Do We Know It When We See It? Defining Significance and Integrity in the National Women's History Landmark Project, 1989–1993

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Received for peer review 5 September 2025; revised 18 November 2025; accepted 25 November 2025; published 15 January 2026

ABSTRACT

The National Women's History Landmark Project (NWHLP) was the most influential, concentrated effort to improve women's history representation across the National Historic Landmarks (NHL) Program. Between 1989 and 1993, representatives of the NHL Program, Organization of American Historians (OAH), and the National Coordinating Committee for the Promotion of History (NCCPH) collaboratively generated 39 landmark nominations. Throughout the collaborative process, dissension emerged as project participants disagreed on how to define the two terms most integral to the NHL nomination process: "significance" and "integrity." This article examines the root causes of these debates and outlines recommendations for productive academic–federal collaborative partnerships.

INTRODUCTION

In 2023, the National Historic Landmarks (NHL) Program of the National Park Service (NPS) received funding from the Mellon Foundation to hire a postdoctoral fellow for a two-year position, specifically tasked with developing "a strategy, including new interpretation and outreach, for enhancing the representation of women's history in the National Historic Landmarks Program using an intersectional approach."[1] When I was hired for that role, I began sifting through the NHL Program's over 2,600 designations, identifying obvious women's history landmarks and highlighting women's histories that had originally been overlooked in the program's documentation. Thinking through how NHL nominations could be updated to more fully reflect women's lives and contributions necessitated close engagement with the program's specialized mechanics. NHL intricacies were fascinating and flummoxing by turn, as I was sometimes perplexed by the nuance of key terms like "national significance" and "historic integrity." National significance—whether a property possesses exceptional value in communicating histories of noteworthy importance to all Americans—struck me as a difficult measuring stick to conceptualize. Integrity—defined by the 2023 *NHL Bulletin* as "a measure of how a property physically conveys its national significance"—felt similarly complex. Figuring out how to apply these concepts was a necessary challenge.[2]

My academic training did not always translate smoothly to the framework articulated by the NHL Program. Inculcated with the bottom-up ethos of social history, I occasionally rankled at the phrasing of "proving" a person or place's significance, grappling with how to balance democratic ideals of inclusivity with respect for broad, recognizable significance to everyone who calls the US home. Constructing arguments via comparative analysis of associated properties felt like learning a new language with a distinctive and unfamiliar grammar. Gaining passable fluency in the genre created by NHL regulations reframed my conceptualization of what types of nomination were possible.

I am not the first historian to encounter these challenges, even in the specialized subfield of women's history. This article examines the National Women's History Landmark Project (NWHLP), a collaborative initiative between the Organization of American Historians (OAH), NPS, and the National Coordinating Committee for the Promotion of History (NCCPH). NWHLP was active between 1989 and 1993. Page Putnam Miller (the director of NCCPH from 1980–2000) led the effort, which ultimately yielded 39 NHL designations. The path to those successes, however, was fraught with potential obstacles: abandoned

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nominations, professional disagreements, and recurrent miscommunications. Definitional disputes regarding significance and integrity particularly shaped the project's trajectory, as the following case studies suggest.

Establishing a shared basis for understanding is critical across all intellectual projects—hence, I next present a brief synopsis of the NHL Program's history and regulations. I will then analyze key case studies drawn from the NWHLP, examining how "significance" and "integrity" were interpreted and understood by different project partners, arguing that fundamentally misaligned definitions of these two key terms were the primary source of debate. I conclude with recommendations for future collaborative partnerships of the sort attempted by both the NWHLP and the Mellon Humanities Postdoctoral Program.

THE NHL PROGRAM'S ORIGINS AND MISSION

The NHL Program was founded in 1960, but its roots lie in NPS's Park History program founded in 1931, when Peru State College history professor Verne Chatelain was appointed as the agency's first chief historian by NPS Director Horace Albright. During his tenure, Chatelain was understandably preoccupied by maintaining and interpreting military history sites, then the most common historic property type recognized by NPS. However, he saw the totality of US history more expansively. He advocated for assessing the nation's historical background systematically, strategically, and comprehensively, creating a methodological framework to support a gestalt analysis of significant landmarks across the nation. Chatelain planned NPS's survey of historic places by isolating broad themes and then generating lists of places relevant to the identified general subjects. His five-year term in office set the precedent for the NHL Program's theme studies, which follow a similar model to this day.[3]

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The Historic Sites, Buildings and Antiquities Act of 1935 (commonly referred to as the Historic Sites Act) formed the NHL Program's legislative foundation. The act expanded NPS's role to encompass identifying, documenting, marking, and preserving historic and archaeological sites, promising NPS would assess "which possess exceptional value as commemorating or illustrating the history of the United States." This survey was effectively NPS's initial attempt to identify and categorize the US's historic places. The act also called on NPS to "erect and maintain tablets to mark or commemorate historic or prehistoric places and events of national historical or archaeological significance."[4] Twenty-five years later, this language was incorporated into the NHL Program's mission; designation plaques are now a cornerstone of the program's brand.

The Historic Sites Act gave the secretary of the interior, acting through NPS, a role in the nascent field of historic preservation. It also established what was then called the Advisory Board on National Parks, Historic Sites, Buildings, and Monuments—a deliberative advisory body appointed by the secretary of the interior and now known as the National Park System Advisory Board (NPSAB).[5] The board planned to create an inventory of nationally significant places that would be eligible for NPS acquisition. However, this objective was abandoned during the 1940s, as World War II demanded the nation's attention and resources.[6] Postwar, though, NPS programming evolved into a wider recognition of and involvement with extant historic properties—regardless of ownership. The trend toward working with properties not owned by NPS spotlighted a need that the NHL Program filled: it established a mechanism for recognizing historic places without demanding their acquisition and management by NPS. The NHL Program formally became part of NPS in 1960. Distinguishing between national historic sites, national monuments, national historical parks, and other similar designations, which are operated by NPS and are part of the National Park System, and NHLs, which are not, provided a framework for demarcating differing levels of governmental involvement and investment.[7]

Carrying forward the systematic approach established by Chatelain, the NHL Program used the concepts of national significance and integrity as key factors in NHL eligibility. The Code of Federal Regulations (CFR) stipulated that "The quality of national significance is ascribed to districts, sites, buildings, structures and objects that possess exceptional value or quality in illustrating or interpreting the heritage of the United States in history, architecture, archeology, engineering and culture and that possess a high degree of integrity of location, design, setting, materials, workmanship, feeling and association."[8] The listed subcategories associated with integrity encompassed elements of both tangible and intangible heritage, laying the groundwork for future debates about how each respective facet of integrity should be weighted.

Potential NHLs could fall under one or more of six criteria. They might be deemed significant under Criterion 1, recognizing places that were "associated with events that have made a significant contribution to, and are identified with, or that outstandingly represent, the broad national patterns of United States history and from which an understanding and appreciation of those patterns may be gained." They might be recognized under Criterion 2, denoting association with individuals of exceptional significance to US history. Criterion 3 could be used to designate properties that provided an exemplary representation of American ideals (e.g., "attaining democracy, achieving freedom, and securing fundamental rights"). Properties recognized using Criterion 4 uniquely embodied "the distinguishing characteristics of an architectural type specimen exceptionally valuable for a study of a period, style, or method of construction, or that represent a significant, distinctive and exceptional entity whose components may lack individual distinction." Criterion 5 grouped associated buildings and landscapes into historic districts of exceptional significance. Criterion 6 landmarked sites that held "information potential" that might "yield information of major scientific importance by revealing new cultures, or by shedding light upon periods of occupation over large areas of the United States." These criteria could be mixed and matched to best suit a particular prospective landmark's case for significance.[9]

In the initial flurry of excitement for the new program, Secretary of the Interior Fred A. Seaton designated landmarks based on place-based research that had been in progress since the end of World War II. In the program's first year, it recognized an impressive 160 historic properties as NHLs—but none of those 160 designations explicitly featured women's history. Early theme studies identified places qualified for NHL status under broad umbrella subjects like *Development of the English Colonies, 1700–1775* (1960), *The War for Independence* (1960), and *The Fur Trade* (1960).[10] These NPS publications captured a conventional story of nation-building and westward expansion typical of mid-20th-century historical scholarship.

The first women's history properties were designated following the 1962 theme study *Literature, Drama, and Music*: the Emily Dickinson House in Amherst, Massachusetts; Orchard House (home to Louisa May Alcott) in Concord, Massachusetts; the Wayside (home to writers Louisa May Alcott, Harriett M. Lothrop, and Nathaniel Hawthorne) in Concord, Massachusetts; and the Harriet Beecher Stowe House in Brunswick, Maine. Women's history sites like Hull-House in Chicago, Illinois, and Susan B. Anthony's Home in Rochester, New York, were recognized as landmarks as part of the *Social & Humanitarian Movements* theme study (1965). Throughout the 1970s and 1980s, women's histories slowly trickled into the NHL Program. Page Putnam Miller later cited the Afro-American Bicentennial Corporation's landmark Black history study *Beyond the Fireworks of '76* (1973), along with *Literature, Drama, and Music* and *Social and Humanitarian Movements,* as the trio of theme studies that formed the NWHLP's foundation.[11] Those three efforts raised the number of women's history landmarks to represent approximately 3% of all NHLs.[12]

ORIGINS OF THE NATIONAL WOMEN'S HISTORY LANDMARK PROJECT

Twenty-five years after the NHL Program was founded, representatives from OAH, NCCPH, and NPS agreed that increasing the number of women's history NHLs was a shared priority. In 1986, OAH and NCCPH signed a memorandum of understanding (MOU) that defined the imagined scope of their collaboration with NPS on a women's history initiative. Joan Hoff-Wilson, then OAH's executive secretary, signed on as the organization's representative; Page Putnam Miller represented NCCPH. The proposed project's summary declared: "[T]he project will involve public and academic historians in the updating of information on current sites so that where pertinent, the role of women is included, and will coordinate the compilation of appropriate nominations for additional National Historic Landmarks to assure that all nationally significant aspects of women's history are commemorated."[13] The MOU created a "committee" relationship between the directors of NPS, NCCPH, and OAH, who would be "empowered to initiate historical studies, prepare Landmarks nominations, and also to provide NPS with formal opinions on such studies and potential nominations prepared or suggested by other individuals or groups." While the three-way partnership negotiated the funding needed to get the project underway, pressure to comprehensively survey women's history sites continued to build.[14] Historiographic advancements in women's history ensured that the relationship between NPS, NCCPH, and OAH stressed the need for alliances between academic historians, NPS staff, public historians, and historic preservationists.[15] Forging partnerships would ensure that advances in one sphere would translate into progress elsewhere, avoiding each sector of the historical profession becoming siloed.

Formal preparations for the women's history landmark study were slow, despite growing buy-in from feminist historians, Congress, and the Department of the Interior.

On April 8, 1988, Miller wrote to NHL program manager Benjamin Levy, "I was delighted to hear of the language in [the] House budget report on involving professional and scholarly societies in the National Historic Landmark theme studies. Of course, this is at a very tentative stage in terms of actual funding." In fact, there were no explicit guarantees for funding, and NPS seemed reluctant to commit any percentage of its operating budget to the initiative. Miller estimated that a $60,000 investment would facilitate the project's first order of business: organizing a small coalition of women's history scholars to review NCCPH's database of approximately 400 sites in search of potential NHLs. She suggested the review would take two days of "intensive" work before the team would begin to produce thematic essays summarizing their findings.[16]

On February 9, 1989, NPS staff, affiliates from OAH, and members of NCCPH signed a formal cooperative agreement to produce a women's history landmark study, intended "to broaden public support for historic preservation by involving historians and their professional organizations in the study, identification, nomination of, and the dissemination of information about, potential National Historic Landmarks on the role of women in United States history."[17] Miller signed on to be the project's director and wrote an article for the March 1989 edition of *NCC News* to describe the initiative's "three-fold" goals: "to increase the number of National Historic Landmarks that commemorate the experiences of women; to develop theme essays that integrate the tangible resources of women's past with recent scholarship on women's history; and to involve the wider scholarly and preservation communities in preparation of this theme study."[18] From the project's inception, forging partnerships between academic, government, and preservation-focused historians was considered crucial to its future success.

When outlining the envisioned NWHLP, Miller observed that the initiative's aims were well-aligned with emergent women's history scholarship and research methods: "The use of tangible resources is particularly appropriate for the study of women's history because fewer documents on women are available and because women's experiences were often closely associated with sites such as homes, schools, and settlement houses." The place-based history practiced by the NHL Program would thus, she imagined, fit the priorities outlined by cutting-edge women's history research. However, the roots of future disputes are also evident within Miller's project overview, as she noted the NWHLP intended to highlight not only famous women but women who were "more representative of their time and place."[19] Such an assertion could run counter to the NHL Program's stated mission—designating places of *exceptional* significance. Miller's statement foreshadows a tension that recurred across NWHLP's lifespan.

To begin building momentum for preservation, the NWHLP generated a study list detailing potential properties to investigate for NHL eligibility. Edwin C. Bearss, then NPS chief historian, deemed the list "imaginative and stimulating" before providing Miller with suggestions about how to direct the project's course. Bearss proposed narrowing down to focus on a more selective range of themes to ensure that the NWHLP's aspirations remained achievable. Bearss' recommendation recognized the time-consuming nature of comparative analysis of associated properties, itself a crucial element of the NHL Program's modus operandi. Comparative analysis seeks to identify potentially eligible landmarks not by asking whether a site represents a particular theme, legacy, or building type, but instead by asking if said site *best represents* the theme, legacy, or building type. That question can't possibly be answered without the context offered by direct comparison to equivalent or associated places. NHLs are meant to be exemplary, not merely representative. Bearss additionally reminded Miller of the non-negotiable centrality of tangible integrity, asserting: "The integrity of the associated properties, i.e., the degree to which the property reflects its period of significance, is of equal importance to the significance of the associated person, event, or organization."[20]

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Bearss made his recommendations with an eye toward bureaucratic efficiency, presenting comprehensive record-keeping as the key preventative mechanism for warding off future redundancy. He suggested the project avoid examining women's past roles in historic preservation movements since the "potential controversy poses an excessive administrative burden." His point was arguably pragmatic, as it neatly sidestepped provoking resentment or critique by assessing and comparing preservationists' legacies, some of whom were still part of national dialogues about cultural heritage.[21] Regardless,

the omission of historic preservation as a relevant sub-theme within the NWHLP created a lacuna that is clear to women's historians today. Perhaps avoiding a discussion of women's longstanding role in historic preservation while embarking on a women's history preservation project was somewhat ironic, but still necessary to maintain a time-efficient initiative. Bearss ultimately concluded that the study "appears likely to generate a body of work we can all be proud of and a signal achievement in cooperation with our partners in the scholarly community."[22] His optimism was grounded in the rich potential associated with collaboration across conventional federal, academic, and specialist lines.

NHL Program Manager Benjamin Levy quickly recognized that its specific regulations and place-based orientation might flummox external scholars. In a letter written on December 12, 1989, Levy raised a series of quandaries posed by the NWHLP's proposed landmarks, all of which connected to the NHL Program's unique criteria. He flagged the difficulty of nominating an entire building to commemorate a nationally significant person who once occupied a single apartment within it (as in the case of Emma Goldman, Mary Dewson, and Carrie Chapman Catt's homes). He warned Miller that "Historically, our review boards have been hesitant to recommend buildings which have housed numerous occupants and activities in order to recognize just one event or one occupant. I believe there is merit in their caution, because the ability of such a building to memorialize, commemorate, and interpret the life's work of the individual in question is minimal at best."[23] This point has nothing to do with the significance of the person for whom the landmark is proposed; rather, it centers integrity, a concept far less familiar to most academic historians. Integrity demands that a site's physical condition is able to meaningfully evoke a sense of what the place was like at the time of the event that made it noteworthy. It asks if it is possible to glean insight into the person, event, or time period the landmark commemorates by being physically present in the place in question. What can we learn about a person from their presence in a particular apartment building?

Through their correspondence, Levy, Bearss, and Miller sought to establish a shared scope of work and delineate project standards. Their common investment in the NWHLP's success is evident in their detailed planning; however, they couldn't foresee all of the tensions that emerged as the project got underway. The following brief case studies examine how misunderstandings and disagreements regarding two fundamental NHL terms—"significance" and "integrity"—dogged the initiative's activities as it developed 39 successful landmark nominations.

DEFINING SIGNIFICANCE

Assessing significance in the NHL context requires asking the question: Does this property possess exceptional value to illustrating, interpreting, and commemorating major themes in US history?[24] Answering this question is not necessarily straightforward. During the NWHLP, for example, NCCPH historian Jill Topolski prepared a nomination for Paulsdale, Alice Paul's long-time residence in Mount Laurel Township, New Jersey. However, the Sewall-Belmont House (now Belmont-Paul Women's Equality National Monument) had been designated an NHL in 1974, recognizing Alice Paul's eligibility under Criterion 2 (acknowledging an individual's national significance). Whether it was appropriate or necessary to designate another NHL for Paul became the subject of disagreement. When staff historian Barry Mackintosh characterized Paul as lacking the "transcendent significance" that would justify a second NHL in her honor, Miller objected. In a letter to Levy, Miller argued that Mackintosh's comments were "clearly out of step with most recent social and political history as well as recent women's history scholarship." She cited two "major texts on my shelf" that spotlighted Paul, concluding, "This statement about Paul as a 'figure of less-than-transcendent significance' reflects a basic problem that results from having people who are not well versed in women's history scholarship making judgments."[25]

Miller perceived Mackintosh's comments to be dismissive and ill-informed. However, Mackintosh clarified in a letter to Levy that he and Miller simply defined "transcendent significance" differently: "Page's reaction to my comment on Paulsdale reveals a disagreement over what is meant by transcendent significance. I tend to limit the term to figures and events of truly epochal import—the very few greatest in their respective fields, universally recognized as such without argument. Others may allow a lower threshold—but then, it seems to me, the term loses its usefulness." Stating that a person exists for whom the term "transcendent significance" could be applied without any argument may itself be a controversial claim; the dispute between Miller and Mackintosh itself reveals that "transcendent" is not an objective analytical category. However, Mackintosh rooted his definition of "transcendent significance" in the NHL Program's regulations, whereas Miller's definition drew on academic and public reference points.[26] Mackintosh noted this distinction: "The real reason for Page's annoyance, I suspect, is that she did not appreciate the regulatory basis of my reference and took it as a putdown of Paul. This was surely not my intent—there's no shame in possessing less than transcendent significance!"[27] The question of whether Paul possessed such significance was resolved in her favor; Paulsdale was designated an NHL on December 4, 1991.

The nomination of Angelus Temple, the headquarters for evangelist and media sensation Aimee Semple McPherson's Foursquare Church, similarly prompted heated debate.[28] NHL staff historian James Charleton deemed the site's significance "borderline," observing, "We have not landmarked Billy Sunday! There is a real question of how significant this early day Tammy Faye is." Miller responded sharply when Levy passed Charleton's comments on to her: "I think it is most important in this project to move beyond personal opinions and to rely on scholarly sources. I find the reference in your letter to Aimee Semple McPherson being like Tammy Faye Bakker to be a case in point. Such a statement reveals more about your staff's lack of knowledge of current research in American religious history than it does about Aimee Semple McPherson. I would appreciate in the future that your staff's comments be based on cited scholarly resources." Her comments suggest a kind of academic primacy or elitism, making research emerging from the academy the arbiter of whether a landmark is deemed significant by the NHL Program.[29]

Levy responded diplomatically, apologizing for mentioning Charleton's "lighthearted" joke likening McPherson to Bakker. He pointed out that Miller hadn't included the sources she cited in her letter in Angelus Temple's nomination, making it difficult to weigh whether they reinforced her argument for national significance. What's more, once he referred to the texts in question, he noted that one of the authors called McPherson's career "atypical" and "in a class by itself." These claims of non-representativeness could diminish McPherson's generalizable national significance as conceptualized by the NHL Program. Levy clarified staff concerns about the nomination by observing, "I think it also needs to be understood that simply because a person is cited in a scholarly work does not mean the individual is nationally significant." Levy distinguished between scholarly arguments and NHL criteria, subtly contradicting the presumption that a historical figure's appearance in academic research automatically trumped staff determinations regarding the person's significance. According to Levy, "Logic itself dictates whether an argument for national significance has indeed been demonstrated."[30] However, it is clear that, just as different project contributors had different perspectives on what constituted significance, they also took different logical routes to defining significance. "Logic" was seemingly as self-evident a category as "significance" was—which is to say, not necessarily self-evident at all.

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In the cases of Paulsdale and Angelus Temple, conflict stemmed from the assumptions both partners in the initiative made about how to define and prove significance. Project partners approached the task at hand from different angles, debating what the best possible evidence for national significance entailed. Both partners appear to have been reluctant to acknowledge the subjectivity of national significance, as they asserted their respective reliance on federal regulations or academic research as indicators of their impersonal, objective decision-making. In the absence of substantial dialogue regarding their respective vantage points on the question of national significance, communications operated at cross-purposes.

DEFINING INTEGRITY

The NHL Program has always striven to balance significance and integrity when designating new landmarks. Levy's note to staff historians Carolyn Pitts and Patty Henry about a NWHLP draft nomination for the New York Studio School of Drawing, Painting, and Sculpture (the former site of Gertrude Vanderbilt Whitney's modern art museum) outlines the struggle to thoroughly assess both qualities: "Alas, how can our staff be so overcome by the evident layer on layer of significance that they did not leave a jot about the apparent loss of integrity of this fine institution."[31] The school building had undergone substantial alterations, including outright removal of interior walls and doors. Despite the building's readily apparent significance, its impaired integrity left its qualifications as a prospective NHL open to question.

The standards for NHL designation specifically call for a "high degree" of integrity, requiring a prospective landmark to retain integral aspects of its historical character that date to the property's period of significance ("a length of time during which a property was associated with nationally significant events, activities, and persons, or attained the qualities that make it a candidate for NHL designation").[32] This issue is even more specific to the NHL program than national significance. Whether a place associated with a historic figure, event, or trend still exists in a relatively unaltered form does not necessarily concern most academic historians. For example, when writing a biography, it isn't considered necessary to

visit the research subject's substantially intact home or workplace to glean a sense of what made that person compelling. In a place-based historic preservation program, however, integrity is of paramount concern.

This aspect of place-based history is therefore likeliest to throw academics for a loop. A place-based historian's preoccupation with, for instance, the presence or absence of original wood paneling and ornamental cornices might seem abstruse and pedantic. Levy was well aware of this misconception about the NHL Program's work: "Folks, we are not potted plants! Nor are we ciphers employed to nit-pick technicalities of a nomination form. Our grades testify to a responsibility to examine nominations in relationship to criteria. And one of the greatest of these is 'integrity.'"[33] Levy succinctly outlines the critique most often leveled at historic preservation: the misperception that it inherently flattens historical significance to something as fussy as whether or not a door fixture is substantially intact. To echo Levy, historic preservation is not a "potted plant"—a decorative but fundamentally useless endeavor—or a bureaucratic nonentity. Such a misunderstanding overlooks the substantial critiques preservationists themselves have made regarding integrity. For example, a substantial sector of preservationists have rightly observed that the historic places likeliest to remain substantially intact across time are those that were occupied by wealthy White people.[34] As such, uncritical valorizing of "integrity" can be exclusionary, posing barriers to meaningful representation. Qualitative comparative analysis can substantiate arguments for a property's relative integrity and significance, mitigating over-rigid interpretations of integrity. That multidimensional comparative process cannot be boiled down to strict technical hairsplitting.

In the same letter, Levy explicitly distinguished between weighing significance and integrity: "It is not enough to assert that the 'atmosphere of creativity and artistic energy' survives. Our program criteria demand the survival of historical fabric and appearance."[35] The school's atmosphere of creative energy might reflect integrity of feeling—but what of the other six elements of integrity? Exactly what "survival of historical fabric and appearance" meant became fodder for debate as the NWHLP prepared a nomination for the Allerton Building in Chicago. Noted as the site where Hannah Greenbaum Solomon founded the National Council of Jewish Women (NCJW) during the 1893 Columbian Exposition, staff historian Charleton considered the building's national significance "plausible, but not overwhelming."[36] His review of the building's significance was somewhat tepid, but he was ultimately more doubtful of the property's integrity. He was unsure whether the NCJW was associated closely enough with the site to make the designation meaningful, since they were never headquartered there. He was also uncertain whether the site was intact enough to communicate a historical connection to the NCJW—assuming one even existed.

Miller, on the other hand, argued that structures made specifically for the fair were intended to be ephemeral, making it "unrealistic to require interior integrity for a world fair building."[37] She raised a compelling point in terms of building type: not all buildings of historic significance were intended to be permanent. Communities marginalized on the basis of their identities (as the NCJW's founding members were on the basis of both their sex and their religion) were less likely to successfully secure permanent headquarters, particularly so soon after organizing. Grassroots organizations, solidifying in more spontaneous and organic ways, tended toward transience. Upon hearing both Charleton's and Miller's viewpoints, Levy declared in a letter to Miller, "Alas! The Allerton Building. I believe Historian Charleton's critique proves fatal to this nomination. The space in which the founding of the NCJW took place was entirely reconfigured and today bears no resemblance to the original."[38] He observed that the changes were so substantial that, had the Allerton Building been declared an NHL while it was intact years earlier, its designation would be withdrawn in the face of its major alterations. The building no longer evoked a sense of the relevant historic event; there was, quite simply, no "there there."

The building no longer evoked a sense of the relevant historic event; there was, quite simply, no "there there."

Integrity is an easily misunderstood concept. It can sometimes be misconstrued as a mere "potted plant," reflective of preservation's preoccupation with architectural minutiae rather than as a framework for understanding whether a place's story is clearly communicated in tangible and intangible ways when individuals interact with the place's substance. From a perspective primarily shaped by academia, the story of a place exists somewhat independently from the place; in the context of the NHL Program, however, the story is the place, and vice versa. Determinations regarding the national significance of the Allerton Building or the New York Studio School of Drawing, Painting, and Sculpture existed independently of—and sometimes in direct contradiction

to—programmatic assessments of integrity. This distinction ratcheted up tensions across the NWHLP as potential nominations were debated.

NWHLP'S OUTCOMES

The NWHLP's initial round of submitted nominations met with a mixed response from reviewers, leading to nine deferrals.[39] Managing the nominations that were held back while continuing forward momentum on new draft nominations posed difficulties, prompting Levy to take a more assertive approach to project management. In a letter written May 30, 1991, he told Miller, "[W]e will be more ready than in the past to remove an evidently weak candidate from the agenda. We simply cannot afford the administrative burden on future agendas by the backlog occurring from significant numbers of deferrals."[40] Later that summer, Miller wrote, "The Women's Landmark Project has thus far produced about forty nominations, yet only half have been presented to the advisory board, and only twelve of those have been acted upon." Reviewing nominations was a slow and labor-intensive process, particularly because readers didn't always agree on what arguments proposed designations should make, creating frustrating contradictions for revising authors.[41]

Upon receiving another round of synopses describing potentially eligible landmarks, Levy notified Miller: "We cannot be definitive in our responses, as I am sure you understand, at so early a stage in review. We will need to see complete draft nomination forms before we can be confident in our responses."[42] Levy's reticence is understandable, likely stemming from the hassle of managing an extensive slate of deferred nominations and a reluctance to implicitly commit program staff to outcomes they couldn't explicitly guarantee. However, as Miller would note in retrospective analysis of the project, writing a full nomination to justify landmark designation and then having the nomination fail at the review level was not just dispiriting—it was time-consuming.

The NWHLP ultimately informed Miller's groundbreaking edited volume *Reclaiming the Past: Landmarks of Women's History* (1992).[43] At the point of publication, she estimated that 50 places significant to women's history had been designated as NHLs. Thirty-nine of those designations stemmed from the NWHLP.[44] The initiative was a success, yet women's history sites remained under 2% of total NHL designations. Miller juxtaposed this statistic with the then-current tally of properties designated for architectural significance (over 25%) and properties designated for their connection to military history (approximately 14%).[45] Although progress had been made, there were many miles to go. Approximately 50% of the properties identified, researched, and documented by the NWHLP made it to the desired finish line of NHL designation.[46]

In 1993, Miller published a retrospective analysis of the NWHLP in *The Public Historian*, in which she bluntly described her view of the obstacles standing in the way of expanding women's history representation across the NHL Program. She cited difficulties in gaining owner consent, the review process's lengthiness, and the high likelihood that women hadn't owned or permanently occupied the buildings in which an event significant to women's history occurred. Her sharpest critiques centered significance and integrity. She wrote, "It frequently appears … that the concept of national historical significance is not immediately apparent or relevant to anyone not employed by the NPS's history division." She lamented the absence of a women's history specialist on the NPS side of the project, implicitly suggesting that staff historians' preoccupations were behind the scholarly curve. In her words, "the emphasis of the NHL program and the concentration of research in women's history are moving in two very different directions."[47] Prior to the NWHLP, Miller noted clear synergies between academic women's histories and the NHL Program's place-based work; following the initiative, she felt differently.

However, as Levy had noted in their correspondence regarding Angelus Temple, the NHL Program's priorities and academia's priorities are not—and cannot be—identical. The NHL Program's regulatory framework outlines a specific, well-defined mission: to recognize places that are of unique importance to all Americans' stories and that are still sufficiently intact to convey a sense of the place as it was. As a program established by mid-20th-century federal legislation, it is not particularly flexible or adaptable, and it was not intended to be so. Its operations are governed by precise mechanics that require study to understand and perseverance to appreciate. Miller's perspective on definitions of integrity was similarly critical. She cited the National Register's guidance in Bulletin 15, stating that historic properties must retain their "*essential* physical characteristics" in order to possess integrity. She juxtaposed this statement with the functioning definition for properties designated on the basis of architectural significance, which were required to possess "*most* of the physical features" that rendered them unique, suggesting that the NWHLP's nominations were held to the more exacting standards associated with architecture. That being said, NHL Program staff had concurrently raised concerns about whether external contractors writing nominations properly adhered to NHL regulations and expectations. NHLs are explicitly

held to a higher standard of integrity than are properties listed on the National Register, and inadvertent conflation of NHL and National Register specifications regularly created confusion.[48] NHL staff historians often carefully corrected instances where nomination authors mistakenly used National Register criteria to describe prospective NHLs. They also reconnected draft nominations to concrete descriptions of tangible heritage by regularly asking for more specific measurements, more site photographs, and more detailed maps.

One can specialize in the logistics of the NHL documentation process much as one can, within the academy, specialize in women's history. The NWHLP's beauty was that these sets of expertise were given an opportunity—however fraught—to build on each other to spotlight under-recognized and under-valued histories. The frustrations that emerged throughout the process stemmed from conflicting reference points for key concepts, not from differing ambitions or divergent perspectives on the importance of revealing women's histories. All of the NWHLP's collaborators shared a commitment to acknowledging and honoring women's histories, and this shared vision ultimately ensured that, despite disagreements and debates, participants persisted in doing the work.

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CONCLUDING RECOMMENDATIONS

The need for the sort of collaborative project undertaken by the NWHLP was underscored by OAH's more recent report entitled *Imperiled Promise: The State of History in the National Park Service*. Completed in 2011 at NPS's invitation, the authors observe academic and federal historians tend to operate in silos: "For far too long, academe's own culture and structure have prevented many talented scholars from engaging with history in the national parks—in effect reinforcing the insularity that NPS practices build from within, and preventing us from recognizing and nurturing our common purpose."[49] The Mellon Humanities Postdoctoral Program was originally designed to partner scholars with NPS parks and programs, addressing this inclination toward disciplinary insularity.

The NWHLP's trajectory offers lessons for contemporary federal/non-federal partnerships, speaking to the hurdles that may be faced even within the context of an ultimately successful and groundbreaking project. Correspondence generated by the NWHLP suggests the pressing need to establish shared understandings of key terms like "national significance" and "integrity." The problem with these terms is truly not that they are arcane or overly complex, but rather, that they appear deceptively simple. Both concepts suffer from the "I know it when I see it" framing by which US Supreme Court Justice Potter Stewart famously described "obscenity" in 1964: it is easy to feel confident that one can define "significance" and "integrity" while not having a clear understanding of how these terms operate in the specialized landscape of federal historic preservation writ broadly. Explicitly ensuring a common foundation across all project partners goes a long way toward smoothing the collaborative process.

At the beginning of my postdoctoral fellowship, NHL staff immediately shared an up-to-date copy of the *NHL Bulletin* with me. I already had a passable understanding of NHL documentation and designation, but a crash course in the NHL Program's specificities was sorely needed, particularly because of how easy it is to take terms like "national significance" at face value. As I was delving into NHL technicalities, it was profoundly helpful for me to occasionally step back and take a broad view of the program's entire history. For a newcomer to the NHL Program, it is easy to feel overwhelmed by the sheer number and specificity of undergirding policies and procedures. As a person acclimated to the independence of dissertation writing and a PhD program's focus on scholarly originality, the sharp turn toward writing in a highly structured and regulated format was sometimes jarring. It can be difficult to perceive how a program that feels quite rigid has changed over time, but zooming out to take a bird's-eye view of the program's history reminded me of the many ways in which it expanded its scope by creating room for more complex arguments for integrity and significance. As I paid closer attention to change over time and became more familiar with the program's idiosyncrasies, it became clearer that its structure was not as restrictive as it initially appeared.

When establishing a common basis for understanding, it is often vital to check prior disciplinary assumptions at the door. After years of training through graduate school or on-the-job experience, we have a tendency to assume that the way we were trained to approach a problem is the way most people would naturally approach the

problem. This is often not the case. For example, my instincts forged through a history PhD program would suggest that clarifying a scholarly argument entails providing more explicit research support and more clearly defining what aspects of the argument are especially novel. However, when clarifying an argument for national significance in an NHL letter of inquiry, what's usually needed is more explicit reference to the criteria for assessment laid out by the NHL Program. In one venue, originality is required; the other demands adherence to a predetermined format. Additionally, the NHL Program has a less granular scope than that of an academic specialist in a specific region, time period, or thematic focus. When writing as a PhD candidate, I delved into arcane details like the kinds of sleepwear American colonists wore in the 17th century; in the context of the NHL Program, that type of atmosphere-conjuring specificity is largely irrelevant.

Finally, the NWHLP reminds us how important it is to stay focused on a shared goal. Friction between collaborators is, if not inevitable, likely in the course of any long-term project. However, regardless of internal tensions, the NWHLP was a productive initiative that dramatically broadened women's representation across the NHL Program. It is a misconception across public history that collaboration must be utopian in order to be a "success." Federal and academic partnerships are illuminating precisely because they encourage collaborators to hone ways of communicating disciplinary ideas that may be taken for granted within our respective realms of expertise. Clarity comes from the struggle to connect across disciplinary boundaries.

ENDNOTES

1. See NPS, "Meet the Fellows: Dr. Sarah Pawlicki," **https://www.nps.gov/articles/000/mellon_pawlicki.htm** (accessed June 12, 2024). See also NPS, "Mellon Humanities Postdoctoral Program," **https://www.nps.gov/orgs/1296/index.htm** (accessed August 14, 2025).
2. The NHL program's approach to applying its own criteria has evolved over time. The manner in which NHL criteria were applied during the NWHLP does not necessarily reflect the NHL program's current practices. For current definitions of "national significance" and "integrity," see NPS, *NHL Bulletin: Guidelines for Preparing National Historic Landmark Nominations* (Washington, DC: National Historic Landmarks Program, NPS, 2023), **https://www.nps.gov/subjects/nationalhistoriclandmarks/upload/NHL_Bulletin_508_Final_2023-09.pdf** (accessed August 15, 2025). For further information about the NHL Program, see NPS, "National Historic Landmarks Program Info," **https://www.nps.gov/subjects/nationalhistoriclandmarks/program-info.htm** (accessed August 15, 2025).
3. See NPS, "Chief Historians of the National Park Service," **https://www.nps.gov/orgs/1220/npschiefhistorians.htm** (accessed August 19, 2024); NPS, "Guide to the Verne E. Chatelain Papers," **https://www.nps.gov/articles/000/guide-to-the-verne-e-chatelain-papers.htm** (accessed March 26, 2025). Theme studies are the primary mechanism through which the NHL Program recognizes underrepresented histories. They provide historic context for potential landmarks connected to broad subject areas, time periods, and/or geographic regions. By identifying how places relate to nationally significant topics, theme studies provide an overview of relevant sites worthy of the program's consideration. See "Guide to the Verne E. Chatelain Papers"; "Chief Historians of the National Park Service"; Harlan D. Unrau and G. Frank Williss, *Expansion of the National Park Service in the 1930s: Administrative History* (Washington, DC: National Park Service, 1983), chapter 5, section B, "Creation and Activities of History Division."
4. See US Department of Agriculture, "Historic Sites of Act of 1935," **https://efotg.sc.egov.usda.gov/references/public/VA/HistoricSitesAct.pdf** (accessed August 19, 2024).
5. For further information regarding the National Park Service Advisory Board's history and role in the NHL Program, see Barry Mackintosh, "NPS Advisory Board: A Short History," 1999 (updated 2004), **https://www.nps.gov/articles/npsab-history.htm** (accessed December 4, 2025).
6. For brief and accessible summaries of the NHL Program's origins, see *NHL Bulletin: Guidelines for Preparing National Historic Landmark Nominations*, 16–18; Geoffrey Burt, "Roots of the National Historic Landmarks Program," **https://www.nps.gov/articles/roots-of-the-national-historic-landmarks-program.htm** (accessed July 12, 2024).
7. *NHL Bulletin*, 16–17. For further insight into NHL regulations, see 36 CFR § 65.1–65.10; 36 CFR § 800.10; NPS, "Federal Effects of NHL Designation," **https://www.nps.gov/subjects/nationalhistoriclandmarks/federal-effects-of-nhl-designation.htm** (accessed July 14, 2025). Some national monuments are administered by other agencies, but the great majority come under NPS.
8. See 36 CFR § 65.1–65.10.
9. *NHL Bulletin: Guidelines for Preparing National Historic Landmark Nominations*, 40–47.
10. Women's histories were minimally and often tangentially mentioned in these early theme studies. For example, in *Development of the English Colonies, 1700–1775*, one property explicitly centers a woman's history: Eliza Lucas's cultivation of indigo at the

Lucas Plantation in South Carolina. (Lady Pepperrell House is also featured but is solely designated under Criterion 4 for its architectural significance.) *The War for Independence* also barely touches on women's history, invoking the folklore of Molly Pitcher to describe "Molly Pitcher Spring" at Monmouth Battlefield in New Jersey. See Frank B. Sarles, Jr. and Charles E. Shedd, Jr., *Development of the English Colonies, 1700–1775* (Washington, DC: US Department of the Interior, 1960), **https://npshistory.com/publications/nhl/theme-studies/english-1700-1775.pdf;** Frank B. Sarles, Jr. and Charles E. Shedd, Jr., *The War for Independence* (Washington, .C: U.S. Department of the Interior, 1960), **https://npshistory.com/publications/nhl/theme-studies/war-of-independence.pdf** (accessed August 25, 2025).

11. Page Putnam Miller, ed. *Reclaiming the Past: Landmarks of Women's History* (Bloomington and Indianapolis: Indiana University Press, 1992), 4. See also Afro-American Bicentennial Corporation, *Beyond the Fireworks of '76: A Summary Report of Thirty Sites Determined to be Significant in Illustrating and Commemorating the Role of Black Americans in United States History* (Washington, DC: US Department of the Interior, 1973), **https://npshistory.com/publications/nhl/special-studies/beyond-fireworks-76-1973.pdf** (accessed August 25, 2025); National Survey of Historic Sites and Buildings, *Literature, Drama, and Music* (Washington, DC: US Department of the Interior, 1962), **https://npshistory.com/publications/nhl/theme-studies/literature-drama-music.pdf** (accessed August 25, 2025); Walter Hugins, Charles W. Snell, Ray H. Mattison, William E. Brown, Horace J. Shelly, Jr. and S. Sydney Bradford, *Social and Humanitarian Movements* (Washington, DC: US Department of the Interior, 1965), **https://npshistory.com/publications/nhl/theme-studies/social-humanitarian.pdf** (accessed August 25, 2025).
12. Page Putnam Miller, "Reclaiming Our Past: Landmark Sites of Women's History," *NCC News* **https://www.historians.org/perspectives-article/ncc-news-march-1989/** (accessed February 11, 2025).
13. Draft form enclosed within a letter written from Jannelle Warren-Findley to Beth [surname unknown], May 29, 1986, NHL Program Administrative Files, National Park Service, Washington, DC. Subsequent citations of NHL Program Administrative Files will be abbreviated to NHLAF.
14. See, for example, Marion Tinling, *Women Remembered: A Guide to Landmarks of Women's History in the United States* (New York: Greenwood Press, 1987); Heather Huyck, "Beyond John Wayne: Using Historic Sites to Interpret Western Women's History," in Lillian Schlissel, Vicki Ruiz, and Janice Monk (eds.), *Western Women: Their Land, Their Lives,* Lillian Schlissel, Vicki Ruiz, and Janice Monk, eds. (Albuquerque: University of New Mexico Press, 1988), 305. Tinling's focus on place-based history translated well to the NHL Program's priorities, as did her concentration on properties associated with socially and politically prominent people. Huyck's work argued for the omnipresence of women's history across all historic sites.
15. Precise dividing lines between academics, NPS staff, public historians, and historic preservationists are necessarily artificial; there is overlap between each professional category. For example, a person might be trained as an academic and enter public history or be trained as a historic preservationist and join the NPS staff. However, because perceived professional distinctions and norms shape the way historians operate, it is useful to examine the nuanced ways boundaries are created to distinguish between different aspects of the historical field.
16. Page Putnam Miller to Ben Levy, April 8, 1988, NHLAF.
17. Miller, *Reclaiming the Past*, 16.
18. Miller, "Reclaiming Our Past."
19. Miller, "Reclaiming Our Past."
20. Edwin C. Bearss to Page Putnam Miller, June 8, 1989, NHLAF.
21. Although Charles Hosmer's milestone work *Presence of the Past*, published in 1965, had provided an overview of historic preservation's history as a movement, his work had not generated a subsequent robust body of scholarship analyzing preservation's past. The contemporary view of preservation as a historical movement was therefore limited, which may have influenced Bearss' perspective. See Charles Hosmer, *Presence of the Past: A History of the Preservation Movement in the United States before Williamsburg* (New York: G.P. Putnam's Sons, 1965); Randall Mason and Max Page, eds. *Giving Preservation a History: Histories of Historic Preservation in the United States*, 2nd ed. (New York: Routledge, 2020), 7–9.
22. Bearss to Miller, June 8, 1989, NHLAF.
23. Levy to Miller, December 12, 1989, NHLAF.
24. See chapter 4 of NPS, *NHL Bulletin*.
25. Miller to Levy, June 7, 1991, NHLAF.
26. The 2023 *NHL Bulletin* (p. 49) discusses the meaning of "transcendence," noting that federal regulations do not provide a specific definition of the term. However, "transcendent usually indicates that a nationally significant person, event, or topic in history must exceed the 'usual limits' of significance or surpass 'others of its kind.' Such persons, events, or topics in history might be considered 'first among equals' in terms of their significance."

27. Barry Mackintosh to Levy, memo dated June 12, 1991, NHLAF.
28. Like Paulsdale, the Angelus Temple faced a higher degree of scrutiny regarding its claims to significance than the average NHL nomination might. In Angelus Temple's case, this is because it falls under NHL Criterion Exception 1. The program's regulations state that "Ordinarily … properties owned by religious institutions or used for religious purposes … that have achieved significance within the past 50 years are not eligible for designation. Such properties, however, will qualify if they fall within the following categories: (1) A religious property deriving its primary national significance from architectural or artistic distinction or historical importance.…" A property's qualification under Criterion Exception 1 relies on the nomination's inclusion of academic scholarship that adequately proves its secular historical and/or architectural significance. The particular centrality of academic scholarship to addressing Criterion Exception 1 might have contributed to the tenor of conversations about the Angelus Temple; however, the criterion exception is not explicitly addressed within the nomination's associated correspondence. For insight into NHL criteria exceptions, see 36 CFR § 65.4.
29. James Charleton, comments on *Angelus Temple*, National Historic Landmarks Nomination, National Archives Catalog, **https://catalog.archives.gov/id/123857916** (accessed August 8, 2025); Miller to Levy, November 5, 1991, *Angelus Temple*.
30. Levy to Miller, November 12, 1991, *Angelus Temple*.
31. Ben Levy to Carolyn Pitts and Patty Henry, October 22, 1991, *New York Studio School of Drawing, Painting, and Sculpture,* National Historic Landmark Nomination, National Archives Catalog, **https://catalog.archives.gov/id/75315898** (accessed August 11, 2025).
32. 36 CFR 65.4. For the definition of the period of significance, see *NHL Bulletin*, 39.
33. Levy to Pitts and Henry, October 22, 1991, *New York Studio School*.
34. See, for example, Sarah Marsom, "Dismantle Preservation—Unsettling Heritage; Historical, Not Historic," YouTube, July 28, 2021, **https://www.youtube.com/watch?v=O3ZR95GuwCQ&list=PLrY14P-fp0aJfzL0xFNZ1SqSrBeHbIn8C&index=10** (accessed August 18, 2025).
35. Levy to Pitts and Henry, October 22, 1991, *New York Studio School*.
36. Charleton to Levy, May 9, 1991, NHLAF.
37. Miller to Levy, June 7, 1991, NHLAF.
38. Levy to Miller, May 30, 1991, NHLAF.
39. Miller to Levy, June 27, 1991, NHLAF.
40. Levy to Miller, May 30, 1991, NHLAF.
41. Miller to Levy, August 14, 1991, NHLAF.
42. Levy to Miller, November 20, 1991, NHLAF.
43. Confusingly, the work produced by the women's history initiative has been referred to as a "theme study," but it itself did not constitute a formal theme study as produced via the NHL Program. *Reclaiming the Past* is the primary text associated with the NWHLP.
44. See "Foreword," *Placing Women in the Past,* special issue of *CRM* 20:3 (1997): 3.
45. Miller, *Reclaiming the Past*, 13.
46. Page Putnam Miller, "Women's History Landmark Project: Policy and Research," *Public Historian* 15:4 (1993): 83; **https://www.jstor.org/stable/3378641.** Proposed properties that failed to earn landmark designation included the Carrie Chapman Catt Residence (New York, New York); the Mary Dewson Residence (New York, New York); the Emma Goldman Residence (New York, New York); the Misses Adams's English and French School for Girls (Baltimore, Maryland); Moore School of Art (Philadelphia, Pennsylvania); the Hearst Magazine Building/*Good Housekeeping* offices (New York, New York); the Young Women's Christian Association of the City of New York (New York, New York); the Margaret Louisa Home (New York, New York); the Hollywood Studio Club (Hollywood, California); the Allerton Building (Chicago, Illinois); Sojourner Truth Industrial Club (Los Angeles, California); Symphony Hall (Boston, Massachusetts); the Cambridge School of Architecture and Landscape Architecture (Cambridge, Massachusetts); Convent at Old St. Ferdinand's Church (St. Louis, Missouri); Newcomb Pottery (New Orleans, Louisiana); Miss Farmer's School of Cookery (Bedford, Massachusetts); Rookwood Pottery (Cincinnati, Ohio); Mother Seton House (Baltimore, Maryland); the Lucy Hobbs Taylor Building (Lawrence, Kansas); Riversdale (Riverdale Park, MD); the Dorothy Thompson (and Sinclair Lewis) Home (Barnard, Vermont); the Emily Briggs House (Washington, DC); Chinese Mission Home (San Francisco, California); Cooperative Agricultural Community of Cortez, California (San Joaquin Valley, California); the Polly Bemis Cottage (Salmon Canyon, Idaho); Lafayette Hotel (Buffalo, New York); Fine Arts Building/Studebaker Building (Chicago, Illinois); the Martha Cook Building (Ann Arbor, Michigan); Limberlost Cabin (Geneva, Indiana); Wildflower Woods (Rome City, Indiana); Dumbarton Oaks (Washington, DC); Hope Farm–Emily P. Bissell Hospital (Wilmington, Delaware); the Marie Webster House (and the Amy Beach House; Boston, Massachusetts).

47. Miller, "Women's History Landmark Project," 85
48. See, for example, *Kate Mullany House,* National Historic Landmarks Nomination, National Archives Catalog, **https://catalog.archives.gov/id/75316036** (accessed October 2, 2024). Reviewers of the nomination were concerned about the property's internal integrity and whether the labor organizer Kate Mullany rose to the appropriate level of national significance. Reviewers also expressed the need for further comparables to make an informed assessment. Miller, "Women's History Landmark Project," 84.
49. Anne Mitchell Whisnant, Marla R. Miller, Gary B. Nash, and David Thelen, *Imperiled Promise: The State of History in the National Park Service* (Bloomington, IN: Organization of American Historians, 2011), 17.