016 as a site at the local level of significance with a period of significance of 1100 AD to present under Criteria A, B, C, and D for its significance to the ongoing traditional cultural beliefs, custom, and practices of the Tlingit Indians of Alaska. X'unáxi was notable for its herring run which was a highly valued resource until it disappeared from the area in the 1970s or '80s. (Charles W. Smythe)

Conducting Background Research

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

Engaging with Traditional Communities

Whether the work is being done by professional preservationist or a community member, an important step in identifying any kind of historic place is to engage with experts on the area and on the types of places under consideration. In the case of TCPs, this means those individuals and groups who may attribute traditional cultural significance to the study area or places within it. The need for community participation is critical. Efforts should be made to identify groups that may have long-established cultural connections with the area involved, and with individuals who are knowledgeable about these connections. There may be more than one traditional community that ascribes significance to a place and efforts should be made to identify and engage these groups.

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

Having reviewed available background information, the next step—if it has not already been initiated—is to contact knowledgeable people directly. 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. With respect to Federally-recognized Tribes, Federal entities should initiate consultation. Other traditional communities may have official representatives, for example, an urban neighborhood association. In other cases, leadership may be less officially defined, and establishing contact may be more complicated. SHPOs and THPOs can be helpful in identifying points of contact, but may not be fully informed and authoritative about all potentially interested groups. The assistance of historians, ethnographers, sociologists, folklorists, and archeologists or others who may have conducted research in the area or otherwise worked with its communities may be necessary to find ways of contacting and conferring with such groups in ways that are both effective and consistent with their systems of leadership and communication.



Figure 17. Ocmulgee Old Fields, Georgia (NR DOE) was determined eligible for listing by the Keeper of the National Register in 1997 (east/west boundary DOE in 1999) under Criterion A for its cultural and historical significance to the Muscogee People who were forced to abandon it when they were relocated in the early 19th century and who still revere it as their ancestral homeland; and under Criterion D, because it has provided and can be expected to continue to provide important information on the long history of the Macon Plateau and the Ocmulgee River Valley. The Keeper concluded that the eligible district includes both banks of the river and extends from the northern boundary of Ocmulgee National Monument in the north to the southern boundary of Bond Swamp National Wildlife Refuge in the south. (Evelyn Causey/NPS)



Figure 18. Ballast Island, Washington State (NR Ref. No. 100006067) was listed in 2021 as a site at the local level of significance with a period of significance of circa 1880 to 1898 under Criteria A and D for its historic and cultural significance to several Tribes as a location of traditional use during a period when Native Americans were otherwise excluded from city access. Located along Seattle’s heavily developed waterfront, Native Americans established camps atop the sandstone cobbles, non-native stone, and debris (now buried beneath modern features), where they lived, conducted business, and interacted socially. This image, a detail from *Bird's eye view of the city of Seattle, W.T., Puget Sound, county seat of King County 1884*, published by J. J. Stoner, 1884, shows the growing Ballast Island is in the near-center of the image. The current state of the place—an anthropogenic landform 25 feet below a parking lot—does not diminish the ongoing significance of the location and the role it plays in teaching future generations about important but painful Tribal histories. (Library of Congress, <https://www.loc.gov/item/75696661>)

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

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

If there is serious animosity within a community, or between two or more communities, about how or indeed whether a nomination should be pursued for a place, 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, at particular times, 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). There may be instances where a general inquiry may be made to a traditional community's leaders, who may then choose to undertake their own research and provide information results in a way consistent with their values, such as through Tribal survey reports or community forums.

Inspecting and Documenting Places

Identifying TCPs for a National Register nomination involves not only conferring with knowledgeable people, but also inspecting and recording places identified as significant by traditional communities. Whether the work is done by a professional consultant, a community member, or an interdisciplinary team or community group, it is important to work with traditional experts to inspect and record places the traditional community identifies as significant. In some cases, such places may not be discernible as such to anyone but a knowledgeable member of the community that attributes significance to them. In such cases, it may be impossible even to find the relevant places, or locate them accurately, without the aid of community experts.

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

Proper ways to approach the place should be discussed with knowledgeable advisors before undertaking a field visit. If the place in question has religious significance or spiritual connotations, it is important to ensure that any visit is carried out in a culturally attuned manner. In some cases, specific cultural practices or protocols are necessary before a place can be approached. Some communities forbid visits to such locations by people outside of the community, or for other culturally-based reasons. Taking of photographs or using electronic recording equipment may not be appropriate. In all instances, the wishes of the traditional community must be respected.

If it has been determined that releasing the location or other information about a place may put it or the traditional values or practices associated with it at risk of harm (*e.g.*, by encouraging tourists to intrude upon the conduct of traditional practices), that information may be protected in accordance with the provisions of the National Historic Preservation Act (specifically, "Section 304"—so called for its former reference number—now found at 54 U.S.C. § 307103) or the Archeological Resources Protection Act (ARPA) (which applies to Federal or Native American Tribal lands). Information restricted in accordance with NHPA Section 304 may not be reproduced or otherwise publicly released without the permission of the Keeper of the National Register acting on behalf of the Secretary of the Interior. (Figure 19, National Register Registration Form; Figure 20, restricted file cover sheet; Figure 21, NHPA Section 304 language.) Confidentiality of information provided via the National Register registration form is discussed further at Section V "Documenting TCPs for the National Register."

NPS Form 10-900
CMR Control File: 1000-0018
revision date 03/15/2022

United States Department of the Interior
National Park Service
National Register of Historic Places Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions to National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

1. Name of Property
 Historic name: _____
 Other names/site number: _____
 Name of related multiple property listing: _____
 (Enter "N/A" if property is not part of a multiple property listing)

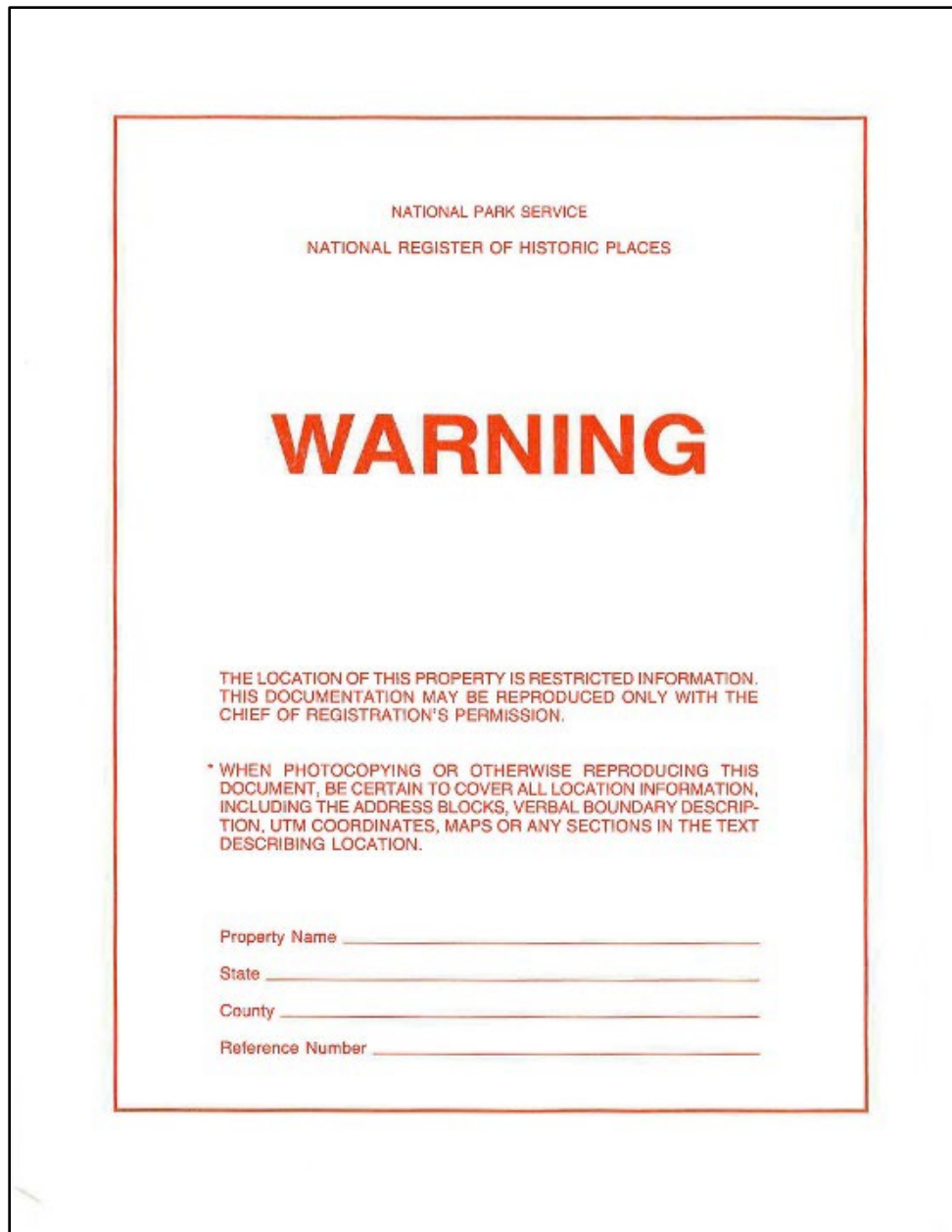
2. Location
 Street & number: _____
 City or town: _____ State: _____ County: _____
 Not For Publication: ☐ Vicinity: ☐

3. State/Federal Agency Certification
 As the designated authority under the National Historic Preservation Act, as amended,
 I hereby certify that this _____ nomination _____ request for determination of eligibility meets
 the documentation standards for registering properties in the National Register of Historic
 Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.
 In my opinion, the property _____ meets _____ does not meet the National Register Criteria. I
 recommend that this property be considered significant at the following
 level(s) of significance:
 _____ national _____ statewide _____ local
 Applicable National Register Criteria:
 _____ A _____ B _____ C _____ D

Signature of certifying official: _____ Title: _____ Date: _____
 State or Federal agency/bureau or Tribal Government

1

Figure 19. National Register Registration Form. If making the location of a place known to the public would be culturally inappropriate, or compromise the integrity of the place or its associated cultural values, the "Not for Publication" box on the National Register Registration Form should be checked by the nomination's authors.

The image shows a template for a National Register restricted file cover. It features a large, bold, red "WARNING" text in the center. Above this, in smaller red text, are the words "NATIONAL PARK SERVICE" and "NATIONAL REGISTER OF HISTORIC PLACES". Below the warning, there is a paragraph in red text stating: "THE LOCATION OF THIS PROPERTY IS RESTRICTED INFORMATION. THIS DOCUMENTATION MAY BE REPRODUCED ONLY WITH THE CHIEF OF REGISTRATION'S PERMISSION." This is followed by a red asterisk and another paragraph: "* WHEN PHOTOCOPYING OR OTHERWISE REPRODUCING THIS DOCUMENT, BE CERTAIN TO COVER ALL LOCATION INFORMATION, INCLUDING THE ADDRESS BLOCKS, VERBAL BOUNDARY DESCRIPTION, UTM COORDINATES, MAPS OR ANY SECTIONS IN THE TEXT DESCRIBING LOCATION." At the bottom, there are four red lines for text entry, labeled "Property Name", "State", "County", and "Reference Number" respectively.

NATIONAL PARK SERVICE
NATIONAL REGISTER OF HISTORIC PLACES

WARNING

THE LOCATION OF THIS PROPERTY IS RESTRICTED INFORMATION.
THIS DOCUMENTATION MAY BE REPRODUCED ONLY WITH THE
CHIEF OF REGISTRATION'S PERMISSION.

* WHEN PHOTOCOPYING OR OTHERWISE REPRODUCING THIS
DOCUMENT, BE CERTAIN TO COVER ALL LOCATION INFORMATION,
INCLUDING THE ADDRESS BLOCKS, VERBAL BOUNDARY DESCRIp-
TION, UTM COORDINATES, MAPS OR ANY SECTIONS IN THE TEXT
DESCRIBING LOCATION.

Property Name _____
State _____
County _____
Reference Number _____

Figure 20. National Register restricted file cover. All restricted National Register files—both paper and digital—are clearly identified by the National Park Service with the addition of this cover sheet.

**Section 304 of the National Historic Preservation Act of 1966, as amended
(54 U.S.C. 307103)**

(a) **AUTHORITY TO WITHHOLD FROM DISCLOSURE.** The head of a Federal agency, or other public official receiving grant assistance pursuant to this division, after consultation with the Secretary, shall withhold from disclosure to the public information about the location, character, or ownership of a historic property if the Secretary and the agency determine that disclosure may—

- (1) cause a significant invasion of privacy;
- (2) risk harm to the historic property; or
- (3) impede the use of a traditional religious site by practitioners.

(b) **ACCESS DETERMINATION.** When the head of a Federal agency or other public official determines that information should be withheld from the public pursuant to subsection (a), the Secretary, in consultation with the Federal agency head or official, shall determine who may have access to the information for the purpose of carrying out this division.

(c) **CONSULTATION WITH COUNCIL.** When information described in subsection (a) has been developed in the course of an agency's compliance with section 306107 or 306108 of this title, the Secretary shall consult with the Council in reaching determinations under subsections (a) and (b).

Figure 21. Section 304 of the National Historic Preservation Act. The NHPA provides authority to withhold information about a place to protect privacy, prevent harm, and preserve traditional religious use. Further guidance for working with Section 304 may be found in *National Register Bulletin: Guidelines for Evaluating and Registering Archeological Properties*.

Reconciling Sources

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

- The historical record is inherently incomplete. Some communities, groups, areas, and topics have received much more attention than others.
- 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.
- Some 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. However, it 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 the place. Likewise laws, regulations, and policies—such as “redlining,” a discriminatory practice in which services, such as home mortgages or infrastructure improvements, were withheld from residents in neighborhoods with significant numbers of racial or ethnic minorities—may have created conditions that, to the casual observer, have diminished or damaged a place, causing some to say its significance has been lost. On the other hand, it may be that the significance attributed to the place when the documents describing its significance were prepared has since been lost.

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

The views of the traditional cultural community that ascribes cultural significance to a place should be prioritized; after all, it is they who believe it to be significant, and therefore are the most authoritative about its significance. Where this 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, or other relevant disciplines.

Key Concept

Identifying TCPs involves conducting background research, conferring with communities, conducting field inspections, and reconciling source information—exactly the sort of work that is done when identifying any historic place. There may be a difference between historical documentation and the information shared by contemporary community members. In general, the knowledge of those who attribute cultural value to a place should be prioritized; after all, it is they who value it, and therefore are the most authoritative about its value.

IV. EVALUATING TCP ELIGIBILITY

Whether a place is known, found during routine survey work, identified through consultation, or brought forward by the community, it must be evaluated according to the National Register criteria for evaluation in order to reach conclusions about whether it is eligible for inclusion in the Register. This section discusses the process of evaluation as a series of actions. Each action informs the other; that is, they are not always sequential. For example, two key actions—evaluating significance and assessing integrity—may best be understood and applied as an integrated process: “integrity”—the ability of a place to convey its significance—cannot realistically be assessed until a place’s significance is understood, or at least preliminarily identified. On the other hand, “significance”—that is, how a place is understood within the context of our history—is difficult to evaluate without assessing how the place conveys that significance through its location, setting, design, materials, workmanship, feeling, and/or association.

National Register criteria for evaluation are found at 54 U.S.C. § 302101 and 36 C.F.R. § 60.4, and reproduced at Appendix I. Detailed guidance on application of the criteria is found in *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*. National Historic Landmark program guidance can be found in the *NHL Bulletin: Guidelines for Preparing National Historic Landmark Nominations* (2023).

Ensure that the Property or Place Under Consideration is a Physical Thing or Location

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

For example, the National Register regulations define a “site” as “the location of a significant event, a [precontact] or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure.”¹⁰ A place may be defined as a “site” as long as it was the location of a significant historic event or cultural activity, regardless of whether the event or activity left any evidence of its occurrence. Depending on its size, its features, and its associations, a culturally significant natural landscape may be classified as a site, as may any location where significant traditional events, activities, or observances have taken place. (Figure 22, Maka Yusota (Boiling Springs), Minnesota.)

¹⁰ 36 C.F.R. § 60.3(I).



Figure 22. Maka Yusota (Boiling Springs), Minnesota (NR Ref. No. 02001703 R)(restricted) was listed in 2003 as a site at the state level of significance with a period of significance of 1650 to 2002 under Criteria A for its significance in the cultural heritage of the Dakota (Shakopee Mdewakanton Sioux) community. The natural spring, shown in this circa 1930 image, is valued for its long association with the cultural identity of their people and their spiritual beliefs. (Minnesota Historical Society)

A natural feature such as a rock or a tree may be an eligible object if it is associated with a significant tradition or event. For example, Sleeping Buffalo Rock in Montana was listed in 1996 as an object. (Figure 23.) By contrast, animals, or species of animals, do not fall within one of the types of property that may be listed in the National Register. However, animals most certainly can, and often do, add to the character of a historic place. Animals that are characteristic of a place may contribute to the significance of a TCP, such as salmon in a river, eagles nesting in a canyon associated with tribal traditions, or cattle associated with historic cattle drives. Rocks, trees, and other natural elements are likely to be character-defining features of a larger site rather than significant objects on their own merit. For example, a massive burr oak in Oklahoma is part of the Creek Council Tree Site, listed in 1976 as a site. (Figure 24.) Further guidance on animals and natural elements as character-defining features is found at Section V, in the subsection “Documenting Character-Defining Features, and Contributing and Non-Contributing Resources.”

A concentration, linkage, or continuity of sites or objects, as well as buildings or structures, comprising a culturally significant entity may be classified as a district. (Figure 25, Tarpon Springs Greektown Historic District; Figure 26, Fishtown Historic District.) Very large landscapes and linear places, such as traditional travel routes, are often classified as districts. There is no size limit for historic places, including TCPs, to be listed on the National Register; that is, a place may be as small as a square foot to or as large as thousands of acres. For example, the Green River Drift Trail, listed for its significance as a TCP with reference to the State of Wyoming’s “Ranches, Farms, and Homesteads in Wyoming, 1860-1960” multiple property documentation effort, is a 58-mile long corridor, comprising 7,041 acres. The Drift is a livestock drive route that represents the local ranching community’s multi-generational, traditional practices and patterns of land use. (Figure 27, Green River Drift Trail.)



Figure 23. Sleeping Buffalo Rock, Montana (NR Ref. No. 96000548) was listed in 1996 as an object at the state level of significance under Criteria A and D with a period of significance of the late precontact to the present for significance in the ongoing traditional cultural practices of several Native American Tribes. Resembling a resting buffalo, the rock is a powerful spirit helper important to several Northern Plains Tribes. Despite repeated relocations, Buffalo Rock remains important for its traditional cultural significance. (Chere Jiusto)



Figure 24. The Creek Council Tree Site, Oklahoma (NR Ref. No. 76001576) was listed in 1976 as a site at the local level of significance for its historical and cultural significance to the Muscogee (Creek) Nation. The Lochapoka of the Muscogee Nation arrived in the vicinity in 1836 after their forced relocation from their homeland in the southeastern United States by the Federal government. After their arrival, the Tribe chose the site of this Burr Oak, *Quercus macrocarpa*, on top of a hill that overlooked the Arkansas River, as the gathering place for Tribal business, ceremonies, feasts, and games. Despite the visual intrusion of a residential development, the place continues to hold significance to the Muscogee Nation, whose members hold a celebration here every year, marking their arrival at this site. (City of Tulsa)



Figure 25. The Tarpon Springs Greektown Historic District, Florida (NR Ref. No. 14000321) of approximately 140 acre district has 296 contributing resources: 282 buildings, 1 site, and 13 structures, one of which is the sponge boat shown in this image, the “Anastasi.” (Tina Bucuvalas)



Figure 26. Fishtown Historic District, Michigan (NR Ref. No. 10000676) was listed in 2022 (updated 2023) as a district at the state and local levels of significance with a period of significance of 1903 to the present under Criterion A for its significance in Michigan’s commercial fishing heritage and Fishtown’s cultural practices associated with commercial fishing and fish processing. A working waterfront, this place embodies traditional occupational and social activities that are rooted in its history and practiced in the present. (Amanda Holmes)



Figure 27. The 58-mile long corridor of the Green River Drift Trail, Wyoming (NR Ref. No. 12001224), comprising 7,041 acres, supported 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. (Wyoming State Historic Preservation Office)

Evaluate the Significance According to the Criteria

Once the property or place to be evaluated has been determined to be a physical thing or a location, it is evaluated against the four basic criteria for evaluation described in the National Register regulations at 36 C.F.R. § 60.4, namely Criterion A (events), Criterion B (person or persons), Criterion C (design or construction), and/or Criterion D (yielding, or likely to yield, information important in prehistory or history). If the place meets one or more of the criteria, it may be eligible. If it does not, it is not eligible.¹¹

Understanding the Historic Context

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

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

Providing a strong context in a nomination is essential for conveying the significance of a particular traditional place within an understanding of a community's traditional beliefs, customs, and practices, and will often better support a more focused discussion of a place's particular physical (and non-physical) aspects.

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

TCPs are most often found eligible for the National Register under Criterion A, association with "events that have made a significant contribution to the broad patterns of our history."¹² In the context of evaluating a traditional cultural place, the word "our" in this criterion refers to the community to which the place has traditional cultural significance, and the word "history" includes oral history as well as recorded history. For example, Mt. Tonaachaw on Moen Island in Chuuk, Federated States of Micronesia,

¹¹ This section draws heavily on *National Register Bulletin: How to Apply the National Register Criteria* (Washington, DC: US Department of the Interior, National Park Service, 1997), pp. 11-24 to apply the guidance provided in that Bulletin to TCPs. Nomination proponents are encouraged to review that Bulletin for further guidance on applying National Register Criteria and the Criteria Considerations.

¹² 36 C.F.R. § 60.4(a).

discussed at Figure 15, is listed in the National Register in part because of its significance in the establishment of Chuukese society.

Since traditional cultural significance is derived from the role a place plays in a community's historically rooted beliefs, customs, and practices, places may have significance under Criterion A if they are associated with events, or a pattern of events, significant to the cultural traditions of a community. "Events" can include specific moments in history or a pattern of events reflecting a broad pattern or theme. For example, the long-standing participation of an ethnic group in an area's history, reflected in a neighborhood's buildings, streetscapes, or patterns of social activity, constitutes such a pattern of events, as does a community's long-standing interactions with a landscape's natural environment. Tarpon Springs Greektown Historic District, discussed at Figures 6, 25, and 43, is one example. Ordinarily, a community's account of its traditions should be taken as authoritative; the community, after all, is the most expert about its own beliefs. If for some reason it is necessary and appropriate to understand the community's account or beliefs more fully, then the place's perceived association with significant events may be clarified by doing additional research. The kinds of research most often undertaken for TCPs include ethnographic, ethnohistorical, and folklore studies, as well as historical and in some cases archeological research. Often the community itself may carry out such research, and, if the nomination is being prepared by a preservation professional, the community should be encouraged and assisted as needed to do so. Alternatively, agency representatives or outside experts may be engaged to do research, but this should be done only in close coordination or consultation with the community.

Sometimes, though, exactly 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 may have occurred in a time before the creation of the planet as demonstrated by the geological record. For many Indigenous Peoples, such events have existed since time immemorial, meaning there is no collective memory of the event not ever having existed or occurred. 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 28, Spirit Mountain.)

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

Under Criterion B, a place can be eligible for the National Register if it is "associated with the lives of significant persons in our past."¹³ Again, the word "our" should be interpreted with reference to the community that regards the place as traditionally important. The word "persons" can refer to a physical human being whose existence in the past can be documented from historical, ethnographic, or other research, as well as an ancestor or spirit who features in the traditions of a group. However, Criterion B is intended to be applied to a place associated with a *specific* person—or ancestor or spirit—not a general group like "the ancestors." For example, Tahquitz Canyon in southern California is included in the National Register in part because of its association with a Cahuilla spirit being who figures prominently in the Tribe's traditions and is said to live within the canyon. (Figure 29, Tahquitz Canyon, California.) Still, if

¹³ 36 C.F.R. § 60.4(b).

the significance of a place rests in the cumulative importance of prominent people associated with that place, the place may be eligible for the National Register but under Criterion A for its association with events that have made a significant contribution to the broad patterns of our history.

Places eligible under Criterion B are usually those associated with a person's productive life, reflecting the time period when he or she achieved significance. For example, a village might meet Criterion B if the Tribal leader who signed an important treaty lived there when the treaty was signed. Doe-Kag-Wats, discussed further at Figure 32, was listed in part for its association with three identified Tribal elders who played significant roles in maintaining Suquamish culture and who contributed to the Suquamish people's resilience and resurgence in the early to mid-20th century. As described in the nomination, these elders are linked directly to this traditional cultural place because they made their most important contributions to Suquamish history and culture while they were living at Doe-Kag-Wats. By contrast, if a leader lived at multiple villages, perhaps a different village best conveys that leader's contribution to their Tribe. Not every location where the chief lived would meet the threshold of significance under Criterion B, but might under Criteria A (for events) or D (for information potential).

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



Figure 28. Spirit Mountain, Nevada (NR Ref. No. 99001083 R)(restricted) was listed in 1999 as a site at the state level of significance with a period of significance of creation to the present under Criteria A and B, and Criteria Considerations A and C, for its significance with the traditional beliefs and practices of several Tribes. This naturally prominent place continues to serve an essential role in their ongoing cultural beliefs and practices. (Stan Shebs)



Figure 29. Tahquitz Canyon, California (NR Ref. No. 720000246 R)(restricted) was listed in 1972 as a site at the state level of significance for its significance to the Cahuilla people. The varied natural features within this place are associated with Cahuilla spiritual beliefs and traditions. (Agua Caliente Band of Mission Indians and Archaeological Research Unit of University of California)

Criterion C: Design or Construction Characteristics

Places may be eligible for the National Register under Criterion C that (1) express the distinctive characteristics of a type, period, or method of construction, (2) represent the work of a master, (3) possess high artistic values, or (4) represent a significant and distinguishable entity whose components may lack individual distinction.¹⁴ Each of the four parts of this criterion is discussed separately, below.¹⁵

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

This sub-criterion most often applies to places that have been constructed, or contain constructed things—that is, buildings, structures, or built objects—in a place that has traditionally been occupied by a particular ethnic group. The place may display particular methods of construction, architectural styles, vernacular forms, gardens, street furniture, or ornamentation distinctive of the group. For example, the Chinatown Historic District in Honolulu is significant for the central role it has played in the lives of several different Asian communities in Honolulu as reflected in its buildings and structures. Likewise, mounds created by Indigenous People—both visible (above ground) and not visible (buried) structures—represent thousands of years of planned and intentional construction.

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

A place may be considered significant under Criterion C(2) if the place is identified in tradition or suggested by scholarship to be the work of a traditional master builder or artisan. A master builder or artisan is a figure of generally recognized greatness in a field, a known craftsman of consummate skill, or an anonymous craftsman whose work is distinguishable from others by its characteristic style and quality. The work of an unidentified craftsman is eligible if it rises above the level of workmanship of the other properties encompassed by the historic context. As of this writing, in 2023, no TCP has yet been included in the National Register for its significance as the work of a master.

Criterion C(3): Possesses High Artistic Values

“High artistic values” may be expressed in many ways, including areas as diverse as community design, engineering, and sculpture. A place may be included for the National Register for its high artistic values if it so fully expresses an aesthetic ideal valued by a group for traditional cultural reasons.¹⁶ For example, a place whose decorative elements reflect a local ethnic group’s distinctive modes of expression may be viewed as having high artistic value from the standpoint of the group. (Figure 30 , Our Lady of Mount Carmel Grotto, New York.)

¹⁴ 36 C.F.R. § 60.4(c).

¹⁵ Note: Criterion C is not subdivided into sub-criteria in 36 CFR § 60.4. The subdivisions given here are for the convenience of the reader.

¹⁶ *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, p. 20.



Figure 30. Our Lady of Mount Carmel Grotto, Staten Island, New York (NR Ref. No. 00001276) was listed in 2000 as a district at the local level of significance with a period of significance of 1937 under Criteria A and C, and Criterion Consideration A, for its significance as an example of Italian American vernacular religious architecture and a tangible expression of Staten Island's Italian American community. Created by Italian immigrants, the Grotto's stone-studded ornamentation and rough surface is augmented with sea shells and bicycle reflectors, demonstrating an appreciation of the spiritual power of objects long associated with water and light. The Grotto was neither initiated, nor is it maintained, by the Roman Catholic Church. (Kathleen Howe)

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

A place may be regarded as representing a significant and distinguishable entity, even if many of its parts appear to lack individual distinction to the casual observer. These parts, when considered together, may represent a larger entity of traditional cultural importance—in other words, a district. A district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources, which may or may not be individually included in the National Register.

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

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

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

Places that have traditional cultural significance often have already yielded, or have the potential to yield, important information through ethnographic, archeological, sociological, folkloric, or other studies. The most common type of place nominated under Criterion D is an archeological site, or a district comprised of archeological sites. For example, studies of Kaho'olawe Island in Hawai'i were conducted in order to clarify its eligibility for inclusion in the National Register. This work provided important insights into Native Hawaiian traditions and into the history of twentieth century efforts to revitalize traditional Hawaiian culture. The Kaho'olawe Island Archeological District was listed in the National Register in 1981. (Figure 33, Kaho'olawe Island Archeological District.) However, although a place may have significance under Criterion D for its archeological resources, this does not mean that invasive or destructive study is necessarily required or recommended, or even suitable from the perspective of the traditional community that values the place.



Figure 31. Chí'chil Bildagoteel (Oak Flats), Arizona (NR Ref. No. 16000002 R)(restricted) was listed 2016 as a district at the state and local levels of significance with a period of significance of 1300 AD to the present under Criteria A, B, C, and D for its significance in the beliefs, customs, and practices of several Tribes. Although the nomination focuses on the role Chí'chil Bildagoteel plays in Western Apache culture, this is not intended to diminish its importance to other cultures or ethnic groups. A place may be of significance to one or more groups and a National Register nomination may be updated with additional documentation to capture that significance and, possibly, extend a place's boundaries if needed to do so. (U.S. Forest Service)



Figure 32. Doe-Kag-Wats, State of Washington (NR Ref. No. 10004076) was listed in 2019 as a site at the local level of significance with a period of significance of time immemorial to the present under Criteria A, B, and D, and Criterion Consideration A, for its significance to the Suquamish Tribe as a place that is integral to its cultural history and traditional cultural practices and activities; for its association with three (identified) Tribal elders who played significant roles in maintaining Suquamish culture and who contributed to the Suquamish people’s resilience and resurgence in the early to mid-20th century; and for its potential to yield important information regarding Suquamish history. This complex site is comprised of natural features on the Port Madison Indian Reservation in Washington state. (Stephanie Trudel)



Figure 33. This shrine is located within the Kaho'olawe Island Archeological District, Hawai'i (NR Ref. No. 81000205 R)(restricted) which was listed in 1981 as a district at the state level of significance with a period of significance of precontact through 1900 under Criterion D for its potential to provide significant information on Hawaii's past. The end date of the period of significance of 1900 is more a reflection of the limitations of the circa 1980 National Register nomination form than of the meaningful time frame for the Native Hawaiians who have long venerated the island as a sacred place of refuge where native Hawaiian cultural practices again flourish. (Greg Koob/U.S. Department of Agriculture, Natural Resources Conservation Service, Pacific Islands)

Buildings, objects, and structures (or districts comprised of these property types) may also be eligible under Criterion D for their information potential. “Information potential” is not exclusive to archaeological data; it can include continued cultural knowledge and identity. For example, the Luiseño Ancestral Origin Landscape in California (discussed at Figure 55) continues to provide important ethnographic and historic information about the Luiseño People.

A TCP’s history of yielding or potential to yield information may be secondary to its association with the traditional history and culture of the group that attributes value to it, suggesting that Criterion A—association with events that have made a significant contribution to the broad patterns of our history—may be a more appropriate choice. Not all archeological sites are significant under Criterion D: if the archeological site has been assessed as lacking information potential or is otherwise unverified by archeological field investigation, then it may not contribute to the information potential of the district; nevertheless, it may still be significant under Criterion A. (Figure 34, Anaem Omot.)

Determine Whether Any of the Criteria Considerations Make the Place Ineligible

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

Criterion Consideration A: Religious Places

The fact that traditional history and culture may be discussed in spiritual terms does not make places associated with traditional beliefs, customs, and practices ineligible for inclusion in the National Register. A religious place, according to National Register guidance, requires additional explanation for nomination to avoid any appearance of judgment by the government about the merit of any religion or belief. Criterion Consideration A was included among the National Register Criteria for Evaluation to avoid historic significance being determined on the basis of religious doctrine, not to exclude any place having religious associations.

¹⁷ 36 C.F.R. § 60.4(a)-(g).

¹⁸ This section draws heavily on *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, pp. 25-43, and readers are encouraged to review that Bulletin for further guidance in applying the criteria to TCPs.



Figure 34. Anaem Omot, Michigan and Wisconsin (NR Ref. No. 100008616 R)(restricted) was listed in 2023 as a district at the state level of significance with a period of significance of time immemorial to the present under Criteria A and D for its significance to the Menominee Indian Tribe. It is part of their ancestral homeland and a place of religious, cultural, and sacred practices stretching back millennia and continuing to the present day. (David Overstreet)

As described in *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, a religious property can be eligible under Criterion Consideration A for any of three reasons:

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

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

Simply because TCPs are used for purposes that are perceived as “religious” by European American standards does not automatically make them ineligible for inclusion in the National Register. For example, Inyan Kara Mountain, a National Register-listed district in the Black Hills of Wyoming, is significant in part because it is the home of spirits in the traditions of the Lakota and Cheyenne. (Figure 35, Inyan Kara Mountain.) Likewise, Kootenai Falls in Idaho, part of Kootenai Falls Cultural Resource District determined eligible for listing in 1982, has been used for centuries as a vision questing site by the Kootenai Tribe.

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

The fact that a place is used by a community for spiritual purposes, such as seeking visions or offering prayers, should not by itself be taken to make the place ineligible for the National Register. Nor should the fact that the place is described by a community in terms that are classified by an outside observer as “religious” be taken to disqualify it. These activities and expressions may reflect traditional beliefs that are central to the continuation of traditional cultural customs and practices. Similarly, the fact that a community that values a place describes it in spiritual terms, or comprises a group of traditional spiritual practitioners, does not automatically exclude the place from inclusion in the National Register. For example, Our Lady of Mount Carmel Grotto on Staten Island in New York was listed in the National Register in 2000, in part, for its significance to Staten Island’s multi-generational Italian American

¹⁹ National Historic Preservation Act, as amended through December 16, 2016, 54 U.S.C. § 302706.

Catholic community. (Figure 36, Mt. Carmel Grotto detail.) Likewise, Saint Augustine Catholic Church and Cemetery in Natchitoches Parish, Louisiana, is historically and culturally significant to the area's Cane River Creole of Color community and was listed in the National Register in 2014. (Figure 37, St. Augustine Catholic Church and Cemetery.)

Over the years, nominations for TCPs have addressed Criterion Consideration A differently—some have discussed it, while others have not, and TCP listings reflect that. However, because a TCP is significantly associated with traditional cultural values, Criterion Consideration A typically does not apply to TCPs and this may be addressed in a nomination with a simple statement to that effect.

Criterion Consideration B: Moved Places

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

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

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

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



Figure 35. Historic view of Inyan Kara Mountain, Black Hills region, Wyoming (NR Ref. No. 73001929). This place was listed in 1973 as a district under Criteria A and D in part for its significance to the cultural traditions of the Lakota and Cheyenne. (Mark Junge)



Figure 36. This image of Our Lady of Mount Carmel Grotto, New York (NR Ref. No. 00001276) shows details of its religious iconography. A religious property may be included in the National Register, if, like the Grotto, it is significantly associated with traditional cultural values. (Kathleen Howe)



Figure 37. A religious place like Saint Augustine Catholic Church and Cemetery, Louisiana (NR Ref. No. 14000679) may be included in the National Register by applying Criterion Consideration A if it is significantly associated with traditional cultural values. (Laura Ewen Blokker)



Figure 38. Sleeping Buffalo Rock, Montana (NR Ref. No. 96000548) was listed in 1996 as an object at the state level of significance with a period of significance of precontact to present and 1700 BP to present under Criterion A, and Criteria Considerations A and B, for its significance to several Tribes. Because it is a moved property and important in native religious and ceremonial life, Criteria Considerations A (religious properties) and B (moved properties) were applied in its evaluation and discussed in the nomination. (Chere Jiusto)

Criterion Consideration C: Birthplaces and Graves

A birthplace or grave of a historically significant person is not usually eligible for inclusion in the National Register. A person significant in the past usually is recognized in the National Register by a place (or places) associated with their *productive* life's work. Birthplaces and graves, as places that represent the beginning and the end of the life of distinguished individuals, may be temporally and geographically far removed from the person's significant activities, and therefore are not usually considered eligible. However, if the birthplace or gravesite of a historic figure is significant for reasons other than its association with them, or if there is no other extant place associated with that person, the place may be included in the National Register. If the significance of a place rests in the cumulative importance of prominent people associated with that place, the place may be eligible for the National Register under Criterion A for its association with events that have made a significant contribution to the broad patterns of history and Criterion Consideration C "birthplaces and graves" for its association with the traditional origin of a group of people. For example, Tahquitz Canyon in southern California (discussed at Figure 29) is the traditional birthplace of the entire Cahuilla Indian people. This status did not make it ineligible for listing in the National Register; on the contrary, it is essential to its eligibility.

Criterion Consideration D: Cemeteries and Burial Places

A cemetery or burial place—or other place of collective internment—is not ordinarily eligible for inclusion in the National Register unless it derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design, or from association with historic events, including traditional cultural beliefs, customs, and practices of a living community. (Figure 39, Cycadia Cemetery.)

Many TCPs contain burial places, however, and the presence of burials does not detract from and indeed may contribute to their significance. For many Indigenous Peoples, places where ancestors are interred, or where funeral ceremonies are conducted, are sacred places and thus of great cultural significance. Evidence of traditional funerary practices—often inherent in burial locations, orientation of graves, and the design of grave markers—may make a strong case for the cultural significance of the place and, therefore, the place's eligibility for listing in the National Register. For example, Tahquitz Canyon in California (discussed at Figure 29) was listed in 1972 for its significance to the Cahuilla Nation because it contains a number of burial places that are of great importance to the Cahuilla people. The fact that they are present did not render the Canyon ineligible; on the contrary, as evidence of the long historic association between the Cahuilla and the Canyon, the burial places contribute to the Canyon's significance. The fact that a TCP is or contains a cemetery should not automatically be presumed to make the place ineligible for the National Register.²⁰ Additionally, the fact that burials may have been disturbed—by natural forces, scientific study, urban renewal, looting, etc.—is not reason alone for a place not to be evaluated for significance. Disturbances may not necessarily impact a place's integrity as

²⁰ For further guidance, see Elisabeth Walton Potter and Beth M. Boland, *National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places* (Washington, DC: US Department of the Interior, National Park Service, 1992).

a traditional cultural place in the view of the traditional community that values the place. In some cases, the former location of ancestral remains continues to be significant to a community.

Criterion Consideration E: Reconstructed Places

A reconstructed place—new construction that reproduces the form and detail of a building or structure that has vanished, as it appeared at a specific period in time—is not ordinarily eligible for inclusion in the National Register unless it is accurately reconstructed in a suitable environment and presented in a respectful manner as part of a restoration master plan, and when there is no other extant building or structure with the same association. For example, on the island of Kaho'olawe, listed in 1981 as the Kaho'olawe Island Archeological District (discussed at Figure 33), revitalization of traditional Hawaiian culture and religion on the island has included reconstruction of cultural and religious structures that had been destroyed by the U.S. military's long use of the island as a target range. As an older nomination focused on archeological sites, this listing may be considered for updating to recognize Kaho'olawe's significance as a TCP, and the reconstructed buildings and structures may be eligible for inclusion as resources that contribute to the significance of the place.

Criterion Consideration F: Commemorative Places

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

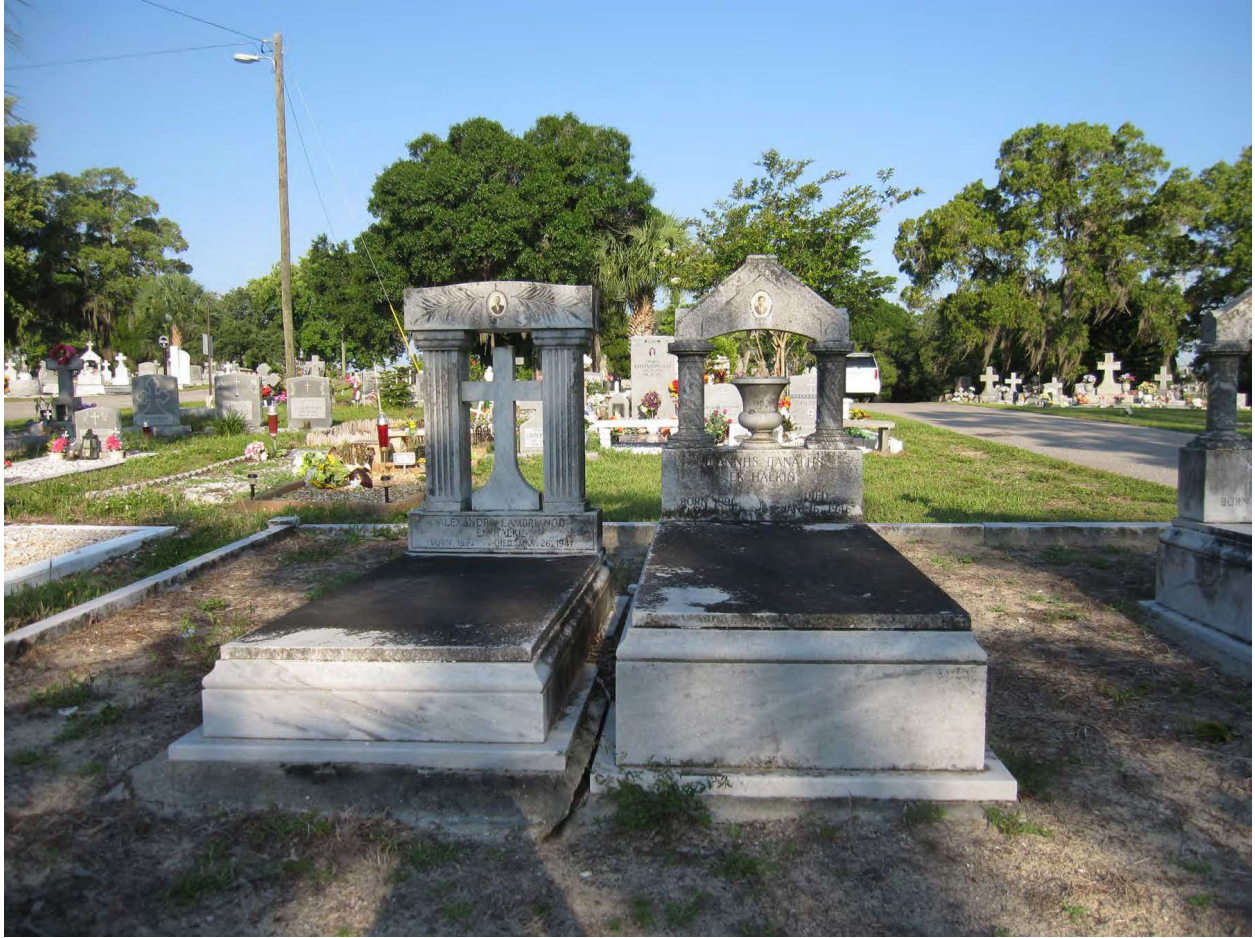


Figure 39. Cycadia Cemetery, Florida (NR Ref. 100003522) was listed in 2019 as a site at the state and local levels of significance with a period of significance of 1905 to the present under Criteria A and C, and Criterion Consideration D, for its significance in Greek and Greek American cultural practices and the distinctive style of its Greek American funerary monuments. Because cemeteries may embody values beyond personal or family specific emotions, National Register Criterion Consideration D supports the listing of cemeteries associated with the traditional cultural beliefs, customs, and practices of a living community. (Tina Bucuvalas)



Figure 40. Atantano Shrine (Guam) (NR Ref. 95001367) was listed in 1995 as a structure at the national, state, and local levels of significance with a period of significance of circa 1786 to the present under Criterion A and Criterion Considerations A and F for the story it tells of the evolving nature of territorial expansion and for its significance in Pacific Islander heritage. The shrine is comprised of four parts, with each new piece added beneath the existing parts. A commemorative property does not qualify as eligible for the National Register for its association with the event or person it memorializes; however, like the Atantano Shrine, it may acquire significance after the time of its creation through age, tradition, or symbolic value. (Guam Historic Preservation Office)

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

A place achieving significance within the last fifty years may be included in the National Register if it is of exceptional importance.²¹ Places that have achieved significance only within the past 50 years are not eligible for inclusion in the National Register unless sufficient perspective exists to determine that the place is of exceptional importance. This consideration guards against the listing of properties of passing contemporary interest and ensures that the National Register is a list of truly historic places. If a place has come to be significant to a community for its beliefs, customs, or practices only within the past 50 years, it is unlikely to be considered a *traditional* cultural place.

However, the fact that a place may have gone *unused* for a long period of time, with use beginning again only recently, does not trigger an analysis under Criterion Consideration G, nor does it necessarily make it ineligible for inclusion in the National Register. For example, Ocmulgee Old Fields in Georgia, discussed at Figure 17, holds historic and cultural significance to the Muscogee of Oklahoma. 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 the Tribe still reveres the site as their ancestral homeland. The Ocmulgee Old Fields were determined eligible for listing in the National Register in 1997 and again in 1999 (for a boundary clarification) under Criteria A and D for its historic and cultural significance to the Muscogee.

Like Criterion Consideration A regarding religious properties, nominations for TCPs over the years have addressed Criterion Consideration G differently—some have discussed it, while others have not, and TCP listings reflect that. However, because the significance of a TCP continues into the present—because a TCP is a place significant for its role in a community’s *traditional and continuing* beliefs, custom, and practices—Criterion Consideration G typically does not apply to TCPs and this may be addressed in a nomination with a simple statement to that effect.

Assess the Place’s Integrity

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

The integrity of a traditional cultural place must be evaluated according to the views of those who hold the place to be significant; if the place’s integrity has not been lost in their eyes, it likely has integrity. Nevertheless, just how a place conveys its integrity must be described in the nomination; it is insufficient to simply state that a place retains integrity in the opinion of the community.

²¹ 36 C.F.R. § 60.4(g).

The National Register criteria for evaluation recognize seven aspects, or qualities, that in various combinations define the overall integrity of a place: location, setting, design, materials, workmanship, feeling, and association.²² Historic places either retain integrity (that is, their ability to convey their significance) or they do not. To retain historic integrity, a place will always possess several, and often most, of the aspects. Determining which of these aspects are most important to a particular place requires knowing why, where, and when the place is significant. For example, “design” and “workmanship” is less relevant to a TCP like Doe-Kog-Wats (discussed at Figures 32) that is comprised of natural features.

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

Assessing the Physical Aspects of Integrity

“Location” is the place where the historic property was built or the place where the historic event occurred. Most TCPs retain integrity of location by virtue of being in their traditional locations. (Figure 41, Ballast Island.) Others—for example, traditional watercraft—may not have specific locations, so integrity of location is not an issue. Still others may not occupy their original location but still have locational integrity, for example, traditional plant gathering that was relocated from one place to another because plant distributions have changed due to changing climatic conditions, or traditional fishing that was moved from one location to another because of sea level rise or reservoir construction. Generally, in these situations, locations should be in the same vicinity as the historic location and retain several other aspects of integrity.

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

“Design” is the combination of elements that create the form, plan, space, structure, and style of a place. Integrity of design is relevant to TCPs that someone designed, for example, buildings, structures, and rock art sites. “Design” may include organization of space, scale, proportions, and ornamentation. A TCP’s design may reflect traditional historic functions and technology, as well as aesthetics. For example, the Tarpon Springs Greektown Historic District features residential and commercial places that retain culturally identifiable elements such as specific paint schemes, common landscaping forms, and functional design characteristics consistent with long-held traditional practices handed down from generation to generation. (Figure 43, Tarpon Springs Greektown Historic District.) For TCP districts significant primarily for their historic associations, design may concern more than just individual

²² 36 C.F.R. § 60.4.

²³ See *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, 44-49, for more in-depth discussion of each aspect of integrity.

buildings, structures, and objects; it may also apply to the way in which these resources are related to each other and the surrounding landscape.

“Materials” are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic place. Integrity of materials generally means that the place should be made of whatever has traditionally made it up, for example, soil and plants in the case of a relatively natural landscape site, or wood, stone, or other building materials in the case of a building or structure. Changes in materials may be consistent with the evolving nature of traditional building patterns and have little or no effect on traditional values ascribed to a place, or group of properties, by the traditional community. For example, the use of asphalt rolled roofing in place of multicolored asphalt shingle would not necessarily create a lack of integrity of materials. (Figure 44, Fishtown Historic District.) While it is literally the nature of natural landscapes to evolve over time, the fundamental characteristics and most important physical aspects of those landscapes should remain intact. (Figure 45, Rice Bay.) The relative importance of integrity of materials should always be assessed according to the perspectives of the traditional community.

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



Figure 41. This image shows Ballast Island circa 1888. Although completely buried by the modern urban environment, it continues to be significant to several Tribes as a place of resistance and resilience. Ballast Island retains integrity of location, setting, feeling, and association. Preliminary investigations suggest it may also retain integrity of design, materials, and workmanship. Future archeological investigations may confirm this and, if so, the nomination may be amended to more fully document the record. (Museum of History and Industry, Seattle, Washington)



Figure 42. Ch'ichu'yam-bam (Soda Rock), California (NR Ref. No. 03000963 R)(restricted) was listed in 2003 as a site at the state and local levels of significance with a period of significance of creation to the present under Criteria A and D for its significance in the cultural beliefs and practices of the Maidu People. This 21-acre site still plays an important role in transferring cultural information from generation to generation. (U.S. Forest Service)



Figure 43. The nomination for Tarpon Springs Greektown Historic District, Florida (NR Ref. No. 14000321) documents the district's unique sense of place evident in the design of its commercial, industrial, residential, and religious buildings. Shown here is St. Nicholas Greek Orthodox Cathedral, built in 1943 in the Neo-Byzantine style. Although properties owned by religious institutions or used for religious purposes are not ordinarily eligible for listing in the National Register, St. Nicholas Greek Orthodox Cathedral meets Criteria Consideration A as a place integral to the culture of the Greektown community. (Tina Bucuvalas)



Figure 44. Early photos of “Building 7” (right) in Fishtown Historic District, Michigan (NR Ref. No. 10000676), show a wood shingle roof, later replaced with hexagonal multicolored asphalt shingle in the summer of 1934, and then by green asphalt rolled material during the 1950s. Nevertheless, Building 7 retains integrity of location, setting, design, feeling, and association. (Amanda Holmes)



Figure 45. Rice Bay, Michigan (NR Ref. No. 15000353) was listed in 2015 as a site at the state level of significance with a period of significance of circa 1784 to 1965 under Criterion A for its significance in the cultural practices of the Ojibwe Tribe. Although wild rice is, by definition, an undomesticated food source, traditional management strategies, passed on by oral tradition, have been used to encourage an abundant and consistent harvest. Human impacts in the nineteenth and twentieth centuries degraded or eliminated many rice beds throughout the region but Rice Bay is the only known site in Michigan where wild rice has been regularly harvested from the earliest Ojibwe settlement to the present day. (Camilla Mingay)



Figure 46. The nomination for Our Lady of Mount Carmel Grotto, New York (NR Ref. No. 00001276) documents the traditional workmanship evident here. Most of the wall surfaces are decorated with smooth round stones, as well as shells, bicycle reflectors, and glass marbles inlaid into cement in various shapes that include crosses, triangles, ovals, stars, and diamonds. (Kathleen Howe)

Evaluating Integrity of Feeling and Association

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

“Feeling” is a place’s expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the place’s historic character. The sights, sounds, and even smells of a place can evoke feelings. For example, the nomination for Fishtown Historic District in Michigan documents the hustle and bustle of the waterfront, vividly conveying the traditional feeling of the place as evoked through its sounds and smells. (Figure 47, Fishtown Historic District.)

“Association” is the direct link between an important historic activity, event, or person and a historic place. A place retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship. Like feeling, association requires the presence of physical features that convey a property's historic character. (Figure 48, de 'ek wadapush (Cave Rock).)

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

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

Is the Relationship Essential?²⁴

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

For example, consider two groups of people living along the shores of a lake: each group practices a form of water immersion to mark an individual's acceptance into the group and both carry out this practice in the lake. One group, however, holds that this ritual is appropriate in any body of water that is available; the lake happens to be available, so it is used, but another lake, a river or creek, or a swimming pool would be just as acceptable. The second group regards this ritual *in this particular lake*, as critical to its acceptance of an individual as a member. Clearly the lake is *essential* to the second group's practice, but not to that of the first. The same may be said for all of the examples of listed places discussed in this

²⁴ In the 1998 version of the Traditional Cultural Properties Bulletin, this question was framed as “integrity of relationship.” This phrasing led to questions over the decades as to whether traditional cultural places are subject to an additional aspect of integrity.

Bulletin: each place is essential in maintaining or passing on beliefs, customs, or practices of the community that holds the place significant.

Does the Relationship Endure?²⁵

A place may retain its traditional cultural significance for a community even though it has been substantially altered. 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. (Figure 48, de 'ek wadapush (Cave Rock).) 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 during the eruption of May 18, 1980. (Figure 49, Lawetlat'la.)

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

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

²⁵ This question was presented as “integrity of condition” in the 1998 Traditional Cultural Properties Bulletin, likewise leading to questions about an additional aspect of integrity for traditional cultural places.



Figure 47. The nomination for Fishtown Historic District, Michigan (NR Ref. No. 10000676), listed in 2022 (and updated in 2023), documents the less tangible aspect of “feeling” by vividly describing the activities of the waterfront. (Amanda Holmes)



Figure 48. de 'ek wadapush (Cave Rock), Nevada (NR Ref. No. 100000610 R)(restricted) was listed in 2017 as a site at the local level of significance with a period of significance of creation to the present under Criterion A for its traditional cultural value to the Washoe Tribe of Nevada and California. (The place was also listed with a period of significance of 1863 to 1957 under Criterion C for significance in engineering and transportation). It retains significance to the Tribe despite the effects of modern highway development and recreational use. (Advisory Council on Historic Preservation)



Figure 49. This historic view of Lawetlat'la (Mt. St. Helens) State of Washington (NR Ref. No. 13000748), documents the eruption of May 18, 1980. The resultant crater, which dramatically altered its appearance, does not affect its integrity in terms of inclusion in the National Register. Lawetlat'la continues to be significant to several Native American Tribes and was listed in 2013 as a site with a period of significance of myth age to the present under Criterion A for its significance in Native American heritage. (Robert Krimmel)

Key Concept

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

V. DOCUMENTING TCPs FOR THE NATIONAL REGISTER

Historic places possessing significance to communities as TCPs are documented in order to make it possible to manage them, regulate impacts on them, and where desirable, interpret them for the public. This section discusses the process of documenting TCPs for the National Register, and addresses common challenges in doing so.

Typically, these questions should be answered in developing documentation:

- **What** is the place in National Register terms: is it a building, structure, object, site, or district? And what further describes the place, for example, temple, hill, neighborhood, trail, lake, grove?
- **Where** is the place (general and specific geographic location)?
- **To whom** is the place culturally significant?
- **Why** is the place significant, as perceived by those who value it, and **how** does it convey that significance?
- **When** is the place significant; that is, what is the time period for which the place holds significance?

A completed National Register nomination on Form 10-900, or the documentation developed for a determination of National Register eligibility, should include a clear representation of the shared beliefs, customs, and practices that contribute to the place's cultural and historic significance for a community. This documentation should be based on direct engagement with knowledgeable members of the community, supplemented where necessary and appropriate by research and analysis. The information may be collected in any number of ways, including audio or video recordings, photographs, field notes and sketches, and primary as well as credible secondary written records.

Specific Information Issues

Obtaining and presenting documentation in a National Register nomination can pose several issues.

- Those who attribute significance to the place may be reluctant to allow its description to be committed to paper or electronic media, or to be filed with a public agency that may be compelled to share that information.
- Documentation involves addressing not only the physical characteristics of the place but culturally significant aspects of the place that may be visible or knowable only to those in whose traditions it is significant.
- Identifying what features of the place's setting—the larger environment—do and do not contribute to the place's character is important to ensure the physical qualities valued by a community are properly considered in planning or management decisions.
- Establishing a place's level of significance in National Register terms—that is, local, state, or national—requires understanding the reach of the significance of the place.
- Establishing and expressing the place's period of significance in European American terms may be difficult.

- The place's boundaries may be difficult to define and express in European American terms.

Protecting Confidentiality

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

The need to reveal information about something that a cultural system demands be kept secret can present a paradox for traditional communities. Although members of a traditional community may be concerned about the impacts, for example, of a construction project on a TCP, sharing relevant information outside their community may be culturally inappropriate, prohibited, or taboo. This may be hard for those outside the community to understand, but these concerns should not be ignored, especially for communities that have been negatively impacted by cultural assimilation practices or profound loss in the past. In some traditional communities, it is sincerely believed that sharing information with outsiders will lead to injury or death of one's family or group.

Reluctance or refusal of a traditional community to share information should not be perceived as a challenge to overcome. A nomination need not detail specific cultural practices if doing so would violate cultural norms. It may be sufficient to generally describe the significance of a place to a traditional community, particularly if the nomination contains sufficient contextual information to present a clear understanding of the general beliefs, customs, or practices of the community. For example, the Spirit Mountain nomination, discussed at Figure 28, documents through historical and contemporary sources, including oral histories, that the place has since time immemorial served and continues to serve an essential role in traditional cultural beliefs and practices of several Tribes. The nomination clearly states that "Tribal members shared information on the significance of the Spirit Mountain Traditional Cultural Property with the understanding that they could not provide detailed information because of its extreme religious sensitivity" and that "the lack of detailed traditional use information in this nomination does not imply a lack of such information among the [T]ribes."²⁶ Likewise, the Zuni Salt Lake and Sanctuary, discussed further at Figure 59, clearly states

Pueblo religious leaders traditionally protect their religious places by not revealing information about them to uninitiated people. As a result, none of the pueblos consulted during the preparation of this nomination form have elected to release information about the location or use of specific religious places within the Zuni Salt Lake and Sanctuary.²⁷

²⁶ Cynthia Ellis and Stanton Rolf, "Spirit Mountain," National Register of Historic Places Registration Form (Washington, DC: US Department of the Interior, National Park Service), Section 8, pp. 5-7.

²⁷ T. J. Ferguson and Roger Anyon, "Zuni Salt Lake and Sanctuary," National Register of Historic Places Registration Form (Washington, DC: US Department of the Interior, National Park Service), Section 8, p. 6.

Confidentiality should be considered, documented, and communicated across all parties involved at every step in the nomination process, beginning with identification and ending with the nomination and archiving of documentation. Each instance in which information is exchanged should be carefully considered in terms of what and to whom information is to be transferred. Although a National Register nomination received by the NPS becomes part of the public record, information about location, character, and ownership may be kept confidential by Federal agencies and other specified parties (including SHPOs, THPOs, or other authorities receiving grant assistance from a source identified in the NHPA) under the authority of Section 304 of the National Historic Preservation Act.²⁸ The Secretary of the Interior (represented by the Keeper of the National Register) is authorized to withhold information if releasing it might (1) cause a significant invasion of privacy, (2) risk harm to the historic place, or (3) interfere with the use of a traditional religious site by practitioners.

While Section 304 may be invoked by nominating parties—typically, SHPOs THPOs, and FPOs—throughout the nomination process to justify withholding certain information, the specific legal authority for withholding is established and documented through consultation with the Keeper of the National Register. Once informed of a traditional community’s specific concerns, the Keeper (or their delegated representative) can authoritatively delineate what may be covered under the law and establish an administrative record so that consistent confidentiality will be maintained across the administrative life of the documentation.

Nevertheless, National Register regulations require locational information be made available to a Federal agency planning a project, the property owner, the chief elected local official of the political jurisdiction in which the property is located, and the local historic preservation commission for certified local governments.²⁹ A confidentiality agreement among the SHPO, the nomination proponent, and the agency/owner/official may be useful in ensuring information that must be provided is protected.

Public access to information related to archeological resources may also be restricted pursuant to the provisions of the Archeological Resources Protection Act (ARPA).³⁰ If the information pertains to a place on Federal land that is an “archeological resource” as defined in ARPA, and if a Federal land manager responsible for administering the property believes that releasing the information could create a risk of harm to the resource, then ARPA provides that, with limited exceptions, the Federal land manager must consider the information to be confidential. Under ARPA, the Federal land manager need not consult with the Keeper of the National Register regarding the confidentiality of the information.

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

²⁸ 54 U.S.C. § 307103.

²⁹ 36 C.F.R. § 60.6(x).

³⁰ 16 U.S.C. § 470hh.

These limited protections may not always be enough to relieve the concerns of those who value TCPs but resist releasing information on them. In some cases, these concerns may affect a community's willingness to nominate places to the National Register at all. Confidentiality concerns may also affect formal determinations of eligibility. However, an evaluation of a traditional cultural place may be made by treating documentation requirements in a nuanced and strategic manner and by retaining only minimal information in the project files. Respecting and protecting confidentiality can usually be accomplished by recognizing the concerns and collaborating with creativity and flexibility to find a solution.

Documenting Character-Defining Features, and Contributing and Non-Contributing Resources

Documentation describing a TCP should convey not only its historic appearance (if known) and its current physical appearance, but also how it is viewed by the traditional community or described in the relevant traditional belief. For example, one of the important characteristics of Mt. Tonaachaw in Chuuk (Truk), Federated States of Micronesia, is an area called "Neepisaram," which physically looks to many like an otherwise unremarkable grassy slope near the top of the mountain. To the traditional community that values this place, however, it is seen as the ear of a metaphorical octopus identified with the mountain, and as the home of a warrior spirit/barracuda. However, a nomination of Mt. Tonaachaw would be incomplete and would fail to capture the significance of the place if it identified this important cultural location only as a grassy slope near the top of the mountain. (Figure 50, Mt. Tonaachaw.)

It is important to include the characteristics of a place that are viewed as important to the traditional character or use of the area. The identification and description of character-defining features—the parts or pieces of the place that individually or collectively represent the place—is important to ensure a complete National Register nomination.

- What qualities of the place's visual, auditory, and atmospheric settings—including those qualities that extend beyond the boundaries of the place into the surrounding environment—contribute to its significance? For example, is the view from or toward the place important? Is one view more important than another?
- Are there plants, animals, or other species that help convey the place's character? If so, what are they, how do they contribute, and how are they distributed over the landscape? For example, if a place is important in traditional plant gathering, as is Rice Bay in Michigan, what elements of its landscape and environment are especially valued? (Figure 51, Rice Bay.) At the Creek Council Tree Site in Oklahoma, listed in 1976 as a site, a large oak tree marks the location where the Muscogee (Creek) Nation arrived in 1836 after their forced expulsion from Alabama. (Figure 24, Creek Council Tree Site). If there are certain animals or animal species important to a place's character, the fact that the animals are migratory or leave the area altogether does not necessarily affect the integrity of the place. What habitat supports species associated with a traditional community's cultural practices? For example, certain locations within the 45-acre Mus-yeh-sait-neh Village and Cultural Landscape—and not the entire length of the Smith River—are significant in the procurement of salmon, steelhead, and eels. (Figure 52, Mus-yeh-sait-neh Village and Cultural Landscape Property.)
- Does the quality of the place's surface or subsurface water, its air, its sun or wind exposure, or its view of the sky or the landscape contribute to its significance?
- What beliefs, customs, and practices contribute to the place's character?



Figure 50. The nomination for Mount Tonnachau, Chuuk/Truk, Federated States of Micronesia (NR Ref. No. 76002210 R)(restricted) describes both the visible characteristics and non-visible aspects significant to the traditional community that values the place to ensure the place is accurately documented. (Lawrence E. Aten)



Figure 51. Rice Bay in Michigan is the site of an annual traditional wild rice harvest which serves as a yearly gathering of Ojibwe from the surrounding region, many of whom maintained a semi-nomadic way of life well into the 1880s. The National Register nomination describes how this crop enabled the creation of seasonal settlements and the establishment of an economy based on wild rice, and how it contributed to a distinct cultural identity differentiated from other Ojibwe and non-Ojibwe cultures of the surrounding region. (Giiwegiizhigookway Martin)



Figure 52. Mus-yeh-sait-neh Village and Cultural Landscape Property, California (NR Ref. No. 93001109 R)(restricted) was listed in 1993 as a site at the local level of significance with a period of significance of circa 1500 to circa 1850 under Criteria A and D for its significance to members of the Tolowa community in maintaining their cultural traditions. Habitats associated with salmon, steelhead, and eel are identified by the Tolowa as essential to the their traditional practices, and thus the character, of this 45-acre place. (Thomas S. Keter)

Likewise, a nomination should identify both contributing and non-contributing resources.³¹ A contributing resource is a building, site, structure, or object that adds—“contributes”—to the significance of the place. This is most often relevant to sites and districts. (Figures 53 and 54, Tortugas Pueblo Fiesta of Our Lady of Guadalupe, New Mexico.) However, a place may be classified as a “building” and have contributing resources if, for example, there is a primary building and one or more supporting buildings, structures, or sites within the place’s boundary. For example, Bohemian Hall and Park, discussed at Figure 7, is classified as a “building” and is comprised of two contributing buildings and one contributing site. Animals, plants, and other living entities important in understanding the place are not identified as “contributing resources” but rather character-defining features.

There may be non-contributing resources that have no association with the community’s cultural beliefs, practices, or customs, and these should be clearly identified in the narrative. For example, the nomination for Tortugas Pueblo Fiesta of Our Lady of Guadalupe specifically identifies the Shrine of Juan Diego sculpture as one non-contributing object; the Shrine of Juan Diego canopy as one non-contributing structure; and the Parish Hall and shed as one non-contributing building.

A list of character-defining features and contributing resources should be understood to be provisional, not definitive; that is, nominations and eligibility determination documents are products of their times and of those who produce them, and may require correction or updating based on new information.

Identifying the Level of Significance

In National Register practice, the significance of a place is understood when it is explained within its historic context. Historic contexts are themes, patterns, or trends through which a historic event or cultural practice is understood, and their meaning (and significance) within history is demonstrated. Historic contexts are found at a variety of geographical levels; in National Register practice, these are categorized as local, state, and national levels of significance.

- A traditional cultural place may be locally significant if it expresses an aspect of the history or culture of a village, town, city, county, community, cultural area, or region. Bohemian Hall and Park, discussed at Figure 7, is significant at the local level because it is significant to the New York City Czech and Czech American community. A place that is significant to a single family, including an extended family, would not typically be considered locally significant.
- A traditional cultural place may be of statewide significance if it represents an aspect of the history or culture of the state or territory as a whole. Tarpon Springs Greektown Historic District, discussed at Figures 6, 25, and 43, is significant at the state level for the impact of Greek American culture on the state’s maritime industry: it became the center for Florida’s sponge fishing industry, and it was the Greeks who dominated that work, bringing traditions and techniques to western Florida from their homeland. Gold Strike Canyon, discussed at Figure 56, crosses the border between southeastern Nevada and northwestern Arizona, and is significant at the state level for its significance to several Tribes associated with these two states. A place

³¹ 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.

that overlaps state boundaries may be significant to the state history of each of the states; however, this does not mean the place is necessarily of national significance.

- A traditional cultural place may be nationally significant when its significance encompasses a broad segment of the population, or numerous traditional groups across a particular region or portion of the country. Medicine Wheel/Medicine Mountain NHL in Wyoming, discussed at Figure 1, is significant at the national level as one of the most important and well-preserved Native American sacred sites in North America, playing an essential role in the lives of Native Americans throughout the Northwest Plains during its long history of human use as a sacred pilgrimage site. It is significant to more than 80 Tribes living across the Northwestern United States.

The level of significance is not necessarily about the number of people associated with a place, nor is it about the size of a place, but rather the reach of its significance. A place with national significance furthers a better understanding of the nation's history by illustrating the nationwide impact of events at that place or of persons who are associated with that place. Additionally, a place may be deemed of national significance when its importance encompasses a broad segment or number of traditional groups across a particular region or portion of the country.

Most traditional cultural places are significant at the local level, as they are significant to a local community that is grounded in a specific, geographically-limited location. In all cases, the level of significance—be it local, state, or national—does not make a difference as to how a place listed in the National Register is treated under Federal law.

Identifying the Period of Significance

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

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



Figure 53. Tortugas Pueblo Fiesta of Our Lady of Guadalupe, New Mexico (NR Ref. No. 100001437) was listed in 2017 as a district at the state level of significance with a period of significance of 1910 to the present under Criteria A and Criteria Consideration A for its significance in Indo-Hispanic heritage. A fiesta was first held here in 1910 and the activities of the three-day fiesta have continued nearly unaltered to the present. The fiesta is a celebration of the community's cultural mix of Native American Piro, Manso, Tiwa, and Ysleta del Sur ancestry and Hispanic customs and traditions. This image shows Our Lady of Guadalupe Parish Church and plaza. (Steven Moffson)



Figure 54. Shown in this image of the Tortugas Pueblo Fiesta of Our Lady of Guadalupe, New Mexico (NR Ref. No. 100001437) are two contributing resources: at left, La Capilla (building) and, at right, the Grotto of Our Lady of Guadalupe (structure). (Steven Moffson)

As discussed at Section II “What is a Traditional Cultural Place,” a place does *not* have to have been in continual use by a community to be eligible for inclusion in the National Register, yet the period of significance for a TCP may be recorded as extending over an unbroken stretch of time. For example, the period of significance for the Luiseño Ancestral Origin Landscape, California, is “Luiseño Creation to the present.” This place is 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 in contemporary times. (Figure 55, Luiseño Ancestral Origin Landscape.)

Since significance to a living community *in the present* is a key characteristic for recognition of a National Register-eligible place as a TCP, the period of significance of a TCP must extend to the present and may continue into the future. However, determining the “starting point” of a period of significance for a TCP may be challenging. There are two different types of “periods.”

(1) The period of significance as presented in a National Register nomination may be the period in which, in tradition, the place has been considered significant according to the beliefs of the community that values it. For example, the nomination for Gold Strike Canyon/Sugarloaf Mountain in southeastern Nevada and northwestern Arizona, listed in the National Register in 2004, cites a period of significance of “creation to present.” As expressed through oral histories, several Tribes’ traditions connect them to this place from time immemorial, a common and important element in many Native American oral traditions. (Figure 56, Gold Strike Canyon/Sugarloaf Mountain TCP.) Such periods often have no fixed point in time as it is ordinarily construed in European American terms. Traditional periods should be presented in their own terms. If a traditional group says a place was created at the dawn of time, this should be reported in the nomination or eligibility documentation. For purposes of National Register eligibility, there is no need to try to verify this date according to European American scholarship or practices like radiocarbon age determination.

(2) A second period of significance for some TCPs is the period during which the place has actually been used for cultural purposes. For example, the nomination for Pascua Cultural Plaza in Arizona, listed in the National Register in 2004, cites a period of significance of 1921 to the present. (Figure 57, Pascua Cultural Plaza.) Since 1921, when Pascua Village was officially established on what was then the northern outskirts of Tucson, the plaza has been the focus of Yoeme (Yaqui) traditional religious, cultural, and social events. Although these Yoeme activities pre-date Pascua Cultural Plaza, the nominated traditional cultural place associated with these activities dates to 1921 and it is the *place*—not the *practices*—that is eligible for listing in the National Register. Direct, physical evidence for cultural use at particular periods in the past may be hard to find, but oral histories are recognized sources for informing National Register nominations and it is usually possible to fix a period of use, at least in part, in chronological time.



Figure 55. The Luiseño Ancestral Origin Landscape, California (NR Ref. No. 14000851 R)(restricted) was listed in 2014 as a district at the local level of significance with a period of significance of creation to the present under Criteria A, B, C, and D for its significance as one of the most sacred areas for all Luiseño People. Although the Tribe that values this place did not have access to portions of the nominated property in contemporary times, they maintained their cultural traditions associated with the area even as it was taken over by other governments and privatized. (Pechanga Cultural Resources Department/National Anthropological Archives, Smithsonian Institution)



Figure 56. Gold Strike Canyon / Sugarloaf Mountain, Arizona / Nevada (NR Ref. No. 04000935 R)(restricted) was listed in 2004 as a district at the state level of significance with a period of significance of creation to the present under Criteria A and C for its significance to the Hualapai, Mojave, and Southern Paiute Tribes. The mountain and adjacent natural canyon along the Colorado River are integral to the maintenance and perpetuation of the cultural traditions of the Tribes. (David Ruppert)



Figure 57. Pascua Cultural Plaza, Arizona (NR Ref. No. 04001032) was listed in 2004 as a site at the local level of significance with a period of significance of 1921 to the present under Criterion A for significance in the traditional cultural practices of the Yoeme (Yaqui) people. This open plaza and adjacent chapel, kitchen, and fiesta ramada serve as a significant location for the traditional cultural practices of the Yoeme (Yaqui) people. Intertwining religious practices, traditional lifeways teachings, and youth education, the plaza has been used since 1921 to conduct dances, processions, and other ceremonial activities central to Yoeme cultural identity. (Gail Hartmann)

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

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

Examples

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

For places like Lawetlat’la, where no specific starting date is readily identified, the recommended phrase for nominations is “time immemorial to the present.”

Determining the Boundary

A specific boundary description and justification for any nominated place, including those recognized as TCPs, must be included in a National Register nomination. For places that are buildings or structures—like the Pascua Cultural Plaza, Bohemian Hall and Park, or Mount Carmel Grotto—boundaries usually reflect the full extent of building lots and developed parcels, with boundaries drawn to include the specific physical place that a community has valued for generations and continues to value to the present day. For ethnic neighborhoods or rural sites, appropriate boundaries may be defined by the perspective of the living traditional community as the area(s) they value and perceive to retain integrity. In all situations, the boundary is determined by the significance and integrity, as perceived by the traditional community, of the resources within it.

Establishing the boundaries for larger places, such as natural landscapes with no human modification, can present challenges. Often those who value such a place have never had occasion to think about its boundaries, and describing boundaries may not be consistent with their values. Community engagement or Tribal consultation is important in determining appropriate boundaries. (Figure 58, Medicine Wheel/Medicine Mountain; Figure 59, Zuni Salt Lake and Sanctuary.) Some traditional communities find the very concepts of landholding and boundary setting to be offensive. In some cases, it may be impossible to achieve agreement on a boundary, and the preparer of the nomination will find it necessary to set the boundary using their best judgment to provide a clear justification for the boundary.

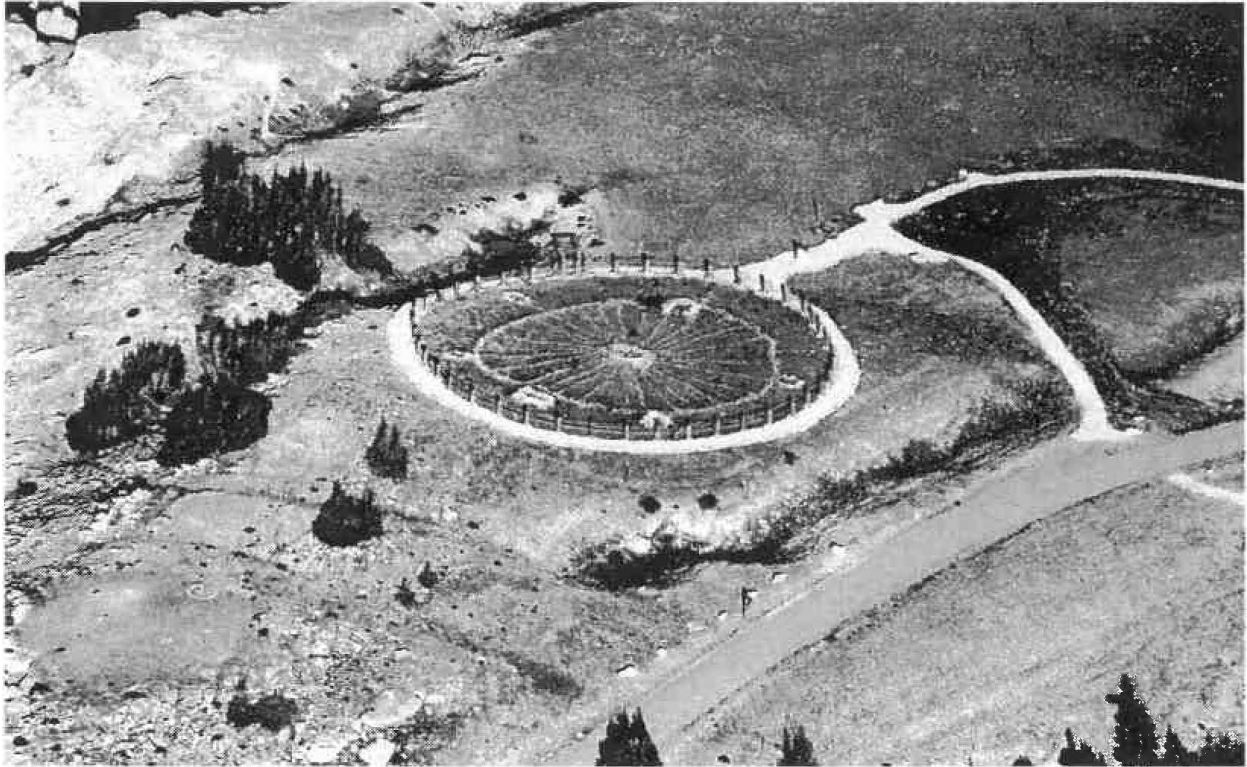


Figure 58. Medicine Wheel/Medicine Mountain, Wyoming, National Historic Landmark (NR Ref. No. 69000184 R)(restricted) was first designated as an NHL in 1969, and updated in 2011, for its significance in Native American religion, ethnic heritage, history, and archeology. The updated boundary established in 2011 was developed through consensus among more than 80 Tribes, using topographical lines for much of the northern boundary. The expansion from 100 to more than 4,000 acres reflects the recognition that the Bighorn Medicine Wheel was built in this location because of the importance of the mountain summit and its associated lands. (U.S. Forest Service)



Figure 59. The boundary of Zuni Salt Lake and Sanctuary, New Mexico (NR Ref. No. 98000238 R)(restricted) was determined by natural features described by the Tribes' oral histories, although each Tribe has slightly different boundary markers at certain locations. In these areas, the boundary was delineated to encompass all areas identified as part of the Sanctuary by all the Tribes. (T.J. Ferguson)

The justification should also state if the boundary has not been agreed to by the community that values the place.

The physical integrity of the significant historic and archeological resources contained within the area is an important consideration in drawing a boundary. Changes through time should be taken into consideration. For example, research may suggest that a particular cultural practice occurred within particular boundaries in the past, but the practice today may occur within different boundaries—perhaps larger, perhaps smaller, perhaps covering different areas. The fact that changes have taken place, and the reasons they have taken place, if these can be learned, should be documented and considered in developing the justification for the boundaries identified in the nomination or eligibility documentation.

Even when boundaries are drawn somewhat narrowly, the setting—the surrounding environment—may be an aspect of the place’s integrity and should be discussed in the nomination. Viewsheds are important; they must be considered in a boundary delineation and, even if not included in the boundary, may be identified as character-defining features. Information about aspects that are important to the traditional community is critical to understanding the significance of the place to those who value it. Intrusions, if severe enough, may compromise the place’s integrity.

More detailed guidance on how to determine historically appropriate boundaries for a National Register nomination can be found in at “Guidelines for Selecting Boundaries” in *National Register Bulletin: How to Complete the National Register Registration Form* as well as *National Register Bulletin: Defining Boundaries for National Register Properties*.

Key Concept

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

VI. COMPLETING THE NATIONAL REGISTER REGISTRATION FORM 10-900

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

Complete instructions and guidance may be found in *National Register Bulletin: How to Complete the National Register Registration Form* as supplemented and updated by additional information, and photograph and mapping documentation requirements, found at the National Register's publications webpage. National Register staff at the National Park Service are always available to answer questions about preparing a nomination; a staff list is available on the National Register's website.

National Register nominations do not need to be lengthy documents. They are not intended to be an exhaustive history of a place, with dozens of footnoted references. However, a nomination does need to be adequately documented and technically and professionally correct and sufficient.³² The extent—or “adequacy,” as specified in National Register regulations—of documentation in a National Register nomination depends upon the nature of the place being nominated, as well as the depth and breadth of available information regarding a particular place, community, or property type. Rather than providing expansive or sensitive details regarding a specific place or traditional practice, presenting a broader historical or cultural context is appropriate and may be more helpful in conveying the importance of a place. The Keeper is not reviewing a nomination to be convinced of the regard in which a community holds the nominated place, but rather to ensure that *the nomination conveys that regard* by adequately describing that place, its significance to the community, and its integrity as perceived by the community; and that the nomination is technically and professionally correct and sufficient.

1. Name of Place

- a. The name given a TCP by its traditional community should be entered as its historic name. Many places are listed in the National Register in the community's Native language, followed by another name in English (*e.g.*, “Lawetlat'la (Mt. St. Helens)”). “Traditional cultural property” or “TCP” should not be appended to the historic name.
- b. Names, inventory reference numbers, and other designations ascribed to the place by others should be entered under other names/site number.

2. Location

- a. Whenever possible, for single or small groupings of properties, enter the name and number of the street or road where the place is located. For larger districts or sites, particularly those associated with natural features and landforms with no street reference points, provide a general notation with reference to nearby topographical features or cities, towns, villages, etc. Examples include “north shore of Eastwater River, approximately 25 miles southwest of Cowtown” or “approximately 25 miles due north of Smallville” or “a linear corridor running from

³² 36 C.F.R. § 60.3(i).

the junction of the northern border of South Dakota and the Missouri River in a generally southeasterly direction to the village of Pakota, Illinois.”

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

- b. The Keeper of the National Register may restrict a TCP nomination in its entirety upon request. If release of some of the information is acceptable—for example, if the release may be advantageous to the preservation or public stewardship of a place—a redacted version of the nomination may be included submitted along with the non-redacted nomination at the time of submission to the National Register.

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

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

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

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

3. State/Tribal/Federal Agency Certification

- a. Nominating authorities include Federal Preservation Officers (FPOs), State Historic Preservation Officers (SHPOs), and Tribal Historic Preservation Officers (THPOs) or, in the case of a place located in more than one jurisdiction, a combination of two or more of these authorities.
- b. FPOs have certifying authority for nominations of places owned or administered by their respective agencies or, pursuant to Section 106 of the NHPA, for determinations of eligibility for places involved in Federal undertakings within state jurisdictions or on Tribal lands. Federal agency staff—for example, those in regional or local offices, or national forests or national parks—cannot be recognized as official nominating authorities for their agencies by the Keeper of the National Register unless they have received delegation of authority from their agency’s FPO.

- c. SHPOs have certifying authority only for nominations of places located within their respective state jurisdictions that are not Federally owned, and for Tribal lands where the THPO has not assumed National Register responsibilities.
- d. THPOs have certifying authority only for nominations of places located on Tribal lands when and where they have assumed National Register responsibilities. However, THPOs should be invited to sign as commenting officials for nominations of places directly associated with Tribal activities, or when the Tribe has contributed directly to the nomination process.

In cases where there is no Federally approved Tribal preservation program with a THPO in place who has been delegated as nominating authority by the Tribal government, nominations are processed through the SHPO of the state in which the Tribal lands are located (*i.e.*, the SHPO functions as the nominating authority).

4. National Park Service Certification

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

5. Classification (Ownership, Category)

- a. The ownership of the place should be identified as private or public. In some instances, a place may have multiple owners, both private and public. Places under Tribal control, *e.g.*, reserved or trust lands, may be considered in private or public ownership and nomination proponents are advised to check with the relevant SHPO, THPO, or FPO for further guidance.
- b. National Register regulations at 36 C.F.R. Part 60 specify that a resource may be a building, structure, object, site, or district. “TCP” is not a resource type, but should be noted on the form at Section 6 “Function or Use.”
- c. “Building,” “object,” and “structure” are usually used for single resources or a small grouping, while larger places are usually classified as a “district” or “site.”
- d. While the “district” and “site” classifications may sometimes be used interchangeably, the use of the “site” classification may be more appropriate when the TCP is not marked by human-made physical features, as in the case of large natural feature landscapes associated with a precontact and/or a historic event or pattern of events.
- e. Use of the “district” classification is usually more appropriate for places that contain a significant concentration or linkage of buildings, structures, or sites associated with specific traditional beliefs, customs, or practices.
- f. The resource count should be provided in all nominations and should correspond to the information provided in the narrative description and inventory lists and maps included in the registration form.
- g. The narrative description required in Section 7, as described below, can be used to describe character-defining features of a place.
- h. A nomination for a place that contains many smaller features scattered across a large area can account for them by designating the entire land area as a contributing site.

6. Function or Use

- a. TCPs should use the categories and subcategories provided in *National Register Bulletin: How to Complete the National Register Registration Form* to the extent possible.
- b. Typically, a TCP should be identified in this section as “Other: Traditional Cultural Place.”

7. Description

- a. The narrative description in Section 7 should begin with a summary paragraph describing the general character of the TCP, with subsequent paragraphs providing more detailed discussion of its contributing and non-contributing resources, including changes over time.
- b. It is appropriate to address both visible and non-visible aspects of the place here, as discussed at Section IV’s subsection “Assess the Place’s Integrity.” Visible and non-visible aspects of the place may also be discussed in the statement of significance at Section 8.
- c. Where possible, avoid providing sensitive information that is likely to require protection from public access per the provisions of Section 304 of the NHPA (54 U.S.C. § 307103) discussed at Section V’s subsection “Protecting Confidentiality.” Nomination authors should share just enough information for nominating authorities and NPS to understand the place’s significance and integrity. In anticipating that a redacted version of the nomination may be prepared, it may be useful to place sensitive information on separate pages or within subsections.
- d. The narrative description should account for all of the resources identified in the resource count and shown on any maps or attachments. Districts with a high number of resources may find it advantageous to include an inventory table, including both contributing and non-contributing resources.
- e. There may be non-contributing resources at a traditional cultural place that have no association with the cultural beliefs, practices, or customs, and these should be clearly identified in the narrative.

8. Statement of Significance

- a. The most current version of the suggested “Areas of Significance” categories and subcategories is included in this Bulletin at Appendix II. Multiple categories and subcategories may be specified. This list is an ongoing work-in-progress and if a suitable category or subcategory of significance is not on this list, the nomination proponent may specify any area or subcategory of significance that accurately represents the place being nominated. The most common areas of significance applied to TCPs include religion, social history, and ethnic heritage.
- b. For the Period of Significance, where no specific starting date is readily identified, the recommended phrase for nominations is “time immemorial to the present.”
- c. The narrative statement of significance should begin with a summary paragraph specifying the applicable National Register Criteria for Evaluation, areas of significance, level of significance, and period of significance. The summary paragraph is also the place to provide a definition of the traditional community, or communities, associated with the nominated place. Subsequent paragraphs should directly address and support each of the criteria and area(s) of significance identified in the summary page of Section 8.
- d. This section should clearly identify the characteristics of the traditional cultural place:

- The place must be associated with and valued by a living community.
- The community that values the place must have existed historically, and continue to exist in the present.
- The community must share beliefs, customs, or practices that are rooted in its history and held or practiced in the present.
- These shared beliefs, customs, or practices must be important in continuing the cultural identity and values of the community.
- The community must have transmitted or passed down the shared beliefs, customs, or practices, including but not limited to through spoken or written word, images, or practice.
- These shared beliefs, customs, or practices must be associated with a tangible place.
- 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.
- e. 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. Guidance on the development of context can be found at Section IV's subsection "Understanding the Historic Context."
- f. 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.
- g. Note that because the significance of a TCP extends to the present—that because a TCP is a place significant for its role in a community's traditional and continuing beliefs, custom, and practices—Criterion Consideration G typically does not apply to TCPs.

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

Guidance on providing geographical data has evolved considerably since the National Register was established in 1966. It continues to evolve along with technology and the most recent nomination guidance for providing geographical data may be found on the National Register's website, on its publications page.

11. Form Prepared By

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

Additional Documentation and Photographs

Photographic images are important for conveying the character of a place, supplementing descriptions, and providing a record of existing conditions. If direct imagery of sensitive resources or locations is objectionable to the community, general images of the area may be provided in their place. In rare cases, if the community objects to the inclusion of photographs, photographs need not be included. In both these situations, a clear statement for general images—or no images—explaining the reason for their exclusion must be provided here.

Key Concept

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

VII. SUMMARY

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. Places that today would be considered traditional cultural places—"TCPs"—have been listed and recognized as eligible for listing in the National Register since its inception in 1966. The purpose of this Bulletin is not to introduce a new classification type but rather to assist both preservation professionals and community members in recognizing, documenting, and evaluating places that always have been potentially eligible for inclusion in the National Register.

This guidance is premised on a traditional community's desire to nominate a place to the National Register as a place significant to their traditional cultural beliefs, customs, or practices. If a traditional community chooses not to identify or discuss a place, for whatever reason, or is not interested in nominating a place for its traditional cultural significance to them, those wishes should be respected. Communities that do wish to pursue National Register listing for a traditional culture place should approach their work as a collaborative effort among community members; local leaders; Tribal governments; SHPO, THPOs, and FPOs; and National Park Service.

The places valued by America's communities, be they Native Americans 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.

GLOSSARY

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

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

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

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

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

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

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

Determined Eligible or Determination of Eligibility A place formally determined eligible for listing—but not actually listed—in the National Register by the Keeper of the National Register. A “Keeper determination of eligibility” most often occurs when a private owner objects (or majority of private owners, in the case of a district, object) to the listing of their property in the National Register or when a State Historic Preservation Officer and/or Tribal Historic Preservation Officer and a Federal agency disagree as to whether a property meets the criteria for listing.

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

Federally recognized Tribe As of this writing in 2023, the U.S. government officially recognizes 574 Indian Tribes in the contiguous 48 states and Alaska. These Federally-recognized Tribes are eligible for funding and services from the Bureau of Indian Affairs, either directly or through contracts, grants, or compacts. The most current list of Federally-recognized Tribes is available on the website of the Bureau of Indian Affairs.

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

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

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

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

National Register of Historic Places (National Register) The National Register is the official list of the nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966, the National Register is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources.

Native American The term “Native American” as used in this Bulletin refers to any person that is a member of an Indigenous People to the United States or any of its territories and may be used as an adjective to describe such a People’s culture, beliefs, lands, property, and organization, among other things. The term “Native American” includes members of Native American Tribes or groups, Native Hawaiians, Native Alaskans, Pacific Islanders, and other Indigenous Peoples.

Native American Tribe The term “Native American Tribe” as used in this Bulletin means an Indian Tribe as defined in the NHPA, 54 U.S.C. § 300309.

Native Hawaiian Organization The term "Native Hawaiian Organization" means any organization that is composed primarily of Native Hawaiians and that assists in the social, cultural, and educational development of Native Hawaiians in that community.

State Historic Preservation Officer (SHPO) The SHPO is a state governmental official created under the National Historic Preservation Act. The SHPO’s responsibilities include surveying and recognizing historic

properties, reviewing nominations for properties to be included in the National Register, reviewing Federal undertakings for effects on historic properties, and supporting local preservation efforts. A current listing of SHPOs may be found on the website of the National Conference of State Historic Preservation Officers (NCSHPO).

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

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

Section 304 This section of the National Historic Preservation Act protects sensitive information about historic properties from disclosure to the public when that disclosure could result in a significant invasion of privacy or damage to the historic property, or impede the use of a traditional religious site by practitioners.

Traditional Cultural Place (TCP) A traditional cultural place (formerly, “property”) 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.

Tribal Historic Preservation Officer (THPO) A THPO is an official appointed by Tribal leadership to officially represent the Tribe’s interests regarding sites of historic and religious significance to the Tribe. Some Tribes have an agreement with the NPS to take the lead on Historic Preservation Officer responsibilities on Tribal lands as defined in the NHPA, and some do not. However, all Tribes retain the same consultation rights in a Section 106 action. Tribes do not need an agreement with the NPS to appoint a THPO. A current listing of THPOs may be found on the website of the National Association of Tribal Historic Preservation Officers (NATHPO).

SOURCES AND REFERENCES

Images

All images are from National Register or National Historic Landmark nominations unless otherwise noted.

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The Secretary of the Interior's Standards and Guidelines for Federal Agency Historic Preservation Programs Pursuant to the National Historic Preservation Act of 1966, as amended. 1998.

Code of Federal Regulations

Determinations of Eligibility for Inclusion in the National Register of Historic Places, 36 C.F.R. Part 63.

National Register of Historic Places, 36 C.F.R. Part 60.

National Historic Landmarks Program, 36 C.F.R. Part 65.

Protection of Historic Properties, 36 CFR Part 800.

National Park Service: National Register and National Historic Landmarks Documentation

“R” after the reference number indicates some information in this nomination is restricted and may be made available in redacted form only.

100008616 R	Anaem Omot
95001367	Atantano Shrine
100006067	Ballast Island
01000239	Bohemian Hall and Park
16000002 R	Chi'chil Bildagoteel (Oak Flat)
03000963 R	Ch'ichu'yam-bam (Soda Rock)
78000674 R	Coso Hot Springs
76001576	Creek Council Tree Site
100003522	Cycadia Cemetery
15000380	Cypress Street Schoolhouse
100000610 R	de 'ek wadapush (Cave Rock)
10004076	Doe-Kag-Wats
100006765	Fishtown Historic District
04000935 R	Gold Strike Canyon / Sugarloaf Mountain
12001224	Green River Drift Trail
73001929	Inyan Kara Mountain
81000205 R	Kaho'olawe Island Archeological District
13000748	Lawetlat'la (Mt. St. Helens)
1400851 R	Luiŝeño Ancestral Origin Landscape
02001703 R	Maka Yusota (Boiling Springs)
74001659	Medicine Bluffs
69000184	Medicine Wheel-Medicine Mountain
76002210 R	Mount Tonnachau
93001109 R	Mus-yeh-sait-neh Village and Cultural Landscape Property
DOE	Nantucket Sound
DOE	Ocmulgee Old Fields
00001276	Our Lady of Mount Carmel Grotto
73001074 R	Pahuk
04001032	Pascua Cultural Plaza
15000353	Rice Bay
96000548	Sleeping Buffalo Rock
99001083 R	Spirit Mountain
14000679	St. Augustine Catholic Church and Cemetery
720000246 R	Tahquitz Canyon
14000321	Tarpon Springs Greentown Historic District
100001437	Tortugas Pueblo Fiesta of Our Lady of Guadalupe
14000925	Turtle and Shark
07000522	White Eagle Park
16000401 R	X'unaxi (Indian Point)

98000238 R Zuni Salt Lake and Sanctuary

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APPENDIX I: NATIONAL REGISTER OF HISTORIC PLACES CRITERIA FOR EVALUATION

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

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

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

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

Criteria considerations. Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria of if they fall within the following categories:

- (a) A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- (b) A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- (c) A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life.

- (d) A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- (e) A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- (f) A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- (g) A property achieving significance within the past 50 years if it is of exceptional importance.

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

The following areas of significance are used by the National Register Information System (NRIS) to manage the data associated with National Register and National Historic Landmark nominations. The areas of significance categories have evolved, and continue to evolve, and many were not in place until more recent decades. Nomination proponents may choose to identify an area of significance that is not in this list; to do so, the category of “Other” should be selected and a specific subcategory provided.

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 INDONESIAN JAPANESE KOREAN LAOTIAN THAI VIETNAMESE
ETHNIC HERITAGE-BLACK	

CATEGORY (51)	SUBCATEGORY (56)
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 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

CATEGORY (51)	SUBCATEGORY (56)
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	
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	

*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.”