

**United States Department of the Interior
National Park Service
National Register of Historic Places**

**Comments
Evaluation/Return Sheet**

Property Name: Glenwood Cemetery
Property Location: Washington, DC
Reference Number: 16000638
Date of Return: 9/19/2016

Nomination Summary

The Glenwood Cemetery, Washington, DC, is nominated for listing in the National Register under Significance Criteria A, C, and D at the local level, invokes criterion consideration d, and has an associated period of significance identified as 1852-1966.

Reasons for Return

There are two reasons that the nomination for Glenwood Cemetery is being returned. The first is that the case for Significance Criterion D (“That have yielded, or may be likely to yield, information important in history or prehistory”) is not adequately supported. The second is that the rationale for counting two buildings identified as contributing resources—specifically, the c. 1950 Maintenance Building and Shed—should be reworded so as not to contradict itself. Each is dealt with individually below, and then a few other proposed edits are identified.

Comments Regarding the Applicability of Significance Criterion D

Two places in the nomination offer application of Significance Criterion D to Glenwood Cemetery. Both note that “no systematic archaeological survey” has occurred at the Cemetery, but that it has high potential for both prehistoric and historical archeological remains. The short paragraph in Section 9, p. 55 references the property’s upland setting, noting it “may have been attractive to American Indians for camps or special use sites.” Then, in relation to potential historical archeological research the nomination notes that: “It is known to have been farmland as early as 1809, and there may be undocumented historic use or occupation, such as by slaves or tenants.” Neither of these relates to the cemetery occupation, and even later reference in the nomination to “Unmarked graves, especially from reinterments” identifies no specific research questions to which the archeological recovery of such materials might speak. Other than the potential ground-truthing of the presence of clandestine burials, the basis for significance under Criterion D is not supported.

National Register Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places provides the following guidance regarding Significance Criterion D and cemeteries:

“Under Criterion D, the common requirements are that the property have information to contribute and the information is considered important. The importance of the information to be yielded usually is determined by considering a research design or a set of questions that could be resolved by controlled investigation of the site” (p. 14). Until a great many more specifics are provided as to what sort of materials might be expected to be encountered archeologically, the

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specific information to be garnered from them and the research questions to be addressed, it is premature to invoke Significance Criterion D.

C. 1950 Maintenance Building and Shed as Contributing Resources

The nomination identifies both the c. 1950 Maintenance Building and Shed as contributing buildings to the nomination without a logically consistent rationale. As currently written, both buildings are identified as contributing resources yet the associated text entirely detracts from that attribution. We provide suggested text for consideration in an attempt to better support the assessment of these two properties.

As relates to the Maintenance Building, the nomination reads: “Because the maintenance building was constructed during the Period of Significance and it maintains its integrity, it is considered contributing; however, the building has minimal architectural or historical significance” (Section 7, p. 32). The second half of that sentence appears to contradict the first half, and a reasonable person might read it and conclude that the Maintenance Building should be counted among the non-contributing resources. As a remedy, we suggest inserting text that stresses that the historic use and function of the Maintenance Building continues, that the specific aspects of integrity it retains be identified by name (which is not currently the case), and that such statements would successfully bolster the case for identification of the Maintenance Building as a contributing resource to the larger NR-listed Glenwood Cemetery.

As for the Shed, which was “. . . likely constructed around the same time as the maintenance building, circa 1950. As with the maintenance building, the shed was built within the Period of Significance and maintains its integrity and so is considered contributing. However, it holds minimal architectural or historic significance.” We recommend employing a tactic similar to that identified for the Maintenance Building to avoid this problematic wording and support the case for counting the Shed as a contributing resource to the larger Glenwood Cemetery.

Additional Editorial Suggestions

The following suggestions and requests for clarification will assist in strengthening the revised nomination.

1. Summary Description in Section 7, p. 4—On the second line, please correct the acreage to read 53.85 acres.
2. Summary Description in Section 7, p. 4—On the third line, please insert the word Cemetery so that the reference is to the “. . . Rural Cemetery, Lawn Park, and Memorial Movements.”
3. Section 7, p. 7—We recommend the addition of some sort of concluding sentence, possibly at the end of the second paragraph on this page where the picturesque landscape is described, that explicitly states something to the effect of “This ensemble consisting of the circulation system, topography, and associated landscaping collectively constitutes the contributing resources identified as the site in this nomination.”

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4. Numbers are spelled out as words (e.g., nineteenth century) in the beginning of the nomination and then later when it gets into the descriptions of specific resources the numbers are written as numerals (e.g., 19th century). One convention should be selected and used throughout the document.
5. Section 7, p. 13—The penultimate line of the first paragraph under the heading “Mausolea” should end with “. . . an aesthetic that was popular in . . .”.
6. Section 7, p. 40—The second sentence in the section identified as “Lawn Park Movement Markers” should delete the second appearance of the word “more” and read: “Although more restrained than the markers of the . . .”.
7. The photo captions are inconsistent in their use (or lack) of terminal punctuation.
8. Section 9, p. 56—The header should read: Cemetery Design in America: Pre-1830.
9. Section 9, p. 59—Please delete the hyphen in the heading so that it reads: The Lawn Park Cemetery Movement (1960s – 1950s).
10. Section 9, p. 83—The caption/text box needs to be raised as it obscures the first line of text in the paragraph that follows.
11. Section 9, p. 90—The heading should read: The Battleground of the Dead.

In sum, the argument for Significance Criteria A & C at the local level are well met, but the corresponding case for Significance Criterion D is not sufficiently supported. Likewise, the rationale for counting the Maintenance Building and Shed among the contributing resources warrants some revision. My best recommendation is to remove the references to Criterion D and reword the justifications for identifying the Maintenance Building and Shed as contributing buildings, and submit the revised nomination for designation.

Please do not hesitate to contact me at 202.354.2217 or via e-mail at julie_ernstein@nps.gov if have any questions or require clarification of any of these comments.

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