

Local Landmark Reports

Pursuant to NC GS Sections 160D-945 and 946, North Carolina law provides for a straightforward but multi-step procedure for designation of historic landmarks at the local level.

The state enabling legislation requires that *before* recommending designation of a historic landmark to the local governing board, a local preservation commission must find that the property in question meets two criteria: first, that it has **special significance** and, second, that it retains **integrity**. Because these can be variable terms, there has to be some way of explaining why a property is “significant” and how it has “integrity.” Thus, state law specifically requires a report or study to be undertaken on the proposed landmark, based on objective evidence and research and an opportunity for the State Historic Preservation Office to review and comment on the designation report *before* the local governing authority designates a landmark.

- **NC G.S. 160D-945.** *No property shall be recommended for designation as a historic landmark unless it is deemed and found by the preservation commission to be of special significance in terms of its historical, prehistorical, architectural, or cultural importance, and to possess integrity of design, setting, workmanship, materials, feeling and/or association [emphasis added].*
- **NC G.S. 160D-946 (2).** *The preservation commission shall make or cause to be made an investigation and report on the historic, architectural, prehistorical, educational or cultural significance of each building, structure, site, area or object proposed for designation or acquisition. Such investigation and report shall be forwarded to the [State Historic Preservation Office].*
- **NC G.S. 160D-946(3).** *The [State Historic Preservation Office] shall... be given an opportunity to review and comment upon the substance and effect of the designation of any landmark.... Any comments shall be provided in writing. If the [State Historic Preservation Office] does not submit its comments or recommendation in connection with any designation within 30 days following receipt... of the investigation and report of the preservation commission, the commission and any governing board shall be relieved of any responsibility to consider such comments.*

The landmark report should help justify and explain to the general public why the local governing authority’s decision to landmark any property as “historic” is appropriate and defensible. Ultimately, the decision to landmark rests in the hands of the local governing authority, but the report should inform both the general public as well as the local governing authority as to why a property is properly designated a “historic landmark”. The report also serves as a baseline for the preservation commission’s evaluation of Certificate of Appropriateness applications for the property. While the report is sent to both the State Historic Preservation Office (HPO) and the Office of State Archaeology (via the HPO) for review and comment, the report is required for the benefit of the public, the local governing authority, and the preservation commission.

SIGNIFICANCE AND INTEGRITY

Even though a property’s value as a historic resource may seem obvious, the required report sets forth what is known about the property and explains how it meets the statutory criteria for significance and integrity. Because it is both a public record and documented history of the property, a landmark report

must substantially inform and explain why a particular property is worthy of preferential taxation treatment by the local government.

A report must spell out the property's significance and integrity with specific details. When you say a property is **significant**, or important, you have to say why and how. Most of the time, significant properties are those that are fifty or more years old, although considerable age is not necessarily equated with significance. A property can be significant because it is associated with an important historic event (e.g., a building used to house World War II soldiers training for combat), or because it is associated with an important historic person (e.g., an office associated with the community's first doctor), or because it is architecturally distinctive (e.g., an Italianate house or a mill house), or because it holds or may hold important archaeological information (e.g., the site of railroad repair shops now vanished) – or for a combination of these things. One claim of significance usually is sufficient.

The significance claim should be thought of as an argument “making a case” for designation based on evidence. It must be clearly stated and supported by an evaluation of the property's integrity. **Integrity** is the extent to which the building or property looks like it did during the period in which it gained significance. In other words, a property can be said to have integrity if its historic importance can be seen or experienced, rather than imagined. To qualify for designation, a property generally should show integrity in most or all of these six aspects: design, setting, workmanship, materials, feeling, and/or association. (See pp. 47-48 of *Handbook for Historic Preservation Commissions in North Carolina* for an explanation of the aspects of integrity.) In particular, integrity of feeling or association alone is not sufficient, because these are more subjective qualities. Generally, a property retains integrity if it has not been substantially altered and if it is not severely deteriorated or dilapidated.

The integrity criterion gives you the opportunity to explain all the ways in which the property may or may not have been altered over time and how these changes have affected its integrity – specificity is *strongly* encouraged. For instance, if you say a house is important because it is a Federal-era house, then the report must show whether or not it is recognizable as such.

- Some changes can be considered to have attained historic status in and of themselves – for example an 1820s house, which has had its carriage shed demolished and replaced by an auto garage in 1920, or its back porch give way to a 1950 addition. These changes are not original to the house but do represent different historical periods and thus might contribute to an understanding of the property's significance. A change is likely to diminish integrity if it did not occur within the property's period of significance.
- However, some changes detract from integrity because they destroy, damage, or conceal authentic features or elements from historic periods – such as replacement siding, windows, and roofs; or the enclosure of open porches; or the removal of architectural features. These changes must be acknowledged and accounted for in this section. In the case of our Federal-era house, the architectural elements that define it as Federal should be apparent – even if a casual observer could not identify it as “Federal.” A Federal-era house that has had its windows and doors replaced or reconfigured, that has had its siding altered, or that has had porches or wings added may no longer look enough like a Federal-era house to make landmark designation appropriate – no matter how historic it might be!

REPORT FORMAT

In order for the Historic Preservation Office to provide informed and worthwhile comments regarding the proposed designation, each report should contain all of the following information:

I. General information

1. Common and Historical Property Names
2. Physical Address or Location
3. Tax Parcel Identification Number (PIN)
4. Current Owner(s) Name(s)
5. Current Owner(s) Mailing Address(es)
6. Appraised Value of the Property (a copy of the most recent tax card will suffice)

II. Abstract

1. A clear summary statement of the property's significance and degree of integrity in two to three sentences. Why are you proposing designation for this property?
2. A concise statement of what buildings and portion of land are to be included in the designation. Is it all of the legal parcel(s) historically and currently associated with the building(s) or only a portion? The land area included should be, at minimum, that which is historically associated with and which continues to provide historic context for, the building(s) for which designation is proposed.

III. Historic Background

1. A narrative of the property's history that focuses on points relevant to the significance and integrity criteria. A chain of title should not be included unless you are claiming that the property is significant for its association with a historically significant person – and then only those deeds directly related to that person.
2. Date(s) of original construction (use "circa" and a year if the exact year is unknown). The report may need a chain of title to help prove or substantiate the original construction date.
3. Date(s) of all additions and/or alterations (use "circa" and a year if the exact year is unknown)

IV. Assessment

1. A full description of the property's historical, prehistorical, architectural, and/or cultural importance (significance).
2. A complete architectural description of the property. For architecturally significant properties, the description should focus on the elements that define the building's design. For report preparers, commissions, or staff who are unfamiliar with this kind of technical

writing, an outline for an architectural description may be found at <https://files.nc.gov/ncdcr/historic-preservation-office/CLG/ArchitecturalDescriptionTemplate.pdf>

3. A description of any elements that contribute to the property's archaeological significance. A brief archaeological comment should be included in every report. If no known archaeological features are present at the current time, a statement to that effect will suffice.
4. A complete and thorough evaluation of the property's integrity of design, setting, workmanship, materials, feeling, and/or association, fully accounting for all alterations and changes to the property, including those which detract from or do not contribute to the property's significance.
5. A justification of the proposed boundaries of the designation.

V. Supporting documentation

1. Digital photographs that clearly show the overall property in its current condition
 - a. At least 1 digital photograph of each elevation, to the extent they are visible or accessible; if an elevation is not visible, the report must explain why.
 - b. At least 1 digital photograph of each interior feature proposed for designation; if interior features are not to be designated, photographs of interior spaces are encouraged for documentary purposes but are not required.
 - c. Supporting photographs that illustrate architectural features, spatial relationships, orientation, size, scale, and texture, or which otherwise illustrate context
 - d. Digital photographs should be submitted to the Local Government Program Coordinator via Drop Box or saved to a cd or flash drive and mailed.
2. A sketch floor plan of the building(s). It does not have to be of "draftsman quality" or exactly to scale, but should clearly show arrangement of spaces and their relationship to one another. Floor plans may be drawn by hand with a ruler and legible printing or may be created with graphics or drafting software.
3. A site plan (preferably but not necessarily drawn to scale) showing:
 - a. the property's location
 - b. location of primary structures
 - c. location of all outbuildings and appurtenant features (e.g., a well)
 - d. major landscape and hardscape features such as large, ancient trees, driveways, and walkways
 - e. the boundaries of the proposed designation.
4. Plat or tax map, including the tax appraised value of the property.
5. Any other information the local governing board deems necessary.

VI. Bibliography/Source Citations

Note: If the property has been listed individually in the National Register of Historic Places, the National Register nomination might serve as the substance of the local designation report, either verbatim or re-formatted to meet the report guidelines set forth by the local commission (including a cover form required by the commission). If the property boundaries for the local designation are different from those for the National Register nomination or if there have been physical changes to the property since the nomination was written, the nomination may substantively serve as the designation report as long as an explanation of the different boundary and physical changes to the property are incorporated in the report. The usefulness of a nomination depends on when the property was listed and the amount and quality of information in the nomination. Because of the passage of time and changes that may have happened in the interim period, nominations written prior to ca. 2015 may need to be augmented for the architectural description and/or the significance section of the designation report.

SUBMITTAL. Please send completed reports to:

Kristi.brantley@ncdcr.gov

Or

Local Government Program
Attn: Local Landmarks Reports
North Carolina State Historic Preservation Office
4617 Mail Service Center
Raleigh, NC 27699-461