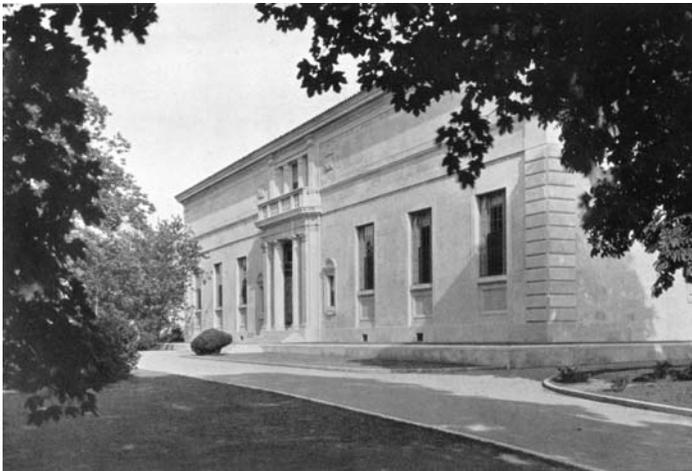


**NATIONAL HISTORIC LANDMARK  
ELIGIBILITY  
OVERVIEW ASSESSMENT**

**THE BARNES FOUNDATION PROPERTY  
300 N. LATCH'S LANE  
MERION STATION, PA**

**June 5, 2007  
CRCG # 07-080-01**

**Emily T. Cooperman Ph.D., Principal Investigator**



**The Barnes Foundation Building, from the T-Square Club Annual Exhibition Catalogue, 1926**

***Prepared for:  
Friends of the Barnes Foundation***

***Prepared by:  
Cultural Resource Consulting Group  
1500 Walnut Street, Suite 702  
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## **1.0 Introduction**

### **1.1 Purpose of Study**

The purposes of this study are to:

- 1) Present the professional qualifications of the investigator
- 2) Identify and define an appropriate regulatory framework relevant to the historic significance of the Barnes Foundation Property at 300 North Latch's Lane in Merion Station, PA
- 3) Provide a professional overview assessment of the historic significance of the Barnes Foundation based on that framework
- 4) Identify a regulatory framework relevant to the proposed removal of the Barnes Foundation Collection as an element of the Barnes Foundation property as a potential historic property
- 5) Provide a professional overview assessment of the potential effect of the removal of all or part of the collection on the Barnes Foundation property as a historic property and on any other relevant potential historic properties.

### **1.2 Study Administration**

Project Sponsors:

Friends of the Barnes Foundation

Cultural Resource Consultant:

Emily T. Cooperman, M. S., Ph.D.  
Cultural Resource Consulting Group  
1500 Walnut Street, Suite 702  
Philadelphia, PA 19102

### **1.3 Subject Property Location**

The subject property is located at 300 N. Latch's Lane, Merion Station, PA.

### **1.4 Project Description**

The Barnes Foundation proposes the removal of substantial portions of the Barnes Foundation Collection from its current location at the Barnes Foundation property.

### **1.6 Dates the Study Was Conducted**

Background research and report preparation was conducted in April through June of 2007.

### **1.7 Authorship**

The report was written by Emily T. Cooperman, Ph.D., Senior Architectural Historian, Project Manager and Principal Investigator, CRCG, with research assistance and other contributions from Sandra Gross Bressler, Ph.D.

## **2.0 Investigator Qualifications**

### 2.1 Federal Standards

In contrast to other professions and professional practice such as engineers and architects, there is no licensing associated with either the practice of historic preservation or architectural history at either the state, local, or federal level. Relevant national standards for professional qualifications are set through Title 36, Part 61 of the code of federal regulations. 36 CFR 61 establishes qualification standards for the

minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise may be needed, depending on the complexity of the task and the nature of the historic properties involved.

Standards are defined for History, Archaeology, Architectural History, Architecture, and Historic Architecture. The standard for architectural history is as follows:

The minimum professional qualifications in architectural history are a graduate degree in architectural history, art history, historic preservation, or closely related field, with coursework in American architectural history, or a bachelor's degree in architectural history, art history, historic preservation or closely related field plus one of the following:

1. At least two years of full-time experience in research, writing, or teaching in American architectural history or restoration architecture with an academic institution, historical organization or agency, museum, or other professional institution; or
2. Substantial contribution through research and publication to the body of scholarly knowledge in the field of American architectural history.

As the attached vita indicates, the principal investigator in this evaluation, Emily T. Cooperman, Ph.D., substantially exceeds this minimum in both experience and education. Specifically, she holds a Masters in Historic Preservation with a concentration in American landscape and architectural history, and a Ph.D. in the History of Art with substantial coursework in American architectural history. In addition, she has worked as a professional historic preservation consultant since 1989, with numerous studies on American architectural topics, and has either authored or assisted in preparing multiple nominations to the National Register of Historic Places (including nominations that have been commended by the Pennsylvania Historical and Museum Commission Review Board for their outstanding quality), and evaluated numerous properties for eligibility for listing in the National Register. Among Dr. Cooperman's most recent projects was the

successful National Historic Landmark nomination for Beth Sholom Congregation (April 2007). It should be noted that there are fewer than 2500 National Historic Landmarks listed in total, and that, therefore, the successful nomination of a property for that status is not a common area of experience or expertise among those who meet 36 CFR 61 standards.

## 2.2 State Standards

There are no standards set by the state of Pennsylvania in this matter separate or different from those established by the federal government.

## 2.3 Local Standards

Some local jurisdictions, including Lower Merion Township, incorporate federal standards in their zoning code in regard to the preparation of certain reports, such as, in the case of Lower Merion, the preparation of a Historic Resource Impact Study (Lower Merion Lower Merion §155-153.1).<sup>1</sup>

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<sup>1</sup> It might be noted that the Lower Merion code refers to federal (i.e., 36 CFR 61) standards for “historic preservation” and “historical architecture.” The federal code includes no such standards per se.

### **3.0 Regulatory Framework for Evaluation of Historic Significance**

#### **3.1 Federal Regulations: Criteria for Evaluation for Eligibility and Integrity: 36 CFR 60 and 36 CFR 65**

##### **3.1.1 Criteria for Evaluation**

Eligibility, the necessary prerequisite for listing in the National Register of Historic Places or as a National Historic Landmark, is a matter of two essential factors: meeting one or more of established criteria for evaluation and passing the “integrity test.” Both of these arise from federal regulations: specifically, from subchapters 60 and 65 of Title 36.I of the Code of Federal Regulations.

In regard to the National Register of Historic Places, 36 CFR 60.4 establishes four essential components:

- The definition of properties that can be evaluated for eligibility
- The components of integrity
- The four criteria for evaluation
- The considerations that may affect the circumstances under which properties can be considered eligible.

Specifically:

“National Register criteria for evaluation. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association and

“(a) that are associated with events that have made a significant contribution to the broad patterns of our history; or

“(b) that are associated with the lives of persons significant in our past; or

“(c) that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

“(d) that have yielded, or may be likely to yield, information important in prehistory or history.

“Criteria considerations. Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes,

structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria of if they fall within the following categories:

“(a) A religious property deriving primary significance from architectural or artistic distinction or historical importance; or

“(b) A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

“(c) A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life.

“(d) A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

“(e) A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

“(f) A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or

“(g) A property achieving significance within the past 50 years if it is of exceptional importance.

Relevant to National Historic Landmarks, 36 CFR 65.4 establishes the following in regard to integrity and criteria for evaluation:

“(a) Specific Criteria of National Significance: 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, and:

“(a)(1) That are 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; or

“(a)(2) That are associated importantly with the lives of persons nationally significant

in the history of the United States; or

“(a)(3) That represent some great idea or ideal of the American people; or

“(a)(4) That embody 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; or

(a)(5) That are composed of integral parts of the environment not sufficiently significant by reason of historical association or artistic merit to warrant individual recognition but collectively compose an entity of exceptional historical or artistic significance, or outstandingly commemorate or illustrate a way of life or culture; or

(a)(6) That have yielded or may be likely to 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. Such sites are those which have yielded, or which may reasonably be expected to yield, data affecting theories, concepts and ideas to a major degree.

(b) Ordinarily, cemeteries, birthplaces, graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings and properties 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:

(b)(1) A religious property deriving its primary national significance from architectural or artistic distinction or historical importance; or

(b)(2) A building or structure removed from its original location but which is nationally significant primarily for its architectural merit, or for association with persons or events of transcendent importance in the nation's history and the association consequential; or

(b)(3) A site of a building or structure no longer standing but the person or event associated with it is of transcendent importance in the nation's history and the association consequential; or

(b)(4) A birthplace, grave or burial if it is of a historical figure of transcendent national significance and no other appropriate site, building or structure directly associated with the productive life of that person exists; or

(b)(5) A cemetery that derives its primary national significance from graves of persons of transcendent importance, or from an exceptionally distinctive design or from an exceptionally significant event; or

(b) (6) A reconstructed building or ensemble of buildings of extraordinary national significance when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other buildings or structures with the same association have survived; or

(b) (7) A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own national historical significance; or

(b) (8) A property achieving national significance within the past 50 years if it is of extraordinary national importance.

### 3.1.2 Integrity

As noted, in order for a property to be considered eligible for listing in the National Register of Historic Places it must not only be significant under one or more of the applicable Criteria, but must also “possess integrity of location, design, setting, materials, workmanship, feeling, and association.” Further, in order to be considered eligible for National Historic Landmark listing, a property must not only meet the applicable Criteria, but also possess “a high degree of integrity of location, design, setting, materials, workmanship, feeling and association.”

The National Park Service defines integrity as

the ability of a property to convey its significance. To be listed in the National Register of Historic Places, a property must not only be shown to be significant under the National Register criteria, but it also must have integrity. The evaluation of integrity . . . must always be grounded in an understanding of a property's physical features and how they relate to its significance.

And goes on to further define integrity's components:

**Location:** Location is the place where the historic property was constructed or the place where the historic event occurred.

**Design:** Design is the combination of elements that create the form, plan, space, structure, and style of a property.

**Setting:** Setting is the physical environment of a historic property.

**Materials:** Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.

**Workmanship:** Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.

**Feeling:** Feeling is a property's expression of the aesthetic or historic sense of a particular period of time.

**Association:** Association is the direct link between an important historic event or person and a historic property <sup>2</sup>

Finally, it should be noted that certain aspects of integrity are more relevant to certain Criteria than others. While not all aspects of integrity need be present for a property to be considered eligible, those that are relevant to the applicable Criteria must be.

### 3.2 State Regulations Regarding Historic Significance

The Pennsylvania "History Code" (Pennsylvania Consolidated Statute, Title 37) empowers the Pennsylvania Historical and Museum Commission to (Section 502.2):

Compile, maintain, revise and publish a selected inventory of significant historic resources in this Commonwealth, to be known as the Pennsylvania Register of Historic Places, pursuant to criteria of significance approved by the commission.

In practice, the PHMC does not actively maintain such an inventory and instead maintains information on the National Register eligible and listed properties in the state. National Register eligibility and listing, and National Historic Landmark eligibility and listing functions primarily as the state's means of identifying historic places in the Commonwealth today. As in most states, the State Historic Preservation Officer in Pennsylvania is delegated with the authority to determine eligibility for listing in the National Register. Similarly, nominations to the National Register are reviewed by the Pennsylvania Museum and Historical Commission's Bureau for Historic Preservation staff and State Board before being forwarded to the Keeper of the National Register in Washington, D. C.

There are no Pennsylvania regulations regarding the evaluation of National Historic Landmark significance; federal regulations apply.

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<sup>2</sup> National Park Service, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (U.S. Department of the Interior, National Park Service, Cultural Resources, Interagency Resources Division, Washington, D.C., 1998), 44-48.

### 3.3 Local Regulations

The Lower Merion code (§ 88-18) defines the criteria for designation as a historic resource as the following:

A. Criteria for designation. A building, structure, or site, or a complex of the same, may be placed on the Historic Resource Inventory if it meets any three or more of the following criteria:

- (1) Has significant character, interest or value as part of the development, heritage or cultural characteristics of the Township, County, Region, Commonwealth or Nation, or is associated with the life of a person significant in the past; or
- (2) Is associated with an event of importance to the history of the Township, County, Region, Commonwealth or Nation, or
- (3) Embodies an icon associated with an era characterized by a distinctive architectural style; or
- (4) Embodies distinguishing characteristics of an architectural style or engineering specimen; or
- (5) Is the noteworthy work of a designer, architect, landscape architect or designer, or engineer whose work has significantly influenced the historical, architectural, economic, social, or cultural development of the Township, County, Region, Commonwealth or Nation; or
- (6) Contains elements of design, detail, materials or craftsmanship which represent a significant innovation; or
- (7) Is part of or related to a commercial center, park, community or other distinctive area which should be preserved according to an historic, cultural or architectural motif; or
- (8) Owing to its unique location or singular physical characteristic, represents an established and familiar visual feature of the neighborhood, community or Township; or
- (9) Has yielded, or may be likely to yield, information important in pre-history or history; or
- (10) Exemplifies the cultural, political, economic, social or historical heritage of the community.

## **4.0 Assessment of Historic Significance**

### **4.1 Summary of Property Resources and History**

The Barnes Foundation Property encompasses the buildings, landscape, and collections compiled or commissioned by Albert C. Barnes at 300 North Latch's Lane in Lower Merion. Barnes made a substantial amount of money in the production of the antiseptic Argyrol, and had amassed a substantial collection of paintings and objects to aid in his vision for an educational program by 1922, when Barnes used the property for the purposes of establishing facilities for his foundation, its educational and curatorial activities, and the materials that enabled the educational program Barnes established for the foundation. A notably large amount of controversy has surrounded: 1) Barnes himself and his relationship to academic art historians, art collectors, and art museum curators and administrators; 2) the management of his collection and, more recently, 3) the fate of the Foundation itself. It must be recognized, however, that a fundamental defining characteristic of the property as a whole is its role as an educational institution created by Barnes beginning with the purchase of the property in 1922 and the creation of the Indenture of Trust establishing the Foundation and its characteristics.

The Barnes Foundation is arguably best known for the assemblage of important works by renowned 20<sup>th</sup>-century artists such as, inter alia, Pierre-Auguste Renoir, Paul Cézanne, and Henri Matisse. As Barbara Supplee has aptly noted, however:

along with the extraordinary collection of moderns are paintings representative of old masters . . . art from cultures and ethnic sources as diverse as African, Egyptian, Greek, Hindu, Chinese, Persian, Native American, and Pennsylvania Dutch share space with Italian, Spanish, German, Flemish and French primitives. What is most [sic] unique about this world renowned collection is its *raison d'être*. This incredible assemblage of art and artifacts are a principle resource for the Barnes Foundation, an educational institution chartered in 1922. . . . The collection and institution exist solely for the purpose of education, an education directed toward a specific aesthetic philosophy and educational methodology.<sup>3</sup>

The individual components, or character defining features of the property, were purposefully created, specifically installed, and assembled or adapted to the educational uses of the Foundation. Finally, it is crucial to note that the interactive role of the components of the property – that is, the relationship of the building to the collection, collection to building, building to landscape setting, and collection to landscape views – are among the most important of the character-defining features of the property.

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<sup>3</sup> Barbara P. Supplee, *Reflections on the Barnes Foundation's Aesthetic Theory, Philosophical Antecedents, and 'Method' for Appreciation* (Ph.D. Diss., Pennsylvania State University, 1995), p. 9.

## Architecture

The Barnes Foundation Museum buildings are the work of architect Paul Philippe Cret (1876-1945). The Cret's commission was first announced in the *Philadelphia Real Estate Record and Builders' Guide* in November, 1922, when it was revealed that he was preparing plans for a "private museum and art gallery."<sup>4</sup> March of the following year, the designs had sufficiently progressed that the architect was soliciting estimates.<sup>5</sup> In April, 1923, contracts were awarded for an "art gallery, administration building, and service building."<sup>6</sup> As these brief descriptions published in the period indicate, the Barnes Foundation buildings were purpose-built to house the Foundation's art and object collections as the facilities and tools for its educational program in art appreciation, not simply as the residence for Dr. Barnes and his wife, as has sometimes been supposed. The details of the main building attest to this purpose, including the scale of most of the gallery spaces, which provide the opportunity for intimate and extended study of the groups of objects installed specifically to meet Barnes's purpose of experiential learning; in spaces where the exterior is visible, the installations specifically took this into account.

Paul Cret (1876-1945) has been called "One of the most influential forces in Philadelphia architecture during the early part of the twentieth century."<sup>7</sup> He was also was one of the most influential architectural educators and designers in the United States between the turn of the twentieth century and World War II. Born in Lyon, France, Cret (originally Crêt) came to the United States in the first decade of the 20<sup>th</sup> century as the first Professor of Architecture at the University of Pennsylvania under Dean Warren Powers Laird. Although American architects had been studying at the Ecole des Beaux-Arts in Paris since the period of the Civil War, Cret revolutionized American architectural education by influencing generations of architecture students who would become the most important designers in the United States. Cret's own work as a designer is prominent not only throughout the Philadelphia region, but internationally, and includes such prominent work as the Folger Shakespeare Library in Washington, D. C., as well as such projects as the Rodin Museum in Philadelphia. Cret's work extended beyond buildings to large-scale urban planning projects in Philadelphia and elsewhere.<sup>8</sup>

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<sup>4</sup> *Philadelphia Real Estate Record and Builders' Guide*, v. 37, n. 44, p. 704 (11/1/1922)

<sup>5</sup> *Philadelphia Real Estate Record and Builders' Guide*, v. 38, n. 10, p. 158 (3/7/1923)

<sup>6</sup> *Philadelphia Real Estate Record and Builders' Guide*, v. 38, n. 14, p. 222 (4/4/1923)

<sup>7</sup> Sandra Tatman, "Cret, Paul Philippe," *American Architects and Buildings Database*, [www.philadelphiabuildings.org](http://www.philadelphiabuildings.org).

<sup>8</sup> There are multiple publications on the life and work of Paul Cret. On his influence as a teacher, see Ann Strong and George E. Thomas, "The Laird Years," in *The Book of the School* (Philadelphia: the Graduate School of Fine Arts, 1990), pp. 25-92.

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The Barnes Foundation Buildings embody many of the key characteristics of Cret's work. Its simplified (sometimes call "stripped down") Classicist details and functionalist plan are hallmarks of the Beaux Arts methods. The grand purpose of this institutional building is embodied in the *gravitas* of the style Cret employed. The nature of the commission and purpose of the building was reflected in details expressive of those that, typically of Cret's work, can be found throughout the building, including the Jacques Lipchitz bas-relief sculptures on the exterior commissioned by Dr. Barnes and the interior and exterior custom ironwork, as well as custom crown moldings, all with African mask motifs commissioned to relate to the collection.

### **Education, Integration, and Philosophy**

One of the fundamental precepts of the educational program of art appreciation of the Barnes Foundation has been, from its inception, the ability of all people, particularly those of the working class of all races and both sexes, to appreciate artistic production. Barnes's educational activities began with his own factory employees before the establishment of the Foundation, and his desegregated program stood in stark contrast to contemporary practice and policy.

A key figure in the Barnes Foundation's program is John Dewey, whom Barnes appointed as the Foundation's first director of education. As Barbara Supplee has detailed, the relationship between Dewey and Albert Barnes was not simply one of employer and employee by any stretch of the imagination. Instead, it was one of philosophical and educational collaboration.<sup>9</sup> As Larry Hickman has also noted

Dewey's influence on American life can scarcely be underestimated. During his lifetime he was America's leading educational theorist, and his work continues to be a source of insight for reformers in that field. His social and political ideas, especially his radical conception of democracy, continue to be assaulted from both the right and the left.<sup>10</sup>

### **Collections**

As noted above, while the works of famous artists are the best known objects in the Barnes Foundation Collection, they cannot be separated from the collection as a whole in terms of its purpose in the Foundation's program, nor within the property as an entirety. The site-specific role of the objects in the collection, manifest through the installation that both exemplifies and enables the experience of the Barnes method, and the objects' role as character-defining of the Barnes Foundation

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<sup>9</sup> Supplee, Chaps. II, III.

<sup>10</sup> Larry A. Hickman, "Dewey, John," <http://www.anb.org/articles/20/20-00289.html>, *American National Biography Online* Feb. 2000, access Date: Wed. May 16, 2007.

property, can be exemplified by the creation and installation of Henri Matisse's famous *La Danse*, one of the most celebrated paintings in the Barnes Foundation. As Jack Flam has documented, Matisse created the work in relationship not only to the other paintings in the room, but in connection with the view of the garden outside. Flam records Matisse as asserting that "it is really immovable," that "it cannot be separated" from the Barnes art gallery, and that he conceptualized the mural "with the idea always of creating the sky for the garden one sees through the doors."<sup>11</sup>

## **Landscape**

From the inception of the Barnes Foundation, the 13-acre Arboretum (begun by the previous property owner Joseph Lapsley Wilson) was not simply an incidental feature of the property, but was instead an integral part of the institution and its program. The Arboretum has provided a "setting that reflects concepts from the unique arrangement of art works in the Gallery rooms."<sup>12</sup> John Dewey explained that "the art gallery and the arboretum make a unit each of definite educational value and one must reinforce the other. . . ."<sup>13</sup>

The Indenture of Trust for the Barnes Foundation includes the statement that

Donor (Albert C. Barnes) desires to endow said art gallery and arboretum to the end that the educational work for which Donee (the Barnes Foundation) is organized may be adequately accomplished.<sup>14</sup>

The Trustees of the Donee shall control both the art gallery and the arboretum of the Donee, both of which are integral parts of the educational resources of the Donee.<sup>15</sup>

In 1933, Dr. Barnes, Director of the Foundation, Mrs. Barnes, Director of the Arboretum, and John Dewey, Director of Education, provided testimony about the relationship between the Art Gallery and the Arboretum. Dr. Barnes's statements included the following:

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<sup>11</sup> Jack Flam, *Matisse: On Art* (University of California Press: Berkeley, 1995), p. 109-114.

<sup>12</sup> Jacob Thomas, "The Arboretum at The Barnes Foundation USA: an Exquisite Piece of Nature and a Professional Training Center for Horticulturists," *Journal of Botanic Gardens Conservation International*, 2:2 (July 2005).

<sup>13</sup> Testimony of John Dewey, p. 1. From the case, Barnes Foundation v. Keely et al., Appellants No. 268 Supreme Court of Pennsylvania, January 30, 1934. Testimony in Arboretum Archives File in the Barnes Foundation Archives.

<sup>14</sup> ARTICLE IX - MANAGEMENT of the CORPORATION, April 30, 1946 Article IX, Section 2., p. 4.

<sup>15</sup> ARTICLE IX - MANAGEMENT of the CORPORATION, April 30, 1946 {October 20, 1950 } 17., p. 7.

Our Charter calls for a plan for advancement of education by instruction in knowledge of the fine arts and the maintenance of an arboretum. These two aspects of one and the same purpose cannot be separated: they are one and indivisible and both are educational in their essence. . . .

In short, the Foundation as it exists at present may be compared to a composition by Titian of a symphony by Beethoven; that is, every unit was studied in relation to what was the ultimate composite entity which prompted us to establish the Foundation and devote our money and the rest of our individual lives to make the Foundation the servant of educational authorities in advancing the knowledge and happiness of mankind.”<sup>16</sup>

## 4.2 Evaluations of Historic Significance

### 4.2.1 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.<sup>17</sup>

CRCG finds 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.

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<sup>16</sup> Testimony of Albert C. Barnes, p. 1. From the case, Barnes Foundation v. Keely et al., Appellants No. 268 Supreme Court of Pennsylvania, January 30, 1934. Testimony in Arboretum Archives File in the Barnes Foundation Archives.

<sup>17</sup> PHMC files.

#### 4.2.2 Eligibility for listing as a National Historic Landmark

CRCG finds 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 in order to accomplish the ground-breaking integrated education program which both manifested the thinking of and had 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.

In its current state, the property retains the high level of integrity requisite for National Historic Landmark listing.

The Barnes Foundation property, while unique, does relate to several other National Historic Landmark properties in key ways. These include Hill-Stead, located in Farmington, Connecticut. This property features a purpose-built museum designed by owner and collector Theodate Pope Riddle, who worked with McKim, Mead & White to complete the facility to house his outstanding collection of French Impressionist paintings. The Wagner Free Institute of Science, located in Philadelphia, is an unparalleled survivor of a type of educational institution prominent in the 19<sup>th</sup> century: the scientific society. Its collections have remained central to its educational program as well as to its historic significance. The Wagner is also significant for its association with prominent scientist Dr. Joseph Leidy. Finally, Fonthill (Mercer Museum and Moravian Pottery and Tile Works), located in Doylestown, is significant as the work of Henry Chapman Mercer, and also houses a remarkable, didactic collection of objects assembled by Mercer.

#### 4.2.3 Eligibility for listing as a Lower Merion Historic Resource

The Barnes Foundation Property is eligible for classification under the Lower Merion Code as a Class 1 Resource under Criterion 1, as an institution significant in the history of the Township, County, Region, Commonwealth, and Nation, and for its associations with multiple significant persons, including Albert Barnes and John Dewey. It is also eligible under Criterion 4 for its embodiment of what is often called the Beaux-Arts style, and under Criterion 5 as a noteworthy work of Paul Cret. Finally, it is eligible under Criterion 10 for exemplifying the heritage of the community.

## **5.0 Regulatory Framework for the Assessment of Potential Effects**

### 5.1 Federal Laws and Regulations

#### 5.1.1 National Register Properties

The actions of the federal government and the potential effect on National Register-listed or eligible properties are defined by what is generally referred to as “the Section 106 process.” This name, in turn, alludes to Section 106 of the National Historic Preservation Act of 1966 (16 USC 470 et seq.) which established the responsibility of federal agencies

prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register.

The process whereby the National Register-eligible properties are identified and the effect of the “undertaking” determined is governed by 36 CFR 800 – Protection of Historic Properties.

In this regulatory process, the lead federal agency must identify potential historic properties, evaluate their eligibility for the National Register, and assess the effect of the undertaking on any properties evaluated as eligible for the National Register. The criteria for adverse effect are the following:

800.5 (a) (1) *Criteria of adverse effect.* An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be farther removed in distance or be cumulative.

Should an adverse effect be found, the resolution of adverse effect is to be conducted through consultation with stipulated consulting parties and the public. Under some circumstances, the Advisory Council on Historic Preservation can also play a role in the resolution. The result of this consultation often includes mitigation of some kind of the adverse effects of the project, depending on the undertaking and its effect, the consulting parties, and the involvement of the public. The resolution can be effected by and memorialized in a Memorandum of Agreement.

### 5.1.2 National Historic Landmark Properties

36 CFR 800 provides additional protection for National Historic Landmarks and National Historic Landmark, arising from Section 110(f) of the National Historic Preservation Act (16 USC 470 et seq.), which states:

Prior to the approval of any Federal undertaking which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark . . . .

36 CFR 800.10 stipulates that the Advisory Council must be requested to participate in the resolution of a potential adverse effect on a National Historic Landmark or National Historic Landmark-eligible property. The Secretary of the Interior must also be notified and be invited to participate in consultation.

### 5.2 Pennsylvania Regulations

Pennsylvania TITLE 37, Chapter 5, Section § 510 states, in regard to “Approval of construction affecting historic resources” that:

The commission shall be consulted on the design and proposed location of any project, building or other undertaking financed in whole or in part by Commonwealth funds which may affect the preservation and development of a district, site or building listed on or eligible for the Pennsylvania Register of Historic Places.

As noted above, the Pennsylvania Register is coincident, for the most part, with the National Register of Historic Places. The Pennsylvania Museum and Historical Commission does not maintain a list of historic properties separate from those that are National Register-listed or eligible and National Historic Landmarks.

### 5.3 Lower Merion Code

Changes to properties that might be considered to have an adverse effect on historic resources are governed by the Lower Merion code relative to construction and land development and relate to those properties that have been classified by the Township as historic.

## **6.0 Assessment of Potential Effects**

It is not known at this time whether federal money or federal licensing will be used or required in connection with the removal of the Barnes Foundation Collection from the Barnes Foundation Property at 300 N. Latch's Lane in Lower Merion. For the purposes of this study, it is assumed that the federal regulations noted above are relevant to the undertaking of removing all or a part of the collection of the Barnes Foundation to a new, purpose built facility to be located on the Benjamin Franklin Parkway in the City of Philadelphia. It is further understood that the proposed location on the northeast side of the Benjamin Franklin is that of the present Youth Study Center, designed and built by the City of Philadelphia

For both National Register listing and National Historic Landmark designation, the removal of a significant portion of the Barnes Foundation Collection can be considered to have an adverse effect on the property in that the Collection is a character-defining feature of the property.

Further, should the creation of a new building on the proposed site on the Benjamin Franklin Parkway entail the demolition of the Youth Study Center, it will have an adverse effect on a property which, in our professional opinion, is also eligible for the National Register under Criterion C as a prominent work of the important architectural firm of Carroll Grisdale and Van Alen. The firm, headed by Roy Carroll, Jr., was one of the most prominent in the Philadelphia region in the post-World War II period, and the Youth Study Center was a particularly important commission and facility for the city.<sup>18</sup>

It can be assumed that, should section 106 regulations apply in the undertaking of constructing a new facility for the Barnes Foundation collection (or portions thereof) that a full investigation to identify potential historic properties would apply. The area of the Youth Study Center is known, based on historic maps, to have been formerly occupied by both residential and industrial buildings, and therefore is potentially sensitive for historic period archaeological remains. A section 106 investigation conventionally seeks to identify not only above-ground potential resources, but those below ground as well.

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<sup>18</sup> Emily T. Cooperman, "Carroll, Jefferson Roy, Jr. (1904-1990)," American Architects and Buildings Database, [www.philadelphiabuildings.org](http://www.philadelphiabuildings.org). On the history of the Youth Study Center see Anny Su, "The Youth Study Center: Bringing Modernism to the Benjamin Franklin Parkway," M.S. Thesis, University of Pennsylvania, 2006.

## 7.0 Bibliography

### Manuscripts

Cret Collection. The Architectural Archives of the University of Pennsylvania.

Cret Collection. The Athenaeum of Philadelphia.

### Selected Publications

Anderson, John. *Art Held Hostage: the Story of the Barnes Collection*. New York: W.W. Norton & Company, 2003.

Braddock, Jeremy. *The Modernist Collector and Black Modernity, 1914-1934*. Ph.D. Diss., University of Pennsylvania, 2002.

Boublil, Alain. *L'étrange docteur Barnes : portrait d'un collectionneur Américain*. Paris : Albin Michel, 1993.

Greenfeld, Howard. *The Devil and Dr. Barnes: Portrait of an American Art Collector*. New York: Penguin Books, 1987.

Grossman, Elizabeth Greenwell. *Paul Philippe Cret: Rationalism and Imagery in American Architecture*. Ph.D. Diss., Brown University, 1980.

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Hart, Henry. *Dr. Barnes of Merion: an Appreciation*. New York: Farrar, Straus, 1963.

Meyers, Mary Ann. *Art, Education, & African-American Culture: Albert Barnes and the Science of Philanthropy*. New Brunswick, NJ: Transaction Publishers, 2004.

National Park Service . *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*. U.S. Department of the Interior, National Park Service, Cultural Resources, Interagency Resources Division, Washington, D.C., 1998.

Supplee, Barbara P. *Reflections on the Barnes Foundation's Aesthetic Theory, Philosophical Antecedents, and 'Method' for Appreciation*. Ph.D. Diss., Pennsylvania State University, 1995.

Strong, Ann L. and George E. Thomas. *The Book of the School*. Philadelphia: The Graduate School of Fine Arts, 1990.



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White, Theophilus Ballou, ed. *Paul Philippe Cret, Architect And Teacher*. Foreword by John F. Harbeson. Philadelphia: Art Alliance Press, 1973.

Larry A. Hickman. "Dewey, John." <http://www.anb.org/articles/20/20-00289.html>.  
*American National Biography Online* Feb. 2000. Access Date: Wed. May 16, 2007.



**Appendix: Investigator Qualifications (following pages)**



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## **Emily T. Cooperman, Ph.D.**

**Title:** Senior Architectural Historian  
*Meets Federal qualifications [36 CFR61] for Architectural Historian*

### **Education:** Degree – Specialization – School

- Ph.D. – History of Art – University of Pennsylvania
- M.S. - Historic Preservation - University of Pennsylvania
- B.A. – French & English – Amherst College

**Years Experience:** 25  
**With CRCG:** 3

### **Overview of Expertise**

- Specializes in both landscape and architectural history. Expertise in eighteenth- through twentieth-century subjects.
- Full range of historic preservation and CRM projects for public and private sector clients.
- Section 106 Review Studies, preservation plans, design reviews, existing conditions surveys, historic site surveys, National Register and National Historic Landmark nominations, HABS/HAER/HALS documentations, historic structure reports and historic resource impact studies.
- Specialized studies including adaptive re-use consulting studies, cultural landscape inventories, and site interpretation studies; grant applications; exhibition curator, and broad experience in numerous types of museums.

### **Previous Relevant Experience**

George E. Thomas Associates, Inc., Philadelphia, PA – Principal – Historic Preservation firm - Landscape history specialist and business manager for the firm.

University of Pennsylvania, Philadelphia, PA – Research Director, Architectural Archives of the University of Pennsylvania - Content supervisor and scholarly writer/editor for Archives cataloging and research projects as part of the Philadelphia Architects and Buildings Project. One of two principal authors of architect biographies on the project. Co-curator of all archive exhibitions.

Stenton Museum, Philadelphia, PA – Executive Director – Chief administrator for 1730 National Historic Landmark house museum, the home of James Logan, William Penn’s colonial administrator. Supervisor of site, outstanding collection of seventeenth and eighteenth-century American decorative arts, paintings and works on paper, and functions under the direction of board.

### **Select Project Experience**

#### Beth Shalom Congregation National Historic Landmark Nomination

Authored successful nomination of Frank Lloyd Wright’s only synagogue, in Elkins Park, PA, presented nomination to National Park Service Board. Keynote speaker at National Historic Landmark Plaque presentation ceremony.

#### Bryn Mawr College, Bryn Mawr, Pennsylvania

- College Campus Historic Preservation, Documentation, Analysis and Planning Initiative (historic buildings, sites & landscapes); pilot project funded by the Getty Grant Program’s Campus Heritage Initiative.
- Historic resources survey and analytical report.

#### Stenton Museum, Philadelphia, Pennsylvania

- Landscape History Scholar for Stenton Interpretation Plan. Served as landscape history specialist on a team of scholars for grant-funded interpretation plan for National Historic Landmark public site.
- Cultural Landscape Inventory.

#### Awbury Arboretum Association, The Francis Cope House, Philadelphia, Pennsylvania

Creation of the Awbury National Register Historic District for the Awbury Arboretum Association.

#### Schuylkill Center for Environmental Education, Philadelphia, Pennsylvania

Creation of the Upper Roxborough National Register Historic District; included research and writing on historic mixed-use landscape along the Schuylkill River and assisted the Center in writing grant applications for project funding.



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#### Haverford College, Haverford, Pennsylvania

Historic Resource Survey: Conducted a historic resources survey and prepared and submitted a report as part of a preservation inventory of all buildings on the campus.

#### University of Pennsylvania, Philadelphia, Pennsylvania

Historic Resource Survey: Conducted a historic resources survey and developed a preservation inventory of all buildings of the campus.

### **Selected Public Lectures**

- Keynote address, Beth Sholom Synagogue National Historic Landmark Plaque Presentation,
- “Two Tastes But One Personality”: Lessing Rosenwald’s Averthorpe and Modern American Architecture.” Abington Art Center, Abington, PA, November 10, 2004.
- “The Eminence of an Opulent City: Birch’s Views and the Image of Philadelphia at the turn of the Nineteenth Century.” 35<sup>th</sup> Annual Meeting of the Lewis & Clark Trail Heritage Foundation, Philadelphia, PA August 10-13, 2003.
- “Growing Importance to the Coming Generations: Stenton’s Colonial Revival Garden, Stenton Museum, May 31, 2001.
- “‘A Work of Duration’: William Birch’s *City of Philadelphia*”. Interdisciplinary Nineteenth Century Studies Conference, Yale University, April 2000.
- “William Birch, Patronage, the States and the Arts in the Early American Republic,” American Culture Association meeting, San Antonio, TX, March 1997.
- “The Graperies of Andalusia: Nicholas Biddle and the Greek Revival Landscape,” Winter Institute, Cliveden, Philadelphia, PA. January 1993.

### **Professional Activities and Affiliations**

- The Wyck Association
  - Director, 2002 - present
    - Chestnut Hill Historical Society – Board of Directors:
  - Vice President, 1998-2001
  - Member, 1996-2001
  - Chair, programs committee 1997-2000
- University of Pennsylvania
  - Adjunct Faculty

### **Expert Testimony**

- Appearances before Evesham Township, New Jersey boards (Historical Commission; Zoning Board)
- Appearances before Baltimore County, Maryland boards (Historic Landmark Commission; Zoning Board of Appeals)
- Appearances at Upper Makefield Township, Bucks County, Pennsylvania, boards (Conditional use hearing)
- Appearances before Holmdel, Monmouth County, New Jersey board (Planning Board).
- Appearance as historic preservation expert before Zoning Board of Adjustment, Philadelphia, on behalf of West Central Germantown Neighbors
- Appearances before Lower Merion, Pennsylvania boards (Historical Commission, Board of Commissioners)

Expert testimony given on behalf of Bryn Mawr College for review of extensive local historic designations and for review of adaptive re-use projects for locally designed properties.