

A New National Register Bulletin

In 1998 the National Register of Historic Places issued a new *National Register Bulletin: Guidelines for Evaluating and Documenting Historic Aviation Properties*. National Register bulletins provide technical information on surveying, evaluating, registering, and preserving historic places. Producing this National Register bulletin turned out to be almost as interesting as the historic property types it examines.

The aviation bulletin was financed in part by the Department of Defense Legacy Resource Management Program in partnership with the Naval Historical Center, and was prepared through a cooperative agreement between the National Maritime Initiative of the National Park Service and the National Conference of State Historic Preservation Officers. It was written by Anne Milbrooke (a historian of technology), David Whipple (historian with the National Maritime Initiative), Jody Cook (historian, Southeast Region, NPS), and this author. These four cooks produced a gumbo of a bulletin, with this one adding a little of this and the others a dash of that.

An immediate decision was the scope of the bulletin. Should it be only about historic aircraft (there is a bulletin on historic vessels) or broader?

We opted to include all historic aviation properties in the bulletin because aircraft are only one part of the multifaceted story of aviation history. The next question was what period to cover; should the bulletin be cut off at the National Register's 50 year point, or go into the more recent past? The 50 year point (1948) included the momentous events from the birth of aviation through World War II, but it left out the Jet

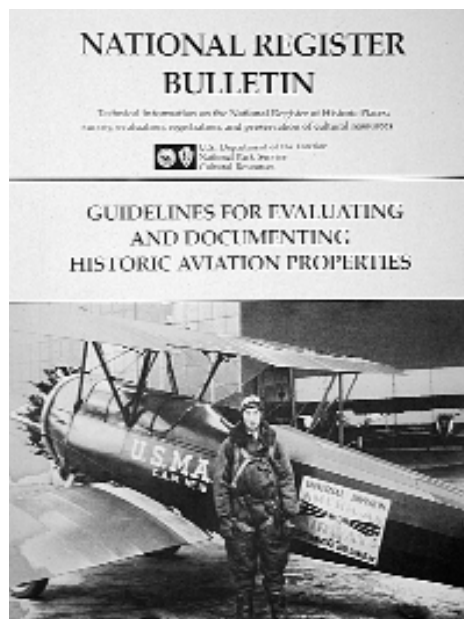
Age and the Space Age, so we decided to include the fairly recent past.

The draft bulletin sent out for review drew an unprecedented response both in numbers of comments and passion of tone. Our experience in dealing with specific property types has shown that enthusiasts hold strong opinions. The initial decision to include a section on the history of aviation in the draft bulletin was perceived much as Goldilocks reacted to the three bowls of porridge. One faction thought the section was way too brief (too cold), while another thought it too long, or even unnecessary (too hot). Other commenters thought the history section placed too heavy an emphasis on military aviation at the expense of the civilian experience, so we adjusted accordingly. The final form of the section (five pages of text plus a time line) provides sufficient contextual information for the novice and an extensive bibliography for more detailed information.

These concerns, though, were a tempest in the gumbo pot relative to the number of comments (of the heated variety) over the issues of integrity of location, setting, and materials for historic aircraft. While the bulletin includes discussions of eight broad aviation property types (aircraft, aviation wrecks, development and production facilities, air terminals, military bases, aids to navigation, administrative and education facilities, and missile launch sites and complexes), only the guidance on historic aircraft elicited a vigorous debate.

The issue of integrity of location is seemingly straightforward. The National Register has a long-standing policy that properties located in museums do not qualify for listing in the National Register. It would not be practical or useful to list the many millions of museum objects significant in our past. Museum objects do not have integrity of location and setting under National Register criteria because museums are not the location or setting where the properties achieved significance. The draft bulletin noted that "aircraft that are museum objects, in the traditional sense, will not qualify.... this includes aircraft removed from an avia-

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tion setting and displayed in a museum as an object (hanging from the ceiling, mounted on a pedestal, etc.).” On the bright side, this statement provided the opportunity for a learning experience. It was pointed out that a strict reading of the location requirement would exclude from listing many (if not most) of the remaining aircraft from the historic period. Ouch!

The published bulletin explains at greater length why aircraft removed from an aviation-related setting and displayed in a traditional museum setting (such as those at the Smithsonian Institution’s National Air and Space Museum on the Mall in Washington, DC), do not meet the National Register’s requirement for integrity of setting, even though historically significant. Greater leeway is given beyond traditional museum settings. Aircraft are not disqualified simply because they are part of a collection, as long as they are in a setting which is appropriate to an aircraft and the setting allows it to convey its significance as an aircraft. Examples include a World War II dive bomber parked on a ramp or in a hangar at a naval aviation station, or a historic DC-3 maintained in a hangar at a municipal airport. Aircraft in modern buildings constructed to house a collection could qualify if the building is in an appropriate location (for example, located near a runway at an airport).

Another issue that provided heat (and even-
tually some light) was if an aircraft has to be located at a facility where it was historically associated. The short answer is no. Period aircraft are not required to be located at airfields where they

were based historically. Aircraft are obviously mobile, and their significance is inherent in their ability to move. The general requirement is that historic aircraft must be located in an appropriate setting, such as an air-related facility.

A final area which elicited a wide diversity of opinion relates to the integrity of materials for historic aircraft. Some respondents thought the National Register should require historic aircraft to be airworthy in order to be listed. Others were of the opinion that a historic aircraft still able to fly probably has had extensive replacement of original materials (either through cannibalization of other aircraft or with modern parts) and is no longer authentic. An extended section of the bulletin deals with the issue of routine maintenance of aircraft and replacement of parts, provides the essential test for integrity of materials, and answers the almost philosophical question, “when does an aircraft stop being original?”

So, did the bulletin make everyone happy? No, it didn’t, but National Register bulletins probably are not needed if there are no hard issues to consider. If you would like a copy of the bulletin for details on how the issues were resolved, it can be downloaded from the National Register web page <www.cr.nps.gov/nr>, click on “Publications.” For a paper copy, call 202-343-8012 or write: National Register of Historic Places, National Park Service, 1849 C St. N.W., Room NC400, Washington, DC 20240.

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recycled paper



U.S. Department of
the Interior
National Park Service
Cultural Resources (Suite 350NC)
1849 C Street, NW
Washington, DC 20240

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PENALTY FOR PRIVATE USE \$300

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VOLUME 23 • NO. 2
Cultural Resources
Washington, DC