

18 January 2010

TO: Montgomery County Historic Preservation Commission
Staff and Commissioners

FROM: David S. Rotenstein

SUBJECT: Upper Patuxent Area Master Plan Amendment

This memorandum contains a brief summary of my review of the Staff Draft Amendment to the Master Plan for Historic Preservation: Upper Patuxent Area Resources. I have read the Draft Amendment document, the Staff Report, and the individual Maryland Inventory of Historic Places forms completed for each of the resources. On Saturday 16 January 2010 I visited the Upper Patuxent area and viewed the two historic districts and several of the individual properties recommended for designation in the Master Plan for Historic Preservation. I am writing this memorandum to summarize my impressions from the various information sources.

Overall I am disappointed by portions of the Draft Amendment and the supporting documents. The supporting documents, notably the MIHP forms, lack consistency in their reporting style and format and in some cases do not provide reviewers sufficient information to form a reasonable opinion regarding the recommendations for designation (or removal from consideration for designation). Although the Draft Amendment contains location maps derived from the County's GIS layers, there is insufficient information in the maps to understand each property's context. The MIHP forms, intended to provide the raw data from which decision making may occur, lack sufficient detail. Some do not contain contemporary location maps; others, notably the MIHP form prepared for the Rezin Moxley House (15/3), lack sufficient photographic documentation. In general, the thumbnail photographs provided for individual properties within the two proposed historic districts do not provide sufficient detail to adequately evaluate the resources.

I also am concerned with discrepancies in the various documents. For example, according to the Draft Amendment, the proposed Etchison Historic District has 20 properties; the Staff report indicates there are 19; and, the MIHP form identifies 21 properties.

Time does not permit a more comprehensive discussion of all of the resources. Discussed below are resources for which I believe there are significant issues regarding the data presented and the recommendations for designation. I do not believe that there are intact historic districts in Etchison and Clagettsville. Although both represent clusters of old buildings, corporately they lack chronological cohesion and many of the individual properties have such diminished integrity that imposing regulatory review via the Historic Area Work Permit process would create an undue burden on property owners and the County.

The bases for recommending designation are parochial and fail to draw upon other jurisdictions — federal, state, and local — which have tackled the problem of ubiquitous rural unincorporated hamlets. I am particularly concerned about the recommendation for designating five unremarkable modern ranch houses in Etchison by suggesting they are resources that have achieved significance within the past fifty years solely because of their associations with families who have a long history of land tenure in the community. There are ways to recognize local importance and not all of those ways may be achieved by designating properties as historic.

Etchison Historic District (15/29)

This proposed historic district is a rural unincorporated hamlet located in the vicinity of the intersection of Laytonsville Road (SR 108) and Damascus Road (SR 650). The period of significance proposed in the Master Plan Amendment spans 1876 to 1965.¹ According to the Maryland Inventory of Historic Properties form, the proposed Etchison Historic District is significant primarily for its association with two early families, the Etchison and Hawkins families, who built homes and businesses. The substance of the proposed historic district's significance appears to turn on the assertion that,

The district displays an unusual dichotomy between residents who built outmoded residences long after popularity waned [sic.] on a regional scale, reflecting persistence of tradition, and up-to-date styles indicative of a consciousness of current trends in architectural design.²

The Master Plan Amendment recommends designating the proposed Etchison Historic District in the Master Plan for Historic Preservation under four criteria:

- 1a) The property has character, interest or value as part of the development, heritage or cultural characteristics of the county, state or nation;
- 1d) The property exemplifies the cultural economic, social, political or historic heritage of the county and its communities;
- 2a) The property embodies the distinctive characteristics of a type, period or method of construction; and,
- 2d) The property represents a significant and distinguishable entity whose components may lack individual distinction.

¹ Maryland National Capital Park and Planning Commission. Montgomery County Department of Planning. Historic Preservation Section, *Staff Draft Amendment to the Master Plan for Historic Preservation: Upper Patuxent Area Resources*, December 2009, 33.

² Clare Lise Kelly and Rachel Kennedy, *Etchison*, Maryland Inventory of Historic Properties Form, November 2009, Section 8.

The recommendations contained in the designation documents do not appear to be consistent with Chapter 24A of the Montgomery County Code. Etchison is a rural unincorporated hamlet with a population of many buildings that individually lack distinction and are historically and architecturally unremarkable. Notably lacking from the staff narratives defending the proposed Etchison Historic District's significance are the many academic and public-sector reports, articles, and monographs that attempt to deal with the difficult issue of evaluating the significance of rural hamlet.³ Etchison does not appear to represent a "significant *and* distinguishable entity" as required to meet Chapter 24A-3. Although distinguishable as a hamlet, the cluster of buildings, structures, and landscape elements does not appear to merit designation.

The designation documents emphasize Etchison's history as a "kinship community" as a key factor in evaluating the property's significance. Although the documents include a fair amount of genealogical and anecdotal data, there is little analysis of the development of kinship networks and land tenure beyond the descriptive data presented in the documents. Staff elected to cite the differences in architectural styles used by different families in Etchison as a major basis for historical significance. This phenomenon is not unique to Montgomery County and there are a number of explanations – none of which were explored in the designation documents – including socioeconomic status.

Designation of the proposed Etchison Historic District would not appear to serve any historic preservation objectives defined under Chapter 24A and would subject individual property owners and the County to costly regulatory compliance requirements that are not commensurate with the resources in the proposed historic district.

Parr's Spring (15/1)

This property historically contained a survey boundary stone marking the intersection of Montgomery, Frederick, Carroll, and Howard Counties. Originally surveyed in the eighteenth century, the site has achieved traditional significance in oral and written histories. Located on private property posted with No Trespassing signs and lacking public access, Parr's Spring consists of two commemorative markers: a concrete marker submerged in the spring/pond at the site and a monument erected in 1976 by the Daughters of the American Revolution.

There is no physical evidence available to suggest that the original boundary markers remain at the site submerged beneath the pond. The designation documents fail to clearly assign a date to the placement of the concrete marker. According to the documents, the property was resurveyed in 1979 or 1980 and the partially submerged marker may have been placed at that time.

³ Jeffrey Winstel, "The Unincorporated Hamlet: A Vanishing Aspect of the Rural Landscape," *CRM* 17, no. 1 (1994): 25-27.

Regardless of the date for the boundary marker, because there is no evidence that the original boundary marker exists, the property's objects (D.A.R. monument and boundary marker) are commemorative. Although Chapter 24A does not specifically deal with the issue of commemorative property historical significance, the National Register of Historic Places Criteria for Evaluation do contain clear language regarding commemorative properties: "Properties primarily commemorative in nature ... shall not be considered eligible for the National Register."⁴

Alfred Baker House (15/4)

According to the designation documents, this property was the home of Methodist circuit rider Alfred Baker built in the 1850s. The National Register of Historic Places Criteria for Evaluation provide amplification for the criteria for designation outlined in Chapter 24A-3. The Amendment ties much of its justification for designation of the Alfred Baker House to his role as a Methodist circuit rider. Although staff has compiled an impressive amount of biographical information regarding Baker, his contributions to local, state, or national history fail to distinguish him as a significant individual as defined by the National Register of Historic Places. "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," wrote the National Park Service in its bulletin on applying the National Register Criteria for Evaluation. "It must be shown that the person gained importance within his or her profession or group."⁵

Architecturally, the Alfred Baker House The house is clad by aluminum siding and has replacement windows. Additions and alterations and alterations to original block contribute to the diminished integrity of this vernacular residence.

⁴ 36 CFR §60.4, Criteria for Evaluation.

⁵ *How to Apply the National Register Criteria for Evaluation*, National Register Bulletin (Washington, D.C.: United States National Park Service, 1997), 15, <http://www.nps.gov/nr/publications/bulletins/nrb15/INDEX.htm>.