

Introduction

I am very disappointed in the level of detail that the *Fourth and Fifth Avenue Historic District Study Report* contained. Considering this issue is so highly politically charged I would expect the report to have addressed more detail about the historical integrity in relation to the significance of the district. In particular, I was hoping for more detail in regards to the standard used for determining whether a house was contributing to the district or not and what logic/reasoning went into the decision that a specific house was contributing.

I would like to make clear at this point that I am not saying the recommendation that the study committee made is incorrect. I do, however, believe that more logic, fact based reasoning and data needs to be included in the report so that the community and city council understands what criteria were used for evaluating the district. The study committee's report relays the conclusion (recommendation for historic district), but provides little evidence or data to support the conclusion and in essence says, "trust us" on how we determined it.

Currently the report has much detail in regards to the history of who lived there but it's insufficient in the following areas:

- The report does not go into detail regarding the significant events claimed in the report.
- The report does not go into detail regarding the significant persons claimed in the report.
- When it comes to the criteria used for the evaluation of the historic integrity it is sorely lacking in detail, yet the study committee concludes that 100% of the properties are contributing. What standard was used? Was the standard established by the by the U.S. Secretary of the Interior used in evaluating the properties? No standard was described.

If, however, a different standard was used, such as establishing that a house is contributing based upon its creation date (i.e. age) rather than evaluating the historic integrity or historic fabric of the house, then this non-conforming standard should be defined in the text of the report. Also, any data that would have been collected under the conforming standard of the NPS should also be included so that the city council and/or community has the option of evaluating the properties using the recommended standards set forth by the NPS.

- Most of the data collected to evaluate criteria were omitted from the report. I am assuming that each house was evaluated using the criteria suggested by the Michigan Historical Center State Historic Preservation Office and established by the U.S. Secretary of the Interior.

I am requesting that the data and evidence used by the committee to support the claims within the study report be inserted into the report.

The criteria that the study committee are required to use are referenced in the following:

According to Chapter 103 8:408.3 of the Ann Arbor city code (see appendix I):

*the study committee shall be guided by the selection criteria for evaluation issued by the United States secretary of the interior for inclusion of resources in the national register of historic places, as set forth in **36 CFR part 60**, as amended, **and criteria established or approved by the SHPO***

The Michigan State Historic Preservation Office (SHPO) says (see Appendix III):

*The criteria that a historic district study committee must apply when determining the historic significance of historic resources and the boundaries of historic districts are the criteria and considerations developed by the **U.S. Secretary of the Interior for the creation of historic districts, as set forth in National Register Bulletin 15: How to Apply the National Register Criteria***

Secretary of the Interior, National Register Bulletin 15: How to Apply the National Register Criteria states (see Appendix IV):

For a property to qualify for the National Register it must meet one of the National Register Criteria for Evaluation by:

- *Being associated with an important historic context **AND***
- *Retaining historic integrity of those features necessary to convey its significance.*

The steps in assessing integrity are:

- **Define the essential physical features that must be present** for a property to represent its significance.
- Determine whether the essential physical features are **visible** enough to convey their significance.
- Determine whether the property needs to be compared with similar properties. And,
- Determine, based on the significance and essential physical features, which aspects of integrity are **particularly vital** to the property being nominated and if they are present.

Criteria for Evaluation

According to NATIONAL REGISTER OF HISTORIC PLACES TITLE 36 CFR 60 Sec 60.4 Criteria for evaluation (see Appendix II), an eligible property in the district must possess integrity and possess one of the following criteria to be significant, but none of these criteria are explained in the report:

(1) Criterion A: *that are associated with events that have made a significant contribution to the broad patterns of our history*

The report does not appear to identify any “events.” The report speaks to the immigration of the Germans into this area, yet specifically says that most of the German immigrants actually chose to live not in the proposed district, but instead in the Old West side. If the German immigration was significant to the City of Ann Arbor history, there is no language in this section that says “why” this immigration is important versus any other immigrant group in Ann Arbor. What makes this group stand out? Why is the German immigration important for any reason? The report only makes assertions of fact with no references or evidence to back up the claim that this immigration event is significant to the City of Ann Arbor history.

According to the Secretary of the Interior , National Register Bulletin section VI (see Appendix IV)

The property you are evaluating **must be documented**, through accepted means of historical or archeological research (including oral history), to have existed at the time of the event or pattern of events and to have been associated with those events. **A property is not eligible if its associations are speculative.**

If the immigration “event” was documented then this information needs to be inserted into the report.

(2) Criterion B: *that are associated with the lives of persons significant in our past.*

The people included in this section have their titles (i.e. Mayor) mentioned but the report does not explain what these people accomplished or their impact

upon the history of the city. An accomplishment – not a title – makes a person significant.

According to the National Park service Bulletin 15 section VI (see Appendix IV)

The persons associated with the property must be individually significant within a historic context. **A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group.**

Eligible

The residence of a doctor, a mayor, or a merchant is eligible under Criterion B if the person was significant in the field of medicine, politics, or commerce, respectively.

Not Eligible

A property is not eligible under Criterion B if it is associated with an individual about whom no scholarly judgment can be made because either research has not revealed specific information about the person's activities and their impact, or there is insufficient perspective to determine whether those activities or contributions were historically important.

Language and references specific to the accomplishments of these Ann Arbor citizens needs to be inserted into the report to show that this claim is valid.

- (3) **Criterion 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**

This section should presumably include the standard and reasoning used for the evaluation of the properties. The survey sheets should contain the data collected along with the analysis pertaining to the specific property.

According to the Secretary of the Interior, National Register Bulletin sect. VIII (see Appendix IV)

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that

constitute that style or technique. A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. **The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.**

In other words if there is little original historic fabric remaining on the house, the house is not eligible for consideration. The data need to be collected for an accurate report to be filed.

Although there is a section dedicated to architectural styles within the district in the History section early in the report, that section merely summarized the architectural styles and why such styles are important. But Criterion C is supposed to establish how the design and construction of each property is significant. The report should therefore include detail along with the explanation of the standard used for contributing vs. non-contributing decision-making.

Criterion C in the study report lists two buildings that were architecturally designed.

According to the Secretary of the Interior, National Register Bulletin section VI (see Appendix IV)

The property must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft.

A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect. For example, not every building designed by Frank Lloyd Wright is eligible under this portion of Criterion C, although it might meet other portions of the Criterion, for instance as a representative of the Prairie style.

Language needs to be included explaining why this particular house is important to the architect's career or the house needs to be included in other sections of Criterion C.

Determining contributing vs. non-contributing

The study committee prepared a survey sheet for each house which listed the style of the house and the materials of the foundation, walls and roof, but there is no language to what that means. Specifically, the report does not explain whether

these materials are original or important and should therefore be preserved. In fact many of the houses appear to have vinyl or aluminum siding and non-original windows (by looking at the pictures). Because the report should make the case that these particular houses are contributing architecturally, there should be some language dedicated to these issues. The report's descriptive notes section essentially reads like a realtor description with a few added notes about some of the architecture.

Above, I referenced the Secretary of the Interior's National Register bulletin 15 (see appendix IV) which provides that the steps in assessing integrity include defining the essential **features that must be present**, determining if they are **visible** and determining if these aspects are **vital to the property**. Considering that the study committee determined that 100% of the houses are contributing, the study committee should describe what went into their decision-making regarding whether something is contributing or non-contributing. The standard used along with the logic and reasoning needs to be described. Should the house have 75% of the original materials or 50%? If the house had vinyl siding (non-original) and non-original windows, should it still be considered a contributing resource because of some other important element? Currently, neither the report nor the survey sheets include any of these details.

The descriptive notes section of the survey sheets should include a more detailed description of the historic fabric of the house, what materials are original, what has been replaced, when were the additions to the houses constructed, etc. Many of these houses have multiple additions added on to them, yet there is no mention of the historical significance of the later additions. When were the additions built? Are they historic in their own right?

Visibility

Special attention should be paid to physical features that are covered up with modern materials with more emphasis place on whether there is enough historical fabric that is visible. The NPS states (see Appendix IV).

*Properties eligible must not only retain their essential physical features, but the features must be **visible** enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction.*

If the historic exterior building material is covered by non-historic material (such as modern siding), the property can still be eligible if the significant form, features, and detailing are not obscured.

Language needs to be included that justifies a determination of “contributing” for all houses that have major physical features that are covered up.

Special attention should be paid to the additions that are added to the front of the original house. According to the NPS (see Appendix IV):

*If a property's **exterior is covered by a non-historic false-front** or curtain wall, **the property will not qualify** under Criteria A, B, or C, because it does not retain the visual quality necessary to convey historic or architectural significance. Such a property also cannot be considered a contributing element in a historic district, because it does not add to the district's sense of time and place. If the false front, curtain wall, or non-historic siding is removed and the original building materials are intact, then the property's integrity can be re-evaluated.*

If the addition that is added on to front of the house is modern (within 50 years) does that qualify as a false front? There are at least a couple of properties that have additions on to the front of the original house as stated on their survey sheets.

Properties owned by Religious institutions

The National Register of Historic Places (see Appendix II) clearly provides that:

properties owned by religious institutions or used for religious purposes.....shall not be considered eligible. 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

Because the criteria clearly stipulate that religious institutions are ineligible, the report needs much more definitive language regarding why the church at 423 S. Fourth and the house at 437 S. Fourth, which is owned by the church, are considered eligible and are contributing resources to the district

Broadway Historic District Committee

I realize that the format for this study report is a template that was also used for the Broadway Historic District Study Committee. However, the Broadway study committee was different in an important way. Their report had 25% of the houses being non-contributing and they listed a reason for their disqualification as a contributing historic resource for the district for many of the houses (i.e. extensive remodeling) in the report. Although one did not know what standard was used to determine a contributing resource to the district, one knew that “a standard” was

used. When the Fourth and Fifth Avenue District Committee classifies everything as contributing, a reader of the report naturally wonders which standard was used or if any standard at all was used. This question can be easily clarified by including more detail on the survey sheets about the historic fabric and integrity of the house.

I was not able to look at the survey sheets for the Broadway Historic district because the link was broken on the city of Ann Arbor website.

Conclusion

A newly established Historic District in the area of Fourth and Fifth Avenue will have an impact on the entire community. I – and the entire community – expect the study committee to be fully transparent in their standards and criteria used when evaluating the proposed district.

Specifically the report needs to modify the following:

- Criterion A: Documentation and/or references need to be included to justify the significance of the German immigration as an “event” or to justify any other implied event that has made a significant contribution to the history of the city.
- Criterion B: Documentation and/or references need to be included to justify the accomplishments of the significant individuals named in this section. An accomplishment – not a title – makes a person significant.
- Criterion C: The study committee needs to explain the criteria used to determine if a property is contributing or non-contributing to the proposed historic district.
- Criterion C: The survey sheets need more detail related to what features are still present, which features are visible along with a more detail description of the history of the additions to the houses.
- Criterion C: More detail is needed explaining how the two buildings that were architecturally designed are unique within the architect’s career.

I therefore request that the report be modified to include the missing information so that the community, the Historic District Commission, the Planning Commission and the City Council all have the relevant information available to them when making their recommendations for approval.

Appendix

I. Chapter 103 8:408.3 of the Ann Arbor City Code

The study committee shall do all of the following:

- a) Conduct a photographic inventory of resources within any proposed historic district following procedures established or approved by the SHPO.
- b) Conduct basic research of each proposed historic district and the historic resources located within that district.
- c) Determine the total number of historic and non-historic resources within a proposed historic district and the percentage of historic resources of that total. In evaluating the significance of historic resources, **the study committee shall be guided by the selection criteria for evaluation issued by the United States secretary of the interior for inclusion of resources in the national register of historic places, as set forth in 36 CFR part 60, as amended, and criteria established or approved by the SHPO**, if any.
- d) Prepare a preliminary historic district study committee report that addresses at a minimum all of the following:
 - I. The charge of the study committee.
 - II. The composition of the study committee membership.
 - III. The historic district or districts studied.
 - IV. The boundaries for each proposed historic district in writing and on maps.
 - V. The history of each proposed historic district.
 - VI. The significance of each district as a whole, as well as as sufficient number of its individual resources to fully represent the variety of resources found within the district, relative to the evaluation criteria.
- e) Transmit copies of the preliminary report for review and recommendations to the historic district commission, the planning commission, the SHPO, the Michigan Historical Commission, and the State Historic Preservation Review Board.
- f) Make copies of the preliminary report available to the public as required by section 8:408(7).

http://www.a2gov.org/government/communityservices/planninganddevelopment/historicpreservation/Documents/FINAL_ADOPTED_%20Chapter_103_09-28-07.pdf

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**II. NATIONAL REGISTER OF HISTORIC PLACES
TITLE 36 CFR 60**

Sec 60.4 Criteria for evaluation

- 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**

<http://www.nps.gov/nr/regulations.htm>

**III. Michigan Department of History, Arts and Libraries Michigan
Historical Center State Historic Preservation Office (SHPO)**

Criteria for Evaluating Resources for Inclusion in Local Historic Districts

Page 2 Criteria for Historic District Boundary Determinations

The criteria that a historic district study committee must apply when determining the historic significance of historic resources and the boundaries of historic districts are the criteria and considerations developed by the U.S. Secretary of the Interior for the creation of historic districts, as set forth in ***National Register Bulletin 15: How to Apply the National Register Criteria***

http://www.michigan.gov/mshda/0,1607,7-141-54317_21884-59512--,00.html

**IV. U.S. Department of the Interior, National Park Service
National Register Bulletin 15: How to Apply the National Register Criteria
(excerpts, please see webpage for complete section)**

Section III. HOW TO USE THIS BULLETIN TO EVALUATE A PROPERTY

For a property to qualify for the National Register it must meet one of the National Register Criteria for Evaluation by:

- Being associated with an important historic context **and**
- Retaining historic integrity of those features necessary to convey its significance.

Section VIII. HOW TO EVALUATE THE INTEGRITY OF A PROPERTY

Historic properties either retain integrity (this is, convey their significance) or they do not.

SEVEN ASPECTS OF INTEGRITY

Location
Design
Setting
Materials
Workmanship
Feeling
Association

ASSESSING INTEGRITY IN PROPERTIES

Integrity is based on significance: why, where, and when a property is important. Only after significance is fully established can you proceed to the issue of integrity.

The steps in assessing integrity are:

- **Define the essential physical features that must be present** for a property to represent its significance.
- Determine whether the essential physical features are **visible** enough to convey their significance.
- Determine whether the property needs to be compared with similar properties. And,
- Determine, based on the significance and essential physical features, which aspects of integrity are particularly vital to the property being nominated and if they are present.

DEFINING THE ESSENTIAL PHYSICAL FEATURES

All properties change over time. It is not necessary for a property to retain all its historic physical features or characteristics. The property must retain, however, the essential physical features that enable it to convey its historic identity. The essential physical features are those features that define both why a property is significant (Applicable Criteria and Areas of Significance) and when it was significant (Periods of Significance). They are the features without which a property can no longer be identified as, for instance, a late 19th century dairy barn or an early 20th century commercial district.

Criteria A and B

A property that is significant for its historic association is eligible if it **retains the essential physical features that made up its character or appearance during the period** of its association with the important event, historical pattern, or person(s). If the property is a site (such as a treaty site) where there are no material cultural remains, the setting must be intact.

Archeological sites eligible under Criteria A and B must be in overall good condition with excellent preservation of features, artifacts, and spatial relationships to the extent that these remains are able to convey important associations with events or persons.

Criterion C

A property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique. A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.

Archeological sites eligible under Criterion C must be in overall good condition with excellent preservation of features, artifacts, and spatial relationships to the extent that these remains are able to illustrate a site type, time period, method of construction, or work of a master.

Historic Districts

For a district to retain integrity as a whole, the majority of the components that make up the district's historic character must possess integrity even if they are individually undistinguished. In addition, the relationships among the district's components must be substantially unchanged since the period of significance.

When evaluating the impact of intrusions upon the district's integrity, take into consideration the relative number, size, scale, design, and location of the components that do not contribute to the significance. A district is not eligible

if it contains so many alterations or new intrusions that it no longer conveys the sense of a historic environment.

A component of a district cannot contribute to the significance if:

- it has been substantially altered since the period of the district's significance or
- it does not share the historic associations of the district.

VISIBILITY OF PHYSICAL FEATURES

Properties eligible under Criteria A, B, and C must not only retain their essential physical features, but the features must be visible enough to convey their significance. This means that even if a property is physically intact, its integrity is questionable if its significant features are concealed under modern construction.

Archeological properties are often the exception to this; by nature they usually do not require visible features to convey their significance.

Non-Historic Exteriors

If the historic exterior building material is covered by non-historic material (such as modern siding), the property can still be eligible if the significant form, features, and detailing are not obscured. If a property's exterior is covered by a non-historic false-front or curtain wall, the property will not qualify under Criteria A, B, or C, because it does not retain the visual quality necessary to convey historic or architectural significance. Such a property also cannot be considered a contributing element in a historic district, because it does not add to the district's sense of time and place. If the false front, curtain wall, or non-historic siding is removed and the original building materials are intact, then the property's integrity can be re-evaluated.

<http://www.nps.gov/history/nr/publications/bulletins/nrb15/>

Section VI: HOW TO IDENTIFY THE TYPE OF SIGNIFICANCE OF A PROPERTY

Criterion A: Event

Criterion B: Person

Criterion C: Design/Construction

Criterion D: Information Potential

****For a complete listing of the Criteria for Evaluation, refer to Part II of this bulletin**

The National Register Criteria recognize different types of values embodied in districts, sites, buildings, structures, and objects. These values fall into the following categories:

- **Associative value (Criteria A and B):** Properties significant for their association or linkage to events (Criteria A) or persons (Criteria B) important in the past.
- **Design or Construction value (Criterion C):** Properties significant as representatives of the manmade expression of culture or technology.
- **Information value (Criterion D):** Properties significant for their ability to yield important information about prehistory or history.

CRITERION A: EVENT

Properties can be eligible for the National Register if they are associated with events that have made a significant contribution to the broad patterns of our history.

Understanding Criterion A: Event

To be considered for listing under Criterion A, a property must be associated with one or more events important in the defined historic context. Criterion A recognizes properties associated with single events, such as the founding of a town, or with a pattern of events, repeated activities, or historic trends, such as the gradual rise of a port city's prominence in trade and commerce. The event or trends, however, must clearly be important within the associated context: settlement, in the case of the town, or development of a maritime economy, in the case of the port city. Moreover, **the property must have an important association with the event or historic trends, and it must retain historic integrity.** (See Part V: How to Evaluate a Property Within its Historic Context.)

Several steps are involved in determining whether a property is significant for its associative values:

Determine the nature and origin of the property,
Identify the historic context with which it is associated, and
Evaluate the property's history to determine whether it is associated with the historic context in any important way.
Applying Criterion A: Event

A property can be associated with either (or both) of two types of events:

A specific event marking an important moment in American prehistory or history and

A pattern of events or a historic trend that made a significant contribution to the development of a community, a State, or the nation.

The property you are evaluating **must be documented**, through accepted means of historical or archeological research (including oral history), to have existed at the time of the event or pattern of events and to have been associated with those events. **A property is not eligible if its associations are speculative.** For archeological sites, well reasoned inferences drawn from data recovered at the site can be used to establish the association between the site and the events.

Significance of the Association

Mere association with historic events or trends is not enough, in and of itself, to qualify under Criterion A: the property's specific association must be considered important as well. For example, a building historically in commercial use must be shown to have been significant in commercial history.

CRITERION B: PERSON

Properties may be eligible for the National Register if they are associated with the lives of persons significant in our past.

(For further information on properties eligible under Criterion B, refer to National Register Bulletin: Guidelines for Evaluating and Documenting Properties Associated with Significant Persons.)

Understanding Criterion B: Person

Criterion B applies to properties associated with individuals whose specific contributions to history can be identified and documented. Persons "significant in our past" refers to individuals whose activities are demonstrably important within a local, State, or national historic context. **The criterion is generally restricted to those properties that illustrate (rather than commemorate) a person's important achievements.** (The policy regarding commemorative properties, birthplaces, and graves is explained further in Part VII: How to Apply the Criteria Considerations.)

The persons associated with the property must be individually significant within a historic context. **A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. It must be shown that the person gained importance within his or her profession or group.**

Eligible

The residence of a doctor, a mayor, or a merchant is eligible under Criterion B if the person was significant in the field of medicine, politics, or commerce, respectively.

Not Eligible

A property is not eligible under Criterion B if it is associated with an individual about whom no scholarly judgement can be made because either research has not revealed specific information about the person's activities and their impact, or there is insufficient perspective to determine whether those activities or contributions were historically important.

CRITERION C: DESIGN/CONSTRUCTION

Properties may be 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.

Understanding Criterion C: Design/Construction

This criterion applies to properties significant for their physical design or construction, including such elements as architecture, landscape architecture, engineering, and artwork. To be eligible under Criterion C, a property must meet at least one of the following requirements:

- Embody distinctive characteristics of a type, period, or method of construction.
- Represent the work of a master.
- Possess high artistic value.
- Represent a significant and distinguishable entity whose components may lack individual distinction.

The first requirement, that properties "embody the distinctive characteristics of a type, period, or method of construction," refers to the way in which a property was conceived, designed, or fabricated by a people or culture in past periods of history. "The work of a master" refers to the technical or aesthetic achievements of an architect or craftsman. "High artistic values" concerns the expression of aesthetic ideals or preferences and applies to aesthetic achievement.

Resources "that represent a significant and distinguishable entity whose components may lack individual distinction" are called "districts." **In the Criteria for Evaluation (as published in the Code of Federal Regulations and reprinted in Part II)**, districts are defined within the context of Criterion C. Districts, however, can be considered for eligibility under all the Criteria, individually or in any combination, as is appropriate. For this reason, the full discussion of districts is contained in Part IV: How to Define Categories of Historic Properties. Throughout the bulletin, however, districts are mentioned within the context of a specific subject, such as an individual Criterion.

Applying Criterion C:

Distinctive Characteristics of Type, Period, and Method of Construction

This is the portion of Criterion C under which most properties are eligible, for it encompasses all architectural styles and construction practices. To be

eligible under this portion of the Criterion, a property must clearly illustrate, through "distinctive characteristics," the following:

- The pattern of features common to a particular class of resources,
- The individuality or variation of features that occurs within the class,
- The evolution of that class, or
- The transition between classes of resources.
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Distinctive Characteristics: "Distinctive characteristics" are the physical features or traits that commonly recur in individual types, periods, or methods of construction. To be eligible, a property must clearly contain enough of those characteristics to be considered a true representative of a particular type, period, or method of construction.

Characteristics can be expressed in terms such as form, proportion, structure, plan, style, or materials. They can be general, referring to ideas of design and construction such as basic plan or form, or they can be specific, referring to precise ways of combining particular kinds of materials.

Type, Period, and Method of Construction:

"Type, period, or method of construction" refers to the way certain properties are related to one another by cultural tradition or function, by dates of construction or style, or by choice or availability of materials and technology.

A structure is eligible as a specimen of its type or period of construction if it is an important example (within its context) of building practices of a particular time in history. For properties that represent the variation, evolution, or transition of construction types, it must be demonstrated that the variation, etc., was an important phase of the architectural development of the area or community in that it had an impact as evidenced by later buildings. **A property is not eligible, however, simply because it has been identified as the only such property ever fabricated; it must be demonstrated to be significant as well.**

Works of a Master

A master 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 property must express a particular phase in the development of the master's career, an aspect of his or her work, or a particular idea or theme in his or her craft.**

A property is not eligible as the work of a master, however, simply because it was designed by a prominent architect. For example, not every building designed by Frank Lloyd Wright is eligible under this portion of Criterion C, although it might meet other portions of the Criterion, for instance as a representative of the Prairie style.