

NPD - KCU EXHIBITS

NEIGHBORHOOD, PLANNING & DEVELOPMENT COMMITTEE

ORDINANCE NO. 260283
HEARING DATE: March 31, 2026

Exhibit #	Description	Offered	Admitted	Refused
1	§ 88-580-01-E & F Review Criteria for City Council, Kansas City Zoning and Development Code			
2	Ordinance No. 260283 designating Leonard Smith Hall as a Local Landmark			
3	Ordinance No. 170109 approving MPD Plan 2/23/17			
4	Approved KCU MPD Plan 2/23/17			
5	Department of the Interior National Register Bulletin Rev. 1995			
6	Amanda Loughlin CV			
7	Amanda Loughlin's 12/11/2025 Report on Eligibility Assessment of Smith Hall			
8	CPC recommendation for denial			
9	March 19, 2026 KCU Petition of Protest filed with City Planning & Zoning Director			
10	§ 88-580-01-E(3) When a Valid Protest Petition of HO Zoning Designation has been Submitted			
11	3/24/2026 Neighborhood, Planning and Development Committee PowerPoint			

88-575-09

Kansas City Zoning and Development Code

88-575-09 REVIEW CRITERIA

An appeal may be sustained only if the board of zoning adjustment finds that the administrative official erred.

88-575-10 DATE OF DECISION

Within 10 days after a decision is made by the board of zoning adjustment, copies of the written decision must be sent to the applicant (appellant). The decision is final on the date that the letter of final disposition is mailed to the applicant.

88-575-11 REHEARING

The board of zoning adjustment may grant a rehearing on any appeal of administrative decision if the rehearing request includes new evidence to be presented that was not available at the time of the original hearing or when the board of zoning adjustment determines that good cause has been shown for a rehearing. The request for a rehearing must be made within 30 days of the date that notice of decision was sent to the applicant. No more than one rehearing is permitted.

88-580 HISTORIC DESIGNATIONS

88-580-01 DESIGNATION

88-580-01-A. APPLICATION FILING

1. Applications for designation of historic districts, landmarks, or overlay zoning districts (collectively referenced as HO districts) may be made by the owner(s) of record of the subject property, any other person or organization with the full consent and written approval of the owner(s) of record of a subject property, a member of the historic preservation commission, a member of the city council, the neighborhood association for the area in which that property is located, a historic preservation organization, or any other person or organization where at least 51% of the owners of the affected parcels in a proposed district do not object to the nomination (exclusive of all publicly owned property, streets, and alleys).
2. Complete applications for designation of HO districts must be filed in the office of the historic preservation commission. Applications must contain a legal description of the property and a statement describing its historic, cultural, aesthetic, or architectural significance.
3. The city planning and development director shall notify the owner of any property within a proposed HO district application, if such person is different than the applicant. This notification shall be

done within 14 calendar days of the application date for the HO district nomination. The notification of the property owner shall include the following:

- a. a copy of the application that was made for the nomination;
- b. an explanation of the nomination procedure for HO district and the consequential property restrictions;
- c. an explanation stating that the property owner has the right to appear at the scheduled public hearing at which the nomination will be considered and the date of the hearing; and
- d. an explanation stating that the property owner has the right to submit documentation either for or against the nomination.

4. **INTERIM CONTROL**

Once an application has been filed, no building permit for alteration, construction, demolition, or removal of a property being considered for designation under an application for an HO district may be issued until the historic preservation commission has dismissed or denied the application for designation, or until the city council has denied designation in accordance with the procedures established in 88-580-01-C. and 88-580-01-E., though no stay on the issuance of a permit may be for more than six months from the filing of the application. No permit may be stayed in the following circumstances:

- a. The building has been declared dangerous according to the procedures established in Chapter 56, Article V.
- b. The director of city planning and development determines that the property does not meet the minimum requirements for historic designation under 88-580-01-F. and under the rules and regulations of the historic preservation commission. An applicant or owner may appeal the director's determination to the historic preservation commission at the next regular or special meeting. If the commission determines that there is merit to the application by a majority vote of those present, then the application will proceed under the procedures set in 88-580-01.
- c. The project located at Westport Road and Broadway, approved by Committee Substitute for Ordinance 170407, and the project on Pennsylvania north of Westport Road, approved by Committee Substitute for Ordinance 170487, shall be exempt from the stay.

During this period of interim control, the applicant for the permit or property owner shall have the opportunity to explain to the historic preservation commission the reasons why a building permit should be issued promptly, and the commission may grant approval for a building permit in this interim period. Additionally,

the city council may authorize such alteration, construction, demolition, or removal by adopting a formal resolution declaring that the proposed work is necessary for the public health, welfare, or safety.

5. CONSIDERATION OF APPLICATION

The historic preservation commission must hold a public hearing on the proposed nomination within 45 days of receipt of the application and must render a decision concerning the merits of the application within 90 days of the receipt of the application, which may be extended with the agreement of the owner of the property.

88-580-01-B. NOTICE OF HEARING

a. REQUIRED NEWSPAPER NOTICE

Notice of required public hearings on proposed designation of historic districts, landmarks, or overlay zoning districts (HO districts) must be published in the newspaper at least 15 days before the date of the public hearing. See 88-505-07.

b. REQUIRED MAIL NOTICE

Notice of required public hearings must be mailed at least 13 days before the scheduled hearing to the subject property owner, any registered neighborhood organization, and/or registered civic organization whose boundaries include the subject property, and all owners of property within 300 feet of the subject property. See 88-505-07. The mailed notice shall provide contact information sufficient for those interested to determine when the city council will hold its hearing on the designation.

88-580-01-C. HEARING AND RECOMMENDATION—HISTORIC PRESERVATION COMMISSION

1. The historic preservation commission must hold at least one public hearing on the designation of historic districts, landmarks, or overlay zoning districts (HO districts). Following the close of the hearing, the historic preservation commission must act to recommend that the proposed designation be approved, approved with modifications, continued for further deliberation, forwarded to the city plan commission with no recommendation, or denied. Five affirmative votes are required to recommend approval or approval with modifications. A majority of those present is required to continue for further deliberation, forward to the city plan commission with no recommendation, or deny the application.
2. The historic preservation commission may grant a rehearing if the rehearing request includes new evidence to be presented that was not available at the time of the original hearing. The request for a

rehearing must be made within 30 days of the date of the historic preservation commission's original action. No more than one rehearing is permitted.

3. The findings of the historic preservation commission, must be forwarded to the city plan commission and city council for review.
4. In reviewing and making decisions on proposed historic landmark and historic district designations, the historic preservation commission must consider at least the following factors:
 - a. the criteria used in determining eligibility for listing on the U.S. Department of Interior's National Register of Historic Places, including the historic, cultural, aesthetic, or architectural significance of the building, structure, site, object, or district; and
 - b. conformance with the city's adopted plans and planning policies;
 - c. the economic impact of the designation on the subject property and the surrounding area.

88-580-01-D. HEARING AND RECOMMENDATION—CITY PLAN COMMISSION

1. The city plan commission must hold at least one public hearing on all historic district, landmark, or overlay zoning district (HO) designation applications forwarded by the historic preservation commission. Following the close of the hearing, the city plan commission must act by simple majority vote to recommend that the proposed designation be approved, approved with modifications, or denied. The city plan commission may also act to continue the matter for further deliberation.
2. In reviewing and making decisions on proposed historic landmark and historic district designations, the city plan commission must consider at least the following factors:
 - a. the criteria used in determining eligibility for listing on the U.S. Department of Interior's National Register of Historic Places, including the historic, cultural, aesthetic, or architectural significance of the building, structure, site, object, or district;
 - b. conformance with the city's adopted plans and planning policies; and
 - c. the economic impact of the designation on the subject property and the surrounding area.

88-580-01-E. HEARING AND FINAL ACTION—CITY COUNCIL

1. After receiving the recommendation of the historic preservation commission and the city plan commission, the city council may convene its own public hearing on the proposed historic district, landmark, or overlay zoning district (HO) designation.

2. Following the close of the public hearing, the city council may act to approve the proposed designation, approve the designation with modifications, or deny the designation.
3. The city council may act by a simple majority vote, except when a valid protest petition of HO zoning designation has been submitted in accordance with 88-515-09, approval or approval with modifications requires a 2/3 majority vote of the full membership of the city council.
4. Immediately upon passage of an ordinance designating a particular site as an historic landmark or historic district, notice of designation must be provided to the city planning and development director.
5. Once designated by city council, the historic district, landmark, or overlay zoning district (HO) designation will remain in place until such designation is officially revoked. Upon designation, a certificate of appropriateness is required in accordance with 88-585 for any exterior alterations or material changes visible from any public place or right-of-way.

88-580-01-F. REVIEW CRITERIA FOR CITY COUNCIL

In reviewing and making decisions on proposed historic landmark and historic district designations, the city council must consider at least the following factors:

1. the criteria used in determining eligibility for listing on the U.S. Department of Interior's National Register of Historic Places, including the historic, cultural, aesthetic, or architectural significance of the building, structure, site, object, or district;
2. the economic impact of the designation on the subject property and the surrounding area;
3. conformance with the city's adopted plans and planning policies; and
4. the recommendations of the historic preservation commission and the city plan commission.

(Ord. No. 120783, § 1, 10-4-2012; Ord. No. 130136, § A, 4-25-2013; Ord. No. 130814, § A, 5-1-2014; Ord. No. 160759, § 1, 10-20-2016; Ord. No. 170957, § 1, 12-7-2017)

88-580-02 REVOCATION OF HISTORIC LANDMARK OR HISTORIC DISTRICT DESIGNATION

88-580-02-A. APPLICATION FILING

Complete applications for official revocation of historic landmark or historic district designation must be filed with appropriate personnel in

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title

Sponsor: Director of City Planning and Development Department

Rezoning an area of about .16 acres generally located on the north side of Independence Boulevard just west of the intersection of Highland Avenue from District MPD/ICO to District MPD/ICO/HO in order to designate Leonard Smith Hall at 1700 Independence Boulevard as a local landmark on the Kansas City Register of Historic Places. (CD-CPC-2026-00003)

body

BE IT ORDAINED BY THE COUNCIL OF KANSAS CITY:

Section A. That Chapter 88, Code of Ordinances of the City of Kansas City, Missouri, commonly known as the Zoning and Development Code, is hereby amended by enacting a new section to be known as Section 88-20A-1530, rezoning an area of approximately .16 acres generally located at 1700 Independence Boulevard from Master Planned Development/Independence Corridor Overlay (MPD/ICO) to (MPD/ICO/Historic Overlay), said section to read as follows:

Section 88-20A-1530, That an area legally described as:

A 20,305 sq ft lot: Beg at 375' w of se cor of Lot 20, Block 1, Dykington Place, th n 147', th 77' w, th sw 95' th s 97', th e returning to pob.

is hereby rezoned from Master Planned Development/Independence Corridor Overlay (MPD/ICO) to MPD/ICO/HO (MPD/ICO/Historic Overlay), all as shown outlined on a map marked Section 88-20A-1530, which is attached hereto and made a part hereof, and which is hereby adopted as a part of an amendment to the zoning maps constituting a part of said chapter and in accordance with Section 88-20 thereof.

Section B. That Leonard Smith Hall was built in 1927 and designed by the firm of Hoyt, Price and Barnes and is a good example of the Colonial Revival/Georgian Revival Style of architecture and also has historical value for its association with Children's Mercy.

Section C. That the Historic Preservation Commission recommended approval of the designation of Leonard Smith Hall at 1700 Independence Boulevard to the Kansas City Register of Historic Places (H/O Overlay) at its meeting on December 19, 2025.

Section D. That the City Plan Commission recommended denial of the inclusion of the property on the Kansas City Register of Historic Places (H/O Overlay) at its meeting on March 4, 2026.

Section E. That the City Council considered the factors set forth in Section 88-580-01-F of the Zoning and Development Code in making its decision, including the criteria used in determining eligibility for listing on the U.S. Department of Interior's National Register of Historic

Places, and specifically Criterion A, as the property was associated with events that have made a significant contribution to the broad patterns of the City's history in the area of healthcare for its association with Children's Mercy; and Criterion C in the area of architecture, as the property is a good example of the Colonial Revival/Georgian Revival Style.

Section F. That the Council finds and declares that before taking any action on the proposed amendment hereinabove, all public notices and hearings required by the Zoning and Development Code have been given and had.

end

I hereby certify that as required by Chapter 88, Code of Ordinances, the foregoing ordinance was duly advertised and public hearings were held.

Sara Copeland, FAICP
Secretary, City Plan Commission

Approved as to form:

Sarah Baxter
Senior Associate City Attorney



Do you need interpretation

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EXHIBIT
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**CPC
OWNER'S
EXHIBIT
6**

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Rezoning an area of approximately 32 acres generally bounded by Missouri Avenue on the north, E. 9th Street on the south, Woodland Avenue and Maple Boulevard on the east and Paseo Boulevard on the west from Districts R-1.5, R-2.5, R-6, B1-1, B3-2 and B4-2 to District MPD, and approving a MPD Development Plan for an educational institution. (14608-MPD-1).

BE IT ORDAINED BY THE COUNCIL OF KANSAS CITY:

Section A. That Chapter 88, Code of Ordinances of the City of Kansas City, Missouri, commonly known as the Zoning and Development Code, is hereby amended by enacting a new section to be known as Section 88-20A1085, on approximately 32 acres generally bounded by Missouri Avenue on the north, E. 9th Street on the south, Woodland Avenue and Maple Boulevard on the east and Paseo Boulevard on the west from Districts R-1.5 (Residential 1.5), R-2.5 (Residential 2.5), R-6 (Residential 6), B1-1 (Neighborhood Business-dash 2), B3-2 (Community Business/Commercial dash 3) and B4-2 (Heavy Business/Commercial-dash 2) to District MPD (Master Planned Development), and approving a MPD Development Plan for an educational institution, said section to read as follows:

Section 88-20A1085. That an area legally described as:

(Area A)

All of Lots 1, 2, 3 and 15 thru 19, Block 1 and all of Lot 5, Block 3, Dykington Place; all of Lots 2 thru 4 and 8 thru 15 and part of Lot 7 and 16, Wm. W. Kendall's 1st Addition; all of Lots 3 and 4 and part of Lot 1, Trost's 1st Addition; all of Lots , 20, 24 thru 26, 39 and 41 thru 43 and part of Lots 16 thru 20, 22 and 28, Ranson Place; all of Lots 1 thru 4 and part of Lots 5 thru 7, Askew's Partition of Parts of Lots 44, 45, 46, 47, 57, 58, 59, 60, Ranson Place; all of Lots 93, 94 and part of Lot 95, Hurck's Subdivision of the Guinotte Bluff; all of Lots 32 thru 49 and 95 thru 103, 108 and 109, Suwanee, all being subdivisions of land in said Kansas City, Jackson County, Missouri; Part of Admiral Boulevard, as now established; Part of Highland Avenue, as now established; Part of Woodland Avenue as now established; all of vacated Highland Avenue, vacated Brownell Avenue and vacated Dykington Avenue and all that part of lands lying in the Southwest Quarter and Southeast Quarter of Section 33, Township 50 North, Range 33 West and the Northwest Quarter of Section 4, Township 49 North, Range 33 West in the 5th Principal Meridian in Kansas City, Jackson County, Missouri: Beginning at Northwest corner of Lot 9, Dykington Place, a subdivision of land in said Kansas City, Jackson County, Missouri; thence South 03 degrees 05 minutes 11 seconds West, along the West line of said Dykington Place, 418.80 feet to the Southwest corner of Lot 4, said Dykington Place; thence South 87 degrees 23 minutes 04 seconds East, along the South line of said Lot 4, 154.50 feet to

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the Southeast corner of said Lot 4, said corner also being a point on the West right-of-way line of Woodland Avenue, as now established; thence South 03 degrees 05 minutes 11 seconds West along said West right-of-way line, 58.74 feet; thence South 87 degrees 13 minutes 01 seconds East, 54.00 feet to a point on the East right-of-way line of said Woodland Avenue, said point also being the Northwest corner of Lot 15, Kendall's 1st Addition, a subdivision of land in said Kansas City, Jackson County, Missouri; thence continuing South 87 degrees 13 minutes 01 seconds East, along the North line of said Lot 15, 115.31 feet; thence North 02 degrees 58 minutes 15 seconds East, 32.00 feet; thence South 87 degrees 13 minutes 01 seconds East, 39.61 feet to a point on the West line of Lot 2, said Kendall's 1st Addition; thence North 02 degrees 58 minutes 15 seconds East, along said West line, 18.00 feet to the Northwest corner of said Lot 2; thence South 87 degrees 13 minutes 01 seconds East, along the North line of said Lot 2, 180.00 feet to the Northeast corner of said Lot 2, said corner also being a point on the West right-of-way line of Maple Boulevard, as now established; thence South 02 degrees 58 minutes 15 seconds West, along the East line of said Lots 2, 3 and 4, said Kendall's 1st Addition, 180.00 feet to the Southeast corner of said Lot 4; thence North 87 degrees 13 minutes 01 seconds West, along the South line of said Lot 4, 180.00 feet to the Southwest corner of said Lot 4, said corner also being a point on the East line of said Lot 13 said Kendall's 1st Addition; thence South 02 degrees 58 minutes 15 seconds West, along the East line of Lots 10, 11, 12 and 13, said Kendall's 1st Addition, 140.00 feet; thence South 87 degrees 13 minutes 01 seconds East, along a line lying 20.00 feet South of and parallel with the North line of Lot 7, said Kendall's 1st Addition, 180.00 feet to a point on the West right-of-way line of Maple Boulevard, as now established; thence South 02 degrees 58 minutes 15 seconds West, along said West right-of-way line, 95.23 feet; thence Southwesterly, continuing along said West right-of-way line, on a curve to the right, being tangent to the last described course with a radius of 35.00 feet, a central angle of 89 degrees 48 minutes 44 seconds and an arc length of 54.86 feet to a point on the South line of Lot 8, said Kendall's 1st Addition, said point also being a point on the North right-of-way of Independence Avenue, as now established; thence North 87 degrees 13 minutes 02 seconds West, along said North right-of-way line, 553.91 feet; thence North 87 degrees 29 minutes 38 seconds West, continuing along said North right-of-way line, 142.23 feet; thence South 03 degrees 01 minutes 11 seconds West, 50.00 feet to point on the centerline of said Independence Avenue; thence North 87 degrees 29 minutes 38 seconds West, along said centerline, 21.63 feet; thence South 02 degrees 16 minutes 08 seconds West along the West right-of-way line of Highland Avenue, as now established and it's Northerly prolongation, said line also being the East line of Lot 24 and it's Northerly prolongation, Ranson Place, a subdivision of land in said Kansas City, Jackson County, Missouri 165.89 feet; thence South 87 degrees 51 minutes 53 seconds East, 100.00

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feet to a point on the East right-of-way line of said Highland Avenue; thence South 87 degrees 31 minutes 43 seconds East, 100.00 feet to a point on the West line of Lot 2, Trost's 1st Addition, a subdivision of land in said Kansas City, Jackson County, Missouri; thence South 02 degrees 08 minutes 07 seconds West, along said West line, 10.00 feet to the Southwest corner of said Lot 2; thence South 87 degrees 13 minutes 01 seconds East, along the South line of said Lot 2, 50.00 feet to the Southeast corner of said Lot 2; thence North 02 degrees 08 minutes 07 seconds East, along the East line of said Lot 2, 145.00 feet to the Northeast corner of said Lot 2, said corner also being a point on the South right-of-way line of said Independence Avenue; thence South 87 degrees 13 minutes 01 seconds East, along said South right-of-way line, 0.57 feet; thence Southwesterly, along said South right-of-way line, on a curve to the right, having an initial tangent bearing of South 87 degrees 17 minutes 48 seconds West, with a radius of 50.00 feet, a central angle of 89 degrees 21 minutes 08 seconds and an arc length of 77.97 feet to a point on the West right-of-way of Woodland Avenue, as now established; thence South 02 degrees 08 minutes 07 seconds West, along said West right-of-way line, 318.59 feet to the Northeast corner of Lot 19, said Ranson Place; thence North 87 degrees 13 minutes 01 seconds West, along the North line of said Lot 19, 135.00 feet; thence South 02 degrees 08 minutes 07 seconds West, 3.00 feet; thence North 87 degrees 13 minutes 01 seconds West, 65.00 feet to a point on the East right-of-way line of said Highland Avenue; thence South 02 degrees 17 minutes 27 seconds West, along said East right-of-way line and its Southerly prolongation, 188.53 feet to a point on the South right-of-way line of Admiral Boulevard, as now established; thence South 87 degrees 21 minutes 58 seconds East, along said South right-of-way line, 200.52 feet to a point on the West right-of-way line of said Woodland Avenue; thence South 02 degrees 08 minutes 07 seconds West, along said West right-of-way line, 341.02 feet to the Southeast corner of Lot 16, said Ranson Place; thence North 87 degrees 13 minutes 01 seconds West along the South line of said Lot 16, 135.00 feet; thence North 02 degrees 08 minutes 07 seconds East, 130.50 feet; thence North 87 degrees 13 minutes 01 seconds West, 189.00 feet to a point on the West right-of-way line of said Highland Avenue; thence South 02 degrees 08 minutes 07 seconds West, along said West right-of-way line, 52.07 feet to the Southeast corner of Askew's Partition of Parts of Lots 44, 45, 46, 47, 57, 58, 59 AND 60, Ranson Place, a subdivision of land in Kansas City, Jackson County, Missouri; thence North 87 degrees 38 minutes 00 seconds West, along the South Line of said, Askew's Partition, 186.00 feet; thence North 02 degrees 08 minutes 07 seconds East, 368.76 feet to a point on the North right-of-way line of said Admiral Boulevard; thence North 87 degrees 42 minutes 32 seconds West, along said North right-of-way line, 90.00 feet to the Southwest corner of Lot 41, said Ranson Place; thence North 02 degrees 08 minutes 07 seconds East, along the West line of said Lot 41 and the West line of Lot 26, said Ranson Place, 452.74 feet

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to the Northwest corner of said Lot 26, said corner also being a point on the South right-of-way line of said Independence Avenue; thence North 87 degrees 29 minutes 38 seconds West, along said South right-of-way line, 150.00 feet; thence South 02 degrees 08 minutes 07 seconds West, 174.50 feet; thence South 87 degrees 42 minutes 32 seconds East, 50.00' to a point on the East line of Lot 28, said Ranson Place; thence South 02 degrees 08 minutes 07 seconds West, along said East line and the East line of Lot 39, said Ranson Place, 278.80 feet to the Southeast corner of said Lot 39, said corner also being a point on the North right-of-way line of said Admiral Boulevard; thence North 87 degrees 42 minutes 32 seconds West, along said North right-of-way line, 100.00 feet to the Southwest corner of said Lot 39; thence North 02 degrees 08 minutes 07 seconds East along the West line of said Lots 39 and 28, 453.50 feet to the Northwest corner of said Lot 28, said corner also being a point on the South right-of-way line of said Independence Avenue; thence North 32 degrees 31 minutes 55 seconds West, 73.28 feet to a point at the intersection of the North right-of-way line of said Independence Avenue and the East right-of-way line of Paseo Drive, as now established; thence North 02 degrees 53 minutes 51 seconds East, along said East right-of-way line, 155.00 feet; thence South 87 degrees 29 minutes 38 seconds East, continuing along said East right-of-way line, 50.00 feet; thence North 02 degrees 53 minutes 25 seconds East, continuing along said East right-of-way line, 362.96 feet; thence North 09 degrees 29 minutes 24 seconds East, continuing along said East right-of-way line, 383.00 feet to a point on the South right-of-way line of Missouri Avenue, as now established; thence South 87 degrees 23 minutes 04 seconds East, along said South right-of-way line, 660.08 feet to the point of beginning. Containing 1,293,492 square feet or 29.69 acres, more or less.

(Area B)

Part of Lot 11 and 12, Ranson Place, a subdivision of land in Kansas being bounded and described as follows: Beginning at the intersection of the South right-of-way line of 8th Street, as now established and the East line of said Lot 12; thence South 02 degrees 08 minutes 07 seconds West, along said East line, 246.00 feet to a point on the North right-of-way line of 9th Street, as now established; thence North 87 degrees 34 minutes 48 seconds West, along said North right-of-way line, 175.00 feet to a point on the East right-of-way line of Highland Avenue, as now established; thence North 02 degrees 08 minutes 07 seconds East, along said East right-of-way line, 246.00 feet to a point on the South right-of-way line of said 8th Street; thence South 87 degrees 35 minutes 05 seconds East, along said South right-of-way line, 175.00 feet to the point of beginning. Containing 43,051 square feet or 0.99 acres, more or less.

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(Area C)

A tract of land in the Southeast Quarter of Section 33, Township 50 North, Range 33 West of the 5th Principal Meridian and all of Lots 1, 2, 33 and 34, Phillips Place, a subdivision in Kansas City, Jackson County, Missouri being bounded and described as follows: Beginning at the Southwest corner of said Lot 34, said corner being the intersection of the North right-of-way line of Brownell Avenue, as now established and the East right-of-way line of Woodland Avenue, as now established; thence North 03 degrees 05 minutes 11 seconds East, along the West line of said Lot 34, 163.50 feet to the Northwest corner of said Lot 34; thence South 87 degrees 13 minutes 01 seconds East, along the North line of said Lots 1, 2, 33 and 34 and its Easterly prolongation, 335.00 feet to a point on the West right-of-way line of Maple Boulevard, as now established; thence South 03 degrees 05 minutes 11 seconds West, along said West right-of-way line, 163.50 feet to a point on the North right-of-way line of said Brownell Avenue; thence North 87 degrees 13 minutes 01 seconds West, along said North right-of-way line, 335.00 feet to the point of beginning. Containing 54,772 square feet or 1.26 acres, more or less.

is hereby rezoned from Districts R-1.5 (Residential 1.5), R-2.5 (Residential 2.5), R-6 (Residential 6), B1-1 (Neighborhood Business-dash 2), B3-2 (Community Business/Commercial dash 3) and B4-2 (Heavy Business/Commercial-dash 2) to District MPD (Master Planned Development) all as shown outlined on a map marked Section 88-20A1085, which is attached hereto and made a part hereof, and which is hereby adopted as a part of an amendment to the zoning maps constituting a part of said chapter and in accordance with Section 88-20 thereof.

Section B. That a Master Planned Development Plan for the area legally described above is hereby approved, subject to the following conditions:

1. The developer shall submit an application to amend the Major Street Plan to remove Woodland Avenue and amend the Bike KC plan to relocate the bike route to Maple Boulevard.
2. The developer shall submit an application to vacate Woodland Avenue prior to closure of the street.
3. The developer shall submit a Final MPD plan for each phase to the Plan Commission for approval, including detailed information on landscaping (screening of service areas and mechanical equipment), signage (including elevations), lighting (including a photometric study showing 2 lux at the property line and no direct illumination beyond the property line) and building, trash and fencing elevations.
4. The developer shall submit a storm drainage analysis from a Missouri-licensed civil engineer to the Land Development Division evaluating

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proposed improvements and impact to drainage conditions. Since this project is within a "Combined Sewer Overflow" (CSO) district, the project shall be designed to retain rainfall of 1.5 inch depth over the entire site to simulate natural runoff conditions and reduce small storm discharge to the combined sewer system and manage the 10-year storm and 100-year storm per currently adopted APWA standards. The analysis shall be submitted, and the developer shall secure permits to construct any improvements required by the Land Development Division prior to issuance of any building permits.

5. The developer shall submit verification of vertical and horizontal sight distance for the drive connection to public right-of-way to the Land Development Division and make improvements to ensure local jurisdiction and/or minimum AASHTO adequate sight distance standards are met, prior to issuance of any certificate of occupancy.
6. The developer shall submit a letter to the Land Development Division from a licensed civil engineer, licensed architect, or licensed landscape architect, who is registered in the State of Missouri, identifying sidewalks, curbs, and gutters in disrepair as defined by Public Works Department's "OUT OF REPAIR CRITERIA FOR SIDEWALK, DRIVEWAY AND CURB revised 4/8/09" and based on compliance with Chapters 56 and 64, Code of Ordinances, for the sidewalks, curbs, and gutters where said letter shall identify the quantity and location of sidewalks, curbs, and gutters that need to be constructed, repaired, or reconstructed to remedy deficiencies and/or to remove existing approaches no longer needed by this project. The developer shall secure permits to repair or reconstruct the identified sidewalks, curbs, and gutters as necessary along all development street frontages as required by the Land Development Division and prior to issuance of any certificate of occupancy permits including temporary certificate of occupancy permits.
7. The owner/developer shall submit plans for grading, siltation, and erosion control to the Land Development Division for review and acceptance, and secure a site disturbance permit for any proposed disturbance area equal to one acre or more prior to beginning any construction activities.
8. The developer shall submit an analysis to verify adequate capacity of the existing sewer system as required by the Land Development Division prior to issuance of a building permit to connect the private system to the public sewer main and depending on adequacy of the receiving system, make other improvements as may be required.

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9. The developer shall abandon and relocate the water main and sanitary sewer line as required by the Water Services Department if any new construction (building/structure) conflicts with an existing water main or sanitary sewer line.
10. The developer shall provide a new easement as required by the Water Services Department for the relocated main/line if any new construction (building/structure) conflicts with an existing water main and/or sanitary sewer line and the main/line is abandoned and relocated.
11. Prior to any amendment to the MPD Plan for any future phases not shown on the MPD Plan, a traffic study acceptable to the Public Works Department shall be submitted to, reviewed by and accepted by the Public Works Department and the developer shall construct any improvements required by the Public Works Department based on the accepted traffic study.
12. The developer shall provide a 10 foot wide shared use path on the north side of Independence Avenue between Woodland Avenue and Maple Boulevard to accommodate the bicycle facility prior to vacation of Woodland Avenue. The improvements shall include bicycle access to the shared use path from the street at the intersections of Woodland Avenue and Independence Avenue and at Maple Boulevard and Independence Avenue.
13. The developer shall modify the traffic signal at the intersection of Woodland and Independence to accommodate the bike facility prior to the vacation of Woodland Avenue.
14. The developer shall be required to modify the inlet grates along Maple Boulevard to make them bike friendly prior to the vacation of Woodland Avenue.
15. The developer shall post the bike signs along the new bike route on Maple Boulevard prior to the vacation of Woodland Avenue.
16. The developer shall dedicate parkland or contribute money in lieu of parkland dedication for any new residential building in satisfaction of Section 88-408 of the Zoning and Development Code.

Section C. That the Council finds and declares that before taking any action on the proposed amendment hereinabove, all public notices and hearings required by the Zoning and Development Code have been given and had.

ORDINANCE NO. 170109

I hereby certify that as required by Chapter 88, Code of Ordinances, the foregoing ordinance was duly advertised and public hearings were held.


Secretary, City Plan Commission

Approved as to form and legality:


M. Margaret Sheahan Moran
Assistant City Attorney



Authenticated as Passed


Sky James, Mayor


Marilyn Sanders, City Clerk

FEB 23 2017

Date Passed

CPC
OWNER'S
EXHIBIT
8

NATIONAL REGISTER BULLETIN

Technical information on the the National Register of Historic Places:
survey, evaluation, registration, and preservation of cultural resources

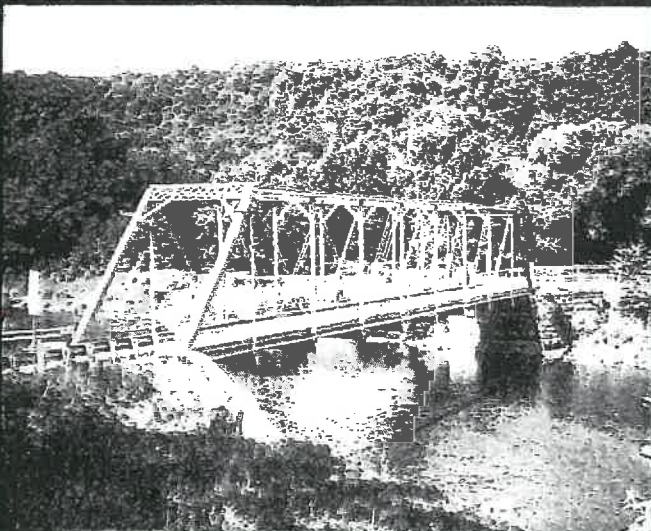


U.S. Department of the Interior
National Park Service
Cultural Resources
National Register, History and Education

NPD - KCU
EXHIBIT
5

OWNER
EXHIBIT
7

How to Apply the National Register Criteria for Evaluation



PREFACE

Preserving historic properties as important reflections of our American heritage became a national policy through passage of the Antiquities Act of 1906, the Historic Sites Act of 1935, and the National Historic Preservation Act of 1966, as amended. The Historic Sites Act authorized the Secretary of the Interior to identify and recognize properties of national significance (National Historic Landmarks) in United States history and archeology. The National Historic Preservation Act of 1966 authorized the Secretary to expand this recognition to properties of local and State significance in American history, architecture, archeology, engineering, and culture, and worthy of preservation. The National Register of Historic Places is the official list of these recognized properties, and is maintained and expanded by the National Park Service on behalf of the Secretary of the Interior.¹

The National Register of Historic Places documents the appearance and importance of districts, sites, buildings, structures, and objects signifi-

cant in our prehistory and history. These properties represent the major patterns of our shared local, State, and national experience. To guide the selection of properties included in the National Register, the National Park Service has developed the National Register Criteria for Evaluation. These criteria are standards by which every property that is nominated to the National Register is judged. In addition, the National Park Service has developed criteria for the recognition of nationally significant properties, which are designated National Historic Landmarks and prehistoric and historic units of the National Park System. Both these sets of criteria were developed to be consistent with the Secretary of the Interior's *Standards and Guidelines for Archeology and Historic Preservation*, which are uniform, national standards for preservation activities.²

This publication explains how the National Park Service applies these criteria in evaluating the wide range of properties that may be significant in local, State, and national history.

It should be used by anyone who must decide if a particular property qualifies for the National Register of Historic Places.

Listing properties in the National Register is an important step in a nationwide preservation process. The responsibility for the identification, initial evaluation, nomination, and treatment of historic resources lies with private individuals, State historic preservation offices, and Federal preservation offices, local governments, and Indian tribes. The final evaluation and listing of properties in the National Register is the responsibility of the Keeper of the National Register.

This bulletin was prepared by staff of the National Register Branch, Interagency Resources Division, National Park Service, with the assistance of the History Division. It was originally issued in draft form in 1982. The draft was revised into final form by Patrick W. Andrus, Historian, National Register, and edited by Rebecca H. Shrimpton, Consulting Historian.

Beth L. Savage, National Register and Sarah Dillard Pope, National Register, NCSHPO coordinated the latest revision of this bulletin. Antionette J. Lee, Tanya Gossett, and Kira Badamo coordinated earlier revisions.

¹Properties listed in the National Register receive limited Federal protection and certain benefits. For more information concerning the effects of listing, and how the National Register may be used by the general public and Certified Local Governments, as well as by local, State, and Federal agencies, and for copies of National Register Bulletins, contact the National Park Service, National Register, 1849 C Street, NW, NC400, Washington, D.C., 20240. Information may also be obtained by visiting the National Register Web site at www.cr.nps.gov/nr or by contacting any of the historic preservation offices in the States and territories.

²The *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation* are found in the *Federal Register*, Vol. 48, No. 190 (Thursday, September 29, 1983). A copy can be obtained by writing the National Park Service, Heritage Preservation Services (at the address above).

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I. INTRODUCTION

The National Register is the nation's inventory of historic places and the national repository of documentation on the variety of historic property types, significance, abundance, condition, ownership, needs, and other information. It is the beginning of a national census of historic properties. The National Register Criteria for Evaluation define the scope of the National Register of Historic Places; they identify the range of resources and kinds of significance that will qualify properties for listing in the National Register. The Criteria are written broadly to recognize the wide variety of historic properties associated with our prehistory and history.

Decisions concerning the significance, historic integrity, documentation, and treatment of properties can be made reliably only when the resource is evaluated within its historic context. The historic context serves as the framework within which the National Register Criteria are applied to specific properties or property types. (See *Part V* for a brief discussion of

historic contexts. Detailed guidance for developing and applying historic contexts is contained in *National Register Bulletin: How to Complete the National Register Registration Form* and *National Register Bulletin: How to Complete the National Register Multiple Property Documentation Form*.)

The guidelines provided here are intended to help you understand the National Park Service's use of the Criteria for Evaluation, historic contexts, integrity, and Criteria Considerations, and how they apply to properties under consideration for listing in the National Register. Examples are provided throughout, illustrating specific circumstances in which properties are and are not eligible for the National Register. This bulletin should be used by anyone who is:

- Preparing to nominate a property to the National Register,
- Seeking a determination of a property's eligibility,
- Evaluating the comparable significance of a property to those listed in the National Register, or

- Expecting to nominate a property as a National Historic Landmark in addition to nominating it to the National Register.

This bulletin also contains a summary of the National Historic Landmarks Criteria for Evaluation (see *Part IX*). National Historic Landmarks are those districts, sites, buildings, structures, and objects designated by the Secretary of the Interior as possessing national significance in American history, architecture, archeology, engineering, and culture. Although National Register documentation includes a recommendation about whether a property is significant at the local, State, or national level, the only official designation of national significance is as a result of National Historic Landmark designation by the Secretary of the Interior, National Monument designation by the President of the United States, or establishment as a unit of the National Park System by Congress. These properties are automatically listed in the National Register.

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.

Information about the property based on physical examination and documentary research is necessary to evaluate a property's eligibility for the National Register. Evaluation of a property is most efficiently made when following this sequence:

1. Categorize the property (Part IV). A property must be classified as

a district, site, building, structure, or object for inclusion in the National Register.

2. Determine which prehistoric or historic context(s) the property represents (Part V). A property must possess significance in American history, architecture, archeology, engineering, or culture when evaluated within the historic context of a relevant geographic area.
3. Determine whether the property is significant under the National Register Criteria (Part VI). This is done by identifying the links to important events or persons, design or construction features, or information potential that make the property important.

4. Determine if the property represents a type usually excluded from the National Register (Part VII). If so, determine if it meets any of the Criteria Considerations.
5. Determine whether the property retains integrity (Part VIII). Evaluate the aspects of location, design, setting, workmanship, materials, feeling, and association that the property must retain to convey its historic significance.

If, after completing these steps, the property appears to qualify for the National Register, the next step is to prepare a written nomination. (Refer to *National Register Bulletin: How to Complete the National Register Registration Form.*)

OBJECT

The term "object" is used to distinguish from buildings and structures those constructions that are primarily artistic in nature or are relatively small in scale and simply constructed. Although it may be, by nature or design, movable, an object is associated with a specific setting or environment.

Small objects not designed for a specific location are normally not eligible. Such works include transportable sculpture, furniture, and other decorative arts that, unlike a fixed outdoor sculpture, do not possess association with a specific place.

Objects should be in a setting appropriate to their significant historic use, roles, or character. Objects relocated to a museum are inappropriate for listing in the National Register.

Examples of objects include:

*boundary marker
fountain
milepost
monument
sculpture
statuary*

SITE

A site is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing structure.

A site can possess associative significance or information potential or both, and can be significant under any or all of the four criteria. A site need not be marked by physical remains if it is the location of a prehistoric or historic event or pattern of events and if no buildings, structures, or objects marked it at the time of the events. However, when the location of a prehistoric or historic event cannot be conclusively determined because no other cultural materials were present or survive, documentation must be carefully evaluated to determine whether the traditionally recognized or identified site is accurate.

A site may be a natural landmark strongly associated with significant prehistoric or historic events or patterns of events, if the significance of the natural feature is well documented through scholarly research. Generally, though, the National Register excludes from the definition of "site" natural waterways or bodies of water that served as determinants in the location of communities or were significant in the locality's subsequent economic development. While they may have been "avenues of exploration," the features most appropriate to document this significance are the properties built in association with the waterways.

Examples of sites include:

*battlefield
campsite
cemeteries significant for information potential or historic association
ceremonial site
designed landscape
habitation site
natural feature (such as a rock formation) having cultural significance
petroglyph
rock carving
rock shelter
ruins of a building or structure
shipwreck
trail
village site*

DISTRICT

A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development.

CONCENTRATION, LINKAGE, & CONTINUITY OF FEATURES

A district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources. The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties. For example, a district can reflect one principal activity, such as a mill or a ranch, or it can encompass several interrelated activities, such as an area that includes industrial, residential, or

commercial buildings, sites, structures, or objects. A district can also be a grouping of archeological sites related primarily by their common components; these types of districts often will not visually represent a specific historic environment.

SIGNIFICANCE

A district must be significant, as well as being an identifiable entity. It must be important for historical, architectural, archeological, engineering, or cultural values. Therefore, districts that are significant will usually meet the last portion of Criterion C plus Criterion A, Criterion B, other portions of Criterion C, or Criterion D.

TYPES OF FEATURES

A district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It may even be considered eligible if all of the components lack individual distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district's historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.

A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district's integrity. In archeological districts, the primary factor to be considered is the effect of any disturbances on the information potential of the district as a whole.

V. HOW TO EVALUATE A PROPERTY WITHIN ITS HISTORIC CONTEXT

UNDERSTANDING HISTORIC CONTEXTS

To qualify for the National Register, a property must be significant; that is, it must represent a significant part of the history, architecture, archeology, engineering, or culture of an area, and it must have the characteristics that make it a good representative of properties associated with that aspect of the past. This section explains how to evaluate a property within its historic context.

The significance of a historic property can be judged and explained only when it is evaluated within its historic context. Historic contexts are those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear. Historians, architectural historians, folklorists, archeologists, and anthropologists use different words to describe this phenomena such as trend, pattern, theme, or cultural affiliation, but ultimately the concept is the same.

The concept of historic context is not a new one; it has been fundamental to the study of history since the 18th century and, arguably, earlier than that. Its core premise is that resources, properties, or happenings in history do not occur in a vacuum but rather are part of larger trends or patterns.

In order to decide whether a property is significant within its historic context, the following five things must be determined:

- The facet of prehistory or history of the local area, State, or the nation that the property represents;
- Whether that facet of prehistory or history is significant;
- Whether it is a type of property that has relevance and importance in illustrating the historic context;
- How the property illustrates that history; and finally
- Whether the property possesses the physical features necessary to convey the aspect of prehistory or history with which it is associated.

These five steps are discussed in detail below. If the property being evaluated does represent an important aspect of the area's history or prehistory *and* possesses the requisite quality of integrity, then it qualifies for the National Register.

HOW TO EVALUATE A PROPERTY WITHIN ITS HISTORIC CONTEXT

Identify what the property represents: the theme(s), geographical limits, and chronological period that provide a perspective from which to evaluate the property's significance.

Historic contexts are historical patterns that can be identified through consideration of the history of the property and the history of the surrounding area. Historic contexts may have already been defined in your area by the State historic preservation office, Federal agencies, or local governments. In accordance with the National Register Criteria, the historic context may relate to one of the following:

- An event, a series of events or activities, or patterns of an area's development (Criterion A);
- Association with the life of an important person (Criterion B);
- A building form, architectural style, engineering technique, or artistic values, based on a stage of physical development, or the use of a material or method of construction that shaped the historic identity of an area (Criterion C); or
- A research topic (Criterion D).

⁴ For a complete discussion of historic contexts, see *National Register Bulletin: Guidelines for Completing National Register of Historic Places Registration Forms*.

PROPERTIES SIGNIFICANT WITHIN MORE THAN ONE HISTORIC CONTEXT

A specific property can be significant within one or more historic contexts, and, if possible, all of these should be identified. For example, a public building constructed in the 1830s that is related to the historic context of Civil War campaigns in the area might also be related to the theme of political developments in the community during the 1880s. A property is only required, however, to be documented as significant in one context.

COMPARING RELATED PROPERTIES

Properties listed in the National Register must possess significance when evaluated in the perspective of their historic context. Once the historic context is established and the property type is determined, it is not necessary to evaluate the property in question against other properties *if*:

- It is the sole example of a property type that is important in illustrating the historic context or
- It clearly possesses the defined characteristics required to strongly represent the context.

If these two conditions do not apply, then the property will have to be evaluated against other examples of the property type to determine its eligibility. The geographic level (local, State, or national) at which this evaluation is made is the same as the level of the historic context. (See *Part V: How to Evaluate a Property Within Its Historic Context.*)

LOCAL, STATE, AND NATIONAL HISTORIC CONTEXTS

Historic contexts are found at a variety of geographical levels or scales. The geographic scale selected may relate to a pattern of historical development, a political division, or a cultural area. Regardless of the scale, the historic context establishes the framework from which decisions about the significance of related properties can be made.

LOCAL HISTORIC CONTEXTS

A local historic context represents an aspect of the history of a town, city, county, cultural area, or region, or any portions thereof. It is defined by the importance of the property, not necessarily the physical location of the property. For instance, if a property is of a type found throughout a State, or its boundaries extend over two States, but its importance relates only to a particular county, the property would be considered of local significance.

The level of context of archeological sites significant for their information potential depends on the scope of the applicable research design. For example, a Late Mississippian village site may yield information in a research design concerning one settlement system on a regional scale, while in another research design it may reveal information of local importance concerning a single group's stone tool manufacturing techniques or house forms. It is a question of how the available information potential is likely to be used.

STATE HISTORIC CONTEXTS

Properties are evaluated in a State context when they represent an aspect of the history of the State as a whole (or American Samoa, the District of Columbia, the Commonwealth of the Northern Mariana Islands, Guam, Puerto Rico, or the Virgin Islands). These properties do not necessarily have to belong to property types

found throughout the entire State: they can be located in only a portion of the State's present political boundary. It is the property's historic context that must be important statewide. For example, the "cotton belt" extends through only a portion of Georgia, yet its historical development in the antebellum period affected the entire State. These State historic contexts may have associated properties that are statewide or locally significant representations. A cotton gin in a small town might be a locally significant representation of this context, while one of the largest cotton producing plantations might be of State significance.

A property whose historic associations or information potential appears to extend beyond a single local area might be significant at the State level. A property can be significant to more than one community or local area, however, without having achieved State significance.

A property that overlaps several State boundaries can possibly be significant to the State or local history of each of the States. Such a property is not necessarily of national significance, however, nor is it necessarily significant to all of the States in which it is located.

Prehistoric sites are not often considered to have "State" significance, per se, largely because States are relatively recent political entities and usually do not correspond closely to Native American political territories or cultural areas. Numerous sites, however, may be of significance to a large region that might geographically encompass parts of one, or usually several, States. Prehistoric resources that might be of State significance include regional sites that provide a diagnostic assemblage of artifacts for a particular cultural group or time period or that provide chronological control (specific dates or relative order in time) for a series of cultural groups.

VI. HOW TO IDENTIFY THE TYPE OF SIGNIFICANCE OF A PROPERTY

INTRODUCTION

When evaluated within its historic context, a property must be shown to be significant for *one or more of the four Criteria for Evaluation - A, B, C, or D* (listed earlier in *Part II*). The Criteria describe how properties are significant for their association with important events or persons, for their importance in design or construction, or for their information potential.

The basis for judging a property's significance and, ultimately, its eligibility under the Criteria is *historic context*. The use of historic context allows a property to be properly evaluated in a nearly infinite number of capacities. For instance, Criterion C: Design/Construction can accommodate properties representing construction types that are unusual or widely practiced, that are innovative or traditional, that are "high style" or vernacular, that are the work of a famous architect or an unknown master craftsman. *The key to determining whether the characteristics or associations of a particular property are significant is to consider the property within its historic context.*

After identifying the relevant historic context(s) with which the property is associated, the four Criteria are applied to the property. Within the scope of the historic context, the National Register Criteria define the kind of significance that the properties represent.

For example, within the context of "19th Century Gunpowder Production in the Brandywine Valley," Criterion A would apply to those properties associated with important events in the founding and development of the industry. Criterion B would apply to those properties associated with persons who are significant in the founding of the industry or associated with important inventions related to gunpowder manufacturing. Criterion C would apply to those buildings, structures, or objects whose architectural form or style reflect important design qualities integral to the industry. And Criterion D would apply to properties that can convey information important in our understanding of this industrial process. If a property qualifies under more than one of the Criteria, its significance under each should be considered, if possible, in order to identify all aspects of its historical value.

NATIONAL REGISTER CRITERIA FOR EVALUATION*

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 (Criterion A) or persons (Criterion 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.

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

TRADITIONAL CULTURAL VALUES

Traditional cultural significance is derived from the role a property plays in a community's historically rooted beliefs, customs, and practices. Properties may have significance under Criterion A if they are associated with events, or series of events, significant to the cultural traditions of a community.⁵

Eligible

- A hilltop associated in oral historical accounts with the founding of an Indian tribe or society is eligible.
- A rural community can be eligible whose organization, buildings, or patterns of land use reflect the cultural traditions valued by its long-term residents.
- An urban neighborhood can be eligible as the traditional home of a particular cultural group and as a reflection of its beliefs and practices.

Not Eligible

- A site viewed as sacred by a recently established utopian or religious community does not have traditional cultural value and is not eligible.



Criterion A - The Old Brulay Plantation, Brownsville vicinity, Cameron county, Texas. Historically significant for its association with the development of agriculture in southeast Texas, this complex of 10 brick buildings was constructed by George N. Brulay, a French immigrant who introduced commercial sugar production and irrigation to the Rio Grande Valley. (Photo by Texas Historical Commission).

⁵For more information, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

APPLYING CRITERION B: PERSON

SIGNIFICANCE OF THE INDIVIDUAL

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.

ASSOCIATION WITH THE PROPERTY

Properties eligible under Criterion B are usually those associated with a person's *productive* life, reflecting the time period when he or she achieved significance. In some instances this may be the person's home; in other cases, a person's business, office, laboratory, or studio may best represent his or her contribution. Properties that pre- or post-date an individual's significant accomplishments are usually not eligible. (See *Comparison to Related Properties*, below, for exceptions to this rule.)

The individual's association with the property must be documented by accepted methods of historical or archeological research, including written or oral history. Speculative associations are not acceptable. For archeological sites, well reasoned inferences drawn from data recovered at the site are acceptable.

COMPARISON TO RELATED PROPERTIES

Each property associated with an important individual should be compared to other associated properties to identify those that best represent the person's historic contributions. The best representatives usually are properties associated with the person's adult or *productive* life. Properties associated with an individual's formative or later years may also qualify if it can be demonstrated that the person's activities during this period were historically significant *or* if no properties from the person's productive years survives. Length of association is an important factor when assessing several properties with similar associations.

A community or State may contain several properties eligible for associations with the same important person, if each represents a different aspect of the person's productive life. A property can also be eligible if it has brief but consequential associations with an important individual. (Such associations are often related to specific events that occurred at the property and, therefore, it may also be eligible under Criterion A.)

ASSOCIATION WITH GROUPS

For properties associated with several community leaders or with a prominent family, it is necessary to identify specific individuals and to explain their significant accomplishments.

Eligible

- A residential district in which a large number of prominent or influential merchants, professionals, civic leaders, politicians, etc., lived will be eligible under Criterion B if the significance of one or more specific individual residents is explicitly justified.
- A building that served as the seat of an important family is eligible under Criterion B if the significant accomplishments of one or more individual family members is explicitly justified.

Not Eligible

- A residential district in which a large number of influential persons lived is not eligible under Criterion B if the accomplishments of a specific individual(s) cannot be documented. If the significance of the district rests in the cumulative importance of prominent residents, however, then the district might still be eligible under Criterion A. Eligibility, in this case, would be based on the broad pattern of community development, through which the neighborhood evolved into the primary residential area for this class of citizens.
- A building that served as the seat of an important family will not be eligible under Criterion B if the significant accomplishments of individual family members cannot be documented. In cases where a succession of family members have lived in a house and collectively have had a demonstrably significant impact on the community, as a family, the house is more likely to be significant under Criterion A for association with a pattern of events.

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.



Richland Plantation, East Feliciana Parish, Louisiana. Properties can qualify under Criterion C as examples of high style architecture. Built in the 1830s, Richland is a fine example of a Federal style residence with a Greek Revival style portico. (Photo by Dave Gleason).

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 here 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.



Grant Family House, Saco vicinity, York County, Maine. Properties possessing high artistic value meet Criterion C through the expression of aesthetic ideals or preferences. The Grant Family House, a modest Federal style residence, is significant for its remarkably well-preserved stenciled wall decorative treatment in the entry hall and parlor. Painted by an unknown artist ca. 1825, this is a fine example of 19th century New England regional artistic expression. (Photo by Kirk F. Moliney).

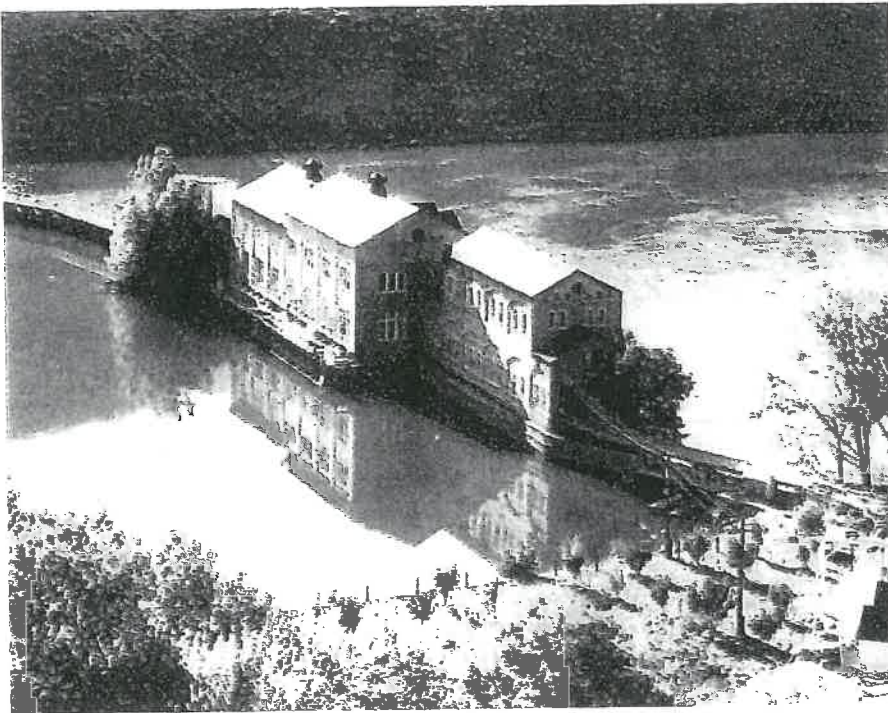
HISTORIC ADAPTATION OF THE ORIGINAL PROPERTY

A property can be significant not only for the way it was originally constructed or crafted, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.

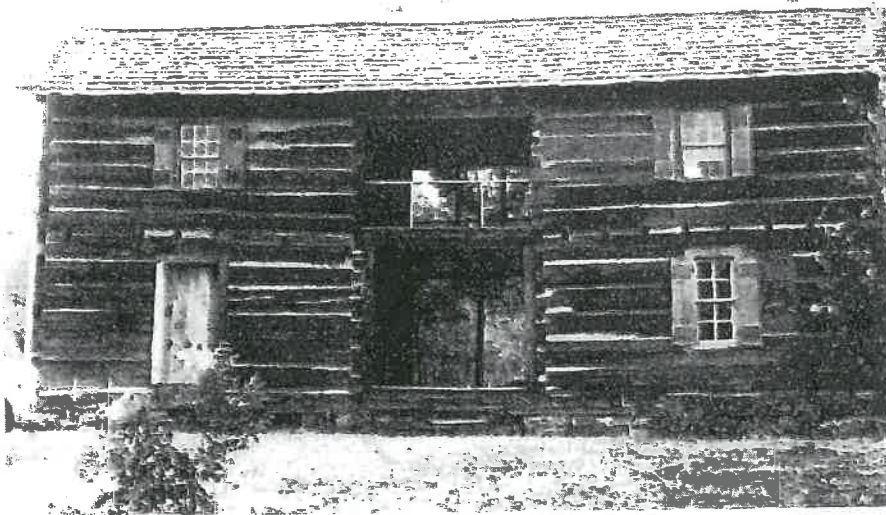
A district is eligible under this guideline if it illustrates the evolution of historic character of a place over a particular span of time.

Eligible

- A Native American irrigation system modified for use by Europeans could be eligible if it illustrates the technology of either or both periods of construction.
- An early 19th century farmhouse modified in the 1880s with Queen Anne style ornamentation could be significant for the modification itself, if it represented a local variation or significant trend in building construction or remodeling, was the work of a local master (see *Works of a Master* on page 20), or reflected the tastes of an important person associated with the property at the time of its alteration.
- A district encompassing the commercial development of a town between 1820 and 1910, characterized by buildings of various styles and eras, can be eligible.



Swan Falls Dam and Power Plant, Murphy vicinity, Ada County, Idaho. Significant works of engineering can qualify under Criterion C. Built between 1900-1907 the Swan Falls Dam and Power Plant across the Snake River is one of the early hydroelectric plants in the State of Idaho. (Photo by H.L. Hough).



Looney House, Asheville vicinity, St. Clair County, Alabama. Examples of vernacular styles of architecture can qualify under Criterion C. Built ca. 1818, the Looney House is significant as possibly the State's oldest extant two-story dogtrot type of dwelling. The defining open center passage of the dogtrot was a regional building response to the southern climate. (Photo by Carolyn Scott).

CRITERION D: INFORMATION POTENTIAL

Properties may be eligible for the National Register if they have yielded, or may be likely to yield, information important in prehistory or history.

UNDERSTANDING CRITERION D: INFORMATION POTENTIAL

Certain important research questions about human history can only be answered by the actual physical material of cultural resources. Criterion D encompasses the properties that have the potential to answer, in whole or in part, those types of research questions. The most common type of property nominated under this Criterion is the archeological site (or a district comprised of archeological sites). Buildings, objects, and structures (or districts comprised of these property types), however, can also be eligible for their information potential.

Criterion D has two requirements, which must *both* be met for a property to qualify:

- The property must have, or have had, information to contribute to our understanding of human history or prehistory, and
- The information must be considered important.

Under the first of these requirements, a property is eligible if it has been used as a source of data and contains more, as yet unretrieved data. A property is also eligible if it has not yet yielded information but, through testing or research, is determined a likely source of data.

Under the second requirement, the information must be carefully evaluated within an appropriate context to determine its importance. Information is considered "important" when it is shown to have a significant bearing on a research design that addresses such areas as: 1) current

data gaps or alternative theories that challenge existing ones or 2) priority areas identified under a State or Federal agency management plan.

APPLYING CRITERION D: INFORMATION POTENTIAL

ARCHEOLOGICAL SITES

Criterion D most commonly applies to properties that contain or are likely to contain information bearing on an important archeological research question. The property must have characteristics suggesting the likelihood that it possesses configurations of artifacts, soil strata, structural remains, or other natural or cultural features that make it possible to do the following:

- Test a hypothesis or hypotheses about events, groups, or processes in the past that bear on important research questions in the social or natural sciences or the humanities; or
- Corroborate or amplify currently available information suggesting that a hypothesis is either true or false; or
- Reconstruct the sequence of archeological cultures for the purpose of identifying and explaining continuities and discontinuities in the archeological record for a particular area.

BUILDINGS, STRUCTURES, AND OBJECTS

While most often applied to archeological districts and sites, Criterion D can also apply to buildings, structures, and objects that contain important information. In order for these types of properties to be eligible under Criterion D, they themselves must be, or must have been, the principal source of the important information.

Eligible

- A building exhibiting a local variation on a standard design or construction technique can be eligible if study could yield important information, such as how local availability of materials or construction expertise affected the evolution of local building development.

Not Eligible

- The ruins of a hacienda once contained murals that have since been destroyed. Historical documentation, however, indicates that the murals were significant for their highly unusual design. The ruins can not be eligible under Criterion D for the importance of the destroyed murals if the information is contained only in the documentation.

ESTABLISHING THE PRESENCE OF ADEQUATE DATA

To support the assertion that a property has the data necessary to provide the important information, the property should be investigated with techniques sufficient to establish the presence of relevant data categories. What constitutes appropriate investigation techniques would depend upon specific circumstances including the property's location, condition, and the research questions being addressed, and could range from surface survey (or photographic survey for buildings), to the application of remote sensing techniques or intensive subsurface testing. Justification of the research potential of a property may be based on analogy to another better known property if sufficient similarities exist to establish the appropriateness of the analogy.

Eligible

- Data requirements depend on the specific research topics and questions to be addressed. To continue the example in "Developing Research Questions" above, we might want to ascertain the following with reference to questions A, B, and C: A) The site contains Ceramic Type X in one or more occupation levels and we expect to be able to document the local evaluation of the type or its intrusive nature. B) The hearths contain datable carbon deposits and are associated with more than one occupation. C) The midden deposits show good floral/faunal preservation, and we know enough about the physical evolution of food plants to interpret signs that suggest domestication.

Not Eligible

- Generally, if the applicable research design requires clearly stratified deposits, then subsurface investigation techniques must be applied. A site composed only of surface materials can not be eligible for its potential to yield information that could only be found in stratified deposits.

INTEGRITY

The assessment of integrity for properties considered for information potential depends on the data requirements of the applicable research design. A property possessing information potential does not need to recall *visually* an event, person, process, or construction technique. It is important that the significant data contained in the property remain sufficiently intact to yield the expected important information, if the appropriate study techniques are employed.

Eligible

- An irrigation system significant for the information it will yield on early engineering practices can still be eligible even though it is now filled in and no longer retains the appearance of an open canal.

Not Eligible

- A plowed archeological site contains several superimposed components that have been mixed to the extent that artifact assemblages cannot be reconstructed. The site cannot be eligible if the data requirements of the research design call for the study of artifacts specific to one component.

PARTLY EXCAVATED OR DISTURBED PROPERTIES

The current existence of appropriate physical remains must be ascertained in considering a property's ability to yield important information. Properties that have been partly excavated or otherwise disturbed and that are being considered for their potential to yield additional important information must be shown to retain that potential in their remaining portions.

Eligible

- A site that has been partially excavated but still retains substantial intact deposits (or a site in which the remaining deposits are small but contain critical information on a topic that is not well known) is eligible.

Not Eligible

- A totally collected surface site or a completely excavated buried site is not eligible since the physical remains capable of yielding important information no longer exist at the site. (See *Completely Excavated Sites*, on page 24, for exception.) Likewise, a site that has been looted or otherwise disturbed to the extent that the remaining cultural materials have lost their important depositional context (horizontal or vertical location of deposits) is not eligible.
- A reconstructed mound or other reconstructed site will generally not be considered eligible, because original cultural materials or context or both have been lost.

VII. HOW TO APPLY THE CRITERIA CONSIDERATIONS

INTRODUCTION

Certain kinds of properties are not usually considered for listing in the National Register: religious properties, moved properties, birthplaces and graves, cemeteries, reconstructed properties, commemorative properties, and properties achieving significance within the past fifty years. These properties *can* be eligible for listing, however, if they meet special requirements, called Criteria Considerations, in addition to meeting the regular requirements (that is, being eligible under one or more of the four Criteria and possessing integrity). *Part VII* provides guidelines for determining which properties must meet these special requirements and for applying each Criteria Consideration.

The Criteria Considerations need to be applied only to *individual* properties. Components of eligible districts do not have to meet the special requirements unless they make up the majority of the district or are the focal point of the district. These are the general steps to follow when applying the Criteria Considerations to your property:

- Before looking at the Criteria Considerations, make sure your property meets one or more of the four Criteria for Evaluation and possesses integrity.
- If it does, check the Criteria Considerations (next column) to see if

the property is of a type that is usually excluded from the National Register. The sections that follow also list specific examples of properties of each type. If your property clearly *does not* fit one of these types, then it does not need to meet any special requirements.

- If your property *does* fit one of these types, then it must meet the special requirements stipulated for that type in the Criteria Considerations.

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 fifty 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 or if they fall within the following categories:

- a. a religious property deriving primary significance from architectural or artistic distinction or historical importance; or

- b. a building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- c. a birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his or her productive life; or
- d. a cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, from association with historic events; or
- e. a reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- f. a property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or,
- g. a property achieving significance within the past 50 years if it is of exceptional importance.

*The Criteria Considerations are taken from the Criteria for Evaluation, found in the *Code of Federal Regulations, Title 36, Part 60.*

RELIGIOUS HISTORY

A religious property can be eligible if it is directly associated with either a specific event or a broad pattern in the history of religion.

Eligible

- The site of a convention at which a significant denominational split occurred meets the requirements of Criteria Consideration A. Also eligible is a property that illustrates the broad impact of a religious institution on the history of a local area.

Not Eligible

- A religious property cannot be eligible simply because was the place of religious services for a community, or was the oldest structure used by a religious group in a local area.

OTHER HISTORICAL THEMES

A religious property can be eligible if it is directly associated with either a specific event or a broad pattern that is significant in another historic context. A religious property would also qualify if it were significant for its associations that illustrate the importance of a particular religious group in the social, cultural, economic, or political history of the area. Eligibility depends on the importance of the event or broad pattern and the role of the specific property.

Eligible

- A religious property can qualify for its important role as a temporary hospital during the Revolutionary War, or if its school was significant in the history of education in the community.

Not Eligible

- A religious property is not significant in the history of education in a community simply because it had occasionally served as a school.

TRADITIONAL CULTURAL VALUES

When evaluating properties associated with traditional cultures, it is important to recognize that often these cultures do not make clear distinctions between what is secular and what is sacred. Criteria Consideration A is not intended to exclude traditional cultural resources merely because they have religious uses or are considered sacred. A property or natural feature important to a traditional culture's religion and mythology is eligible if its importance has been ethnohistorically documented and if the site can be clearly defined. It is critical, however, that the activities be documented and that the associations not be so diffuse that the physical resource cannot be adequately defined.⁸

Eligible

- A specific location or natural feature that an Indian tribe believes to be its place of origin and that is adequately documented qualifies under Criteria Consideration A.

ELIGIBILITY FOR HISTORIC PERSONS

A religious property can be eligible for association with a person important in religious history, if that significance has scholarly, secular recognition or is important in other historic contexts. Individuals who would likely be considered significant are those who formed or significantly influenced an important religious institution or movement, or who were important in the social, economic, or political history of the area. Properties associated with individuals important only within the context of a single congregation and lacking importance in any other historic context would not be eligible under Criterion B.

Eligible

- A religious property strongly associated with a religious leader, such as George Whitefield or Joseph Smith, is eligible.

⁸ For more information on applying Criteria Consideration A to traditional cultural properties, refer to *National Register Bulletin: Guidelines for Evaluating and Documenting Traditional Cultural Properties*.

CRITERIA CONSIDERATION B: MOVED PROPERTIES

A property removed from its original or historically significant location can be eligible if it is significant primarily for architectural value or it is the surviving property most importantly associated with a historic person or event.

UNDERSTANDING CRITERIA CONSIDERATION B: MOVED PROPERTIES

The National Register criteria limit the consideration of moved properties because significance is embodied in locations and settings as well as in the properties themselves. Moving a property destroys the relationships between the property and its surroundings and destroys associations with historic events and persons. A move may also cause the loss of historic features such as landscaping, foundations, and chimneys, as well as loss of the potential for associated archeological deposits. Properties that were moved *before* their period of significance do not need to meet the special requirements of Criteria Consideration B.

One of the basic purposes of the National Register is to encourage the preservation of historic properties as living parts of their communities. In keeping with this purpose, it is not usual to list artificial groupings of buildings that have been created for purposes of interpretation, protection, or maintenance. Moving buildings to such a grouping destroys the integrity of location and setting, and can create a false sense of historic development.

APPLYING CRITERIA CONSIDERATION B: MOVED PROPERTIES

ELIGIBILITY FOR ARCHITECTURAL VALUE

A moved property significant under Criterion C must retain enough historic features to convey its architectural values and retain integrity of design, materials, workmanship, feeling, and association.

Examples of Properties that MUST Meet Criteria Consideration B: Moved Properties

- A resource moved from one location on its original site to another location on the property, during or after its Period of Significance.
- A district in which a significant number of resources have been moved from their original location.
- A district which has one moved building that makes an especially significant contribution to the district.
- A portable resource, such as a ship or railroad car, that is relocated to a place incompatible with its original function.
- A portable resource, such as a ship or railroad car, whose importance is critically linked to its historic location or route and that is moved.

Examples of Properties that DO NOT Need to Meet Criteria Consideration B: Moved Properties

- A property that is moved prior to its Period of Significance.
- A district in which only a small percentage of typical buildings in a district are moved.
- A moved building that is part of a complex but is of less significance than the remaining (unmoved) buildings.
- A portable resource, such as a ship or railroad car, that is eligible under Criterion C and is moved within its natural setting (water, rails, etc.).
- A property that is raised or lowered on its foundations.

PROPERTIES DESIGNED TO BE MOVED

A property designed to move or a property frequently moved during its historic use must be located in a historically appropriate setting in order to qualify, retaining its integrity of setting, design, feeling, and association. Such properties include automobiles, railroad cars and engines, and ships.

Eligible

- A ship docked in a harbor, a locomotive on tracks or in a railyard, and a bridge relocated from one body of water to another are eligible.

Not Eligible

- A ship on land in a park, a bridge placed in a pasture, or a locomotive displayed in an indoor museum are not eligible.

ARTIFICIALLY CREATED GROUPINGS

An artificially created grouping of buildings, structures, or objects is not eligible unless it has achieved significance since the time of its assemblage. It cannot be considered as a reflection of the time period when the individual buildings were constructed.

Eligible

- A grouping of moved historic buildings whose creation marked the beginning of a major concern with past lifestyles can qualify as an early attempt at historic preservation and as an illustration of that generation's values.

Not Eligible

- A rural district composed of a farmhouse on its original site and a grouping of historic barns recently moved onto the property is not eligible.

PORTIONS OF PROPERTIES

A moved *portion* of a building, structure, or object is not eligible because, as a fragment of a larger resource, it has lost integrity of design, setting, materials, workmanship, and location.

ELIGIBILITY FOR OTHER ASSOCIATIONS

A birthplace or grave can also be eligible if it is significant for reasons other than association with the productive life of the person in question. It can be eligible for significance under Criterion A for association with important events, under Criterion B for association with the productive lives of *other* important persons, or under Criterion C for architectural significance. A birthplace or grave can also be eligible in rare cases if, after the passage of time, it is significant for its commemorative value. (See Criteria Consideration F for a discussion of commemorative properties.) A birthplace or grave can also be eligible under Criterion D if it contains important information on research, e.g., demography, pathology, mortuary practices, socioeconomic status differentiation.



Criteria Consideration C - Birthplaces. A birthplace of a historical figure is eligible if the person is of outstanding importance and there is no other appropriate site or building associated with his or her productive life. The **Walter Reed Birthplace**, Gloucester vicinity, Gloucester County, Virginia is the most appropriate remaining building associated with the life of the man who, in 1900, discovered the cause and mode of transmission of the great scourge of the tropics, yellow fever. (Virginia Historic Landmarks Commission)

ELIGIBILITY ON THE BASIS OF AGE

Cemeteries can be eligible if they have achieved historic significance for their relative great age in a particular geographic or cultural context.

Eligible

- A cemetery dating from a community's original 1830s settlement can attain significance from its association with that very early period.

ELIGIBILITY FOR DESIGN

Cemeteries can qualify on the basis of distinctive design values. These values refer to the same design values addressed in Criterion C and can include aesthetic or technological achievement in the fields of city planning, architecture, landscape architecture, engineering, mortuary art, and sculpture. As for all other nominated properties, a cemetery must clearly express its design values and be able to convey its historic appearance.

Eligible

- A Victorian cemetery is eligible if it clearly expresses the aesthetic principles related to funerary design for that period, through such features as the overall plan, landscaping, statuary, sculpture, fencing, buildings, and grave markers.

Not Eligible

- A cemetery cannot be eligible for design values if it no longer conveys its historic appearance because of the introduction of new grave markers.

ELIGIBILITY FOR ASSOCIATION WITH EVENTS

Cemeteries may be associated with historic events including specific important events or general events that illustrate broad patterns.

Eligible

- A cemetery associated with an important Civil War battle is eligible.
- A cemetery associated with the settlement of an area by an ethnic or cultural group is eligible if the movement of the group into the area had an important impact, if other properties associated with that group are rare, and if few documentary sources have survived to provide information about the group's history.

Not Eligible

- A cemetery associated with a battle in the Civil War does not qualify if the battle was not important in the history of the war.
- A cemetery associated with an area's settlement by an ethnic or cultural group is not eligible if the impact of the group on the area cannot be established, if other extant historic properties better convey association with the group, or if the information that the cemetery can impart is available in documentary sources.

ELIGIBILITY FOR INFORMATION POTENTIAL

Cemeteries, both historic and prehistoric, can be eligible if they have the potential to yield important information. The information must be important within a specific context and the potential to yield information must be demonstrated.

A cemetery can qualify if it has potential to yield important information provided that the information it contains is not available in extant documentary evidence.

Eligible

- A cemetery associated with the settlement of a particular cultural group will qualify if it has the potential to yield important information about subjects such as demography, variations in mortuary practices, or the study of the cause of death correlated with nutrition or other variables.

CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

A reconstructed property is eligible when it is accurately executed in a suitable environment *and* presented in a dignified manner as part of a restoration master plan *and* when no other building or structure with the same associations has survived. All three of these requirements must be met.

UNDERSTANDING CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

“Reconstruction” is defined as the reproduction of the exact form and detail of a vanished building, structure, object, or a part thereof, as it appeared at a specific period of time. Reconstructed buildings fall into two categories: buildings wholly constructed of new materials and buildings reassembled from some historic and some new materials. Both categories of properties present problems in meeting the integrity requirements of the National Register criteria.

Examples of Properties that MUST Meet Criteria Consideration E: Reconstructed Properties

- A property in which most or all of the fabric is not original.
- A district in which an important resource or a significant number of resources are reconstructions.

Examples of Properties that DO NOT Need to Meet Criteria Consideration E: Reconstructed Properties

- A property that is remodeled or renovated and still has the majority of its original fabric.

APPLYING CRITERIA CONSIDERATION E: RECONSTRUCTED PROPERTIES

ACCURACY OF THE RECONSTRUCTION

The phrase “accurately executed” means that the reconstruction must be based upon sound archeological, architectural, and historic data concerning the historic construction and appearance of the resource. That documentation should include both analysis of any above or below ground material and research in written and other records.

SUITABLE ENVIRONMENT

The phrase “suitable environment” refers to: 1) the physical context provided by the historic district and 2) any interpretive scheme, if the historic district is used for interpretive purposes. This means that the reconstructed property must be located at the same site as the original. It must also be situated in its original grouping of buildings, structures, and objects (as many as are extant), and that grouping must retain integrity. In addition, the reconstruction must not be misrepresented as an authentic historic property.

Eligible

- A reconstructed plantation manager’s office building is considered eligible because it is located at its historic site, grouped with the remaining historic plantation buildings and structures, and the plantation as a whole retains integrity. Interpretation of the plantation district includes an explanation that the manager’s office is not the original building, but a reconstruction.

Not Eligible

- The same reconstructed plantation manager’s office building would not qualify if it were rebuilt at a location different from that of the original building, or if the district as a whole no longer reflected the period for which it is significant, or if a misleading interpretive scheme were used for the district or for the reconstruction itself.

CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

A property primarily commemorative in intent can be eligible if design, age, tradition, or symbolic value has invested it with its own historical significance.

UNDERSTANDING CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

Commemorative properties are designed or constructed after the occurrence of an important historic event or after the life of an important person. They are not directly associated with the event or with the person's productive life, but serve as evidence of a later generation's assessment of the past. Their significance comes from their value as cultural expressions at the date of their creation. Therefore, a commemorative property generally must be over fifty years old and must possess significance based on its own value, not on the value of the event or person being memorialized.

Examples of Properties that MUST Meet Criteria Consideration F: Commemorative Properties

- *A property whose sole or primary function is commemorative or in which the commemorative function is of primary significance.*

Examples of Properties that DO NOT Need to Meet Criteria Consideration F: Commemorative Properties

- *A resource that has a non-commemorative primary function or significance.*
- *A single marker that is a component of a district (whether contributing or non-contributing).*

APPLYING CRITERIA CONSIDERATION F: COMMEMORATIVE PROPERTIES

ELIGIBILITY FOR DESIGN

A commemorative property derives its design from the aesthetic values of the period of its creation. A commemorative property, therefore, may be significant for the architectural, artistic, or other design qualities of its own period in prehistory or history.

Eligible

- A commemorative statue situated in a park or square is eligible if it expresses the aesthetics or craftsmanship of the period when it was made, meeting Criterion C.
- A late 19th century statue erected on a courthouse square to commemorate Civil War veterans would qualify if it reflects that era's shared perception of the noble character and valor of the veterans and their cause. This was commonly conveyed by portraying idealized soldiers or allegorical figures of battle, victory, or sacrifice.

CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS⁹

A property achieving significance within the last fifty years is eligible if it is of exceptional importance.

UNDERSTANDING CRITERIA CONSIDERATION G: PROPERTIES THAT HAVE ACHIEVED SIGNIFICANCE WITHIN THE LAST FIFTY YEARS

The National Register Criteria for Evaluation exclude properties that achieved significance within the last fifty years unless they are of exceptional importance. Fifty years is a general estimate of the time needed to develop historical perspective and to evaluate significance. This consideration guards against the listing of properties of passing contemporary interest and ensures that the National Register is a list of truly historic places.

Examples of Properties that MUST Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Last Fifty Years

- A property that is less than fifty years old.
- A property that continues to achieve significance into a period less than fifty years before the nomination.
- A property that has non-contiguous Periods of Significance, one of which is less than fifty years before the nomination.
- A property that is more than fifty years old and had no significance until a period less than fifty years before the nomination.

Examples of Properties that DO NOT Need to Meet Criteria Consideration G: Properties that Have Achieved Significance Within the Last Fifty Years

- A resource whose construction began over fifty years ago, but the completion overlaps the fifty year period by a few years or less.
- A resource that is significant for its plan or design, which is over fifty years old, but the actual completion of the project overlaps the fifty year period by a few years.
- A historic district in which a few properties are newer than fifty years old, but the majority of properties and the most important Period of Significance are greater than fifty years old.

⁹ For more information on Criteria Consideration G, refer to *National Register Bulletin: Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Last Fifty Years*.

ELIGIBILITY FOR INFORMATION POTENTIAL

A property that has achieved significance within the past fifty years can qualify under Criterion D only if it can be demonstrated that the information is of exceptional importance within the appropriate context and that the property contains data superior to or different from those obtainable from other sources, including other culturally related sites. An archeological site less than fifty years old may be eligible if the former inhabitants are so poorly documented that information about their lifeways is best obtained from examination of the material remains.

Eligible

- Data such as the rate of adoption of modern technological innovations by rural tenant farmers in the 1950s may not be obtainable through interviews with living persons but could be gained by examination of homesites.

Not Eligible

- A recent archeological site such as the remains of a Navajo sheep corral used in the 1950s would not be considered exceptionally significant for its information potential on animal husbandry if better information on the same topic is available through ethnographic studies or living informants.

HISTORIC DISTRICTS

Properties which have achieved significance within the past fifty years can be eligible for the National Register if they are an integral part of a district which qualifies for National Register listing. This is demonstrated by documenting that the property dates from within the district's defined Period of Significance and that it is associated with one or more of the district's defined Areas of Significance.

Properties less than fifty years old may be an integral part of a district when there is sufficient perspective to consider the properties as historic. This is accomplished by demonstrating that: 1) the district's Period of Significance is justified as a discrete period with a defined beginning and end, 2) the character of the district's historic resources is clearly defined and assessed, 3) specific resources in the district are demonstrated to date from that discrete era, and 4) the majority of district properties are over fifty years old. In these instances, it is not necessary to prove exceptional importance of either the district itself or the less-than-fifty-year-old properties. Exceptional importance still must be demonstrated for district where the majority of properties or the major Period of Significance is less than fifty years old, and for less-than-fifty-year-old properties which are nominated individually.

PROPERTIES MORE THAN FIFTY YEARS IN AGE, LESS THAN FIFTY YEARS IN SIGNIFICANCE

Properties that are more than fifty years old, but whose significant associations or qualities are less than fifty years old, must be treated under the fifty year consideration.

Eligible

- A building constructed early in the twentieth century (and having no architectural importance), but that was associated with an important person during the 1950s, must be evaluated under Criteria Consideration G because the Period of Significance is within the past fifty years. Such a property would qualify if the person was of exceptional importance.

REQUIREMENT TO MEET THE CRITERIA, REGARDLESS OF AGE

Properties that are less than fifty years old and are not exceptionally important will *not* automatically qualify for the National Register once they are fifty years old. In order to be listed in the National Register, all properties, regardless of age, must be demonstrated to meet the Criteria for Evaluation.

SETTING

Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the *character* of the place in which the property played its historical role. It involves *how*, not just *where*, the property is situated and its relationship to surrounding features and open space.

Setting often reflects the basic physical conditions under which a property was built and the functions it was intended to serve. In addition, the way in which a property is positioned in its environment can reflect the designer's concept of nature and aesthetic preferences.

The physical features that constitute the setting of a historic property can be either natural or manmade, including such elements as:

- Topographic features (a gorge or the crest of a hill);
- Vegetation;
- Simple manmade features (paths or fences); and
- Relationships between buildings and other features or open space.

These features and their relationships should be examined not only within the exact boundaries of the property, but also between the property and its *surroundings*. This is particularly important for districts.

MATERIALS

Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of particular types of materials and technologies. Indigenous materials are often the focus of regional building traditions and thereby help define an area's sense of time and place.

A property must retain the key exterior materials dating from the period of its historic significance. If the property has been rehabilitated, the historic materials and significant features must have been preserved. The property must also be an actual historic resource, not a recreation; a

recent structure fabricated to look historic is not eligible. Likewise, a property whose historic features and materials have been lost and then reconstructed is usually not eligible. (See Criteria Consideration E in *Part VII: How to Apply the Criteria Considerations* for the conditions under which a reconstructed property can be eligible.)

WORKMANSHIP

Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components. It can be expressed in vernacular methods of construction and plain finishes or in highly sophisticated configurations and ornamental detailing. It can be based on common traditions or innovative period techniques.

Workmanship is important because it can furnish evidence of the technology of a craft, illustrate the aesthetic principles of a historic or prehistoric period, and reveal individual, local, regional, or national applications of both technological practices and aesthetic principles. Examples of workmanship in historic buildings include tooling, carving, painting, graining, turning, and joinery. Examples of workmanship in prehistoric contexts include Paleo-Indian clovis projectile points; Archaic period beveled adzes; Hopewellian birdstone pipes; copper earspools and worked bone pendants; and Iroquoian effigy pipes.

FEELING

Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character. For example, a rural historic district retaining original design, materials, workmanship, and setting will relate the feeling of agricultural life in the 19th century. A grouping of prehistoric petroglyphs, unmarred by graffiti and intrusions and located on its original isolated bluff, can evoke a sense of tribal spiritual life.

ASSOCIATION

Association is the direct link between an important historic event or person and a historic property. A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property's historic character. For example, a Revolutionary War battlefield whose natural and manmade elements have remained intact since the 18th century will retain its quality of association with the battle.

Because feeling and association depend on individual perceptions, their retention *alone* is never sufficient to support eligibility of a property for the National Register.

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.

Ultimately, the question of integrity is answered by whether or not the property retains the **identity** for which it is significant.

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.

PROPERTY CONTAINED WITHIN ANOTHER PROPERTY

Some properties contain an earlier structure that formed the nucleus for later construction. The exterior property, if not eligible in its own right, can qualify on the basis of the interior property *only* if the interior property can yield significant information about a specific construction technique or material, such as rammed earth or tabby. The interior property *cannot* be used as the basis for eligibility if it has been so altered that it no longer contains the features that could provide important information, or if the presence of important information cannot be demonstrated.

SUNKEN VESSELS

A sunken vessel can be eligible under Criterion C as embodying the distinctive characteristics of a method of construction if it is structurally intact. A *deteriorated* sunken vessel, no longer structurally intact, can be eligible under Criterion D if the remains of either the vessel or its contents is capable of yielding significant information. For further information, refer to *National Register Bulletin: Nominating Historic Vessels and Shipwrecks to the National Register of Historic Places*.

Natural Features

A natural feature that is associated with a historic event or trend, such as a rock formation that served as a trail marker during westward expansion, must retain its historic appearance, unobscured by modern construction or landfill. Otherwise it is not eligible, even though it remains intact.

COMPARING SIMILAR PROPERTIES

For some properties, comparison with similar properties should be considered during the evaluation of integrity. Such comparison may be important in deciding what physical features are essential to properties of that type. In instances where it has not been determined what physical features a property must possess in order for it to reflect the significance of a historic context, comparison with similar properties should be undertaken during the evaluation of integrity. This situation arises when scholarly work has not been done on a particular property type or when surviving examples of a property type are extremely rare. (See **Comparing Related Properties** in *Part V: How to Evaluate a Property within its Historic Context*.)

RARE EXAMPLES OF A PROPERTY TYPE

Comparative information is particularly important to consider when evaluating the integrity of a property that is a rare surviving example of its type. The property must have the essential physical features that enable it to convey its historic character or information. The rarity and poor condition, however, of other extant examples of the type may justify accepting a greater degree of alteration or fewer features, provided that enough of the property survives for it to be a significant resource.

Eligible

- A one-room schoolhouse that has had all original exterior siding replaced and a replacement roof that does not exactly replicate the original roof profile can be eligible if the other extant rare examples have received an even greater degree of alteration, such as the subdivision of the original one-room plan.

Not Eligible

- A mill site contains information on how site patterning reflects historic functional requirements, but parts of the site have been destroyed. The site is not eligible for its information potential if a comparison of other mill sites reveals more intact properties with complete information.

CRITERION D

For properties eligible under Criterion D, setting and feeling may not have direct bearing on the property's ability to yield important information. Evaluation of integrity probably will focus primarily on the location, design, materials, and perhaps workmanship.

Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns can be eligible if:

- floral or faunal remains are found in clear association with cultural material (**Materials and Association**) and
- the site exhibits stratigraphic separation of cultural components (**Location**).

Not Eligible

A multicomponent prehistoric site important for yielding data on changing subsistence patterns would not be eligible if:

- floral or faunal remains were so badly decomposed as to make identification impossible (**Materials**), or
- floral or faunal remains were disturbed in such a manner as to make their association with cultural remains ambiguous (**Association**), or
- the site has lost its stratigraphic context due to subsequent land alterations (**Location**).

Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period can be eligible if:

- the site contains lithic debitage, finished stone tools, hammerstones, or antler flakers (**Material and Design**), and
- the site contains datable material (**Association**).

Not Eligible

A lithic scatter site important for yielding data on lithic technology during the Late Archaic period would not be eligible if:

- the site contains natural deposits of lithic materials that are impossible to distinguish from culturally modified lithic material (**Design**) or
- the site does not contain any temporal diagnostic evidence that could link the site to the Late Archaic period (**Association**).

4. A birthplace, grave or burial if it is of a historical figure of transcendent national significance and no other appropriate site, building, or structure directly associated with the productive life of that person exists; or
5. A cemetery that derives its primary national significance from graves of persons of transcendent importance, or from an exceptionally distinctive design or an exceptionally significant event; or
6. A reconstructed building or ensemble of buildings of extraordinary national significance when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other buildings or structures with the same association have survived; or
7. A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own national historical significance; or
8. A property achieving national significance within the past 50 years if it is of extraordinary national importance.

COMPARING THE NATIONAL HISTORIC LANDMARKS CRITERIA AND THE NATIONAL REGISTER CRITERIA

In general, the instructions for preparing a National Register nomination and the guidelines stated in this bulletin for applying the National Register Criteria also apply to Landmark nominations and the use of the Landmark criteria. While there are specific distinctions discussed below, *Parts IV and V* of this bulletin apply equally to National Register listings and Landmark nominations. That is, the categories of historic properties are defined the same way; historic con-

texts are identified similarly; and comparative evaluation is carried out on the same principles enumerated in *Part V*.

There are some differences between National Register and National Historic Landmarks Criteria. The following is an explanation of how each Landmark Criterion compares with its National Register Criteria counterpart:

CRITERION 1

This Criterion relates to National Register Criterion A. Both cover properties associated with events. The Landmark Criterion, however, requires that the events associated with the property be *outstandingly* represented by that property and that the property be related to the broad national patterns of U.S. history. Thus, the quality of the property to convey and interpret its meaning must be of a higher order and must relate to national themes rather than the narrower context of State or local themes.

CRITERION 2

This Criterion relates to National Register Criterion B. Both cover properties associated with significant people. The Landmark Criterion differs in that it specifies that the association of a person to the property in question be an important one and that the person associated with the property be of *national* significance.

CRITERION 3

This Criterion has no counterpart among the National Register Criteria. It is rarely, if ever, used alone. While not a landmark at present, the Liberty Bell is an object that might be considered under this Criterion. The application of this Criterion obviously requires the most careful scrutiny and would apply only in rare instances involving ideas and ideals of the highest order.

CRITERION 4

This Criterion relates to National Register Criterion C. Its intent is to qualify exceptionally important works of architecture or collective elements of architecture extraordinarily significant as an ensemble, such as a historic

district. Note that the language is more restrictive than that of the National Register Criterion in requiring that a candidate in architecture be "a specimen exceptionally valuable for the study of a period, style, or method of construction" rather than simply embodying distinctive characteristics of a type, period, or method of construction. With regard to historic districts, the Landmarks Criterion requires an entity that is distinctive and exceptional. Unlike National Register Criterion C, this Criterion will not qualify the works of a master, per se, but only such works which are exceptional or extraordinary. Artistic value is considered only in the context of history's judgement in order to avoid current conflicts of taste.

CRITERION 5

This Criterion does not have a strict counterpart among the National Register Criteria. It may seem redundant of the latter part of Landmark Criterion 4. It is meant to cover collective entities such as Greenfield Village and historic districts like New Bedford, Massachusetts, which qualify for their collective association with a nationally significant event, movement, or broad pattern of national development.

CRITERION 6

The National Register counterpart of this is Criterion D. Criterion 6 was developed specifically to recognize archeological sites. All such sites must address this Criterion. The following are the qualifications that distinguish this Criterion from its National Register counterpart: the information yielded or likely to be yielded must be of *major* scientific importance by revealing new cultures, or by shedding light upon periods of occupation *over large areas* of the United States. Such sites should be expected to yield data affecting *theories, concepts, and ideas* to a *major degree*.

The data recovered or expected to be recovered must make a major contribution to the existing corpus of information. Potentially recoverable data must be likely to revolutionize or substantially modify a major theme in history or prehistory, resolve a substantial historical or anthropological debate, or close a serious gap in a major theme of U. S. history or prehistory.

X. GLOSSARY

Associative Qualities - An aspect of a property's history that links it with historic events, activities, or persons.

Code of Federal Regulations - Commonly referred to as "CFR." The part containing the National Register Criteria is usually referred to as 36 CFR 60, and is available from the National Park Service.

CLG - Certified Local Government.

Culture - A group of people linked together by shared values, beliefs, and historical associations, together with the group's social institutions and physical objects necessary to the operation of the institution.

Cultural Resource - See Historic Resource.

Evaluation - Process by which the significance and integrity of a historic property are judged and eligibility for National Register listing is determined.

Historic Context - An organizing structure for interpreting history that groups information about historic properties that share a common theme, common geographical area, and a common time period. The development of historic contexts is a foundation for decisions about the planning, identification, evaluation, registration, and treatment of historic properties, based upon comparative historic significance.

Historic Integrity - The unimpaired ability of a property to convey its historical significance.

Historic Property - See Historic Resource.

Historic Resource - Building, site, district, object, or structure evaluated as historically significant.

Identification - Process through which information is gathered about historic properties.

Listing - The formal entry of a property in the National Register of Historic Places. See also, Registration.

Nomination - Official recommendation for listing a property in the National Register of Historic Places.

Property Type - A grouping of properties defined by common physical and associative attributes.

Registration - Process by which a historic property is documented and nominated or determined eligible for listing in the National Register.

Research Design - A statement of proposed identification, documentation, investigation, or other treatment of a historic property that identifies the project's goals, methods and techniques, expected results, and the relationship of the expected results to other proposed activities or treatments.



Education

- M. Historic Preservation
University of Kentucky, 2009
- B. Interior Architecture
Kansas State University, 2004

Community Engagement

- National Alliance of Preservation
Commissions
- Kansas City, Missouri Historic
Preservation Commission, (Board
Vice Chair, 2017-2025)
- Adjunct Instructor, University of Mis-
souri, Kansas City

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**CPC
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EXHIBIT**

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Amanda Loughlin

Senior Project Manager

Amanda has extensive experience evaluating historic resources and preparing determinations of eligibility and National Register nominations in multiple states. Her current work focuses on internally reviewing determinations of eligibility, register nominations, and federal Part 1 applications. Prior to joining Heritage Consulting Group, Amanda worked in the Kansas State Historic Preservation Office, as Survey Coordinator and as National Register Coordinator. She worked with stakeholders to ensure forms met National Parks Service standards and presented nominations to the state board for review before forwarding to the Keeper of the National Register. These positions honed her skills in researching historic resources, assessing their eligibility for listing in the National Register of Historic Places, and providing insights into the development of contexts for thematic studies. She has prepared HABS documentation, numerous eligibility assessments, and National Register nominations for individual properties and historic districts.

Experience

Senior Project Manager. Heritage Consulting Group. Kansas City, MO 2024-Present
National Register Coordinator. Rosin Preservation, LLC. Kansas City, MO. 2018-2024
Survey & National Register Coordinator. KS Historical Society, State Historic Preservation Office. 2010-2018
Intern. US/ICOMOS & the Transylvania Trust Foundation. Cluj-Napoca, Romania. 2009
Caretaker. Hunt-Morgan House. Blue Grass Trust for Historic Preservation. Lexington, KY. 2007-2009
Interiors Department. DLR Group, Inc. Overland Park, KS. 2005-2007
HABS Architect. Historic American Buildings Survey, National Park Service. Gettysburg, PA. 2004

Recent Project Experience

Hotel Granada. National Register nomination. Atlanta, GA.
Hartford Building. Federal Part 1 application. Dallas, TX.
Greyhound Bus Terminal and Office Building. Federal Part 1 application. Milwaukee, WI.
100 East Building. National Register nomination. Milwaukee, WI.
Walker School. State Register nomination. Merriam, KS.
Hancock Building. National Register nomination. Kansas City, MO.
National Foundation (Life) Center. National Register nomination. Oklahoma City, OK.
Nationwide Context of Public Housing in the US, 1950-1980 (*pending*)

Trusted Advisors
Since 1982



National Presence
Local Expertise

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7

MEMO

TO: James Bowers, Rouse Frets White Goss Gentile Rhodes
Bradley Owens, Kansas City University

FROM: Amanda Loughlin, Heritage Consulting Group

DATE: December 11, 2025

RE: National Register Eligibility Assessment – Smith Hall, Kansas City University, 1710
Independence Ave., Kansas City, MO

PURPOSE & METHODOLOGY: In September 2025, Kansas City University (KCU) hired Heritage Consulting Group (HCG) to evaluate the eligibility of the 1927 Joseph T. Bird Memorial Building/Nurses' Home for *individual listing* in the National Register of Historic Places. This evaluation does not include an assessment of eligibility for listing in the Kansas City Register of Historic Places (local register) nor does it consider KCU's future plans for the building. HCG did not review any information about KCU's proposals for the building, City of Kansas City Historic Preservation Office staff reports, or media accounts.

The following assessment is based on a site visit to the property by HCG's Amanda Loughlin on October 28, 2025, as well as research undertaken on the history of the property. Although historically known as the Joseph T. Bird Memorial Building and Nurses' Home, for clarity, the following discussion refers to the building by its current name, Smith Hall.

National Register eligibility is based on historic integrity and significance. The following begins with an assessment of Smith Hall's integrity then provides a brief history of the building before ending with an assessment of eligibility that discusses significance.

OWNER
EXHIBIT
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proximity of the former hospital building/current administration building. The historic Pendleton Heights district continues to link the former hospital buildings to their historic context. Impacts to the setting of Smith Hall include changes to the commercial character of Independence Avenue and the recent road improvements along The Paseo that reduced the buffer between the campus and highways. More impactful, however, has been the demolition of historic buildings along the eastern periphery of the campus that diminishes the historic link to the Pendleton Heights neighborhood. Within the KCU campus, the construction of additional buildings has largely occurred to the north of the historic building. Construction of the 1966 office building by Children's Mercy between the administration building and Smith Hall visually separates the two buildings.

DESIGN AND MATERIALS

The four-story Smith Hall has a C-shaped plan oriented to the southeast (*Photo 2; Figures 5 to 7*). The symmetrical Classical Revival building has a concrete structure with limestone cladding at the foundation and first story and red-brick cladding on the upper three stories. Simple stone banding separates the third and fourth stories on all elevations, and a stone cornice lines the top of the wall below a simple brick parapet. A flat roof caps the building behind the parapet. Centered on the roof is a non-historic clock tower and cupola installed in the mid-1990s. The clock tower and cupola came from the former university administration building, located at 2105 Independence Avenue to the east. Circa 2000, new fire egress stair towers were constructed at the north and south ends of Smith Hall. These towers share similar design elements with the historic building, including limestone foundations, red brick cladding, and flat roofs. The north stair tower replaced a former (1927) entrance and a 1966 connector to the neighboring office buildings (*Figures 5 & 7*); the entrance and connector directly accessed the second floor (*Figures 8 & 10*). Windows and exterior doors throughout the entire building were replaced in the early 2000s within historic masonry openings.

The segmented main elevation faces southeast. Splayed wings flank a smaller central wall containing a slightly projecting entrance bay (*Photo 2*). Engaged square brick pilasters frame this pedimented four-story bay. A one-story flat-roofed projection at the center of the first story contains the main entrance; a historic smooth-stone portal with broken pediment surrounds the pair of non-historic doors (*Photo 3*). A single window bay flanks the entrance projection at the first story. Four windows pierce the upper three stories above the entrance. Pairs of windows fill each story on either side of the central entry bay. The flanking walls of the main elevation generally mirror each other, each with four windows at each story. At the first story of the north wing, a door replaced the easternmost window at an unknown date, and a metal-clad window wall extends from the corner of the wall to the east of this door and above the historic cornerstone (*Photos 4 & 5*). The non-historic stair towers cover most of the east and south elevations, leaving a single bay of windows at the inner portion of the walls. No

The current interior configuration of the building mostly aligns with the historic design. The double-loaded corridors remain in historic locations, as does the historic stair and the elevator (though the elevator cab and equipment have been updated). Changes to the interior design have mostly occurred beyond the corridor walls where communal bathrooms have been expanded and former dormitories combined in places for larger suites. The biggest impact to the design of the interior occurred in the character-defining rooms at the north and south ends of the first floor corridor. The former recreation room at the north end no longer retains its openness, having been subdivided for other uses. Further, the stage along the east wall no longer remains. At the south end of the corridor, the lounge retains an open feel despite the enclosure of a portion of the room. The concrete structure remains exposed in the lounge, emulating ceiling beams, and the fireplace mantle remains intact. Materially, the interior retains few historic features, having experienced updates throughout the years. Wood floors appear to exist beneath later carpet, and plaster ceilings remain above dropped grids. Additionally, the entry foyer retains its historic mosaic floor and French doors. The lounge, stair, and corridor arrangement continue to communicate the building's historic function as a dormitory.

HISTORY OF SMITH HALL: Constructed in 1927, the Joseph T. Bird Memorial Building (now Smith Hall) is historically associated with Children's Mercy Hospital when it was located on Independence Avenue between 1917 and 1970. Smith Hall was the third of four buildings constructed for the campus, serving as a dedicated dormitory for the hospital's nursing staff until the hospital relocated in 1970.²

The roots of what is now Children's Mercy Hospital date to June 1897 when Dr. Alice Berry Graham (ca.1850-1913) rescued a sick child whose mother was trying to give her away. Trained as a dentist, Dr. Graham and her sister, physician Dr. Katharine Berry Richardson (ca.1860-1933), dedicated their lives to the medical needs of children.

From the beginning, the doctors accepted all children regardless of ability to pay for treatments that ranged from basic care to surgery to dentistry. The hospital accepted children up to sixteen years of age who could demonstrate they did not receive adequate care at another facility. Patients accepted into the hospital also could not have contagious illnesses. Records from 1914 note that the hospital sheltered 852 children in the facility. Hospital staff also treated 14,010 children who did not need to stay in the facility and visited 2,457 children who could not come to the hospital. Daily expenses totaled 93 cents per child, roughly equal to \$30 today, all of which was covered by donations. By 1931, the daily per

² The fourth building was the one-story office building constructed in 1966 between the hospital and Smith Hall.

extant), and General Hospital (1929, extant).⁴ The Christian Hospital at 27th Street and The Paseo also had a nurses' quarters, designed by Henry Hoit in circa 1917 (not extant).

In early 1926, the Children's Mercy Hospital association hired local architects Hoit, Price, and Barnes to design their dedicated nurses' dormitory. This architecture firm formed in 1919 when Alfred Barnes became a partner to founder Henry Hoit and Edwin Price, who had joined Hoit in 1913. From 1919 until its dissolution in 1940, Hoit, Price, and Barnes substantially shaped the built environment of Kansas City. Notable works include the 1920 Baker-Vawter Building (915 Wyandotte St), the 1930-1931 Fidelity National Bank (909 Walnut St), and perhaps their most notable work, the 1930-1931 Kansas City Power & Light Building (1330 Baltimore Ave), all listed in the National Register. The firm's extensive portfolio also included houses and smaller commercial buildings.

Plans for the Mercy Hospital nurses' building date to May 1926. However, construction was delayed due to the pending vacation of Dykington Avenue, which at the time ran parallel to the west side of the hospital building to connect to Independence Avenue. The vacation ordinance passed city council in late summer 1926, and the city issued the building permit in October. Lonsdale Brothers built the four-story Classical Revival building, which the architects designed to complement the older hospital building.

The widow and daughter of Joseph Bird (of the Emery, Bird, Thayer Company) provided the funds for construction. When it opened in 1927, Smith Hall contained seventy-five dormitory rooms for nurses, nursing students, and visiting nurses, as well as private suites for the superintendent, nursing director, and undergraduate supervisors. Nurses living in the individual dormitory rooms shared communal bathroom facilities on each upper floor. Dr. Richardson resided in the building for three years, passing away in her suite in 1933. Her body lay in state in the building, and funeral services took place on the lawn.

The Bird Memorial Building/Smith Hall continued to serve as a dormitory until Children's Mercy Hospital relocated in 1970. The hospital had continued to grow, and its need for additional space led them to purchase the General Hospital property at 24th Street and Gillham Road. The following year, 1971, they sold their four-building campus on Independence Avenue to what is now known as Kansas City University.

⁴ Research Hospital was formerly located at 23rd and Holmes streets on what is now Hospital Hill; its associated nurses' home at 2220 Holmes is now part of the current Children's Mercy Hospital campus. St. Mary's Hospital was located at 28th and Main streets; its nurses' home sat to its southwest at 29th and Baltimore. The Federal Reserve complex replaced all buildings associated with St. Mary's Hospital. General Hospital, also located on Hospital Hill, sat due west of Research Hospital. The nurses' building was built at 24th and Cherry streets and now serves as part of the main hospital complex.

Vawter Building (915 Wyandotte St) and the two Art Deco high-rises, Fidelity National Bank (909 Walnut St), and the 1930-1931 Kansas City Power & Light Building (1330 Baltimore Ave). All three are listed in the National Register of Historic Places for their architecture and for their association with Hoyt, Price and Barnes. While a different architectural style, Smith Hall does not compare to these three buildings in terms of significantly representing the work of this prolific local firm.

- As there is no potential archeological significance, the building is not individually eligible under Criterion D.

These facts are considered in context with HCG's recent experience with the Missouri State Historic Preservation Office (SHPO) and their review of nominations to the National Register of Historic Places. Given the conservative opinions typically issued by the SHPO National Register staff, HCG believes it is unlikely that SHPO would support an individual nomination for Smith Hall.

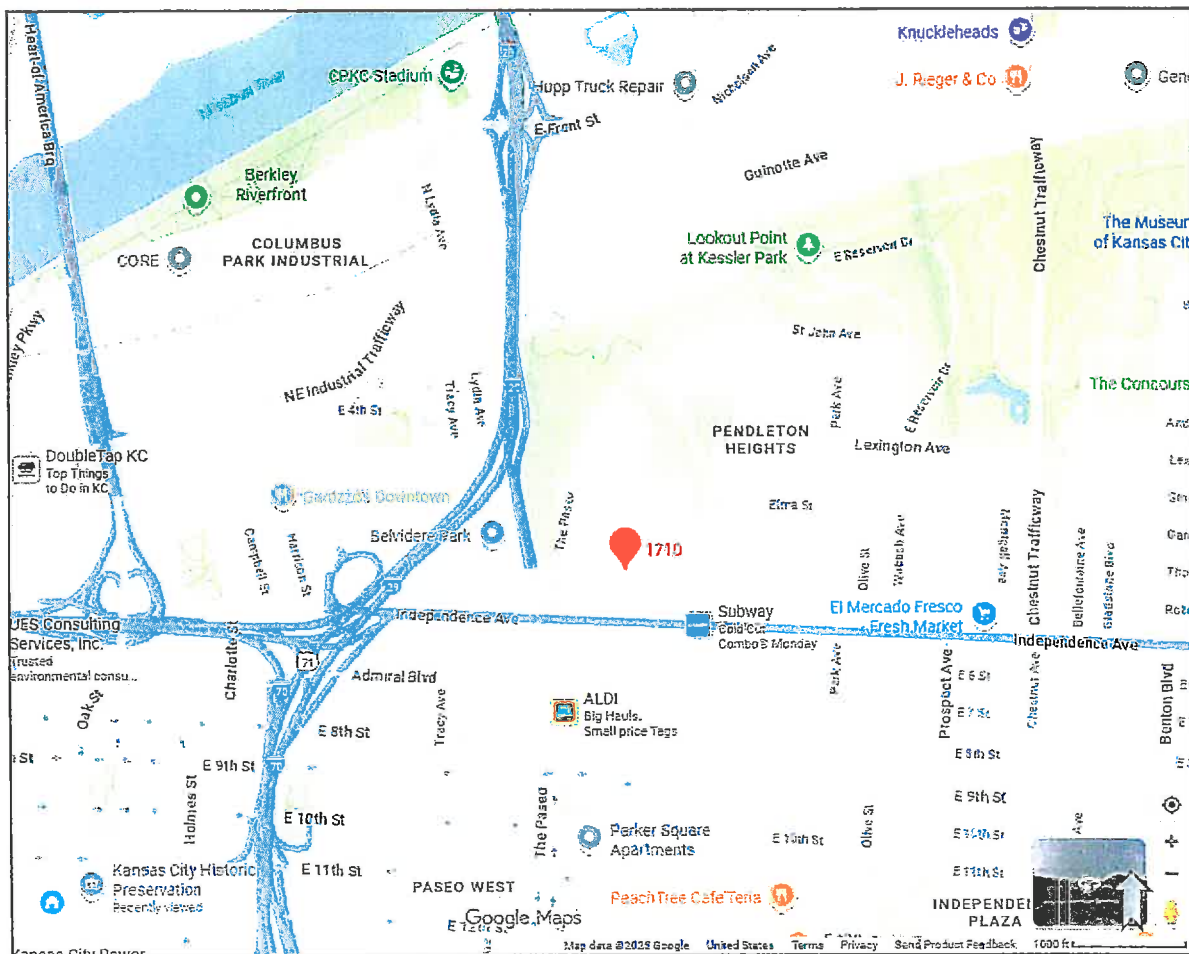


Figure 1: Locational map of Smith Hall within Kansas City, Missouri.
Base map from Google.

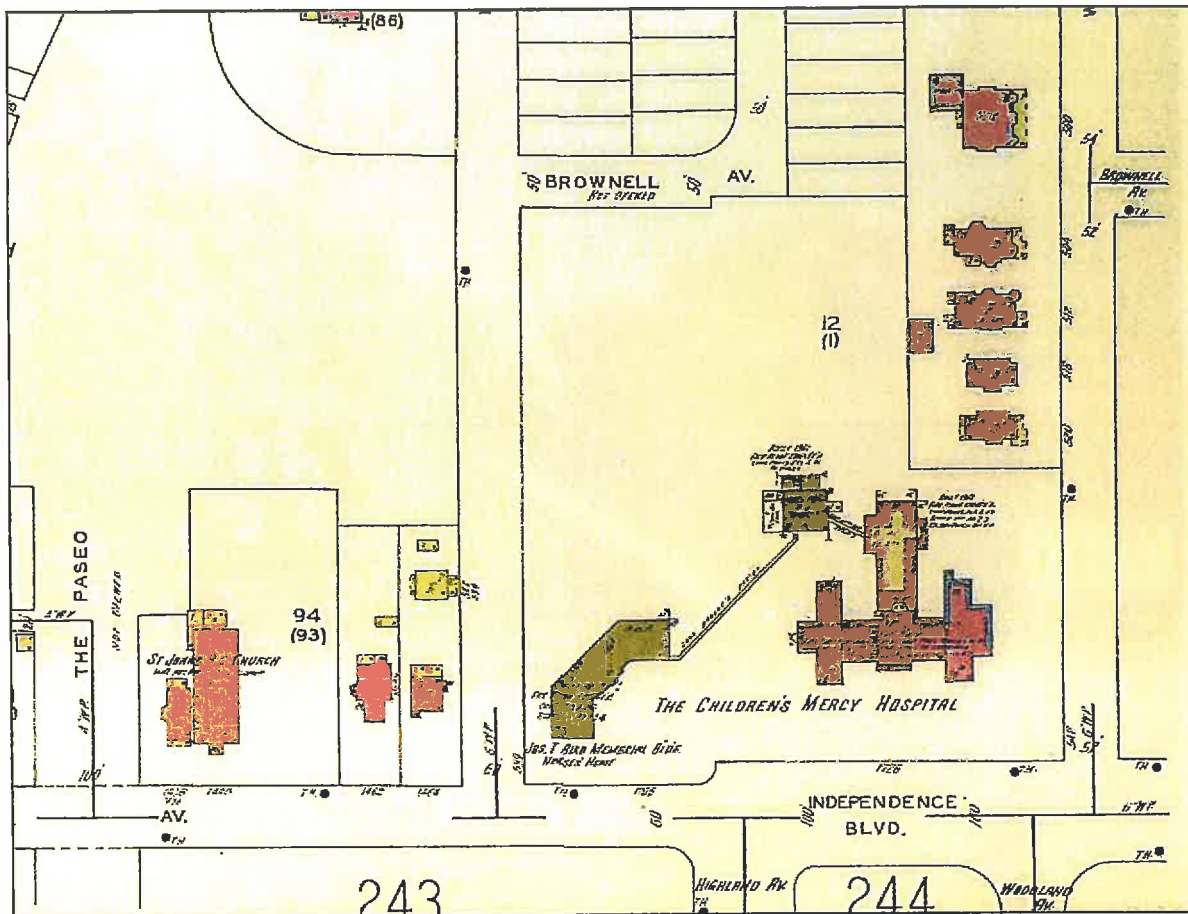


Figure 3: Snippet of the 1940 Sanborn Fire Insurance Map, showing the extent of the campus, which included the Hospital Building (1917), Heating Plant (1917), and Nurses' Home (1927).
Source: Sanborn Fire Insurance Maps of Kansas City, Missouri, Volume Two, 1940, sheet 275.



Figure 5: Undated photograph (pre-1940) of Smith Hall. Note the lack of cupola on roof and egress stair towers. Source: "Children's Mercy Nurses Home," General Collection (P1), Hospitals-Children's Mercy, Number 6, Missouri Valley Special Collections, Kansas City Public Library <https://kchistory.org/image/childrens-mercy-nurses-home>



Figure 7: Mid-1970s photo, looking northwest at Smith Hall. Note the connector between the 1966 building and Smith Hall. Source: KCU Archives.

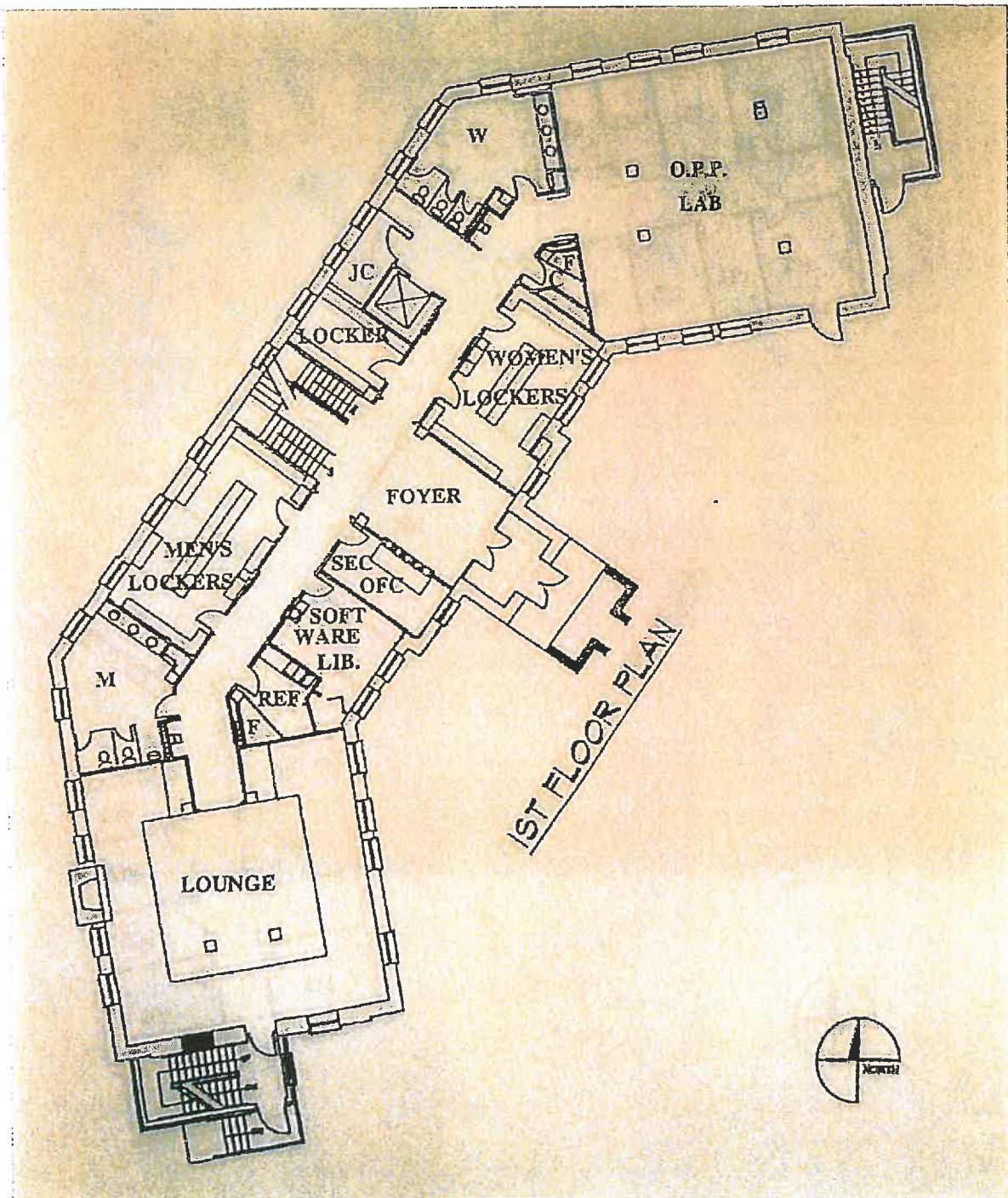


Figure 9: Current first floor plan (classroom in lounge not shown). Plan from KCU Archives.

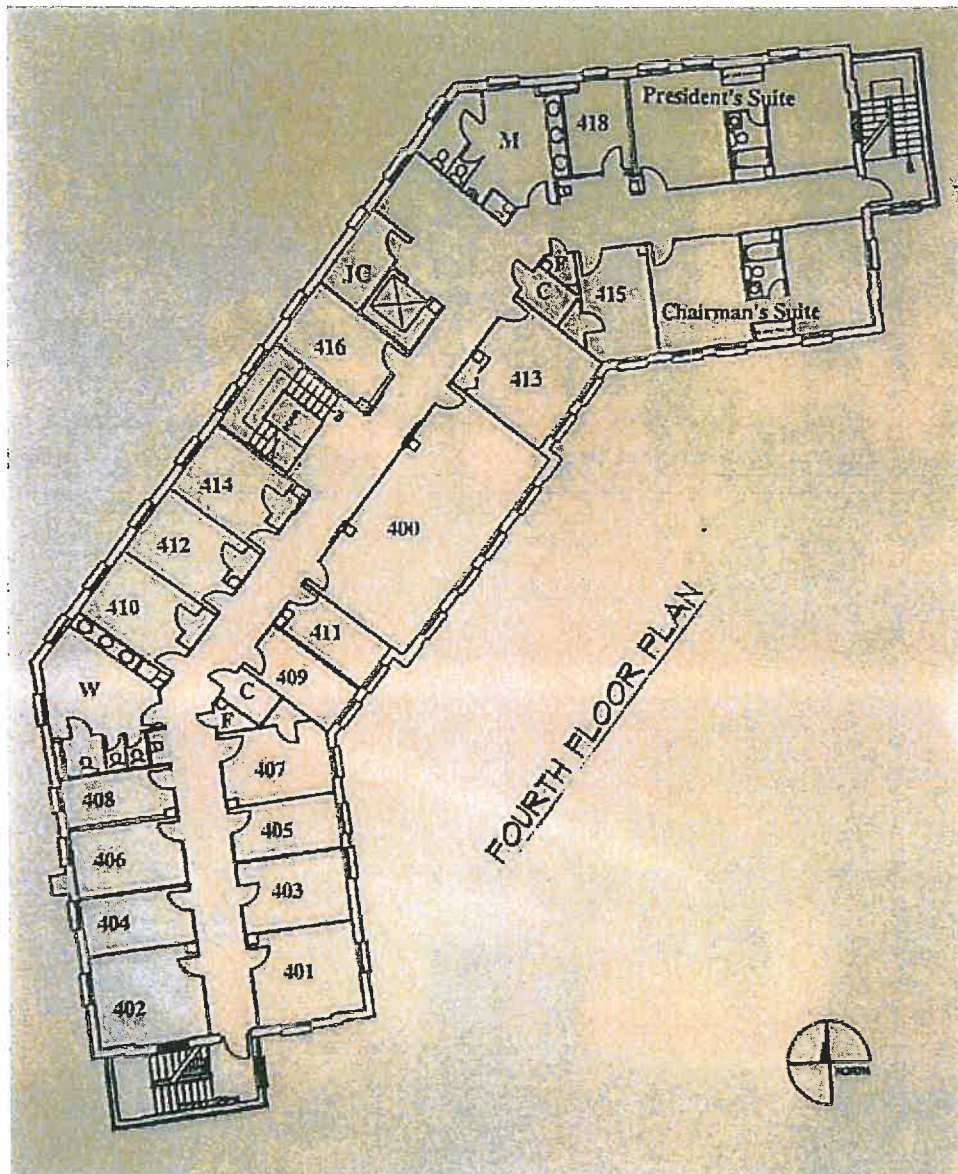


Figure 11: Current fourth floor plan (second and third similar). Plan from KCU Archives.



Photo 1: Contextual view, looking SE from entry walk



Photo 2: Façade, view NW



Photo 5: Historic cornerstone at NE corner of façade



Photo 6: North elevation, showing historic retaining wall, view SW



Photo 9: Northwest and west elevations, looking ESE



Photo 10: West elevation, view E, showing non-historic stair tower



Photo 13: First floor, view NW from foyer, looking at historic stair



Photo 14: Fourth floor, detail of historic stair railing, view SW



Photo 17: First floor, north end, view N into former recreation room



Photo 18: First floor, south lounge, view W at historic mantel (see also Figure 12)



Photo 21: Fourth floor, NW suite created from two former dormitory rooms



Photo 22: Fourth floor, NE suite, view ESE



CITY PLAN COMMISSION

15th Floor, City Hall
414 East 12th Street
Kansas City, Missouri 64106

KCMO.gov/Planning

**NPD - KCU
EXHIBIT
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March 06, 2026

Patricia Carter
Pendleton Heights Neighborhood Association
2119 Lexington Ave
Kansas City, MO 64124

Re: **CD-CPC-2026-00003** - A request to approve a Historic Overlay designation for Leonard Smith Hall to the Kansas City Register of Historic Places (H/O Overlay) on about 0.16 acres immediately adjacent to Independence Boulevard between The Paseo and Maple Boulevard.

Dear Patricia Carter:

At its meeting on March 04, 2026, the City Plan Commission acted as follows on the above-referenced case.

Denied

The Commission's action is only a recommendation. Your request must receive final action from the City Council. All conditions imposed by the Commission, if any, are available on the following page(s).

PLEASE READ CONDITIONS CAREFULLY as some or all of the conditions imposed may require action on your part to proceed to the next step.

- If revised plans are required, you must make such revisions and upload the revised plans prior to proceeding to final action.
- If revised plans are not required, your request will automatically be submitted for City Council consideration.

If you have any questions, please contact me at Larisa.Chambi@kcmo.org or (816) 513-8822.

Sincerely,

A handwritten signature in cursive script that reads "Larisa Chambi".

Larisa Chambi
Planning Supervisor

**ROUSE FRETS WHITE GOSS
GENTILE RHODES, P.C.**

Patricia R. Jensen
pjensen@rousepc.com
816.502.4723

March 19, 2026

**NPD - KCU
EXHIBIT
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VIA HAND DELIVERY

Kyle Elliott, Acting Director
City Planning & Development
414 East 12th Street, 15th Floor
Kansas City, MO 64106

VIA HAND DELIVERY

Ms. Marilyn Sanders, City Clerk
City Hall, 25th Floor
414 E. 12th Street
Kansas City, MO 64106

**Re: Petition of Protest for Ordinance No. 260283
CPC Case No. CD-CPC-2026-00003**

Dear Kyle & Marilyn:

Please find enclosed an executed and certified Petition of Protest signed by the President of Kansas City University, the sole property owner owning property located within the property legally described on Ordinance No. 260283. This Petition of Protest is filed pursuant to Section 88-515-09 of the Zoning and Development Code of Kansas City, Missouri. As KCU is the sole property owner, this Petition is executed by 100% of the owners of property lying within the land area included within Ordinance No. 260283. The Ordinance was introduced on first reading to the City Council on March 12, 2026, and will be considered by the Neighborhood, Planning and Development Committee on Tuesday, March 24, 2026.

If you have any questions or need additional information, please let me know prior to the NPD Committee hearing on March 24, 2026.

Very truly yours,



Patricia R. Jensen

PRJ:kab
Enclosure

cc: Sarah Baxter, Assistant City Attorney (via e-mail sarah.baxter@kcmo.org)
Sara Copeland, Development Management Division, City Planning & Development
(via e-mail sara.copeland@kcmo.org)
James C. Bowers, Jr., Esq. (via e-mail jbowers@rousepc.com)

Attorneys at Law || 801 W 47th Street, Suite 500 || Kansas City, MO 64112 || rousepc.com

PETITION OF PROTEST OF ZONING CHANGE

(Page 1 of 1 pages)

Date: March 17, 2026

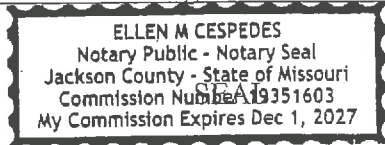
Re: Ordinance No. 260283
CPC Case No. CD-CPC-2026-00003

The undersigned hereby invoke the provisions of Section 88-515-09-B.2 (Zoning and Development Code) of the Code of Ordinances of the City of Kansas City, Missouri, and do hereby register protest under these provisions against the proposed zoning change of the following described property by zoning and creating the Leonard Smith Hall Historic Overlay Zoning District over these properties.

The undersigned hereby certify that we are owners of real estate property lying within the area to be rezoned with the Leonard Smith Hall Historic Overlay District as described in the attached ordinance (and the area of which is described in the attached ordinance which is attached hereto and incorporated herein by reference).

NAME	STREET ADDRESS	LOT NO.	SUBDIVISION
Kansas City University	1700 Independence Avenue	See Attached Legal/KCMO Parcel	

Signed: *[Signature]*
Dr. Marc B. Hahn, President



(Note: OWNER OF RECORD MUST SIGN to be a valid signature. If property is in joint ownership, both husband and wife must sign. If property is owned by corporation, corporate seal must be affixed and signed by President or Vice-President. If owned by partnership or LLC, authorized representative must sign.)

STATE OF MISSOURI)
) SS
COUNTY OF JACKSON)

On this 17 day of March, 2026, before me, the undersigned, a Notary Public in and for the County and State aforesaid, came Dr. Marc B. Hahn, President, of Kansas City University, a Missouri non-profit corporation, who executed the within instrument on behalf of said non-profit corporation and he duly acknowledged the execution of the same to be the act and deed of said non-profit corporation.

In testimony whereof I have hereto set my hand and affixed by official seal in said County and State the day and year last written above.

Ellen M Cespedes
Notary Public

My Commission Expires:

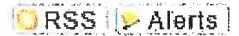
December 1, 2027



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Details Reports

File #: 260283 Version: 1 Name:

Type: Ordinance Status: Referred

File created: 3/6/2026 In control: [Neighborhood Planning and Development Committee](#)

On agenda: 3/24/2026 Final action:

Title: Sponsor: Director of City Planning and Development Department Rezoning an area of about .16 acres generally located on the north side of Independence Boulevard just west of the intersection of Highland Avenue from District MPD/ICO to District MPD/ICO/HO in order to designate Leonard Smith Hall at 1700 Independence Boulevard as a local landmark on the Kansas City Register of Historic Places. (CD-CPC-2026-00003)

Sponsors: [Director of City Planning & Development](#)

Attachments: 1. [Docket Memo Smith Hall](#), 2. [01_CD-CPC-2026-00003_1700IndependenceBlvd_SR](#), 3. [CPC Disposition Letter](#), 4. [CPC PPT](#), 5. [Additional Public Testimony](#), 6. [Catherine Satterwhite Public Testimony 260283](#), 7. [Kate Barsotti - Public Testimony SUPPORT ordinance 260283](#)

History (1) Text

ORDINANCE NO. 260283

title

Sponsor: Director of City Planning and Development Department

Rezoning an area of about .16 acres generally located on the north side of Independence Boulevard just west of the intersection of Highland Avenue from District MPD/ICO to District MPD/ICO/HO in order to designate Leonard Smith Hall at 1700 Independence Boulevard as a local landmark on the Kansas City Register of Historic Places. (CD-CPC-2026-00003)

body

BE IT ORDAINED BY THE COUNCIL OF KANSAS CITY:

Section A. That Chapter 88, Code of Ordinances of the City of Kansas City, Missouri, commonly known as the Zoning and Development Code, is hereby amended by enacting a new section to be known as Section 88-20A-1530, rezoning an area of approximately .16 acres generally located at 1700 Independence Boulevard from Master Planned Development/Independence Corridor Overlay (MPD/ICO) to (MPD/ICO/Historic Overlay), said section to read as follows:

Section 88-20A-1530, That an area legally described as:

A 20,305 sq ft lot: Beg at 375' w of se cor of Lot 20, Block 1, Dykington Place, th n 147', th 77' w, th sw 95' th s 97', th e returning to pob.

Legal

is hereby rezoned from Master Planned Development/Independence Corridor Overlay (MPD/ICO) to MPD/ICO/HO (MPD/ICO/Historic Overlay), all as shown outlined on a map marked Section 88-20A-1530, which is attached hereto and made a part hereof, and which is hereby adopted as a part of an amendment to the zoning maps constituting a part of said chapter and in accordance with Section 88-20 thereof.

Section B. That Leonard Smith Hall was built in 1927 and designed by the firm of Hoit, Price and Barnes and is a good example of the Colonial Revival/Georgian Revival Style of architecture and also has historical value for its association with Children's Mercy.

Section C. That the Historic Preservation Commission recommended approval of the designation of Leonard Smith Hall at 1700 Independence Boulevard to the Kansas City Register of Historic Places (H/O Overlay) at its meeting on December 19, 2025.

Section D. That the City Plan Commission recommended denial of the inclusion of the property on the Kansas City Register of Historic Places (H/O Overlay) at its meeting on March 4, 2026.

Section E. That the City Council considered the factors set forth in Section 88-580-01-F of the Zoning and Development Code in making its decision, including the criteria used in determining eligibility for listing on the U.S. Department of Interior's National Register of Historic Places, and specifically Criterion A, as the property was associated with events that have made a significant contribution to the broad patterns of the City's history in the area of healthcare for its association with Children's Mercy; and Criterion C in the area of architecture, as the property is a good example of the Colonial Revival/Georgian Revival Style.

Section F. That the Council finds and declares that before taking any action on the proposed amendment hereinabove, all public notices and hearings required by the Zoning and Development Code have been given and had.

end

I hereby certify that as required by Chapter 88, Code of Ordinances, the foregoing ordinance was duly advertised and public hearings were held.

Sara Copeland, FAICP
Secretary, City Plan Commission

Approved as to form:

Sarah Baxter
Senior Associate City Attorney



Do you need interpretation? We can help! OLA@kcmo.org 816-513-1030

§88-580-01-E(3) When a valid Protest Petition of HO zoning designation has been submitted in accordance with § 88-515-09 approval requires a 2/3 majority vote of the full membership of the City Council. 9 votes required*

*2/3 of 13 = 8.6

88-580-01-E. HEARING AND FINAL ACTION—CITY COUNCIL

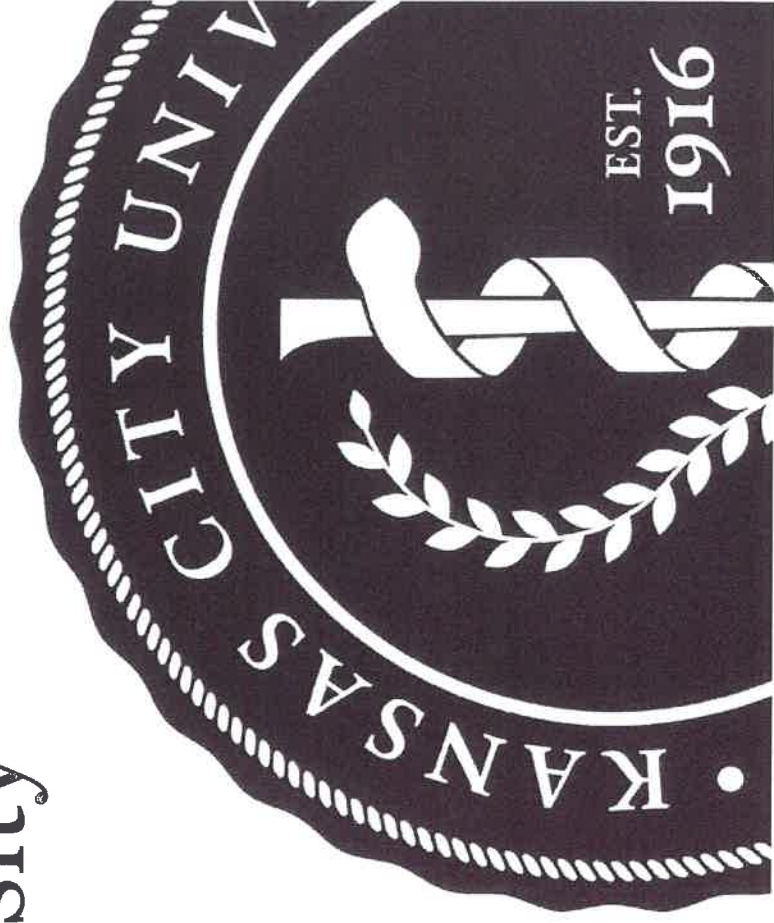
1. After receiving the recommendation of the historic preservation commission and the city plan commission, the city council may convene its own public hearing on the proposed historic district, landmark, or overlay zoning district (HO) designation.
2. Following the close of the public hearing, the city council may act to approve the proposed designation, approve the designation with modifications, or deny the designation.
3. The city council may act by a simple majority vote, except when a valid protest petition of HO zoning designation has been submitted in accordance with 88-515-09, approval or approval with modifications requires a 2/3 majority vote of the full membership of the city council.
4. Immediately upon passage of an ordinance designating a particular site as an historic landmark or historic district, notice of designation must be provided to the city planning and development director.
5. Once designated by city council, the historic district, landmark, or overlay zoning district (HO) designation will remain in place until such designation is officially revoked. Upon designation, a certificate of appropriateness is required in accordance with 88-585 for any exterior alterations or material changes visible from any public place or right-of-way.

Kansas City University

Neighborhood, Planning & Development Committee

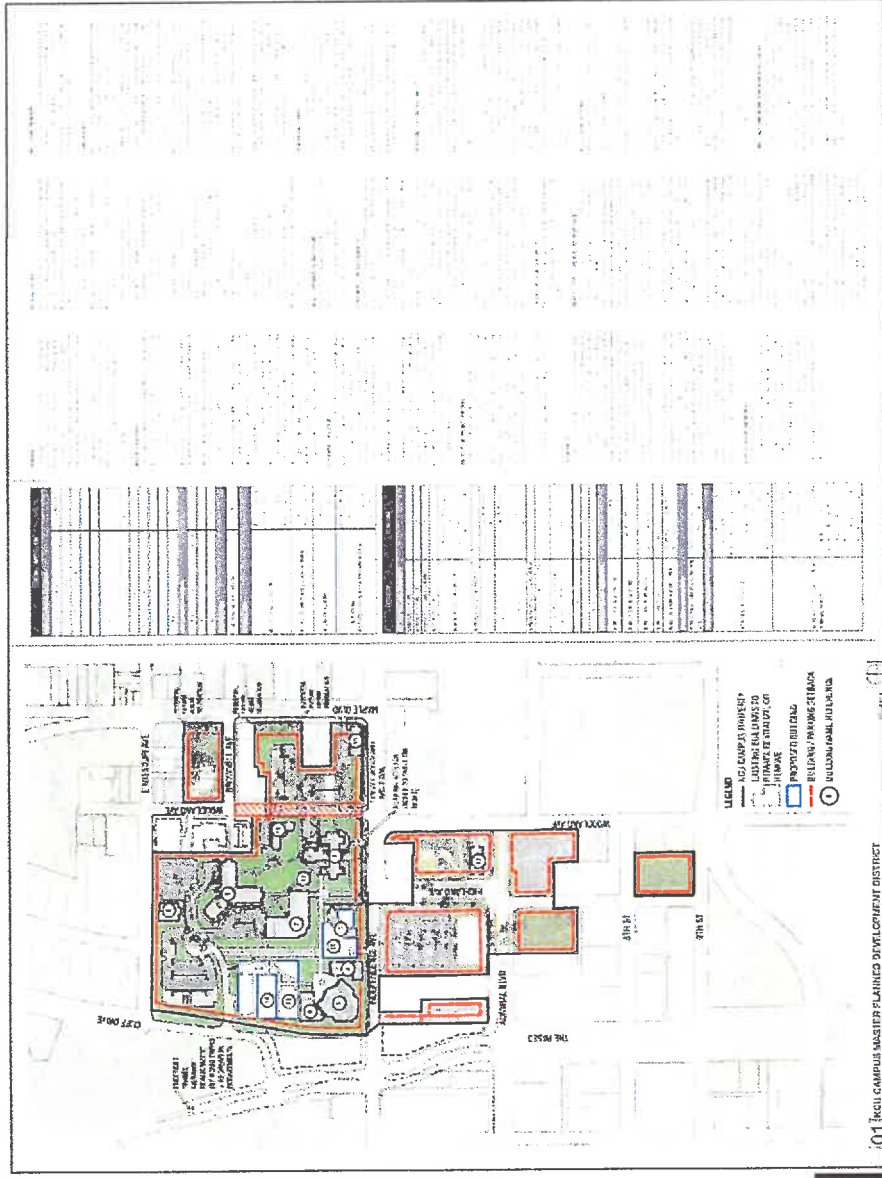
March 31, 2026

*Jim Bowers, Rouse Frets White Goss
Liz Ponder, Helix Architecture + Design firm
Matt Haase, KCU, Chief of Staff*



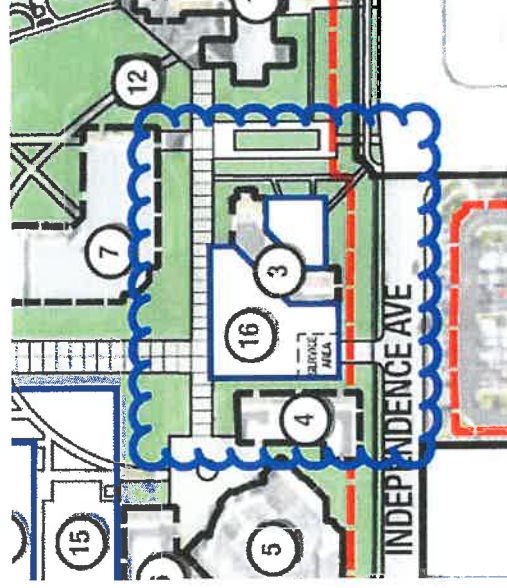
Master Planned Development District

- Approved, February 2017
- Rezoned entire KCU campus into single entity
- Identified potential removal of Smith Hall



Master Planned Development District

- Identified development of a new building and potential removal of Smith Hall



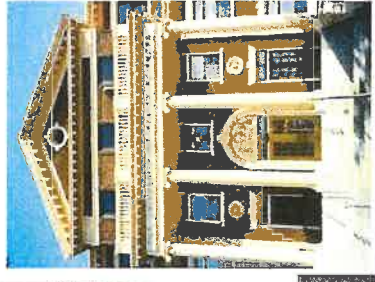
EXISTING CAMPUS BUILDINGS	
1. Administration Building	60,685 SF
2. Classroom Annex (Removed)	---
	32,968 SF

NEW CAMPUS BUILDINGS	
14. New Center for Medical and Surgical Simulation	45,000 SF
15. New Parking Garage	---
	30,000 SF

KCU Commitment to Historic Preservation

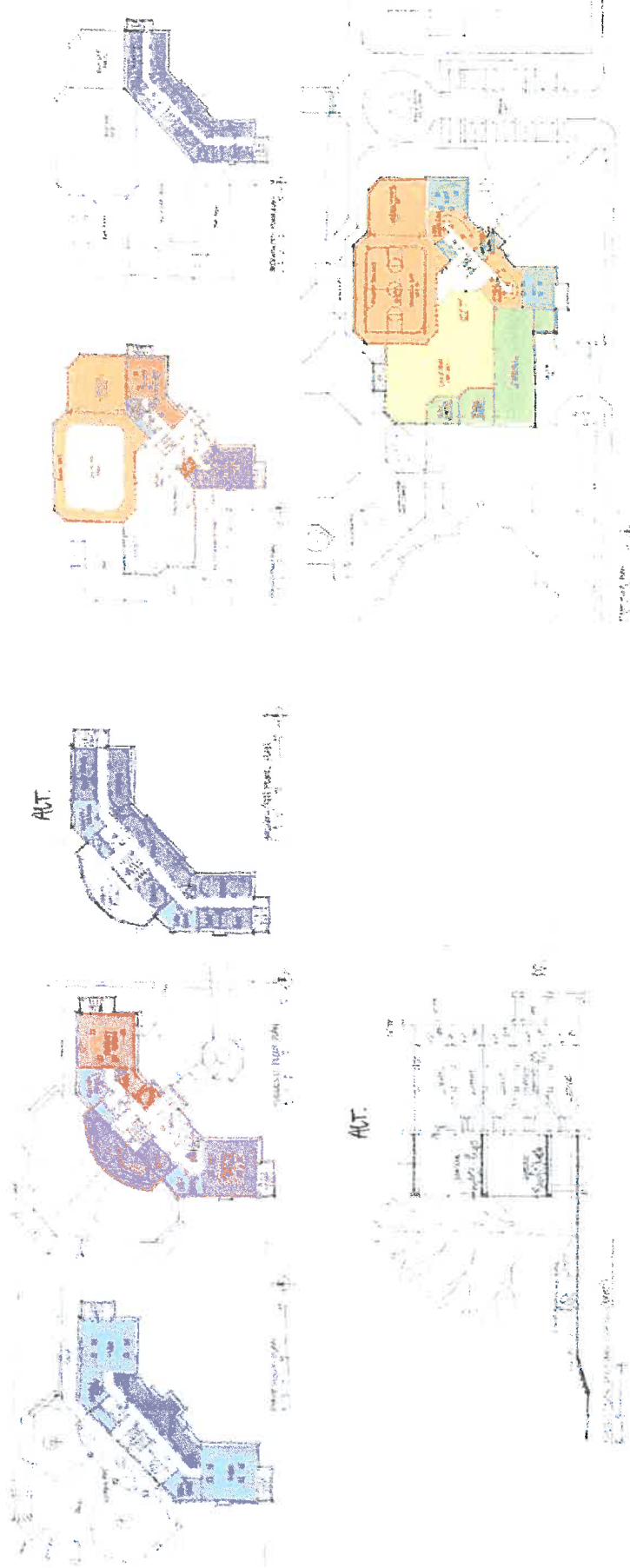
Administration Building Renovations

- *>\$20M spent since 2016 in multiple interior renovations*
- *Financial & functional sacrifice*
- *LEED Gold*
- *Award Winner for Adaptive Re-use*



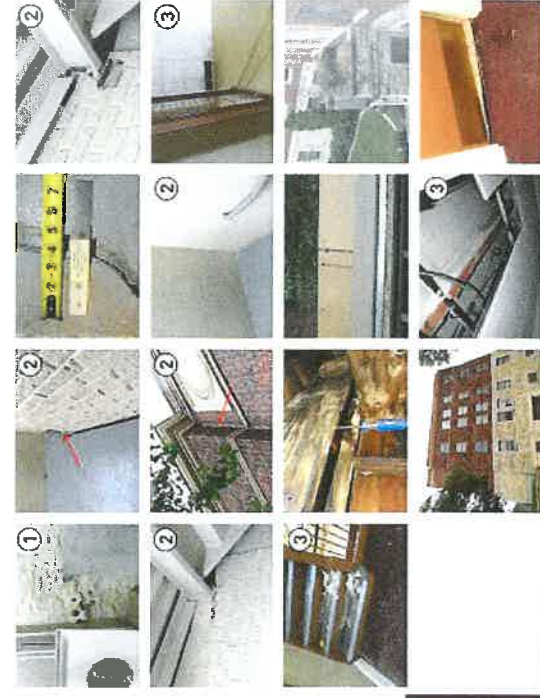
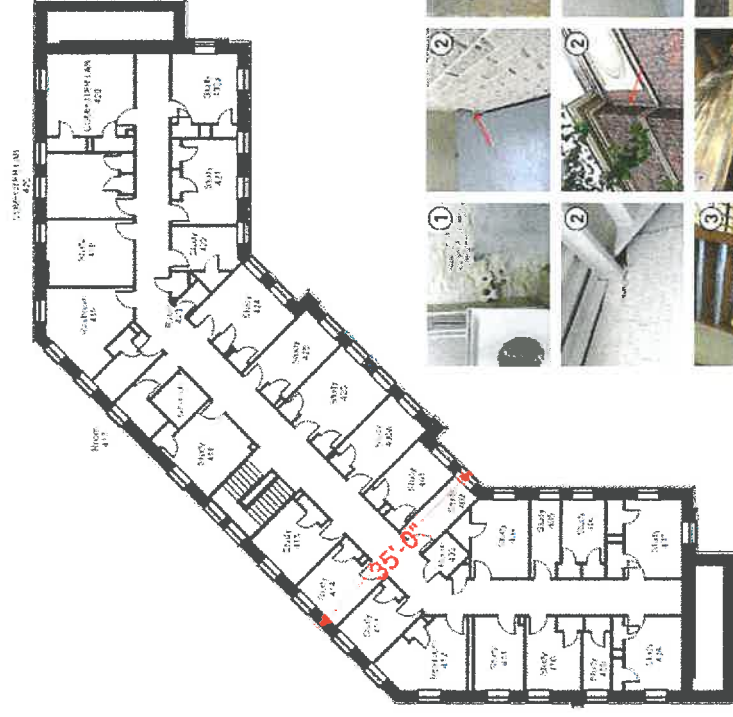
Attempts to Revitalize Smith Hall

Numerous studies since 2015 to renovate and/or expand



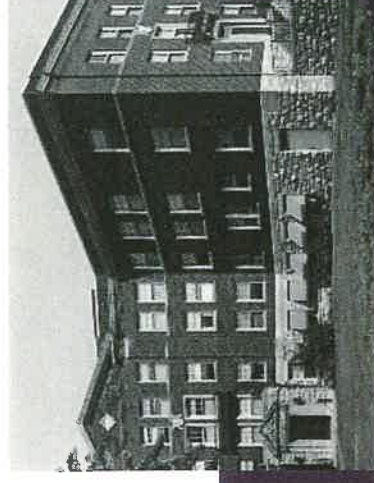
Preventative Factors

- Floor width and orientation
- Floor-floor heights
- Structural design loads and deficiencies

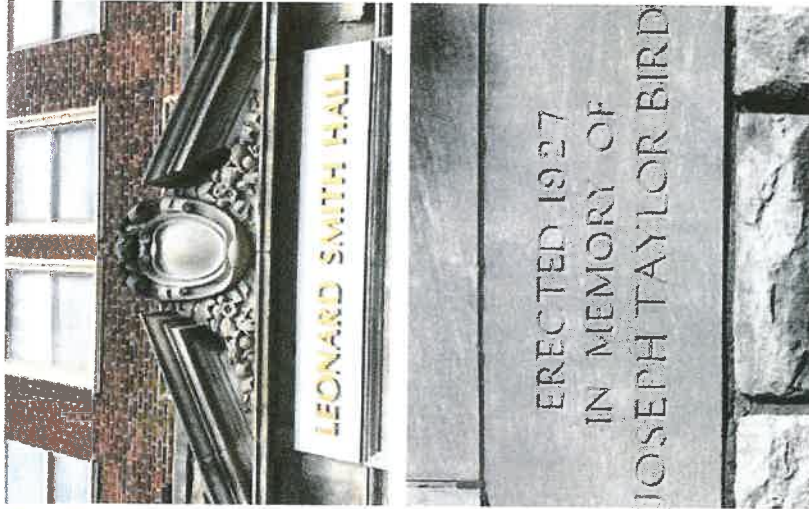


Significant Modifications to Original Exterior Made by Others

- Covering of east grand stair
- Connection to new clinic building (1966)
- Awnings & balconies removed, windows replaced



Thoughtful Removal



Clocktower Preservation

Location Studies



MEMO

TO: James Bowers, Rouse Frets White Goss Gentile Rhodes
Bradley Owens, Kansas City University

FROM: Amanda Loughlin, Heritage Consulting Group

DATE: December 11, 2025

RE: National Register Eligibility Assessment – Smith Hall, Kansas City University, 1710 Independence Ave., Kansas City, MO

PURPOSE & METHODOLOGY: In September 2025, Kansas City University (KCU) hired Heritage Consulting Group (HCG) to evaluate the eligibility of the 1927 Joseph T. Bird Memorial Building/Nurses' Home for *individual listing* in the National Register of Historic Places. This evaluation does not include an assessment of eligibility for listing in the Kansas City Register of Historic Places (local register) nor does it consider KCU's future plans for the building. HCG did not review any information about KCU's proposals for the building, City of Kansas City Historic Preservation Office staff reports, or media accounts.

“Under Criterion C (architectural significance), Smith Hall is a representative example of early twentieth century Classical Revival architecture, which was commonly used for institutional buildings during the period when it was built. **However, Smith Hall was never an exceptional example of the style, and alterations to the building, specifically the addition of the clock tower/cupola, the stair towers, and the first story window wall, compromise its architectural integrity.**”

-National Register Eligibility Feasibility Memorandum, HCG, page 8

*“Another area of significance under Criterion C is association with a master architect. Smith Hall was designed by the noted Kansas City architecture firm Hoit, Price, and Barnes. **Based on a review of their portfolio, this building is not a significant example of their work.***

Neither the circa 2000 American Institute of Architects Guide to Kansas City Architecture & Public Art nor the 2017 Kansas City: A Place in Time even note the presence of the former hospital campus on Independence Boulevard. Further, the notable buildings by Hoit, Price and Barnes included in these guides are the Baker-Vawter Building (915 Wyandotte St) and the two Art Deco high-rises, Fidelity National Bank (909 Walnut St), and the 1930-1931 Kansas City Power & Light Building (1330 Baltimore Ave). All three are listed in the National Register of Historic Places for their architecture and for their association with Hoit, Price and Barnes.”

-National Register Eligibility Feasibility Memorandum, HCG, page 8

“Under National Register Criteria A and B (significance for Association with historical events and people), Smith Hall does not appear to have sufficient individual historic associations with Children’s Mercy Hospital or with the hospital founders, Drs. Alice Graham and Katherine Richardson...The building alone does not fully embody the significance of Children’s Mercy Hospital, especially considering it did not function as additional treatment space or even as a training center for the nurses. While Drs. Graham and Richardson are significant persons related to the history of children’s medical care in Kansas City, the building is not the best representative example of their productive lives.”

-National Register Eligibility Feasibility Memorandum, HCG, page 8

Smith Hall is not eligible for listing on the
National Register
Under Criteria A & B (significance for association
with historical events and people); and
Criterion C (architectural significance and
association with a master architect)
NPD-KCU Exhibit 7

KCU Investments Historic Northeast

- New, \$40M-plus building will be the home for our community focused Center for Population Health and Equity and increase the research capacity of KCU
 - *Approximately 420-630 total jobs created in the construction of this project*
 - *50,000 sq ft with laboratory and support space*
 - *250% available increase in research capacity*
 - *Potential to permanently employ 95 on-site position, including researchers and faculty*

Center for Population Health and Equity

Build momentum around understanding and addressing the social factors that impact health within and outside of the traditional health care setting, **in partnership with local organizations**, to better prepare students to practice osteopathic medicine, clinical psychology and dentistry while **improving the well-being of the communities we serve**



Care Beyond The Boulevard



Center for Population Health Community Impact

- **Care Beyond the Boulevard**
 - *KCU funds a part-time physician and clinical psychologist both of whom see patients directly*
 - *Street Wise Scholar Program pairs our students with people experiencing homelessness and associated health challenges, working together to improve health and well-being*
- **Samuel U. Rodgers Health Center**
 - *Student Health Advocates program pairs patients with KCU students to improve overall health*
- **Della Lamb Community Services**
 - *Refugee Health Navigator Program*
- **Score 1 for Health**
 - *KCU's flagship program provides health screenings to more than 10,000 elementary students annually. In the 2025-2026 academic year, Score 1 is providing screenings to students at 32 elementary schools across the Kansas City area, including many in our neighborhood*

School Mental Health Partnership

- Kansas City Public Schools:
 - *PsyD students supporting KCPS school psychology team*
 - Spring 2025: 5 KCU students part-time
 - Expansion in Fall 2026: 4 KCU trainees full-time practicum (12 schools)
 - *KCPS students aged 3-19 years, six different languages*
 - Direct assessments, IEP meetings, parent consultation, group socio-emotional and academic interventions



KCU Economic Impact

\$225M

KANSAS CITY METRO ECONOMIC IMPACT

1,452 jobs

KANSAS CITY JOBS
SUPPORTED AND SUSTAINED

\$21.3M

GENERATED IN STATE AND
LOCAL TAXES IN KANSAS CITY
METRO



Impacts of Forced Retention of Smith Hall

- **Economic Growth and Community Impact:** Designation will prevent development of the campus, limiting the ability to develop new and existing academic programs, attract new students, and create jobs – directly impacting our positive economic impact on the local community.
- **Competitive Edge:** The proposed new building will position our campus as a leader in cutting-edge education and innovation, making us more competitive to attract faculty, students and research funding. Meeting these needs helps ensure the university’s long-term viability.
- **Sustainability:** The existing structure is not energy efficient nor environmentally sustainable. A new facility will align with community sustainability goals.

Four Factors for the City Council to Consider & Decide

Section 88-580-01-E of the Zoning and Development Code requires the City Council to consider the following factors:

- a. The criteria used in determining eligibility for listing on the U.S. Department of Interior's National Register of Historic Places.
- b. Conformance with the City's adopted plans and planning policies.
- c. The economic impact of the designation on the subject property and the surrounding area.
- d. The recommendations of the Historic Preservation Commission and the City Plan Commission.

a. Smith Hall is not Eligible for Listing on the Local Register

After evaluating Smith Hall for inclusion on the Kansas City List of Historic Places KCU's expert Ms. Loughlin concluded it is not eligible for listing on the National Register of Historic Places under either Criteria A & B or Criterion C.

b. Conformance with the City's Adopted Plans and Planning Policies

The City approved KCU's Master Plan Development District in 2017. It identifies Smith Hall as a building that could be removed, so long as a demolition permit is secured from the City.

c. Economic Impact of the Designation of Smith Hall and the Surrounding Area

As Mr. Haase testified, if the City refuses to allow KCU to continue with its plans to invest substantial capital to improve its campus, it will adversely impact:

- KCU's positive economic impact on the community.
- KCU's competitiveness in attracting talented faculty and research funding.
- the long-term viability of the University.

d. Recommendations of the
Historic Preservation Commission (HPC)
and the City Plan Commission (CPC)

- December 19, 2025, the HPC considered the nominations of Smith Hall by the Pendleton Heights Neighborhood Association and the Kansas City Bungalow Club to the Kansas City Register of Historic Places and found Smith Hall meets Review Criteria A and C.
- March 4, 2026, the CPC held a public hearing to consider the HPC's recommendation and take additional testimony and evidence presented both for and against the nomination and voted 4-1 to recommend the City Council DENY the request.

Request

KCU requests the NPD Committee support the recommendation of the CPC and recommend “DO NOT PASS” Ordinance No. 260283 designating Leonard Smith Hall as a local landmark.

KCU
thanks you

