## DOCUMENT RESUME

ED 351 252

SO 022 504

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TITLE

Women's History Landmark Project: Policy and

Research.

INSTITUTION

National Coordinating Committee for the Promotion of

History, Washington, DC.

PUB DATE

[92] 10p.

NOTE PUB TYPE

Reports - Evaluative/Feasibility (142)

EDRS PRICE

MF01/PC01 Plus Postage.

DESCRIPTORS

\*Federal Programs; \*Females; Historiography; Sex

Bias; \*United States History; Womens Studies

IDENTIFIERS

\*Historical Landmarks; \*Womens History Landmark

Project

## **ABSTRACT**

The Women's History Landmark Project was undertaken in order to increase the number of National Historic Landmarks (NHL) that focus on women. Despite the fact that the NHL Program is over 25 years old, only about 3 percent of the approximately 2,000 National Historic Landmarks focus on women. When the Women's History Landmark Project ends, the percentage of NHLs associated with women will probably have increased from 3 to 4.5 percent. This report describes the difficulties the project encountered in securing new NHLs associated with women. The difficulties fall into several categories: first, many of the buildings associated with women do not meet the History Division of the National Park Service's standard of physical integrity; second, many of the owners have not submitted written letters to officially support the nominations; third, the National Historic Landmarks criteria requiring "national significance" has a built-in bias for an elitist approach to history that disregards much recent scholarship in women's history; fourth, nominations of structures that represent trends in women's history, as opposed to recognizing notable women, are difficult to develop; fifth, the NHL Program has an unduly long review process and many bureaucratic procedures for considering properties; sixth, many important events in women's history took place in buildings that women did not own and that were not primarily associated with women, making it more difficult to make the case for NHL designation; seventh, and finally, the ground rules for the preparation of NHL nominations are constantly changing. (DB)

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Women's History Landmark Project: Policy Research

by

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Women's History Landmark Project: Policy and Research

by Page Putnam Miller, Director of the National Coordinating Committee for
the Promotion of History

In 1989 the Organization of American Historians and the National Coordinating Committee for the Promotion of History entered into a cooperative agreement with the National Park Service to undertake a Women's History Landmark Project. Despite the fact that the National Historic Landmarks (NHL) Program is over twenty-five years old, only about three percent of the approximately two thousand National Historic Landmarks focus on women. The purpose of the women's history landmark project has been to increase public awareness and appreciation of women's history by identifying significant sites in women's history and preparing nomination forms for consideration for NHL status. In 1990 the Women's History Landmark Project was successful in securing National Historic Landmark status for twelve buildings associated with women. In 1991 eight more were added to this list. And now in 1992 about a dozen more are in progress.

We had hoped at this point to have secured landmark status for many more women's history sites. When this three year project ends, the percentage of NHLs associated with women will probably have increased from three percent to four and a half percent. The National Park Service's initial review process eliminated many of the sites we would like to have studied and rejected over half of the sites for which we had done extensive work.

The difficulties in securing new NHLs associated with women fall into several categories: many of the buildings associated with women do not meet the History Division of the National Park Service's standard of physical integrity; many of the owners have not submitted written letters to



officially support the nominations; the National Historic Landmarks criteria requiring "national significance" has a built in bias for an elitist approach to history which disregards much recent scholarship in women's history; nominations of structures that represent trends in women's history, as opposed to recognizing notable women, are difficult to develop; the NHL Program has an unduly long review process and many bureaucratic procedures for considering properties; many important events in women's history took place in buildings that women did not own and that were not primarily associated with women, making it more difficult to make the case for NHL designation; and finally, the ground rules for the preparation of NHL nominations are constantly changing.

First, disagreements over whether a building has adequate integrity or "physical intactness" has been a chief source of frustration in the women's history landmark project. Judgments about physical integrity often involve subjective factors. In fact, the National Register's Bulletin 15, "How to Apply the National Register Criteria for Evaluation," used by the National Historic Landmarks Program, states that "the evaluation of integrity is sometimes a subjective judgment, but it must always be grounded in an understanding of a property's physical features and how they relate to its significance." Properties significant for historic association should, according to the National Park Service's own guide, retain "the essential physical features that made up its character or appearance during the period of its associations with the important event, historical pattern, or person." If a property is important for illustrating a particular architectural style then a property must "retain most of the physical features." The tendency throughout the women's history landmark project has been for the National Park Service staff to hold properties nominated for



historical significance to the same standard as those properties nominated for architectural significance.

The issue of integrity of buildings is discussed in a very useful way by Antoinette Lee in The American Mosaic: Preserving A Nation's Heritage. She notes that historians of African American and ethnic history argue that properties associated with minority groups cannot be evaluated on the same basis as sites associated with the dominant culture. These resources are more fragile and often lack protective care. Additionally, the NHL proclivity for grand houses over workplaces, which have frequently been altered and do not have the same level of physical integrity, presents problems for the documentation of structures associated with minority groups.

A second major difficulty for this project has been owner consent. The Secretary of Interior's regulations for the NHL program state that owners will be notified and have 60 days to register objections. In only two cases have the owners written to oppose our nomination. Although the National Park Service now stresses owner support, the agency has not officially sought letters from the owners. Instead, the National Park Service has given the women's history landmark project the task of securing letters of support from the owners. Asking an unofficial group to acquire official responses has in many cases been awkward. A number of properties have not moved forward because there was no letter of opposition but also no letter of support. In some cases we have discontinued studies of properties that were near completion because owners had informally indicated to us their unwillingness to support the nomination.

A third difficulty is the interpretation of "national significance." A property must possess national historical significance to be designated as a NHL. But as one historian put it, the concept of national historical

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significance is not immediately apparent or relevant to anyone not employed by the federal government. The History Division staff of the National Park Service frequently dismiss properties as local or regional when scholars have associated these same properties with national significance. Some scholars outside of the National Park Service, such as John Bodnar of Indiana University, have argued that the Park Service preoccupation with national historical significance fosters a brand of history that may be more rooted in symbols than in historical scholarship. Interpreting "national significance" in the light of women's experiences is complicated by the absence of a women's history specialist on the National Park Service's History Division staff. I frequently have to make the point that the assessment of the national significance of women's activities can not be judged the same as that of men. Women have had to operate in a much more confined arena than men and thus their local and regional activities must be viewed differently. Women who are denied a national platform can often affect change on a local or regional level that then has an indirect influence on national developments. In some cases when the History Division staff has argued for state or regional significance, we have been able to persist in making a case for national significance. But this has been difficult.

A fourth problem for the women's history landmark project is that nominations of properties that illustrate broad social trends in women's history are difficult to prepare under the existing practices of the NPS's History Division. While the NHL criteria does provide for properties that exemplify trends in American history, these nominations would each have to become a theme study in which many sites would have to be evaluated to locate the most representative site. The Women's History Landmark project



has neither the time nor money for the kind of extensive research needed for designating representative sites. Yet the current research in women's history has for the last two decades focused on such topics as working women and ethnic communities. Only two sessions out of over 100 at the last Berkshire Conference focused on notable women. Thus the emphasis of the NHL program and the concentration of research in women's history are moving in two very different directions.

A sixth difficulty has been the unexpectedly long review process. It has not been unusual for it to take well over two years from the time we first begin work on a form for it to be designated as a NHL. The forms, based on the format of the National Register's nomination process, are frequently less than twenty pages long with two major sections of text -- one providing an architectural description of the building and the other making a case for the national significance of the person or event associated with the building. After the completion of the forms and their review by the History Division of the National Park Service, we revise the forms, sometimes rather extensively. The History Division then assembles a group of consultants to consider the nominations, prior to the formal review by the History Areas Committee of the National Park System Advisory Board and then by the full Board. The Secretary of Interior makes the final decisions on designations of new National Historic Landmarks.

Work began in the summer of 1989 on the first group of forms for the women's history landmark project. By January, 1990, final forms that had been reviewed the previous fall by NPS staff were in the NPS's History Division offices. It was our expectation that these would be considered at the spring meeting of the National Park Service Advisory Committee. However, because the Advisory Committee, appointed by the President, meets only twice a year and because they have only a limited time for their

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meetings, they prefer to keep the number of NHL nominations being considered at each meeting to less than thirty properties. Because the agenda was full for both the spring and fall Advisory Board meetings in 1990, the first women's history landmark forms did not come before the official review board until 1991. At the March 1991 meeting the Advisory Board unanim usly recommended to the Secretary of Interior the designation of twelve sites associated with women's history. But it took almost another year before the Secretary of Interior signed the designations. Only a few of the properties that we have worked on have received their branze plaques noting their NHL status.

The review process has been not only long but frustrating. To our disappointment, the group of specialists assembled by the National Park Service to consider the first thirteen nominations in the Women's History Project included no one familiar with current American history scholarship or with women's history. The art historian, the architectural historian, and the archaeologist invited to the consultants meeting had little knowledge of the history surrounding these nominations. Only after the Chair of the History Areas Sub-Committee of the National Park System Advisory Board specifically recommended that specialists in women's history be included did the composition of the consultants group change. However, the comments of the women's history specialists who attended the next consultants meeting were not included in the History Division's summary of the meeting. Furthermore, it appeared that the extensive comments of the women's history specialists had no impact on the History Division's position regarding the women's history landmark nominations.

A seventh difficulty is that some important events in women's history took place in buildings that women did not own or that were not primarily



associated with women's history, thus making it hard to nominate a property for its association with women. One of the best illustrations of this is our effort to nominate the Art Institute of Chicago, which during the 1893 World's Fair was the location of the Parliaments of Religion. The National Council of Jewish Women, the primary national social outreach arm of the American Jewish community, was founded in this building during the Parliament of Religion meetings. The building did not become an art gallery until two years after the World's Fair. The National Park Service staff consistently, despite various revisions, resisted our efforts to put forward this nomination.

A final frustration has been that the ground rules for the preparation of National Historic Landmarks forms have changed considerably over the three years that we have been working on the women's landmark project. The NHL Program has no written guidelines for the preparation of nomination forms and the ground rules seem to be constantly shifting under our feet. At the beginning of our project, the Advisory Board unanimously accepted many of our forms which did not include floor plans. Now in many cases, the NPS staff requires floor plans. In the submission of our first group of properties, we had only about two or three photographs for each. Now the NPS Historical Office requests many more photographs. The shifting rules have not only been a frustration but a cause of much delay and added expense.

These issues raise basic questions about the mission of the NHL program. Is the purpose to put bronze plaques on structures frozen in time? I think not. I particularly like David Lowenthal's remarks on this subject. He reminds us that "nothing ever made has been left untouched, nothing ever known remains immutable; yet these facts should not distress be to emancipate us." The primary issue for historic preservation policy



should be toward developing strategies that will enable people to understand and appreciate their links to the past and should be less directed toward the fight to keep old buildings unchanged. "Every relic," Lowenthal asserts, "is a testament not only to its initiators but to its inheritors, not only to the spirit of the past but to the perspectives of the present." We cannot function without familiar environments and links with the recognizable past. But if we recognize that old structures are continually re-fashioned, then Lowenthal concludes, we will "be less inhibited by the past, less frustrated by a fruitless quest for sacrosanct originals."

I have found that the search for pristine originals of women's past is frustrating and nearly impossible, yet the need for identifying and landmarking sites that can connect us to women's past struggles, experiences, and accomplishments is worth the continued fight. Although parts of this project have been discouraging, there are now some additional NHLs dealing with women. Among the properties that have thus far received the support of the National Park Service Advisory Committee are some that represent real victories, such as the boarding house in West Virginia where Mother Jones was held a prisoner for three months during a pivotal miners' strike and the four room cement block house where the noted folklorist and author, Zora Neale Hurston, lived. Also I am pleased that Indiana University Press will be publishing this fall a collection of eight essays titled Reclaiming the Past: Landmarks of Women's History, that will incorporate a recognition of specific places in American women's history with recent scholarship. The contributors to this volume, in addition to myself, are: Gail Lee Dubrow, Joan Hoff, Helen Lefkowitz Horowitz, Barbara J. Howe, Barbara Melosh, Jean R. Soderlund, and Lynn Weiner. I appreciate their willingness to work with me over a two year period in preparing and refining these essays.

