

Evaluating the Significance of Additions and Accretions
A National Register White Paper
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This paper is intended to supplement not replace information in the National Register Bulletins and other NPS publications. If discrepancies are found between this paper and other NPS publications, the guidance in existing publications should be considered correct. Comments are welcome and should be directed to the author. After review and discussion, the substance of this paper may be incorporated into future publications.

Introduction

The National Register program is receiving an increasing number of requests (additional documentation, tax act projects, and new nominations) requiring that the contributing status be determined for additions to historic properties. The issue of how to treat later additions to historically or architecturally significant properties is not addressed in *How to Apply the National Register Criteria* or any other NR guidance. A clearly articulated policy and guidelines for the evaluation of additions to historic properties, particularly those built less-than-50 years ago, are needed. The following paper examines the issues related to this topic and makes recommendations for a statement of policy and guidelines.

General Approach for Evaluating Integrity

While many of the tax-act related cases are commercial buildings in an urban setting (including corporate complexes), similar issues arise in the National Register evaluation of churches (with education wings or new sanctuaries), schools (with less-than-50 gymnasiums or auditoriums), museums and libraries, industrial complexes, and college campuses. Buildings with later additions may also have undergone other alterations that may or may not be considered historically significant.

The date and physical character of the addition and the reasons the property meets the National Register Criteria are important factors in evaluating whether or not an addition contributes to a property's significance. An assessment of the effect of the addition on the property's historic integrity is an important step in evaluation and may also become a deciding factor in eligibility, especially in cases where a question of incompatibility arises between the old and the new.

--For already-listed properties, the additions may have been built outside the previously recognized period of significance and require the evaluation of a longer or additional period of significance. This sometimes means extending the period of significance into the less-than-fifty-year period through a nomination amendment.

--For new nominations, the evaluation of later additions will directly relate to 1) the approval of a period of significance for the property, and 2) the contribution the addition makes to the significance of the property. In some cases--when a later addition is out of scale with the historic property, is incompatible in design and materials, or has damaged, obscured, or obliterated significant character-defining features--the effect of an addition on the property's historic integrity may become a determining factor of eligibility.

Relationship to Qualifying National Register Criteria and Criteria Consideration G

The National Register Criteria for which the property is eligible or listed will affect the determination of whether or not an addition is considered historically significant or contributing. Period of Significance is a primary factor in evaluating the significance of an addition, and the approach taken to define a property's period of significance will vary from criteria to criteria. Criteria A and B most often call for a continuing period of significance, unless the significance relates to one or more singular events or activities or a brief period of historic activity or association (e.g. a Civil War battlefield). Criterion C, on the other hand, most often calls for a brief period of significance usually based on the date of construction. Less-than-fifty-year-old additions that have dramatically transformed a property's appearance should be considered new construction and be evaluated in its entirety under Criterion Consideration G.

Properties listed under Criteria A and B most often have a lengthy period of significance. Here the evaluation of whether an addition contributes or not is generally based on whether or not it was constructed within the period of significance. The problem with less-than-fifty-year resources becomes one of deciding an appropriate "historic" period for the property and linking the more recent additions to the continuing significance of the property. National Register guidance encourages the selection of a closing date based on historical events or the duration of significant activities or historical associations, provided a reasonable explanation is given to justify a particular closing date. Past practice, however, indicates most periods of significance are "cut-off" at the fifty-year mark, whether or not a reasonable argument could be made to extend the period to a more rational and historically relevant point in the history of the property. While this practice avoids the less-than-fifty-year issue altogether for some areas of significance, it results in the recognition of an arbitrary and meaningless closing date (that almost immediately is out of date).

A short period of significance (usually limited to the date of construction) is often identified for properties listed only for significance in design (landscape architecture, architecture, engineering, and community planning) under Criterion C. Significant additions and alterations are recognized by additional periods of significance (based on their respective construction dates). This means that in order to be contributing a later addition must not only be compatible but also have design significance (either by contributing to the significance of the earlier design or in its own right). Less-than-fifty year old additions will need to demonstrate strong architectural character that ties it to the historic building and, in many cases, qualifies as exceptionally important under Criterion Consideration G. Because integrity requirements for materials, design, and workmanship may be higher for properties having design significance, the evaluation of additions are more often likely to require a critical examination of historic integrity; this will likely mean assessing the effect of the addition on the property's overall design.

WORKING DRAFT
National Register White Paper
Additions and Accretions

While Criteria Consideration G calls for properties less-than-fifty-years of age to have “exceptional importance,” it does not address when later additions should be considered a significant and contributing aspect of a historic property’s evolution. The wording of Criteria Consideration G allows the extension of the period of significance for historic districts several years beyond the fifty-year mark so that resources that are “integral” parts of a historic district may be recognized as contributing (this issue is treated in *How to Apply, Guidelines on Evaluating Properties that Have Achieved Significance within the Past 50 Years; and Guidelines for Evaluating and Documenting Historic Residential Suburbs*). Because this concept does not apply to individually nominated properties, the contribution of less-than-fifty additions must be based on a justification that the property possesses exceptional importance or that the significance of the property continued into the less-than-fifty period. In most cases, evaluations of less-than-fifty-year additions require strong significance either under A and B or C (approaching if not actually possessing exceptional significance).

There are several key issues here that can be examined by asking a set of questions:

Continuing significance

--In the case of properties significant for their association with events or important persons (Under A & B), how does the addition reflect the continuing significance of the property? Has a reasonable argument been made for the closing date of the period of significance? Can the addition be considered part of the historic evolution/development of the property? Is it compatible in size, scale or character to the original building and earlier additions (already recognized as significant)?

Significance for Design

--In the case of architecturally significant resources (Criterion C only), does the addition possess architectural importance in its own right? Is it consistent with the design of future additions as specified in the original historic plans (e.g. Dulles Airport)? If less-than-fifty years of age, does the addition possess exceptional importance? Is it an outstanding example of its period and/or type, the work of a master, or “architecturally compatible” design of the late 20th century? Have later additions damaged historically significant or character-defining features?

Impact of Additions and Accretions on Historic Integrity

The NR Bulletin, *How to Apply the Criteria* (pp. 44-7), states that “Integrity is the ability of a property to convey its significance,” and “Ultimately the question of integrity is answered by whether or not the property retains the identity for which it is significant.” These guidelines set forth a process of evaluating integrity whereby the presence of each of the seven attributes (location, design, setting, materials, workmanship, feeling and association) is considered in relationship to the property’s significance. While this process is useful when focused upon the primary resource, it does not provide much direction in dealing with additions.

WORKING DRAFT
National Register White Paper
Additions and Accretions

Although the Secretary of the Interior's Standards for Rehabilitation (see Appendix) are not intended for evaluation purposes, they provide terminology and a set of values for "good practice" that can be useful for evaluating additions. Whereas National Register guidance is concerned with the impact of alterations on significant features, the Secretary's standards focus on "character-defining" features. Derived from the standards, the following sets of questions can help evaluate the impact of an addition and other changes on a historic property.

Compatibility

-- Is the addition sympathetic to or compatible with the historic property? How does it compare in size, scale, materials, design, and workmanship? What other alterations occurred at the time the addition was construction? Do these cumulatively affect the property's historic integrity?

Accurate Representation

-- How do the addition and any related alterations affect the property's ability to accurately portray its history and physical evolution? Does the addition read as an addition to an earlier building? Does the addition accurately represent the property's history and physical evolution? Does it evoke a false sense of history or mask the property's significant historic character?

Protection of Significant Features and Reversability

-- What is the nature of the connection joining the historic building and addition (exterior and interior)? What alterations and changes occurred to the design, materials, and workmanship of the original building when the addition was constructed (including any changes to the exterior walls or internal corridors to accommodate the addition)? Are changes reversible? Were any significant landscape elements (courtyards, gardens, vistas, etc.) altered or lost when the addition was built?

Visibility

-- Has the addition obscured, covered, or altered the principal facades, historic entrances, or character-defining (significant) features of the property? How conspicuous is the addition in views of the principal elevations? How conspicuous is it in views of (secondary) minor elevations? How does the addition interrupt, interfere with, or dominate any historically significant views of the building or important views seen from the building (including the orientation of the building to the street, scenic vistas, views of an inner courtyard or surrounding campus, or the principal facades as viewed from various approaches)?

Some General Principles to Follow

The following principles should be considered when evaluating the impact of an addition on a historic building and determining the significance of the addition.

WORKING DRAFT
National Register White Paper
Additions and Accretions

- o An addition should fall within the period of significance, and, in some cases, its date of construction may be used as the closing date of an extended period of significance.
- o An addition should be sympathetic to the original design (i.e. stylistically appropriate, sensitively rendered, compatible in size and scale, similar or compatible materials). Both the impact of an addition on the original design and historical fabric and the cumulative effect of the addition along with other changes and alterations to the building (window replacements, siding, etc.) should be considered. (To be considered contributing an addition that is not sympathetic in design, it must not substantially damage the historic property and it must have historical importance in its own right (and, if necessary, exceptional importance).
- o An addition should not mimic the historic design to the extent that it becomes indistinguishable from the original building and thereby conveys a false sense of history (matter of veracity and accuracy). The exceptions, here, are the many additions of the 1920s to 1940s which represent recognized patterns of period design which called for replication of the historic design characteristics.
- o An addition should not overwhelm or dominate the historic character of the property as a whole or alter the property's character-defining features (including significant open space). Out-of-scale additions, rooftop additions, and additions that obscure principal elevations are particularly problematic (unless they are stepped back and appear small in scale) and may be difficult to justify as contributing.
- o An addition should not hide a building's principal façade from the public right of way and other significant viewpoints, or change the perceived orientation of entrances.
- o An addition should not impair significant or character-defining features of the historic resource.

Appendix: Secretary of the Interior’s Standards for Rehabilitation

The wording of the following Standards relate to evaluations of historic integrity and are relevant to the evaluations of whether or not an addition contributes to a property’s historic significance.

“The historic character of a property shall be retained and preserved.” (Standard 2)

“Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development...shall not be undertaken.” (Standard 3)

“Most properties change over time; those changes that have acquired historic significance in their own right shall be retained. (Standard 4)

“New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment.” (Standard 9)

“New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.” (Standard 10)

WORKING DRAFT
National Register White Paper
Additions and Accretions