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Cultural Significance in Preservation: Toward a Criterion Reflecting Community Values

By Holly Taylor

In a new year when we can allow ourselves a more optimistic view of preservation's future at the federal level, we have an opportunity to ask what new tools are needed to respond better to community values and concerns about preserving places. The 50th anniversary of the National Historic Preservation Act came and went in 2016, and a number of reports and publications at the time championed "people-centered preservation," but there was little discussion of the impacts of operating within a policy framework that has remained essentially unchanged for 50 years.

This federal framework, including the National Register eligibility criteria, provides a strong foundation for preservation in the U.S., but the criteria also limit the scope of what can be considered worthy of preservation. Now is the time to think about expanding that scope. Building on the Forum 2020 panel discussion "Leading the Community in a Time of Change," this article explores ideas around cultural and social values in preservation and argues for a new National Register criterion to set cultural significance on par with historical, architectural, and archaeological significance in federal regulations.

What Are the Problems that Need to Be Solved?

Preservation has long recognized that it has a diversity problem, with a strong track record of

saving places associated with wealthy white men and a fairly spotty record of saving places valued by marginalized communities. Initiatives around the 25th anniversary of the NHPA focused attention on preserving places that reflect the histories of diverse communities and expanding the diversity of professionals working in preservation jobs. These efforts greatly enriched the field; however, National Register listed properties associated with underrepresented communities have remained stubbornly stuck below ten percent of total listings.

The lack of improvement suggests that the diversity problem is structural and that our methods of assessing significance and integrity do not fully support our goals of preserving places that are valued by all kinds of communities, including those defined by race and ethnicity, gender and sexual

orientation, class, occupation, geography and other dimensions of community identity.

How should we address this problem? In part by recognizing that the significance of historic places is not just grounded in the past, but also in the present – in the collective, lived, ongoing experiences of communities, and in the meanings and associations that connect people to historic places; in other words, in cultural and social values.

Cultural Significance Is Not Cultural History

Before diving into what cultural significance is, and how and why it should be integrated into National Register evaluation criteria, I first want to address what it is not. Cultural significance is not cultural history. Or, more precisely, it is not simply a subcategory of historical significance. Existing designation criteria at every level (federal, state and local) are sufficient to deal with cultural history, in the sense of places associated with people and movements that have been influential in defining past eras.

When culture is evoked at all in preservation it is often in the rather Victorian sense of the word, knitting together social history and the creative arts – a writer's home from the 1920s, a night club associated with a certain music scene in the 1940s, an incubator space for experimental theatre of the 1960s. This is not what I am talking about. We should already be assessing the historical significance of such places and we do not need a new criterion to do so.

What I mean by cultural significance is, in its most basic definition, the meanings and associations that historic places hold for people today. This follows from an anthropological understanding of cul-

ture as community lifeways shaped by traditions, beliefs, practices, and social institutions held and valued by living people. It is based in collective experience, the transmission of knowledge across generations, and continuity of traditional practices in places that communities care about.

Centering the Traditional Cultural Properties Approach

Much of the theoretical and policy framework for recognizing cultural significance was articulated more than 30 years ago in National Park Service Bulletin 38 *Guidelines for Evaluating and Documenting Traditional Cultural Properties* by Patricia Parker and Tom King. Key assessment strategies for TCPs diverge from established preservation practices, including acknowledging the community's primary role in determining significance, with professionals playing a supporting role conducting ethnographic research and preparing documentation, and an approach to integrity focused on the relationship of traditional practices to place.

An important aspect of the TCP approach is that it invests communities with the authority to determine what is culturally significant in the same way that typical preservation approaches rely on experts (historians, architects, architectural historians and archaeologists) to assess significance under other criteria, and this sharing of authority makes some professionals uncomfortable.

The TCP approach should be central to our preservation practices, precisely because of the way it elevates community values, but it remains mostly on the periphery. It has been used successfully by Indian Tribes to protect some sacred places on public lands, or at least to negotiate more meaningful mitigation agreements, but it remains marginalized in terms of National Register eligibility for places in the built environment valued by all

kinds of communities.

The small number of non-tribal places that have been successfully listed or determined eligible have mostly resulted from substantial efforts by scholars (mostly folklorists) or dedicated grant funding for public agencies, not standard CLG surveys or Section 106 reviews. It remains challenging to identify places of any kind that have been documented for the National Register as TCPs, because they still must be listed under Criteria A-D and are rarely identified as TCPs in any searchable data fields.

The Criteria We Have

It is reasonable to wonder why we don't already have a National Register criterion for cultural significance. We've got a pair of criteria for historical association, A and B; a grab-bag for architectural and material qualities in criterion C; and an approach to archaeological properties that focuses on research values in criterion D.

The National Historic Preservation Act identifies culture as an area of significance, but National Register regulations finalized in 1969 do not include a corresponding criterion. This seems like a puzzling omission, but John Sprinkle's 2014 book *Crafting Preservation Criteria* explains how the historians, architects and archaeologists of the National Park Service melded criteria developed by NPS and the National Trust for Historic Preservation meant for assessing potential acquisitions of historic properties, and came up with eligibility criteria for the National Register.

As Sprinkle explains, the original intent of the criteria was to legitimize exclusion, not to embrace diversity. While the intent may have evolved, the eligibility criteria and associated criteria considerations have not. Sprinkle's analysis invites us to

wonder about what preservation is missing, and about the full range of historic places the public cares about and wants to see preserved.

It is worth emphasizing that the National Register criteria are not part of federal law – they are not articulated in the National Historic Preservation Act itself. They are part of federal regulations, in 36 CFR 60.4. While changing the regulations is a complex process, there is an established process for it that does not involve Congress.

National vs. Local Listing

Why focus on National Register criteria when many local commissions can designate cultural landmarks? When local criteria go beyond the typical realm of historical, architectural and archaeological significance to include culture, the language often refers vaguely to cultural history or heritage. Because preservationists are accustomed to only considering values based in the past, such language may be interpreted to apply to a limited range of places associated with social history, the arts, or ethnic history, arbitrarily separated from the present. Staff and commissioners may misinterpret ordinance language around threshold dates (i.e. requirements that places be at least 30 or 40 or 50 years old to be designated) and wrongly assume they must ignore both recent history and present values associated with eligible places.

The majority of jurisdictions around the country are not certified local governments (CLGs), and in those cities and counties the National Register criteria provide the only process for evaluating historic places. Even in jurisdictions with strong local programs, the federal criteria still guide Section 106 reviews and projects funded by CLG pass-through grants. Because of this, places identified through survey or environmental review may be found ineligible for the National Register and



Photo Credit: Joel W. Rogers / Showbox Presents

The Showbox Theatre is a beloved live music venue in Seattle.

subsequently demolished before they can even be considered for local designation.

Seattle's Showbox Theatre nearly met this fate. The Showbox is a beloved live music venue near the Pike Place Market Historic District. It was evaluated by a State DOT/FHWA survey for a highway demolition project and found not eligible for the National Register. Later it was evaluated during a city survey triggered by a neighborhood upzone, but the project team only assessed historical and architectural significance and integrity, ignoring culture, and found it ineligible for local listing.

When it was threatened with demolition a couple of years ago, the music community mobilized and "Save the Showbox" became the biggest grassroots advocacy effort Historic Seattle has ever taken on. People wanted the Showbox preserved because they love the place and want to keep seeing shows there, not necessarily because it exhibits intact art deco elements or because of the musicians who played there decades ago. The

Showbox was designated last year as a City of Seattle Landmark in spite of previous determinations, but its future remains uncertain.

The patchwork of local criteria may protect places of cultural significance in some jurisdictions, but language and interpretation vary and beloved places too often fall through the cracks. A new National Register criterion that can be adopted into local CLG ordinances has the potential to transform the field of preservation.

Why and When Is a Place Really Important?

Another Seattle case study highlights issues around period of significance, and community versus expert perspectives. El Centro de la Raza is a Latino community center located in a former elementary school. It was built in 1904 from a design by architect Charles Saunders, based on a model school plan created by another architect. The school closed in 1971 when a new one was built nearby.



Photo Credit: Joe Mabel

El Centro de la Raza, a community and cultural center for Seattle-area Latinos, hosts political rallies, holiday celebrations and social service programs.

In 1972, Latino anti-poverty activists occupied the building, and El Centro was born. This organization continues to serve the region's Latino community, hosting public gatherings, community organizing, holiday celebrations, and educational activities, including one of the oldest bilingual preschools in the country. So, what is the period of significance here? For the people who organize rallies, learn to make tamales, or engage with the ancestors at *Día de los Muertos*, the period of significance is now.

The building was determined eligible for the National Register in 1984 as an "excellent example of the model school concept developed by the Seattle School Board to accommodate unprecedented growth during the late 19th and early 20th century." It was listed in 2019 as a condition of a memorandum of agreement between the Washington SHPO, City of Seattle, and federal Department of Housing and Urban Development. The final nomination references the 1972 occupa-

tion as a significant event, but ignores subsequent decades of activism, community service, performances, and traditions associated with the place; in other words, the cultural significance is ignored.

Some preservationists take the position that it doesn't matter which criterion is used, that as long as a place is determined eligible for the National Register for any reason then its history can be documented, impacts can be mitigated, and the place has a chance of being preserved. But El Centro demonstrates the implicit bias of this approach. For Seattle's Latino community, the place is important because of all the ways it sustains cultural practices and serves as a gathering place for multiple generations. But according to preservationists, El Centro's importance is based on school district history, architectural style, and a singular event in the 1970s, rendering recent decades of community life associated with the place invisible.

More than 100 units of newly constructed low-

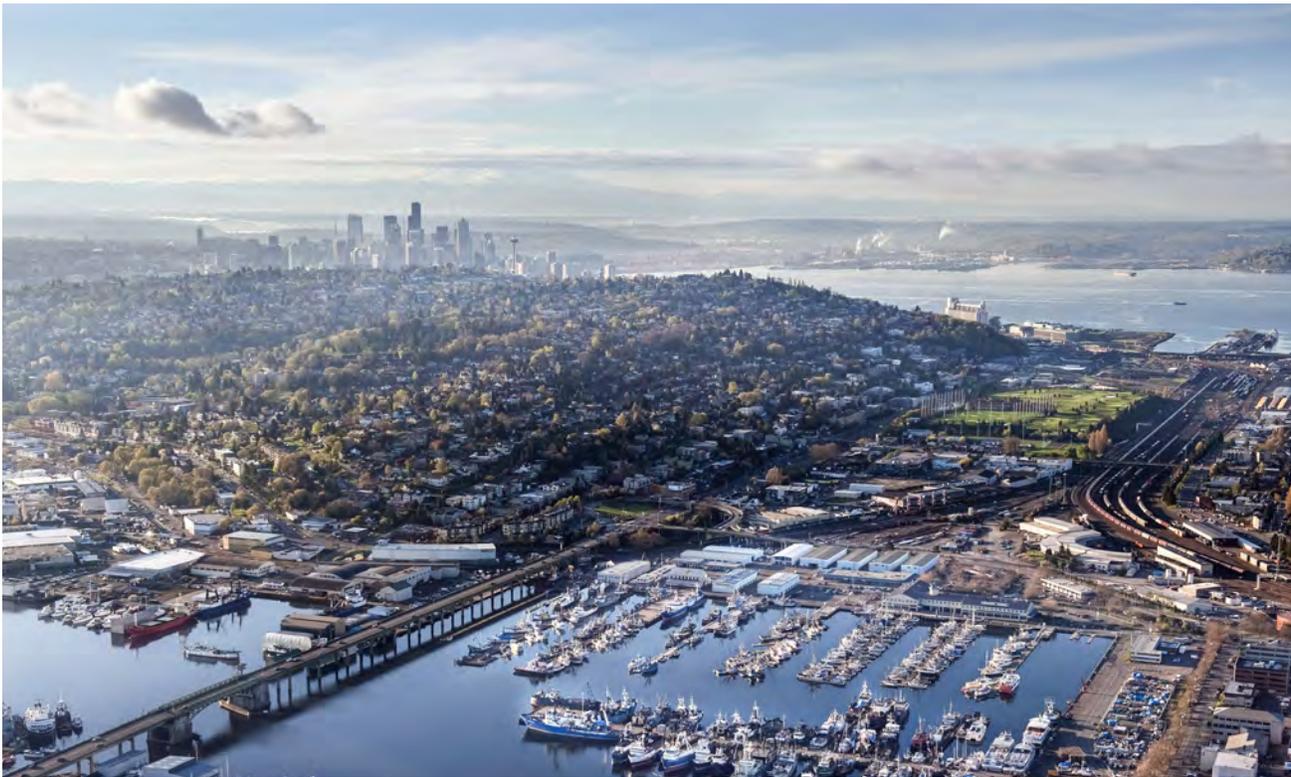


Photo Credit: Don Wilson / Port of Seattle

Fishermen's Terminal north of downtown Seattle serves as the home port for the North Pacific fishing fleet.

income housing flank the courtyard on El Centro's south elevation. Does this compromise the integrity of the setting? Or does it contribute to the place's significance by helping to sustain the neighborhood's diverse population?

Preserving a Place so Its Use Can Continue

A final case study examines Fishermen's Terminal, a 75-acre port facility established in 1914 on the Lake Washington Ship Canal, just north of downtown Seattle. This is a place that preservationists keep failing to recognize as a place, even though it has had the same owner – the Port of Seattle – and the same boundaries for a century. It has been through numerous federal and state environmental review processes, which either found “no known landmarks or evidence of historic, archaeological, or scientific importance...” or focused on a single building and found that it might be eligible for the National Register in spite of past alterations.

There are still heritage fishing vessels homeported at the terminal, many a century old and still working. There are still sawtooth piers, but now they are made of concrete instead of wood. There is still a shipyard owned by the Fishing Vessel Owners co-op, and a constellation of support businesses from marine electricians to insurance brokers. All kinds of maintenance work still happens, like net repair. There is a large open space that looks like a parking lot, but it is in fact a net working area with 100-foot lanes that are reserved by the hour. There is a fishermen's memorial to honor those lost at sea, and a “Blessing of the Fleet” ceremony every spring with clergy, elected officials, and fishing families. All these things are part of local culture.

Most importantly, there is still fishing, and many boats have multi-generation family owners and crews. Most vessels go to Alaska at some point during the year – first the crabbers, then the halibut boats, then the purse seiners and gillnetters

and all the other boats head up to Bristol Bay for salmon, or to make shorter trips off the British Columbia or Washington coasts. And every fall they come back to the Terminal for freshwater moorage and servicing.

Every decade or so, port managers contemplate converting industrial uplands to condos or tourist amenities or opening up moorage slips for yachts. Fortunately, Fishermen's Terminal has remained vital enough to fend off redevelopment thus far, without much help from the preservation community. Do preservationists have to wait until a place is dead before they step in to document what it used to be?

Continuity of use is crucial to the significance of Fishermen's Terminal – that the vessels still operate, the traditional skills are still transmitted to younger workers, that it is still a working port facility. Yes, it has historical significance, but for the fishing community, the present and the future matter too. It should not be such a stretch to find the whole place eligible for the National Register based on historical as well as cultural significance, recognizing that those are two distinct things, documented and evaluated in distinct ways, with implications for both stewardship and mitigation of adverse impacts. While most historic materials have been replaced, the terminal has integrity of location, setting, design, feeling, and association, and also has integrity of use, which should be considered as part of cultural significance.

Calling for consideration of use as an aspect of integrity tends to draw a knee-jerk reaction from many preservationists who say "you can't preserve use." That may be true, but we should consider use as an important aspect of the integrity of some places, and document use in relation to cultural significance in a way that supports the survival of such places.

Adaptive Reuse Is Not Always the Answer

These case studies demonstrate that cultural significance may be directly related to continuity of use and first-hand knowledge of associated communities. One difficulty of integrating cultural significance into U.S. preservation policy and practice is that it challenges the primacy of adaptive reuse as an ideal outcome. Continuity of use is rarely a preservation priority – we are much more accustomed to thinking about continuity of materials.

If the Showbox was "preserved" and the space adapted as an upscale restaurant, or if El Centro was "preserved" and converted to luxury condos, or if Fishermen's Terminal was "preserved" as a pleasure boat marina, the community values associated with these places would be diminished even if the historical or architectural values remained. The gentrification dynamic in these examples is notable as well – continuity of the culturally significant uses of these places serves youth and ethnic and working-class communities, whereas adaptive reuse would more likely serve wealthy residents and tourists. This ethical dimension of preservation's relationship to displacement is often ignored.

Social Significance in Australia

As a final case study, a look at Australia's approach to preserving places valued by present-day communities is both instructive and inspiring. Australia incorporated what they call social value (what we would call cultural significance) as a core criterion in their first federal law, the Australian Heritage Commission Act of 1975. Because social value was included in law, it was later included in the more widely known Burra Charter written by Australia ICOMOS in 1979. The definition of social value focuses on the meanings and associations places hold for living communities. Australian heritage consultant Chris Johnston's excellent report *What is Social Value?* provides an over-

view on how this community-focused approach to preservation integrates with more traditional, material-focused approaches found in Europe and the U.S.

Expertise and Implementation

Ned Kaufman has long argued that we cannot continue to ask people (especially communities of color) what places they value and then ignore what they tell us because those places fail to meet our standards. We have a lot of work to do on that front, and a criterion for cultural significance requiring us to listen to and act on community values may prove to be a significant social justice intervention in the preservation field.

Dealing with present-day significance requires ethnographic research and community engagement, in addition to the usual historical research. Architects, archaeologists, planners and architectural historians rarely have a skill set that includes social science research. Anthropologists, sociologists and folklorists have those skills. So, preservation needs more social scientists, not as an afterthought but as core disciplines for good surveys, nominations and Section 106 reviews.

We already recognize that assessing archaeological resources requires different skills than assessing buildings and landscapes, and we already recognize that places can be significant under multiple criteria. Considering cultural significance in assessment processes could transform the field by better integrating intangible cultural heritage into policy and practice and moving toward a more truly people-centered preservation. ■

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