



July 27, 2011

Samuel C. Stretton, Esquire
Attorney at Law
301 South High Street
P.O. Box 3231
West Chester, PA 19381-3231

Dear Mr. Stretton,

I am writing in order to affirm and reiterate my findings contained in the report entitled “National Historic Landmark Eligibility Overview Assessment, The Barnes Foundation Property, 300 N. Latch’s Lane, Merion Station, Pa.” It was issued on June 5, 2007, when I served in the role of Senior Architectural Historian and Director of Historic Preservation for the Cultural Resource Consulting Group of Highland Park, New Jersey and Philadelphia, Pennsylvania.

The principal findings of this report with regard to the historic significance of the Barnes Foundation property were the following:

1) Eligibility for listing in the National Register of Historic Places

The Barnes Foundation Property was determined eligible for listing in the National Register of Historic Places on 11 April 1991. It was confirmed as eligible on 13 October 2006 (records of the Bureau for Historic Preservation, Pennsylvania Historical and Museum Commission, Harrisburg, PA).

As principal investigator, I found, and affirm, that the Barnes Foundation Property is nationally significant under Criterion A in the areas of Social History and Education for its association with the racially and gender-integrated, philosophy-based educational program of the Barnes Foundation, which preceded the vast majority of integrated education efforts throughout the country.

The Barnes Foundation Property is also nationally significant under Criterion C in the area of Architecture as an important work of the prominent architect Paul Cret.

The character-defining features and contributing elements of the property include the buildings, the arboretum landscape, and the art and objects collections as installed, which have played a key role to the present in the educational program of the Foundation established at its inception in 1922.



The property retains all of the requisite aspects of integrity, including location, design, setting, materials, workmanship, feeling, and association.

None of the Criteria Exceptions are relevant to the Barnes Foundation Property.

Additional findings with regard to National Register eligibility:

- It should be noted that the National Register eligibility of the property was again confirmed in a letter written 19 January 2010 by Jean H. Cutler, Director, Pennsylvania Historical and Museum Commission, Bureau for Historic Preservation, to Bernard C. Watson of the Barnes Foundation. In addition to simply restating the National Register eligibility of the property, Ms. Cutler concurred that the property was eligible under Criteria A and C and stated that “the property was designed to function as an integrated education system reflecting Dr. Barnes’ idea of education in art and aesthetics using the building, collection, and landscape.” She concluded by stating that “it is our opinion that the removal of the collection from this site adversely affects its National Register significance.” I concur with this opinion.
- It should be noted that, from the point of view of significance and compliance with state and federal regulations with regard to cultural resources, there is no meaningful distinction between a determination of eligibility for National Register listing and actual listing. I would further note that individual properties cannot be listed in the National Register, or as National Historic Landmarks, over owner objection.
- I recently reviewed the National Register Nomination for Ker-Feal, the Barnes property in Chester County that served as Albert Barnes’s private residence from 1940 to 1951 (National Register listed, 2003). This nomination documents the significance of this property under National Register Criterion B “for its association with the world-famous personage, Dr. Albert C. Barnes – an avid art collector and critic, educator, philanthropist, inventor of Argyrol, founder and first director of The Barnes Foundation in Merion, Pennsylvania - and his contributions in the areas of Art and Education” (Section 8, p. 1). The nomination, however, specifically locates Barnes’s achievements in “Art in Education,” not at Ker-Feal, but at the Barnes Foundation in Merion (Section 8, pp. 4-5), noting the role the building, collection, and arboretum played as an ensemble in this achievement.

As noted in my original assessment report, subchapter 60.4 of Title 36.I of the Code of Federal Regulations, in regard to the National Register of Historic Places, establishes the four National Register criteria for evaluation., including the “quality of significance” for properties that “(b) that are associated with the lives of persons significant in our past”: Criterion B.

It should be noted, however, that in order to be determined eligible for listing in the National Register or listed in the Register, properties are not considered significant for all categories of association with respect to Criterion B. Rather, that association must be a meaningful one: “the criterion is generally restricted to those properties that illustrate (rather than commemorate) a



person's important achievements." Further, "properties eligible under Criterion B are usually associated with a person's productive life, reflecting the time period when he or she achieved significance" (National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation).

In my professional opinion, the Barnes Foundation property in Merion, in addition to being eligible for listing in the National Register under Criteria A and C, is also eligible for listing under Criterion B for its association with Dr. Albert C. Barnes. As the primary locus of his achievements in the areas of Art and Education, this property best illustrates these significant achievements. Further, the interrelated roles that all of the components of the property – the building, landscape, and art collection – played in these achievements are crucial, as the Ker-Feal nomination makes clear.

2) Eligibility for listing as a National Historic Landmark

- As principal investigator, I found, and reaffirm, that the Barnes Foundation Property is eligible for listing as a National Historic Landmark for its exceptional value as an unparalleled assemblage of the work of an exceptionally important American architect, manifest in a building purpose-built to house a remarkable art and object collection. This, in turn, was installed in site-specific locations in the building to accomplish the ground-breaking integrated education program which manifested the thinking and the direct involvement of John Dewey. The character-defining features of the property include its buildings, arboretum, and art and object collections as installed, which have played a key role to the present in the educational program of the Foundation established at its inception in 1922.
- As principal investigator, I found, and reaffirm, that in its current state, that is, with the art collection in situ, the property retains the high level of integrity requisite for National Historic Landmark listing.
- It should be noted that, in response to my assessment report, J. Paul Loether, Chief of the National Register of Historic Places and National Historic Landmarks Program wrote to Dr. Sandra Bressler on 20 July 2007, concurring that the property "appears to have significance as the physical evocation of an approach to art education put into tangible practice by owner Albert Barnes," and that his office "would be pleased to consider the NHL eligibility of this building under Criterion 1."

Sincerely yours,

Emily T. Cooperman, Ph.D.