

MODERN ERA

DETERMINATION OF ELIGIBILITY ASSESSMENT TOOL

U.S. GENERAL SERVICES ADMINISTRATION, 2023



INTRODUCTION

In the more than twenty years since the U.S. General Services Administration (GSA) published *Growth, Efficiency and Modernism: GSA Buildings of the 1950s, 60s and 70s* (GEM), the agency has used this national context study and its accompanying GSA Eligibility Assessment Tool (GEM Tool) to guide the documentation and the determination of potential significance of its modern-era resources. In so doing, GSA has honed its understanding of mid-century modern federal architecture and the policies and programs that influenced this period of American design and construction.

Intended to assist GSA associates nationwide in assessing the potential eligibility of modern-era resources under the agency's custody and control for listing in the National Register of Historic Places (National Register), the GEM Tool was soon popularized by the widespread utility of GEM outside of GSA. The GEM Tool became used by many, including State Historic Preservation Officers, Cultural Resource Management contractors, academics and others across multiple disciplines who sought to enhance their understanding of this previously largely unevaluated era. The GEM Tool provided a roadmap for applying the National Register Criteria for Evaluation (National Register Criteria) to new building forms, materials, technologies, and the social and environmental programs that defined decades of American architecture and ingenuity. The GEM Tool established GSA as a leader in the identification and documentation of modern-era resources and established a foundation for better understanding the vast array of buildings that constituted nearly thirty percent of the agency's inventory.

The knowledge gained and lessons learned from years of GEM Tool application well positioned GSA to improve upon this guidance, resulting in the revised and renamed "Modern Era Determination of Eligibility Assessment Tool" (DOE Tool). The updated DOE Tool is designed to improve the consistency of GSA's modern-era property documentation and set forth agency expectations regarding the research, organization, and content accuracy of determinations of eligibility.

PURPOSE OF DETERMINATION OF ELIGIBILITY TOOL

GSA relies heavily on its proactive National Historic Preservation Act of 1966 (NHPA) Section 110 stewardship program to inform project planning and guide asset management and reinvestment decisions. Awareness of a property's potential eligibility for the National Register, and therefore its potential to become a historic property, is necessary for accurate project planning and coordination with Section 106 of the NHPA. Section 106 requires federal agencies to consider the effects on historic properties of projects they carry out, assist, fund, permit, license, or approve. If a federal or federally assisted project has the potential to affect historic properties, Section 106 review is necessary. The DOE Tool is designed to supplement and not supplant the National Register Criteria; it is intended to provide additional guidance to GSA in its evaluation and documentation efforts and to improve agency-wide understanding of modern-era construction, building materials, style definitions and, in particular, the impact of federal modern-era construction on communities nationwide.

CHANGES TO DOE TOOL FROM PREVIOUS ELIGIBILITY ASSESSMENT TOOL

The updated DOE Tool reflects the expertise developed over more than two decades of application of the GEM Tool and lessons learned in the process. A significant catalyst for revision was GSA's modernization of the Anthony J. Celebrezze Federal Building in Cleveland, Ohio, where, in accordance with established stewardship practices, GSA contracted with a distinguished modernism expert for a determination of eligibility for the property.

The issue that came to light with the Celebrezze assessment, and then numerous determinations that would follow, was that—despite how the building may have been evaluated using GSA's established national context as the basis for National Register Criteria evaluation—local considerations became the most important factors justifying eligibility.

“... DESPITE HOW THE BUILDING MAY HAVE BEEN EVALUATED USING GSA'S ESTABLISHED NATIONAL CONTEXT AS THE BASIS FOR NATIONAL REGISTER CRITERIA EVALUATION—LOCAL CONSIDERATIONS BECAME THE MOST IMPORTANT FACTORS JUSTIFYING ELIGIBILITY.”

As part of GSA's Section 106 consultation process for the modernization project for the Celebrezze Building, GSA committed to updating the GEM Tool to reinforce the need for comprehensively examining statewide and local significance. In addition, GSA worked to make the DOE Tool more universally applicable and less leading in terms of areas of interest or particular influences. It acknowledges debates within the field about exceptional significance and reflects on issues of diversity, equity and

inclusion. It is more thoughtful than prescriptive and expands on style descriptions. Ultimately, the DOE Tool aims to improve the quality of significance evaluations upon which final determinations rely.

WHO SHOULD USE THE DOE TOOL

The DOE Tool is intended to be used by professionals having specialized knowledge in architectural history and meeting the Secretary of the Interior's Professional Qualifications Standards, previously published in 36 CFR Part 61. If a GSA property is being evaluated, assessments are initiated by the Regional Historic Preservation Officer (RHPO) for the GSA region in which the property is located.

HOW TO USE THE DOE TOOL

When applying the National Register Criteria to a GSA property, users should use the DOE Tool to inform and refine the application of the criteria. DOE Tool guidance should be applied to significance considerations, ensuring areas specific to GSA properties are adequately and accurately addressed. Evaluations must demonstrate how each of the applicable criteria and criteria considerations have been taken into account and how integrity was sufficiently analyzed (see Applying Aspects of Integrity to Modern-Era Properties). All GSA evaluations must be coordinated by the RHPO.

DETERMINING ELIGIBILITY

This is an internal GSA document designed to guide planning and decision-making concerning buildings in its inventory. It is not intended to compete with official National Register guidance and it does not provide a complete list of National Register Criteria or factors that may contribute to a property's significance. The DOE Tool focuses on principal factors contributing to the significance of GSA buildings, including those under or approaching 50 years of age. Detailed guidance for evaluating buildings is provided in the National Register Bulletin "How to Apply the National Register Criteria for Evaluation" and, specifically for more recent resources in "Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past 50 Years." The DOE Tool is designed to supplement and not supplant National Park Service guidance.

GSA's RHPOs and Federal Preservation Officer make preliminary determinations of eligibility for the agency. Formal determinations require consultation in accordance with applicable federal regulations. The DOE Tool has been developed to assist GSA and its contractors in determining whether or not a property is eligible for the National Register. The RHPO is responsible for directing evaluations, ensuring assessments meet GSA standards and maintaining project records.

IN MAY 2011, GSA DETERMINED THE ANTHONY J. CELEBREZZE FEDERAL BUILDING WAS NOT ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES UNDER CRITERIA CONSIDERATION G FOR EXCEPTIONAL SIGNIFICANCE. IN JULY 2011, THE KEEPER OF THE NATIONAL REGISTER DETERMINED THE PROPERTY ELIGIBLE UNDER CRITERIA A AND C AND CRITERIA CONSIDERATION G FOR EXCEPTIONAL LOCAL HISTORIC AND ARCHITECTURAL SIGNIFICANCE. IN A SECTION 106 MEMORANDUM OF AGREEMENT EXECUTED IN 2013, GSA STIPULATED MINIMIZATION AND MITIGATION MEASURES TO OFFSET THE ADVERSE EFFECTS OF THE AMERICAN RECOVERY AND REINVESTMENT ACT OF 2009 (ARRA) FUNDED DESIGN AND CONSTRUCTION OF A NEW SECURE, ENERGY-EFFICIENT, DOUBLE WALL FAÇADE OVER-CLAD SYSTEM FOR THE CELEBREZZE BUILDING. ONE OF THE MITIGATION MEASURES WAS TO UPDATE GSA'S 2003 GEM TOOL TO BETTER EMPHASIZE CONSIDERATION OF LOCAL SIGNIFICANCE. PHOTO: ANTHONY J. CELEBREZZE FEDERAL BUILDING, CLEVELAND, OHIO, 1967.



ASSOCIATED WITH EVENTS THAT MADE A SIGNIFICANT CONTRIBUTION TO THE BROAD PATTERNS OF HISTORY

Consideration of Criterion A should comply with National Register Bulletin “How to Apply the National Register Criteria for Evaluation” and, for more recent resources, the “Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past 50 Years.” Assessment under Criterion A includes a host of considerations and associations, many outlined in the National Register guidance, and others that may come to light in the research and documentation process. Statements of significance within a GSA determination of eligibility must adequately substantiate claims of association. Association may be one of the most critical yet least explained or understood aspects, and one that suffers considerably from over-simplification in the evaluation of modern-era properties.

Per the National Register, “association is the direct link between a property and the event or person for which the property is significant.” Because so few contexts exist for modern-era properties, assumptions and inferences are common here, but given that ‘association’ factors heavily into determining significance, the bar must be raised on affiliations and relationships. In general, claims of historically significant associations must conform to the following three principles:

- Claims must move from mere inferences or assumed associations to the identification and justification of direct associations
- Associations must align with the appropriate level of significance considered for the property and, given the emphasis placed on the local impact of federal modern-era initiatives, seek to also identify associations beyond the federal context
- Associations must be rigorously substantiated with documentation and clearly stated in the Statement of Significance section.

GSA has received many determination reports claiming a property is associated with a movement or a program or a particular policy simply given the fact that the project was realized in a timeframe consistent with those efforts. Without direct associations and references verifying the influence of a particular initiative(s), the association is weak, and the significance claim unjustified.

For example, most projects completed after 1962 are assumed to have been influenced by the Guiding Principles for Federal Architecture (Guiding Principles), and many determinations of eligibility use this assumption as a basis for significance. In the years since GEM was published, countless evaluations completed for GSA have associated agency projects with the Guiding Principles but failed to identify the project’s direct association with them. The updated DOE Tool requires those researching public buildings constructed by GSA between 1962 and 1973, when the Guiding Principles would have been in consideration, to consult, along with other sources such as GSA press releases and other contemporary information, Record Group 121 at the National

“*STATEMENTS OF SIGNIFICANCE WITHIN A GSA DETERMINATION OF ELIGIBILITY MUST ADEQUATELY SUBSTANTIATE CLAIMS OF ASSOCIATION. ASSOCIATION MAY BE ONE OF THE MOST CRITICAL YET LEAST EXPLAINED OR UNDERSTOOD ASPECTS, AND ONE THAT SUFFERS CONSIDERABLY FROM OVER-SIMPLIFICATION IN THE EVALUATION OF MODERN-ERA PROPERTIES.*”

Archives, to determine if it can be confirmed how and if the project was directly influenced by the Guiding Principles:

- It is not enough to suggest an association with a specific local, state or federal program simply given the time frame in which the project was realized; or
- to connect a project to a master plan or urban renewal effort without referencing a primary source record of such; or
- to infer influence from other public or private projects without documentation.

Below are the specific areas and aspects of consideration within Criterion A where GSA seeks more clarity and deliberation when determining eligibility for the federal properties in its custody and control.

SIGNIFICANT PUBLIC BUILDING PROGRAM: PUBLIC SOCIAL OR ENVIRONMENTAL PROGRAMS OF ERA

Consider public social and environmental goals of the period and discuss if and how the property embodies the distinct characteristics that directly reflect these objectives:

- Does the property embody the goals of a significant federal, state or local initiative, Executive Order or legislation? If so, which and what directly associates it to the property?
- Can the property be directly associated with specific national or local redevelopment or revitalization programs? If so, what is the context of its association?
- Was the project, its location or use dictated or influenced by a master plan and, if so, was it realized in accordance with the plan or did it diverge from the plan?

Assessment must make the distinction between concept proposals and completed projects. For instance, where the project was proposed for construction via a master planning process versus where it was actually constructed. If the realized project differed, how so and how does that affect the assessment of significance as it relates to the associated planning and design process?



THE FEDERAL BUILDING IN ANN ARBOR, MICHIGAN, IS SIGNIFICANT UNDER CRITERION A BY EMBODYING THE FEDERAL GOVERNMENT'S RESPONSE TO THE ENERGY CRISIS. IT IS ALSO SIGNIFICANT LOCALLY UNDER CRITERION C FOR ARCHITECTURE AS IT IS UNIQUE FROM OTHER MODERN-ERA BUILDING STOCK IN ANN ARBOR AND FOR ITS PASSIVE DESIGN STRATEGIES THAT RESULTED IN ITS STEPPED AND ANGLED GLASS FAÇADE. THE PROPERTY MEETS CRITERION CONSIDERATION G BECAUSE IT IS EXCEPTIONALLY SIGNIFICANT AS A VITAL STEP IN THE FEDERAL GOVERNMENT'S SOLAR POWER RESEARCH AFTER THE 1973-1974 OPEC OIL EMBARGO. PHOTO: FEDERAL BUILDING, ANN ARBOR, MICHIGAN, 1977.

PUBLIC BUILDING ICON

- Did a significant historical figure, such as a president, major activist, or notable individual have a particular link, other than building name, to the property?
- What aspects of the property – such as its development history, massing, materials, use, impact on community, community gathering place – contribute to defining it as a symbol?
- How was the project received during and upon construction completion? Did the property become an integral part of its community, an active public building upon which the community relied? If so, document functions, services provided, and events associated.
- Is it recognized as an icon nationally, statewide or locally? If interpreted as a symbol of the federal government, describe specifically how.

A sense of the community's involvement in the design and construction of the property, whether or not it was advocated for or against, and how it was received both aesthetically and from a federal presence perspective is critical and should be addressed, and further substantiated through local newspaper accounts and other documentation.



THE BYRON G. ROGERS FEDERAL BUILDING AND U.S. COURTHOUSE WAS DETERMINED LOCALLY SIGNIFICANT UNDER CRITERION A AS A REPRESENTATION OF A NEARLY THREE-DECADE PLANNING EFFORT BY THE CITY OF DENVER TO WORK WITH THE FEDERAL GOVERNMENT TO ESTABLISH A FEDERAL DISTRICT AT THE HEART OF DOWNTOWN DENVER. IT IS SIGNIFICANT UNDER CRITERION C AS AN EXCELLENT EXAMPLE OF NEW FORMALISM, REFLECTING THE PARTNERSHIP OF NOTED DENVER ARCHITECTURAL FIRMS FISHER & DAVIS AND JAMES SUDLER ASSOCIATES, AND AS A REINTERPRETATION OF CLASSICISM WITHIN THE CONTEXT OF THE PERIOD, CAST IN MODERN MATERIALS AND BALANCED WITH A PROGRAM OF EFFICIENT DESIGN AND CONSTRUCTION IN ACCORDANCE WITH FEDERAL DESIGN PRINCIPLES OF THE ERA. PHOTO: BYRON G. ROGERS FEDERAL BUILDING AND U.S. COURTHOUSE, DENVER, COLORADO, 1966. (CAROL M. HIGHSMITH PHOTOGRAPHY, INC.)

LOCATION OF HISTORIC ACTION OR EVENT

- Is the property associated with an important government action or occasion, or an event significant in national, state or local history?
- Is the property the location of an event with far-reaching impact, such as a landmark court decision or a pivotal public demonstration associated with issues of politics, law or diversity, equity and inclusion?

If associated with a significant event, court case, demonstration, legislation, or other effort or program, in accordance with National Register Criteria, those events must be considered in the context of the 50-year threshold and Criteria Consideration G. If events have taken place within the last 50 years, their association must meet Criteria Consideration G to be considered significant.



THE SOCIAL SECURITY ADMINISTRATION BUILDING IN LEWISTON, IDAHO, IS LOCALLY SIGNIFICANT UNDER NATIONAL REGISTER CRITERION A, AS THE FIRST FEDERAL BUILDING CONSTRUCTED UNDER A CONTRACT AWARDED TO A MINORITY OWNED CONSTRUCTION COMPANY UNDER THE PROVISIONS OF 8(A) OF THE SMALL BUSINESS ACT IN THE UNITED STATES. THE AWARD OF THE CONSTRUCTION CONTRACT REPRESENTS A SIGNIFICANT CONTRIBUTION TO EFFORTS OF THE FEDERAL GOVERNMENT TO ADDRESS ECONOMIC DISCRIMINATION AGAINST MINORITY COMMUNITIES THROUGH PROGRAMS SUCH AS THE 8(A) PROGRAM. PHOTO: SOCIAL SECURITY ADMINISTRATION BUILDING, LEWISTON, IDAHO, 1972.

CRITERION

B

ASSOCIATED WITH THE LIVES OF PERSONS SIGNIFICANT IN OUR PAST

Consideration of Criterion B should comply with National Register Bulletin “How to Apply the National Register Criteria for Evaluation” and, for more recent resources, the “Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past 50 Years.” Assessment under Criterion B includes a host of considerations and associations, many outlined in the National Register guidance, and others that may come to light in the research and documentation process. Below are the specific areas and aspects of consideration within Criterion B where GSA seeks more clarity and deliberation when determining eligibility for the federal properties in its custody and control.

DIRECT ASSOCIATION TO SIGNIFICANT INDIVIDUAL

- Did a significant historical figure, such as a president, major activist, or notable individual have a particular link, other than building name, to the property?
- What is the length and nature of the association of the individual with the property?
- Did a significant individual, as defined within the National Register criteria, occupy space in the building within the period of time of their useful life associated with the significance of the individual? If so, does the space occupied by that individual retain its integrity to this period of significance?

If there is another property in the region or nationally that better reflects the contributions and career of the individual, comparable discussion for context and significance consideration purposes is required.

THE J.J. PICKLE FEDERAL BUILDING IS SIGNIFICANT UNDER CRITERION A AND CRITERION B FOR ITS ASSOCIATION WITH THE PRESIDENCY OF LYNDON B. JOHNSON. FROM ITS COMPLETION IN 1965 THROUGH 1969, THE PRESIDENTIAL SUITE ON THE NINTH FLOOR OF THE BUILDING PROVIDED OFFICE SPACE FOR THE PRESIDENT WHILE HE WAS IN TEXAS. HE HELD MANY MEETINGS IN THE BUILDING, THE MOST SIGNIFICANT OF WHICH WAS A MEETING ON DECEMBER 6, 1966, WHICH LED TO THE EVENTUAL SIGNING OF THE SALT AGREEMENT, THE FIRST FORMAL AGREEMENT BETWEEN THE UNITED STATES AND THE SOVIET UNION LIMITING THE USE OF NUCLEAR WEAPONS. THE DECISIONS MADE DURING THIS AND OTHER MEETINGS ARE OF NATIONAL IMPORTANCE, AND THE BUILDING IS SIGNIFICANT UNDER CRITERION CONSIDERATION G (2011) FOR THESE EXCEPTIONAL ASSOCIATIONS. PHOTO: J.J. PICKLE FEDERAL BUILDING, AUSTIN, TEXAS, 1964. (CAROL M. HIGHSMITH PHOTOGRAPHY, INC.)



CRITERION

C

EMBODIES THE DISTINCTIVE CHARACTERISTICS OF A TYPE, PERIOD, OR METHOD OF CONSTRUCTION, OR THAT REPRESENTS THE WORK OF A MASTER, OR THAT POSSESSES HIGH ARTISTIC VALUES, OR THAT REPRESENTS A SIGNIFICANT AND DISTINGUISHABLE ENTITY WHOSE COMPONENTS MAY LACK INDIVIDUAL DISTINCTION

Consideration of Criterion C should comply with National Register Bulletin “How to Apply the National Register Criteria for Evaluation” and, for more recent resources, the “Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past 50 Years.” Assessment under Criterion C includes a host of considerations and associations, many outlined in the National Register guidance, and others that may come to light in the research and documentation process. Below are the specific areas and aspects of consideration within Criterion C where GSA seeks more clarity and deliberation when determining eligibility for the federal properties in its custody and control.

MASTER ARCHITECT

- Is it a formative or influential design in the portfolio of a significant architect, landscape architect or designer/design team? (For GSA documentation purposes ‘designer’ has been defined here to include architects, landscape architects, designers and design teams, to ensure evaluation is comprehensive in its consideration of those contributing to and responsible for the project.)
- Does the property embody the distinct characteristics associated with the significant work of the designer? What, if any, other works were completed by this same designer in the community and how does this property compare? Consider both era of design and construction and placement within their larger portfolio of work.
- How does this property compare to other public buildings completed by the same designer locally, statewide or nationally? Were there other federal commissions realized by this designer?



THE CHET HOLIFIELD FEDERAL BUILDING WAS DESIGNED BY MASTER ARCHITECT, WILLIAM L. PEREIRA, AND COMPLETED IN 1971. THE BUILDING WAS FORMALLY DETERMINED ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACE IN 2015 UNDER CRITERIA C AND CONSIDERATION G FOR ITS ZIGGURAT FORM — A STEPPED PYRAMID DESIGN RARE IN AMERICAN ARCHITECTURE — AND AS A SIGNIFICANT DESIGN WITHIN PEREIRA’S BODY OF WORK. PHOTO: CHET HOLIFIELD FEDERAL BUILDING, LAGUNA NIGUEL, CALIFORNIA, 1971. (CAROL M. HIGHSMITH PHOTOGRAPHY, INC.)

CRITERION

C

The master architect and design team discussion must make a distinction between quantity and quality of work; a prolific portfolio versus one of high caliber, creativity, ingenuity, influence and innovation to which significance can be assigned.



THE GOLDEN-COLLUM MEMORIAL FEDERAL BUILDING AND U.S. COURTHOUSE IS SIGNIFICANT UNDER CRITERION A AS A PRODUCT OF THE POSTWAR EXPANSION OF THE FEDERAL BUILDING PROGRAM AND THE GROWTH AND MODERNIZATION OF THE FEDERAL COURTS IN FLORIDA. THE BUILDING IS SIGNIFICANT UNDER CRITERION C AS IT EMBODIES THE CHARACTERISTICS OF THE INTERNATIONAL STYLE, AS DESIGNED BY THE PROMINENT JACKSONVILLE-BASED ARCHITECTURAL FIRM KEMP, BUNCH, AND JACKSON. MODERNIST DESIGN VALUES ARE ALSO REFLECTED IN THE INCORPORATION OF HOLLIS HOLBROOK'S MURAL A HISTORY OF MARION COUNTY, IN THE FORMER POST OFFICE LOBBY. PHOTO: GOLDEN-COLLUM MEMORIAL FEDERAL BUILDING AND U.S. COURTHOUSE, OCALA, FLORIDA, 1961. (CAROL M. HIGHSMITH PHOTOGRAPHY, INC.)

EXEMPLIFIES MODERN ERA OR CONTEMPORARY STYLE AND VALUES

- How is the property expressive of the architectural era and movement it represents? What style is it and articulate why it meets this style definition.
- What are the aspects of the property – such as materials, massing, landscape design, site-specific public art, among many others – that embody and convey the distinctive characteristic of its style and period? Distinguish between distinctive characteristics that convey significance versus those elements and features that may be original to the project but do not convey significance.
- Does it represent a stylistic shift in its community? Does it embrace local vernacular influences or introduce a new national style, vocabulary or value?
- If there are other properties of the same era within the community, how does it compare in terms of style, design, ingenuity, innovation and execution? Does it illustrate the finest in contemporary thought?
- Has the property been identified or recognized as the first, or best, or an important example of its kind in terms of style on a national, state or local level? Or is its design banal and rudimentary?

“DISTINGUISH BETWEEN DISTINCTIVE CHARACTERISTICS THAT CONVEY SIGNIFICANCE VERSUS THOSE ELEMENTS AND FEATURES THAT MAY BE ORIGINAL TO THE PROJECT BUT DO NOT CONVEY SIGNIFICANCE.”

THE ABRAHAM A. RIBICOFF FEDERAL BUILDING AND U.S. COURTHOUSE WAS DETERMINED NOT ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES BY GSA, WITH CONCURRENCE FROM THE CONNECTICUT STATE HISTORIC PRESERVATION OFFICE, AS COURT CASES HELD IN THIS FACILITY WERE NOT PIVOTAL OR SIGNIFICANT, THE BUILDING IS UTILITARIAN IN NATURE AND NOT A NOTABLE EXAMPLE OF A SPECIFIC FEDERAL DESIGN EPOCH OR THE INTERNATIONAL STYLE OF ARCHITECTURE, AND IT IS NOT A KEY WORK OF ITS LOCAL DESIGNER. ABRAHAM A. RIBICOFF FEDERAL BUILDING AND U.S. COURTHOUSE, HARTFORD, CONNECTICUT, 1960.



PUBLIC BUILDING PROTOTYPE FOR CONSTRUCTION OR TECHNOLOGY

- Is the property a model in terms of urban planning, technology, functionality, material selection, space design, engineering or methods of construction?
- Did it influence other projects within the state, nationally or locally?
- If innovative at the time of construction, did it function as anticipated and are those elements still operating or have those features been replaced, altered or superseded?
- How does the construction of this property and its materials differ from earlier eras in terms of material selection, production, application and workmanship?

“INNOVATION, IN TERMS OF PUSHING THE DESIGN AND CONSTRUCTION INDUSTRY, IS KEY TO PUBLIC BUILDING PROJECTS. DOCUMENTING HOW A PUBLIC BUILDING PROJECT MAY HAVE SERVED AS A PROVING GROUND FOR ADVANCES OF AN ERA IS CRITICAL TO UNDERSTANDING THE INFLUENCE – AND THEREFORE SIGNIFICANCE – OF PUBLIC CAPITAL CONSTRUCTION PROGRAMS.

If applicable, the discussion should note the significance of innovation at the time of construction, and whether or not associated materials or technology or space required alterations later due to failure. Innovation, in terms of pushing the design and construction industry, is key to public building projects. Documenting how a public building project may have served as a proving ground for advances of an era is critical to understanding the influence – and therefore significance – of public capital construction programs.

SIGNIFICANT ENSEMBLE OR DISTRICT

- Is the project located within an existing designated historic district? What are the periods and areas of significance for that district?
- Is the project part of a documented complex of public buildings or a government ensemble defining a cohesive core or civic center?

If the building is a non-contributing element within an existing historic district defined by a period of significance that ends prior to construction of the property, the building cannot be considered as part of that district until either the building is evaluated as individually eligible or the district's period of significance is amended to encompass the completion date of the building. Determinations of eligibility within the context of a designated district or complex must rely on existing documentation and evaluations.

PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE
WITHIN THE LAST FIFTY YEARS

EXCEPTIONAL SIGNIFICANCE

Consideration of Criterion Consideration G should comply with National Register Bulletin “Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Past 50 Years.” Any property less than 50 years of age that is being evaluated using the National Register criteria must apply Criteria Consideration G: Properties that Have Achieved Significance Within the Past Fifty Years. In order to responsibly plan and best inform agency reinvestment decisions, GSA begins evaluating its properties at 40 years of age to ensure that by the time the property reaches 50, a determination of eligibility has been completed. This proactive stewardship approach requires the consideration of exceptional significance along with the acknowledgement that buildings are being evaluated as if they have reached the defined threshold. Each of the criteria – A, B, C, and D – must be considered in the appropriate context and would not be considered eligible for the National Register unless one or more of the criteria revealed, through substantiated documentation, the property to be exceptionally important. For modern-era properties, eligibility reports produced for GSA should also consider the following:

- Is the property set apart from others by its style, massing, materials? If so, how is it unique in its appropriate context(s)? If materials were exceptional, do they remain and retain integrity?
- Did the property introduce a new, never-before-implemented construction system?
- Did the property require an innovative engineering solution made possible only by technologies of the era?
- Are the unique and innovative characteristics above still integral, functional?
- Has sufficient time passed to obtain a scholarly perspective on the events or individuals associated with the building?

An area of the National Register Criteria that has long been challenging and debated is Criteria Consideration G. In the ongoing assessment of modern-era properties, GSA found experts in the preservation field frequently challenging the validity of the acknowledged arbitrary age threshold and that a building either meets the criteria or it does not, regardless of its age. Until the National Register updates or revises its guidance to direct otherwise, eligibility assessments must comply with the current contents of the bulletin.

APPLYING ASPECTS OF INTEGRITY TO MODERN-ERA PROPERTIES

The seven aspects of integrity outlined by the National Register of Historic Places and discussed in the Statement of Significance, Section 8 of the National Register Registration Form, include location, design, setting, materials, workmanship, feeling and association. Though a property need not retain all aspects of integrity to be eligible for listing in the National Register, all aspects must be considered as part of a determination of eligibility assessment.

When considering integrity, it is important to remember that extant modern-era properties have often undergone a significant amount of repair and maintenance. In part, this is by design: Unlike their older counterparts, federal buildings from the modern era were built with an anticipated lifespan of 20-30 years. As they now approach or exceed 50 years of age, many of their original materials and systems are failing or have failed long ago. This planned obsolescence can also be exacerbated by the fact that architects and engineers of the time, intrigued by the enthusiasm for new technologies that was pervading American life at the time, sometimes specified materials and techniques with unproven track records. When these untested features failed—sometimes catastrophically—immediate remedial measures were often necessary to keep the buildings in active use.

Any analysis of the integrity of a modern-era building must consider a host of issues that take a building's probable history of alterations into account. For example:

- If materials have been replaced, have they been replaced in kind or with compatible new materials?
 - If only fragments of original material remain, does that material contribute to the property's potential historic significance? This is an important question to ask because not all original material is significant. A building may retain original office finishes and restroom fixtures, but this alone would not necessarily establish integrity of materials.
 - Similarly, the removal of certain original features may not affect a property's overall integrity if they were not significant components of the property's original design. Many restrooms have been altered over time to meet accessibility requirements. The removal of original fixtures and finishes in these spaces may not affect a building's overall integrity of materials.
- If the property originally exploited advances in technology or engineering in a way that illustrated the workmanship of the modern era, has evidence of this technological innovation survived through subsequent alterations? For example, if an architect or engineer drew on advances in the production of precast concrete panels to create highly uniform and repetitive exterior facades, has the property been maintained in a way that continues to showcase this consistency of production?
- When viewed cumulatively, have alterations been carried out in a way that respects the property's original design?
- If alterations have been made, to what extent do they affect a property's ability to convey its association with the historic event or person with which it is connected? A property that has been extensively altered may retain integrity of association provided

that the alterations have been carried out in a sensitive manner (e.g., materials have been replaced in kind or with compatible new materials, the original design has been respected). See Criterion A introduction, above, for more information on GSA standards for establishing a significant association.

- Analyses of a property's integrity of location, setting and feeling should be carried out in a manner consistent with similar analyses for non-modern historic buildings.

If the project once embodied characteristics representative of programs and philosophies but they have since been compromised, please include as part of the detailed accounting of alterations,



THE ALCAN BORDER STATION COMPLEX WAS DETERMINED NOT ELIGIBLE FOR LISTING IN THE NATIONAL REGISTER OF HISTORIC PLACES DUE TO A LACK OF INTEGRITY. THE ALASKA STATE HISTORIC PRESERVATION OFFICE, IN THEIR DETERMINATION CONCURRENCE LETTER, STATED 'THE ALCAN BORDER STATION COMPLEX HAD THE POTENTIAL TO BE AN HISTORIC DISTRICT SIGNIFICANT UNDER CRITERION A, REPRESENTING ALASKA'S TRANSITION FROM TERRITORY TO STATE, PRIOR TO THE 2011-12 REMODELING PROJECT THAT CONSIDERABLY DIMINISHED THE PROPERTY'S INTEGRITY. THE ALCAN BORDER STATION COMPLEX MAY HAVE BEEN HISTORICALLY SIGNIFICANT UNDER CRITERION C AS AN EXAMPLE OF FEDERAL ARCHITECTURE THAT CREATED AN IMPOSING FEDERAL PRESENCE MARKING THE OFFICIAL GATEWAY TO THE NEW STATE. HOWEVER, CONSIDERING THE MANY CHANGES AND ADDITIONS THAT HAVE TAKEN PLACE DURING THE LAST 45 YEARS, WE CONCUR THAT THE PROPERTY IS NOT ELIGIBLE FOR THE NATIONAL REGISTER OF HISTORIC PLACES UNDER EITHER CRITERION A OR CRITERION C DUE TO A LOSS OF INTEGRITY. PHOTO: ALCAN BORDER STATION COMPLEX, TOK, ALASKA, 1972.

modifications and improvements over time required by GSA in the description narrative section of the determination of eligibility report.

When preparing a modern-era DOE, one should be alert to certain issues related to the use of materials and building technologies that may become relevant when evaluating the building's significance and analyzing its integrity. These issues relate to the ways in which modern-era buildings utilized materials and technologies that were distinct from their more traditional historic building predecessors. A detailed account of the materials and building technologies that were used should be included in the building description, construction history, alteration history, evaluation of significance, and list of character-defining features sections, as appropriate. Only after it is understood how and why these materials and systems contribute to the building's historic significance can one evaluate, in the integrity analysis section, the extent to which their degree of retention affects the building's ability to convey that significance.

Descriptions of materials and technologies should elaborate on:

- How and why different materials were selected;
- How materials align with or differ from other local building materials, with an emphasis on modern-era buildings;
- How is the modern-era vocabulary reflected in the material selection, either in the material itself or the arrangement and application of that material?
- How and where materials were produced, noting likely varying levels and types of mass production;
- How technology made production possible, relating the size, shape, form, texture and application of materials to its technological production (in other words, the role technology played in enhancing workmanship and/or affecting quality);
- Whether or not technology was utilized to manipulate aesthetics of materials to reflect regional motifs, symbols, characters, etc.;
- How technology and feats of engineering made possible the spaces and special features of the building that simultaneously embody the distinctive characteristics of the era and contribute to its significance.

CONCLUSION

GSA continuously seeks to improve its historic preservation practice through compliance excellence. As part of the Section 106 consultation process for the agency’s modernization of the Anthony J. Celebrezze, Jr., Federal Building in Cleveland, Ohio, GSA committed to updating the GSA Eligibility Assessment Tool (GEM Tool) it originally published in 2003. Years of application—knowledge gained and lessons learned—left GSA well-equipped to develop revised guidance now reflected in this Modern Era Determination of Eligibility Assessment Tool (DOE Tool). The DOE Tool is designed to ensure that efforts to document GSA properties are more consistent in terms of both content and findings, that the guidance is used to supplement and not supplant the National Register Criteria for Evaluation, and that determinations consider and reflect, to a far greater degree, the effect of federal construction on communities nationwide, giving greater consideration to local significance.

The new digital format DOE Tool is available online and accessible to the public. GSA’s updating of the DOE Tool continues the agency’s leadership in modern-era stewardship and fulfills a mitigation stipulation set forth in the *Memorandum of Agreement between the U.S. General Services Administration, the Ohio State Historic Preservation Office, and the Advisory Council on Historic Preservation Regarding the Façade Over-Clad and Security Upgrade Project at the Anthony J. Celebrezze, Jr., Federal Building, Cleveland, Ohio*. Release of the updated DOE Tool concludes GSA’s compliance obligation for this measure under this agreement.