



MICHIGAN STATE HISTORIC PRESERVATION OFFICE

GENERAL GUIDANCE
and **REQUIREMENTS** for
NATIONAL REGISTER of
HISTORIC PLACES
NOMINATIONS
in **MICHIGAN**





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**General Guidance
and Requirements
for
National Register of Historic Places
Nominations in Michigan**

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Introduction and Purpose

Thank you for your interest in the National Register of Historic Places and the preservation of Michigan's historic properties. This document is meant to guide preparers – novice and experienced alike – in the preparation of National Register nominations by answering common questions, addressing certain aspects of preparing a nomination, and establishing requirements particular to the Michigan State Historic Preservation Office (SHPO). This document is intended not only to guide and clarify, but also to foster a clear, consistent, and efficient nomination process, thus reducing the length of time from initial inquiry to listing eligible properties in the National Register of Historic Places.

This document is a companion and supplement to National Park Service (NPS) guidance, particularly [How to Apply the National Register Criteria for Evaluation](#) (commonly referred to as Bulletin 15) and [How to Complete the National Register Registration Form](#) (commonly, Bulletin 16A). It is not a substitute for guidance issued by NPS. National Park Service bulletins are the official federal guides and manuals for the National Register program. Bulletin 16A is the basic guide and “how-to” manual for completing a National Register nomination. Preparers of National Register nominations are encouraged to read the aforementioned NPS bulletins prior to reading this document.

This document is informally composed of two parts. The first part clarifies and lays out requirements for National Register of Historic Places nominations that are particular to the Michigan State Historic Preservation Office. The second part addresses the *National Register of Historic Places Registration Form* (NPS Form 10-900) section by section and elaborates on the guidance provided in the NPS bulletins, clarifies the requirements of each section, addresses common questions and concerns, and describes the requirements of the Michigan State Historic Preservation Office, as applicable.

Preparers may find this document to be most useful when used in tandem with Bulletins 15 and 16A, mentioned above, and alongside [National Register of Historic Places Registration Form](#), 10-900. The use of property-specific National Register bulletins, available at the National Register website, is likely to be of further aid.

First-time preparers, and those who have not prepared a National Register nomination in some time, are encouraged to read through all relevant guidance from NPS and SHPO and contact SHPO prior to beginning the nomination process. Doing so at the beginning of the process will foster an efficient and successful process.

Bear in mind that the National Register is more than a history documentation program that provides a chronological history of a place or a genealogical history of a person or people. Additionally, the National Register is not meant to be a monograph, treatise, or academic article. Rather, it is a particular form of history that involves preparing a formal, technical, and complex document that makes an argument to the State Historic Preservation Office and the federal government that a particular property is significant in a particular aspect of local, state, or national history. This work can be challenging, and the process can be a lengthy one that involves significant research, extensive writing, and multiple reviews, but the end result is worth that effort.

The information contained in a National Register nomination form is key to many programs of SHPO, and often assists and provides valuable information to other state agencies as well as federal agencies, local governments, historical societies, researchers and consultants, property owners, and other individuals. Nominations also become a part of the permanent records of the State Historic Preservation Office and the National Park Service. Therefore, nominations must be factual, well-documented, accurate, professional, and complete.

Preparers should also consider that by completing a National Register nomination, they are contributing to the collective knowledge of our state. Quite often a National Register nomination brings to light little-known or understood aspects of our history or little-known or overlooked historical figures and events. While not a monograph or even, strictly speaking, a historical document, preparers should consider that their work will be a part of an enduring public record that guides others in making decisions, serves as a source for future researchers, educates their fellow citizens, and tells a story about Michigan that lasts for years and decades to come. In some cases, a National Register nomination may be the only formal documentation of a person, place, or event.

Please note that the guidance described in this document is not specifically applicable to the *National Register of Historic Places Preliminary Questionnaire*. The preliminary questionnaire is not an application for listing in the National Register, but simply a process of preliminary evaluation by SHPO staff to determine if the property meets the criteria for listing in the National Register. This preliminary evaluation helps to reduce wasted effort and resources and to identify potential problems or complications with a property or nomination. Separate instructions are available for that document. Likewise, this document is not meant to guide the preparation of a Multiple Property Documentation Form, which is a cover document that is used to nominate and register thematically related properties. Preparers should also note that this document has been prepared with above-ground, non-archaeological properties in mind, as these types of properties make up the majority of National Register

nominations in Michigan, but the requirements of this document are applied to all nominations.

Please contact the Michigan SHPO at any time if you have questions about the information and requirements found in this document, about topics not described in this document, or for questions about the National Register program in general. A good deal of information can be found at the National Register page of our website, www.michigan.gov/nrhp, and at the National Register of Historic Places website, www.nps.gov/subjects/nationalregister/index.htm. Our office can also be reached at preservation@michigan.gov or (517) 335-9840.

PART 1

AN OVERVIEW OF THE NATIONAL REGISTER OF HISTORIC PLACES and GENERAL REQUIREMENTS

Before You Begin

An Overview of the Process

Preparers should be aware that preparing a National Register nomination is not a quick process. It can, and often does, take a year or more to complete the process. Experience suggests that one should plan for twelve to eighteen months from completing the preliminary questionnaire to the property being listed in the National Register of Historic Places. Timing may be affected by the complexity of the property, the resources available to the preparer, and their familiarity with the National Register program. Understanding the requirements of the program by making use of available guidance from NPS and SHPO will aid in a more efficient process.

In general terms, the process for listing a property in the National Register goes as follows:

1. Preparer submits a *National Register of Historic Places Preliminary Questionnaire*.
2. SHPO staff evaluates the information in the questionnaire and provides an opinion of eligibility for listing the property in the National Register.
3. When a property is eligible, the preparer conducts research, takes photographs, creates maps, and prepares the *National Register of Historic Places Registration Form*, and submits the materials to SHPO for review.
4. SHPO staff reviews the draft nomination materials and provides comments, questions, edits, and so forth to the preparer.
5. The preparer revises the nomination. This may include revising the registration form, conducting additional research, taking additional photographs, and creating new maps.
6. Once the draft process is complete, the nomination is scheduled for presentation to the State Historic Preservation Review Board.
7. If approved by the review board, the nomination is typically signed by the State Historic Preservation Officer, or their deputy, and sent to the Keeper of the National Register at NPS for review.
8. If approved by the Keeper, the property is listed in the National Register of Historic Places.
9. The property owner, local officials, and preparer are notified that the property has been listed.

Listed Properties and Opinions of Eligibility

Before beginning a National Register of Historic Places nomination, preparers should check with SHPO to determine if the property has already listed in the National Register, either individually or as a resource within a historic district, if (and when) the property was previously evaluated, if any evaluation of the property resulted in an opinion of eligible or not eligible, and what information may be on file at SHPO.

Please note that contributing resources within a National Register-listed historic district are already “listed,” and individual nominations are unnecessary and do not provide any extra recognition or status.

If a property was previously evaluated by SHPO, but not listed, preparers should be sure that the property remains eligible for listing (see additional information below). The passage of time, changing perceptions of significance, incomplete prior evaluations, or changes to the physical state of the property may affect the eligibility of a property. Ensuring the property remains eligible for listing will aid in making sure the time, money, effort, and other resources that go into a National Register nomination are well spent.

In some cases, SHPO staff evaluated a property as eligible or not eligible for listing in the National Register some ten, twenty, or thirty or more years ago. **When SHPO opinions (sometimes referred to as “determinations”) are ten or more years old, a current SHPO opinion is required, and preparers must complete a [National Register of Historic Places Preliminary Questionnaire](#).**

In other cases, if a previous opinion of eligibility does not address specific National Register criteria, areas of significance, periods of significance, and levels of significance, SHPO requires the completion of a preliminary questionnaire and inventory form, and a current opinion provided by SHPO.

By inquiring with SHPO at the beginning of a nomination project, SHPO staff will be able to provide preparers with specific guidance for that property and project. Please keep in mind that a SHPO opinion is based on the information provided at the time the opinion was provided and depends on the property possessing historic integrity. Though not required, we recommend that any nomination project begin with a preliminary questionnaire. Ensuring that the property is eligible for listing at the time the nomination is prepared will lead to the most successful outcomes.

If the property has not been evaluated, the place to begin is the with *National Register of Historic Places Preliminary Questionnaire*, found at the National

Register page of our website, www.michigan.gov/nrhp. The questionnaire is composed of two forms, the questionnaire, itself, and an inventory form, which is available in the [Forms Library at the SHPO website](#). The questionnaire also contains a link to the *Forms Library* page.

A preliminary questionnaire is not needed for a *Multiple Property Documentation Form* (MPDF) but may be needed for an individual nomination associated with an MPDF. SHPO encourages anyone planning to prepare an MPDF to talk with SHPO staff as early in the process as possible, even at the idea stage, to discuss the general approach, any concerns, and more.

Practical Considerations

Preparers can take several actions at the outset of the nomination process that will aid in the efficient preparation of a National Register nomination. These include:

- Checking with SHPO to determine whether a property has been documented as part of a previous nomination or survey, was addressed in a multiple property form, or addressed in a thematic document.
- Checking with SHPO, or [checking the SHPO website](#), to determine whether the property is located within a Certified Local Government (CLG) community.
- Checking with the local community to determine whether the property is located in a local historic district or was included in a local survey.
- Checking with the local library, historical society, and local historians to identify relevant source material.
- Obtaining appropriate reference books, guides, articles, papers, subscriptions, etc.
- Reading all relevant manuals and guidance thoroughly, especially SHPO and NPS guidance.
- Reviewing nominations for similar property types, which are available from SHPO and NPS. Please contact SHPO to request a nomination.

Bulletins, Guidance, and Other Instructions

As noted in the introduction, this document is a supplement to the guidance published by NPS, which is available at the NPS website, www.nps.gov/subjects/nationalregister/publications.htm. Preparers will find many documents there to guide the preparation of National Register nominations – all freely available. Some of these documents address the National Register of Historic Places in general terms, like Bulletins 15 and 16A; others address specific property types or aspects of a National Register nomination, like *How to Apply National Register Criteria to Post Offices* (National Register Bulletin 13), *Guidelines for Evaluating and Registering Archeological Properties* (National Register Bulletin 36), and many others.

Preparers should review all relevant bulletins, guidance, and documents before beginning a nomination (or a preliminary questionnaire) and refer to these documents while completing the nomination. Doing so will aid in an efficient preparation process on the part of the preparer and an efficient review by SHPO, thereby reducing the time it takes to complete the nomination process. Please contact SHPO for questions about the appropriate bulletins and other guidance to use when it is unclear.

Property Ownership and Notifications

Preparers are encouraged to work with property owners before beginning any National Register project, including prior to completing a preliminary questionnaire. The National Register of Historic Places respects private property rights and a property cannot be listed in the National Register if an owner (or a majority of owners) object to the listing.

Preparers should be certain that the property owner supports listing their property in the National Register. Owner consent ensures that all parties have an equal understanding of what National Register designation means and its outcomes. To that end, all National Register nominations of **individual properties** require the completion of a [National Register of Historic Places Statement of Owner Intent, found in Appendix A of this document](#) or a letter from the owner stating their wishes. Either method must be signed by the owner.

SHPO is required to notify the property owner(s) and the chief elected officials of the municipality and county in which the property is located prior to presenting a nomination to the State Historic Preservation Review Board **and** when the property is listed. The preparer is responsible for providing SHPO with the current and accurate mailing address for everyone to be notified. **Information for property owners must be derived from official land recordation records or tax records, whichever is more appropriate.** Information to provide to SHPO includes:

- Salutation, name of property owner or official, and title
- Organization
- Full mailing address, (this may differ from street address)

SHPO does not need phone numbers or email addresses for property owners or officials and does not use them in the notification process.

In the case of historic districts in which there are more than fifty (50) property owners (*note: not fifty or more resources*), notification may be provided by a general notice printed in a local newspaper. In this case, the sponsor or local government is responsible for the cost of placing the notice, but the notice must come from SHPO.

Preparers and nomination sponsors are also encouraged to engage with the local community and affected parties at the beginning of a nomination project. Engaging with the community early on fosters local awareness of and support for the nomination and may reveal important sources of information that may not be known or readily available.

SHPO also encourages prepares and nomination sponsors to engage with Michigan Tribal Historic Preservation Officers (THPOs) and Tribal Cultural Representatives when appropriate. A list of THPOs and Tribal Cultural Representatives is available at the SHPO website, here:

<https://www.miplace.org/historic-preservation/archaeology/michigan-tribal-historic-preservation-officers-and-tribal-cultural-representatives/>.

Common Terminology

The National Register of Historic Places uses certain terms in specific ways. Preparers are encouraged to familiarize themselves with these terms, as they must be used appropriately. For example, “building” and “structure” are often used interchangeably in casual conversation, yet these words mean specific things to the National Register, as described below. One is not the other, and these terms should not be used interchangeably in a National Register nomination. The same is true of “property” and “resource.” These terms are often used interchangeably by preservationists, but in a National Register nomination they mean specific things and are not interchangeable.

This section will familiarize preparers with common National Register terminology. Please be sure to use these terms and phrases correctly in National Register nominations. Some of these definitions are derived from National Register Bulletin 15 and some from National Register Bulletin 16A. Others are revised versions of the same. Additional definitions are provided in *Appendix IV* of Bulletin 16A.

Term or Phrase	Definition(s)
Association	One of the seven aspects of Integrity. It is “the direct link between an important historic event or person and a historic property.”
Building(s)	One of the five property types defined by the National Historic Preservation Act of 1966, as amended; A property created principally to shelter any form of human activity, such as house. This property type may include more than one building or resource.
Complete	A nomination is considered complete when each section of the registration form is completed in full and accepted by SHPO, and all additional documents have been received and approved by SHPO.
Contributing	Classification of resource within a property. A contributing resource that adds to the historic significance of the property. Typically used in reference to historic districts, but technically applicable to all property types.
Design	One of the seven aspects of Integrity. It is “the combination of elements that create the form, plan, space, structure, and style of a property.”
District	One of the five property types defined by the National Historic Preservation Act of 1966, as amended; A significant concentration, linkage, or continuity of

	buildings, sites, structures, or objects united historically or architecturally by plan or physical development.
Eligible	A property is eligible for listing in the National Register of Historic Places if it meets one or more of the National Register Criteria and retains Integrity
Feeling	One of the seven aspects of Integrity. It is "a property's expression of the aesthetic or historic sense of a particular period of time."
Historic Context	An organizing structure for interpreting history that groups information about historic properties that share a common theme, common geographical location, and common time period. The development of historic contexts is the foundation for decisions about the planning, identification, evaluation, registration, and treatment of historic properties, based upon comparative significance. The mechanism for determining the significance of a property.
Integrity	Authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic or prehistoric period; The ability of a property to convey its historic significance. Integrity is the composite of seven aspects: location, setting, design, materials, workmanship, feeling, and association. Also referred to as historic integrity. Integrity and condition or distinct concepts and one does not necessarily reflect the other.
Location	One of the seven aspects of Integrity. It is "the place where the historic property was constructed or the place where the historic event occurred."
Materials	One of the seven aspects of Integrity. It is "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."
Nomination	The package of materials – registration form, photos, maps, etc. – that the State Historic Preservation Officer submits to the Keeper of the National Register when they nominate a property.
Noncontributing	Classification of resource within a property, typically but not always in a district. A noncontributing resource does not add to the historic significance of a property.
Object	One of the five property types defined by the National Historic Preservation Act of 1966, as amended; A construction primarily artistic in nature or relatively small

	in scale and simply constructed, such as a statue or milepost.
Preparer	The individual(s) who completes the registration form, takes photographs, draws maps, etc. This person may be the property owner, a consultant, an interested party, etc.
Property	The area of land and resources addressed in the nomination. The property may contain one or many resources (definition follows) and constitutes a single entry in the National Register of Historic Places.
Resource	Any building, structure, site, or object that is part of a property (see definition); One or many resources compose a property.
Setting	One of the seven aspects of Integrity. It is "the physical environment of a historic property."
Significance	Importance of a historic property as defined by the National Register criteria in one or more areas of significance (themes).
Site	One of the five property types defined by the National Historic Preservation Act of 1966, as amended; Location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archeological value regardless of the value of any existing resource.
State Historic Preservation Officer (SHPO)	The official appointed by the Governor to administer Michigan's historic preservation program and duties described in 36 CFR Part 61, including nominating properties to the National Register. The State Historic Preservation Officer is the one individual with the authority to nominate properties to the National Register, except those properties owned or controlled by the federal government, and certain properties on tribal land.
Structure	One of the five property types defined by the National Historic Preservation Act of 1966, as amended; A functional construction made for purposes other than creating shelter, such as a bridge.
Theme	A trend or pattern in history or prehistory related to a particular aspect of architectural, historical, or cultural development, such as dairy farming, maritime history, or

	the Civil Rights movement; Also called Area of Significance; one component of historic context.
Workmanship	One of the seven aspects of Integrity. It is "the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory."

Common Abbreviations and Initialisms

The table below describes several common abbreviations used in the historic preservation field as well as in this document.

Full Name	Abbreviation
<i>How to Apply the National Register Criteria for Evaluation</i> , National Register Bulletin 15	Bulletin 15
<i>How to Complete the National Register Registration Form</i> , National Register Bulletin 16A	Bulletin 16A; 16A
National Register of Historic Places	National Register or NRHP
National Register of Historic Places Preliminary Questionnaire	NRPQ
National Park Service	NPS
State Historic Preservation Office	SHPO (this may refer to the State Historic Preservation Office in Michigan, or State Historic Preservation Offices in general.) In general, this will also refer to the State Historic Preservation Officer, though not in this document.
State Historic Preservation Review Board	SHPRB

Note: National Register bulletins were numbered documents, previously. They are now, formally, referred to by name, but many preservationists, including SHPO staff, still refer to them by their old numbers. In fact, it is quite common to refer to "*How to Complete the National Register Registration Form*" simply as "16A."

General Requirements and Helpful Information

Research and Sources

As noted above, federal regulations require National Register of Historic Places nominations to be “adequately documented and technically and professionally correct and sufficient” prior to submission to the National Park Service. To meet this standard, a preparer must, among other things, undertake research involving multiple primary and secondary sources. This means that a nomination based on limited sources (e.g., a single county history, anniversary booklet, etc.) is likely to be insufficient.

A well-developed historic context, based upon a multiplicity of reliable and objective sources, is crucial to understanding a property, its place within its historic context, its historic significance, and, ultimately, in determining its eligibility for listing in the National Register of Historic Places.

Research related to the history of a property and its place in its historic context(s) should focus on primary sources to the extent possible. Secondary sources should also be used to develop a historic context and to understand a property in its geographic place and period(s) of significance. Tertiary sources, like encyclopedias, encyclopedic websites, and Wikipedia should be avoided. **In some cases, tertiary sources may be used as a starting point in the research process, but they should not be used as source material in a National Register of Historic Places nomination.** Instead, the citations found in a Wikipedia article, for example, should be evaluated and reviewed separately.

Spending many hours of research only to arrive at a single paragraph or a few lines of text is not uncommon. Do not be discouraged! This is the hard and necessary work of creating a historic context, of establishing the historic significance of a property, and of preparing an “adequately documented and technically and professionally correct and sufficient” National Register nomination.

Plagiarism

It is important to consider the seriousness of plagiarism and intellectual honesty. **Nominations and narrative texts should largely consist of original work.** This work can, and often is, informed by the work of others. When that occurs, proper attribution is required. **Nominations that contain plagiarized text, intentional or unintentional, will be returned for revision.** Using the work of others without attribution is not acceptable in any circumstance and does not meet the “adequately documented and technically and professionally correct and

sufficient" requirement noted earlier in this document. Plagiarism also deprives authors of due credit, devalues the nomination, and infringes on the integrity of the State Historic Preservation Office, the State Historic Preservation Review Board, the National Register of Historic Places, and all of those involved. Please cite your sources. To read more about plagiarism and how to avoid it, please visit, www.plagiarism.org.

Citations, Quotations, and Footnotes

Citations

The development of a historic context and the argument for the historic significance of a property is necessarily based on historical research and preexisting documentation. As such, preparers should be meticulous in documenting and citing their sources. Section 9 of the National Register registration form calls for a bibliography of "major" source material. Additional information on bibliographies and sources is provided in the discussion on *Section 9: Major Bibliographic Resources* that follows.

The Michigan SHPO requires that all ideas, arguments, interpretations, quotations, statements of fact, paraphrases, summaries, data, maps, figures, and so forth that are attributable to another author or source be cited using properly formatted footnotes in all nominations.

When the source is considered a "major" source, it must also be entered in the bibliography in Section 9 of the registration form.

Quotations

The use of quoted material to illustrate certain aspects of the history or significance of a property is encouraged and recommended, especially when relevant primary sources are available. Please note, however, that the extensive use of either quotations or block quotes does not meet the professional standard of a National Register nomination. In such cases, the registration form will be returned to the preparer for revision.

When quoting long passages of text (five lines or more), the text should be set in a block quote indented one-half inch from both left and right margins. For example:

 Lorem ipsum dolor sit amet, consectetur adipiscing elit. Vestibulum rhoncus mauris sed lacinia pretium. Nulla semper neque in dapibus lacinia. Nunc nisi risus, condimentum sed arcu nec, pulvinar semper

ligula. Cras tincidunt libero a risus consectetur faucibus. Vestibulum ante ipsum primis in faucibus orci luctus et ultrices posuere cubilia curae; Proin tempor egestas nunc nec tempor. Aenean ac turpis id tellus molestie feugiat.⁵²

Block quotes do not use quotation marks but must include a citation, as illustrated in the foregoing example.

All quoted material must be introduced or explained when used in prose and incorporated into a sentence. Floating quotations, those that lack an introduction or explanation, are not appropriate in professional writing and may not be used. For example, this text:

In that short amount of time, Yamasaki left an indelible impression upon Francis Keally. "Of all the young men that I have come in contact with during the past ten years, I consider Mr. Yamasaki the most brilliant."

Should instead be written as:

In that short amount of time, Yamasaki left an indelible impression upon Francis Keally. In a letter in support of Yamasaki's application for registration in New York, Keally wrote, "of all the young men that I have come in contact with during the past ten years, I consider Mr. Yamasaki the most brilliant."

Footnotes

Footnotes must follow the citation format for each source type as found in the most recent version of the *Chicago Manual of Style* (CMOS). Citation format examples can be found in Appendix B of this document. Additional examples are available across the internet, especially at university and college library websites, as well as the [CMOS website itself](#). Be sure to use only the *Notes and Bibliography* format and not the *Author-Date* format.

Please note that recent editions of the CMOS have changed from recommending the use of *ibid* to the use of the *short form* citation format. Preparers may use either form, but a nomination must use only one of these formats and the selected format should be applied consistently throughout the document. Preparers should also bear in mind that the format for footnotes and bibliographical entries is different. Please be sure to use the correct format. Citations, footnotes, and bibliographies that are formatted incorrectly will be returned for revision.

Footnotes may also be used to discuss information that is related to a property, resource, historical event, or historical figure, and that either adds clarifying information or is tangential to the historic context or argument for significance for a property.

Footnotes presented in inconsistent fonts and font sizes is a common problem. Please see the “Formatting the Narrative Text” section that follows for guidance on fonts and font sizes.

The SHPO Style Guide

The narrative portions of a nomination must follow the [Michigan State Historic Preservation Office Style Guide found on the SHPO website](#). Developed by SHPO, the *Style Guide* is intended to bring consistency to nominations, assist preparers in meeting the “technically and professionally correct and sufficient” requirements of the program, and make the review process more efficient. Preparers should review this guide and refer to it while preparing the narrative text sections of the registration form.

Please contact SHPO with any questions regarding the *Style Guide*.

Submitting the Nomination for Review

To aid preparers in submitting a complete nomination package, SHPO provides two checklists on the National Register page of the SHPO website.

The first checklist, [National Register of Historic Places Nomination Package Checklist](#), focuses on the products necessary for a complete nomination package. Ensuring that all materials are included, to the extent possible, helps to create a more efficient process.

The second checklist, [National Register of Historic Places Pre-Submission Self-Review Checklist](#), walks preparers through a nomination, section by section, in a similar way that SHPO and NPS staff review nominations. By using this checklist, preparers can evaluate the nomination to ensure the materials are as complete as possible, which creates a more efficient process.

SHPO recommends using both checklists before submitting the nomination package to SHPO to ensure all appropriate and required information is included.

The initial submission of National Register nomination materials must be submitted to SHPO on a flash drive, CD, or DVD. This allows for the nomination to

be processed properly and accurately. Revisions to the registration form, and final nomination materials, may be submitted by other means, in consultation with SHPO.

Please note that the *National Register of Historic Places Registration Form* should be submitted in Microsoft Word .docx format **only**. **Do not submit the registration form in PDF format**. Registration forms submitted in a format other than .docx will be returned for revision.

Organizing the Materials

Well-organized and clearly labeled materials enable a more efficient review process. Although SHPO does not require preparers to submit National Register nomination materials in any set manner, we recommend the following as one method of organizing the materials:

- Main Folder (label with the name of the property)
 - *Subfolder: Form*
 - Draft registration form
 - Figure pages, as applicable
 - Appendix pages, as applicable
 - *Subfolder: Maps*
 - Locational maps, resource maps, and boundary maps
 - *Subfolder: Photos*
 - Nomination photographs labeled in NPS format
 - *Subfolder: Research*
 - *Subfolder: Historical documents and research materials*
 - *Subfolder: Directories*
 - *Subfolder: Newspapers*
 - *Subfolder: Historical maps*
 - *Subfolder: Historical photographs*

Note: the use of “*subfolder*” is only meant to indicate the presence of a subfolder, and need not be included in any folder structure or name.

The registration form, nomination maps, and nomination photos should follow the NPS file name structure, as described elsewhere in this document and in other SHPO guidance.

SHPO also encourages preparers and researchers to utilize a consistent file name structure for all research files. Organizing documents by type and date is often an effective method for maintaining an organized research folder.

Other materials such as the owner acknowledgement form, any correspondence, and so forth may be included in a separate subfolder or simply placed in the main folder.

Once the files are compiled, National Register materials may be sent to SHPO by United States Postal Service, UPS, FedEx, or a service preferred by the preparer. All shipped materials are sent, at the preparer's discretion and cost. Please send materials to:

National Register Coordinator
State Historic Preservation Office
300 North Washington Square
Lansing, Michigan 48913

Using the National Register Forms

National Park Service Registration Forms

The *National Register of Historic Places Registration Form* is available from the National Register of Historic Places website, www.nps.gov/subjects/nationalregister/index.htm. At that page, preparers will notice that four versions of the form are available: 10-900, 10-900a, 10-900b, and *Modified Form 10-900a*. **In most cases preparers will use form 10-900.** If questions arise as to which form is the correct form to use, please contact SHPO before beginning the nomination.

Please note that National Register forms are available only in Microsoft Word .docx format. This form and format work best with a recent version of the Microsoft Word. If you encounter problems using the form, please contact SHPO. **Preparers who use other word processing applications to complete the form should be sure to check all formatting – fonts, spacing, etc. – before submitting the form to SHPO.**

After downloading the form, preparers should not alter the form in any way, except as noted in the *Formatting the Narrative Text* section that follows. Altered forms will be returned to the preparer for revision.

Formatting the Narrative Text

The *National Register of Historic Places Registration Form* is a federal form that has been approved by the National Park Service and the Office of Management and Budget. Preparers should not alter the form by adding or removing sections from the form, or by modifying the form in any way. **Altered forms will be returned for revision.**

Most sections of the *National Register of Historic Places Registration Form* are preset to use single-spaced, Times New Roman, 12-point, regular font. **Please do not alter this setting**, except for the two exceptions noted below. Please note that the use of proprietary fonts is not allowed, as they may cause formatting problems.

Common alterations have been to set the font and font size of the footnotes and of Section 9 *Major Bibliographical References* to a font and size other than the default settings. **The font or font size of any components or sections of the registration form should not be altered.** Registration forms with altered fonts will be returned for revision.

Exceptions to Formatting Requirements:

- Headings and subheadings should be differentiated in format and be consistent in presentation according to heading level. Headings and subheadings may use various font styles (bold, underline, italics), and may not exceed fourteen (14) point font but must remain in Times New Roman font.
- The Section 7 Summary Paragraph, the Section 8 Statement of Significance Summary Paragraph, and a certain section of Section 8 Narrative Statement of Significance are set to “bold” font style in the documents available from the NPS website (as of May 2021). Preparers may, and should, remove the bold setting for the text in these sections.

Preparers should refer to the [Michigan State Historic Preservation Office Style Guide](#), found at the National Register page of the SHPO website, for most formatting questions. Other questions are answered by the *Chicago Manual of Style*. When questions arise or when CMOS and SHPO conflict, please contact SHPO.

Form Header

A form header is located on page two and subsequent pages of the registration form. Complete the header using the Historic Name of the property, as found in Section 1 of the registration form, the name of the county, including “County,” and the two-letter state code. Do not enter any other names or information in these spaces. For example:

United States Department of the Interior National Park Service / National Register of Historic Places Registration Form NPS Form 10-900		OMB Control No. 1024-0018
Chippewa County Courthouse Name of Property		Chippewa County, MI County and State

For properties with exceptionally long historic names, please contact SHPO.

Organizing the Narrative Texts

Submitting a well-organized National Register registration form is essential to conveying the significance of a historic property, necessary for SHPO to provide an expeditious review, and key to listing a property in the National Register of Historic Places.

SHPO recommends the creation of an outline as the first step in preparing a succinct and well-organized Narrative Description and Narrative Statement of Significance. Taking this step is important because it establishes a framework for research and for the narrative texts. An outline allows a preparer to organize their arguments into an order that is clear and concise and helps to make sure that each argument can be developed fully. An outline also helps prevent a nomination (and research!) from drifting into areas, periods, and topics that are not germane, and that do not aid in establishing and explicating the significance of a property. An outline may help identify additional research needs, reveal weaknesses of a proposed argument, and aid in preventing lost time seeking information that does not contribute to the argument of significance for the property.

Considering your argument(s) critically, and the research needed to support those arguments, in advance will result in a better nomination and an easier and more efficient process. Preparers may find that the outline may need revision as research reveals additional information or that certain arguments will be difficult to make. Research may reveal information that is interesting but unrelated to the significance of the property to be nominated, it is best to make a note and return to that information another day. In some cases, it may be worthwhile to include such information in an explanatory footnote. In other cases that information may be better suited to another publication.

Headings and Subheadings

The narrative sections of the registration form found in Section 7 and Section 8 must make use of headings and subheadings to organize the information presented in the text. The use of headings and subheadings guides the flow of the text and indicates to readers and reviewers what to expect from the text. The number of headings and subheadings will depend on the complexity and historical significance of the property. Please ensure that the format of the headings and subheadings used is consistent throughout the registration form.

More information on headings and subheadings are provided in *Section 7 – Description* and *Section 8 – Statement of Significance* that follow.

Part 2

Completing the National Register of Historic Places Registration Form (NPS Form 10-900): A Section-by-Section Guide to the Form

Introduction

The National Register Bulletin, *How to Complete the National Register Registration Form*, also known as Bulletin 16A, provided by the National Park Service, is the basic “how-to” manual for completing the registration form properly. Preparers and property owners alike are encouraged to review both Bulletin 16A and this document thoroughly, and reference them frequently while completing the registration form. This document, Bulletin 16A, and other NPS guidance contain many of the answers to frequently asked questions and solutions to common problems one may encounter when completing the registration form.

Section 1 – Name of Property

Please review pages 8 and 9 of Bulletin 16A for guidance on how to select a name for a property, what format that name should take, and for examples of several types of historic names.

Historic Name

In addition to the instructions provided in Bulletin 16A, SHPO recommends the names of both spouses or partners be included in historic residential properties, when known. The names of persons should include middle initials when known. By way of example:

- Smith, James V. and Jane G., House.
In this example, both James and Jane Smith have known middle names, so the middle initials are included.
- Parks, Rosa L. and Raymond, House.
In this example, Rosa Parks's middle name is known so her middle initial is included, but Raymond Parks's middle name is unknown.
- McAlister, Stephen, Farm.
In this example, the name of Stephen McAlister's spouse has not been identified, McAlister may not have had a spouse, or McAlister's spouse may have passed away at a time that pre- or post-dates the significance of the farm.

For properties that have had owners of equal significance, it may be best to provide a hyphenated name for the property composed of surnames. For example:

- Smith-Jones House
In this example, the Smith Family and Jones Family figure prominently in the significance of the property.

Names for historic districts should use standard terminology that reflects the municipality, the specific part of the municipality, and the type of district. Historic district names should be succinct, logical, and easily understood by the public. Examples of such names include:

- Ishpeming Main Street Historic District
In this example, the historic district is a defined and limited portion of a larger downtown area. The district may include side or cross streets, but Main Street is the primary and most prominent axis.
- Charlotte Central Historic District
In this example, "Central" is key. The district is composed of many types of resources – commercial, religious, civic, social, and residential. The district boundary extends beyond the commercial core of the city but includes the historic and significant core of the city.
- Oxford Downtown Historic District
In this example, the inclusion of "Downtown" readily identifies the location of the district and suggests its likely significance.
- Piquette Avenue Industrial Historic District
In this example, the inclusion of "Industrial" readily identifies the type of district and its significance and "Piquette Avenue" provides its location within the community.
- Center Avenue Historic District
In this example, "Center Avenue" identifies the location of the historic district within the community.

Some properties that may be classified as a historic district, like educational or ecclesiastical campuses, do not need the phrase "historic district" in their name.

Please contact SHPO with questions regarding names for historic districts.

Other Names/Site Number

Enter secondary names, names of significant subsequent owners, other names relevant to the property, names that have been used commonly, or names that reflect the use of the property over time. Do not include names of recent or current owners.

Names entered in the “Other Names” field should reflect historically important, though secondary, ownership, occupation, or uses through time. Many properties have had many owners, and some may have had many names. Every person, business, or organization that has used or occupied a property historically should not be included in this section. Only those names that have an important historical association with the property should be included. Names of individuals or organizations briefly associated with a property should not be entered, though may be explained in the narrative text in the Narrative Statement of Significance.

If there are no other names or if the site lacks a site number please enter “N/A” on that line.

There are several technical aspects to keep in mind when entering names of the property:

- The historic name is the name that “best reflects the property's historic importance or was commonly used for the property during the period of significance,” as noted in Bulletin 16A. This is usually the first organization or first property owner, but not always.
- For most nominations, historic names that use the full name of an individual should begin with the last name first. For example, the Yamasaki, Minoru and Teruko (Hirashiki), House; or Lincoln, Abraham, School.
- When the historic name for a property, such as a house, contains multiple names, the names should be presented in order of historic significance as documented in Section 8 of the registration form.
- Non-residential historic names should reflect the official name of a company or organization. For example, an assembly plant built for Ford Motor Company should be written as the Ford Motor Company Assembly Plant, and not Ford Assembly Plant.
- Ampersands (&) may only be used in business or organizational names when part of the official company name, but not as shorthand or as a substitution for “and.” Conversely, “and” should not be used when the official organizational name contains an ampersand.
- Ampersands may not be used in the names of residential properties. Note in the preceding Yamasaki House example the historic name was written with “and” and not “&.”
- Names of current or recent owners do not qualify as historic names or, generally, as other names. The National Register of Historic Places is concerned with the significant history of historical properties and not the documentation of every owner or use. Enough time must have elapsed to determine if a name or owner is historically significant.
- Enter only one name in the Historic Name field.

Name of Related Multiple Property Listing

If the property is associated with a Multiple Property Documentation Form (MPDF), enter the name of that document here. MPDFs provide important contextual information and registration requirements. The SHPO website contains a list of available multiple property documents (link follows). Please see *Association with a Multiple Property Documentation Form* in Section 8 – Statement of Significance for more information on using multiple property or thematic documents with nominations.

Older versions of these documents may be referred to as a Multiple Resource Area (MRA) or Thematic Resource (TR). These documents may be used for research purposes but should not be considered an MPDF for purposes of this section.

MPDFs, MRAs, TRs, and other context documents can be found at the *Michigan Thematic Historic Contexts* page of the SHPO website, here:

<https://www.miplace.org/historic-preservation/programs-and-services/national-register-of-historic-places/michigan-thematic-contexts/>. Additional MPDFs and contexts are added as they are approved. Please note that this list does not include survey reports held at SHPO, which are too numerous to list. For information about survey reports, please see the *Research and Consultant Resources* page of the SHPO website, <https://www.miplace.org/historic-preservation/research-resources/consultant-resources/>.

Section 2 – Location

This section asks for the physical location of the property. Please review pages 10 and 11 of Bulletin 16A for general guidance on how to complete this section.

For individual properties, please enter the legal address for the property as found in tax records. This address may differ from the mailing address, which may use the nearest city. This is often the case when a property is legally located in a township. In addition to the information provided in Bulletin 16A, SHPO requires that the street address be entered in complete form and abbreviations not be used for street type. For example: 123 South Main Street.

For historic districts, please enter the general streets and major boundaries for the district. Please contact SHPO with questions about completing the “Street & number” part of this section.

The state should be entered using the two-letter state code (MI), as instructed in Bulletin 16A.

A Note on Restricting Information

Section 2 of the National Register of Historic Places Registration Form contains a check box labeled “Not for Publication.” This box is used to restrict public access to the information in the nomination in whole or in part. Restrictions are provided in a limited set of circumstances and are determined by evaluating the request and information provided in the nomination package against Section 304 of National Historic Preservation Act (NHPA) and Section 9(a) of Archaeological Resources Protection Act (ARPA). Information may be restricted if access to the nomination will:

- endanger the resource,
- worsen existing damage,
- endanger the resource’s setting, or
- cause the desecration of a site used in traditional cultural practices.

When a nomination meets one or more of the foregoing requirements and the property owner requests that information in the nomination be restricted in whole or in part, the property owner or preparer must provide to SHPO:

- A written request and thorough justification for the restriction that meets the requirements of either or both Section 304 of NHPA or Section 9(a) of ARPA.
- A complete, unredacted copy of the nomination for SHPO and NPS staff.

- A complete, redacted copy of the nomination for public dissemination for those nominations with partial restriction.

Property owners who are considering or requesting that the nomination for their property be restricted from public access must contact SHPO staff at the beginning of the nomination project to discuss the restriction and whether the request meets the requirements of Section 304 of NHPA and Section 9(a) of ARPA.

SHPO staff will consult with the Keeper of the National Register to determine if the property meets the requirements of either Section 304 of NHPA or Section 9(a) of ARPA.

Please contact SHPO with any questions regarding this section of the registration form.

Section 3 – State/Federal Agency Certification

This section is used by state, tribal, and federal agencies. **Please do not enter any information or mark any portion of Section 3.** Preparers should note that this is where “Level of Significance” is checked by SHPO. A property’s level of significance should be addressed in the Statement of Significance Summary Paragraph and a clear argument for the level of significance provided in the text of the Narrative Statement of Significance.

Please note that properties evaluated for listing in the National Register must be evaluated against other similar properties at the level of significance indicated on the form. This geographical parameter, “place,” is one of the three aspects that compose historic context: theme, place, and time (additional information about historic context is provided in other sections of this document). If a property is significant at the national level of significance, it must be compared to other, similar properties across the country. Likewise, a property significant at the state level of significance must be compared to other, similar properties across the state.

Most properties will warrant a “local” level of significance. **If you think a property is significant at the national or state level, please contact SHPO to discuss this before proceeding.**

Section 4 – National Park Service Certification

This section is used by the Keeper of the National Register or their designee. **Please do not enter any information or mark any portion of Section 4.**

Section 5 – Classification

This section is composed of four subsections: “Ownership of Property,” “Category of Property,” “Number of Resources within Property,” and “Number of Contributing Resources Previously Listed in the National Register.” General instructions for completing these subsections are found on pages 14 through 17 of Bulletin 16A. Please use a capital “X” when selecting the appropriate boxes for “Ownership of Property” and “Category of Property.”

Ownership of Property

Please check all applicable ownership classifications that apply.

When a property contains one or more resources under federal ownership or control, the Federal Preservation Officer (FPO) of the respective department must be notified of the intent of SHPO to nominate the property for listing in the National Register of Historic Places by SHPO. Consultants, preparers, or sponsors of National Register nominations are encouraged to involve the FPO at the outset of the project. A list of FPOs is available from the Advisory Council on Historic Preservation, <https://www.achp.gov/protecting-historic-properties/fpo-list>.

Category of Property

The National Register of Historic Places recognizes five **property** types: Building, Site, Structure, Object, and District. A district is a collection of any or all of the other four property types within a defined geographical area. **Buildings, sites, structures, and objects within a district are referred to as resources** and are classified as either contributing or noncontributing. That is, each resource either contributes to the significance(s) of the district **and** possesses historic integrity or it does not. A resource may have historic significance but lack historic integrity. In that case, the resource cannot convey its significance and is classified as a noncontributing resource.

Only one property type should be selected per nomination. Although a district may include any or all of the other four property types, only “district” would be selected when preparing a nomination for a historic district. Like a district, a “building” or “site” may also contain more than one resource, but is still classified as a “building” or a “site.”

Please contact SHPO when a classification is difficult to ascertain.

Number of Resources within Property

Counting resources within a property can be difficult. In some cases, like a house, the number of resources is clear. In other cases, such as historic district, judgement must be exercised. Preparers should review “Rules for Counting Resources” on page 17 of Bulletin 16A for basic rules for counting resources.

All **major** buildings, sites, structures, and objects within a property must be counted and classified. Enter the number of Contributing and Noncontributing resources on the appropriate line for each resource type. If there are no resources of a specific type, enter “0” on that line. Be sure to total the number of Contributing and Noncontributing resources.

In the case of historic districts, an explanation of how resources are counted, what resources are counted as a resource group (i.e., historic streetlights), and what resources are excluded – and why – should be included in the methodology section of the narrative description (more on methodology is discussed in that section, which follows).

Do not count minor structures or objects (dog houses, mailboxes, plaques, etc.) unless they directly contribute to the significance of the property. If it is unclear whether a resource or feature should be counted, please contact SHPO. Classes of certain resources or features may warrant a summary inventory entry, however. Please see Section 7 that follows for more information.

Large vacant lots, large parking lots, and other large open spaces should be counted, classified, and included in the inventory. Small parking lots and those areas that do not contain buildings, sites, structures, or objects are not typically counted. Likewise, sites where resources once stood are not counted, typically.

For all property types: take care to ensure that the resource count in Section 5 corresponds to the number of resources in the inventory in Section 7 and that those sections correspond to the classification of resources as indicated on any maps that depict the individual resources. A common error is for conflicts between the inventory and resource maps in historic district nominations.

Do not include properties or resources already listed in the National Register in the count of contributing and noncontributing resources. Rather, enter the number of **contributing** listed resources in the space provided. Do not include, or enter separately, the number of noncontributing resources in that space.

Please contact SHPO with any questions that involve the counting of resources.

Number of Contributing Resources Previously Listed in the National Register

When preparing a nomination that includes a previously listed property or previously listed resources, the number of **contributing** resources that were listed in the original nomination should be entered here. Do not include the number noncontributing resources. Generally, this number may be obtained from the existing nomination. In some older nominations, especially those written prior to 1986, the number of contributing resources is not readily identified. In this case, the preparer must review the narrative text and examine the district map, if available, to ascertain the number of contributing resources. If the number of resources contained within the property boundaries is unclear the preparer should contact SHPO for guidance.

If previously listed resources have been demolished, please do not count these. Any previously listed resources that have been demolished should be acknowledged in the Narrative Description. In other words, count only extant contributing previously listed resources.

When a property includes a number of previously listed resources and the previously listed property has undergone substantial change, it may be useful to include a table that clearly differentiates between the previously listed resources and the newly added resources. Please contact SHPO prior to making any changes to the form.

Please contact SHPO with any questions about previously listed resources.

Section 6 – Function or Use

This section is used to catalogue the historic and current functions or uses of the resource(s). For a complete list of categories and subcategories, see Bulletin 16A, pages 18 through 23. Categories for both historic and current functions must be selected from this table. Be sure to read “Guidelines for Entering Functions” on page 19 of Bulletin 16A before entering any functions.

Preparers should keep in mind that function or use will not necessarily be the same as the entries made in “Areas of Significance,” in Section 8. For instance, even though the function of a church may be “RELIGION: religious facility,” the likelihood of the church being significant for religion is unlikely. Most churches listed in the National Register in Michigan have been listed for secular reasons, such as significance in architecture, social history, ethnic heritage, and so on.

Enter functions in rank order. That is, enter the most significant function or use first. Historic functions should be entered for extant **contributing** resources only. Do not enter historic functions for resources no longer extant or for noncontributing resources. **All functions listed in this section must be addressed in the narrative text of Section 7 or Section 8.**

When entering functions on the registration form, be sure to follow exactly the format example found at the bottom of page 18 of Bulletin 16A.

Section 7 – Description

This section comprises three parts: identification of architectural style (Architectural Classification), an inventory of the **primary exterior** materials (Materials), and a description of the property and its component resources (Narrative Description). The Narrative Description contains a summary paragraph and a full narrative description. Please review pages 24 through 34 of Bulletin 16A before completing this section. Do not delete unused lines in the data category section that precedes the Narrative Description.

Architectural Classification

The Architectural Classification, or style, must be chosen from the Category and Sub-Category list of styles found on pages 24 through 26 of Bulletin 16A. The style chosen should reflect the predominant style of the property.

Late nineteenth and early twentieth century buildings commonly draw from several or many architectural styles. In this case, choose the dominant or most evident style and explain other stylistic influences in the narrative text.

Entries for “Architectural Classification” must adhere to the “CATEGORY: subcategory” format, as found in National Register Bulletin 16A. For example: COLONIAL: Georgian.

Materials

The current NRHP form, released in 2012, requests only principal exterior materials. Previous forms requested materials and their locations (e.g., foundation, walls, roof, and other). Please do not modify the form to include these categories. **Enter the principal exterior materials only.** These are the key materials that are **visible** on the outside of a property. For example, a brick Italianate farmhouse with a stone foundation and an asphalt roof would have principal exterior materials of brick, stone, and asphalt. Windows are not counted as glass. Wood trim, for example, no matter how decorative or skillfully created, is not “principal” and should not be entered. Likewise, interior materials, no matter their beauty, should not be entered. Neither should a preparer enter structural or concealed architectural features, even if they may be significant. These items – and their location – should be addressed in the Narrative Description.

When entering the materials for a historic district, enter only the **principal** materials visible throughout the district. It is often the case that judgement must

be used when deciding to include or exclude certain materials. When questions arise, please contact SHPO.

For properties that do not have extant buildings or structures, such as a landscape or battlefield, enter "N/A."

As noted above, the materials listed here must be visible. If historic wood or brick is covered by vinyl or exterior insulation and finish system (EIFS) panels, the proper material to note is vinyl or EIFS. The historic materials, if present, should be discussed in the Narrative Description.

Please be sure to read page 27 of Bulletin 16A before completing the Materials section.

Narrative Descriptions for Individual Properties

General Requirements

Preparers are encouraged to read pages 24 through 34 of Bulletin 16A prior to beginning this section of the registration form. Those pages guide preparers through the completion of Section 7 and provide useful information for describing properties and resources.

The Narrative Description should be written in thorough, clear, and precise prose, and follow a logical sequence. Descriptions should begin at the ground level and work up. Likewise, each elevation must be described in logical pr.

Each resource within a property – contributing and noncontributing – must be described. The level of description will depend on the type and complexity of the property and its resources, but the property should be described thoroughly. Resources that appear to be less significant than the primary resource may require less in the way of descriptive text, but the text should follow the same process as that of the primary resource.

Measurements to the inch are typically unnecessary. Rather than writing that a certain feature "measures seven feet and ten inches in length," write that the feature is "approximately eight feet in length." If the measurement of certain features or spaces is related to the significance of the property, precise measurements may be warranted.

Any alterations, additions, or demolitions that occurred to the property must be addressed in the narrative text. Dates of these changes should be noted when

known. **Alterations can become historic themselves, if made during the period of significance.**

The number and classification of resources described in the Narrative Description must match the number of resources entered in *Section 5 – Number of Resources within Property* regardless of the property type (building, structure, site, object, or district), and, in the case of historic districts and complexes, as depicted on resource maps.

The Narrative Description must differentiate between historic and non-historic features. The description must describe the property – exterior and interior – to the extent possible during the Period of Significance and must describe the physical changes that have occurred to the property since the close of the Period of Significance. **Precise and comprehensive descriptions of the exterior and interior of a property or resources are especially important for those properties that are the subject of historic preservation tax incentives.**

SHPO recommends that preparers use an in-text citation when referencing views or features of the property in the narrative portions of the nomination that have been documented in the nomination photographs. For example:

- "...hipped gable roof (Photo 0013)."
- "... the few remaining trees of a former apple orchard are located at the southwest corner of the property (Photo 0027)."

Prior to submitting a draft nomination, preparers should consider whether the description(s) provided would allow an unfamiliar reader to identify a property in a community or a resource in a historic district without the aid of photographs. If doing so would be difficult, a more detailed description will likely be necessary.

Headings

The Narrative Description for individual properties must contain four headings at a minimum: Environment and Setting, Exterior, Interior, and Integrity. These headings may include subheadings as necessary (e.g., East Elevation, First Floor, etc.), but each area or feature is not required to have a subheading unless doing so contributes to the organization and clarity of the description.

If subheadings are not used to organize the descriptive text of the interior of a building, the component parts of the building (first floor, second floor, etc.) should be separated into distinct paragraphs so that the description of the features of the property are clear.

Please note that the Narrative Description for individual properties must describe both the exterior and interior of each significant resource within the property.

Minor features of a property (doghouse, non-historic flagpole, etc.) should not be included in the count of resources and generally do not require description, though such features may be addressed to some extent. When minor features are described, they should be set apart under a separate heading and the text should indicate clearly that they are not included as contributing or noncontributing resources.

The Michigan SHPO encourages and recommends the consideration and discussion of known or potential archaeological features in National Register nominations. The consideration of archaeological features provides a wholistic view of the history and significance of a property and may provide current and future researchers and others with valuable information. When these features are discussed, that information should be set under a separate heading and precede the Integrity section. Please contact SHPO with questions about including a discussion of archaeological features in National Register nominations.

Summary Paragraph

The Narrative Description section of the registration form (Section 7) begins with a summary paragraph. This text must be a **summary** of the environment and setting, the physical characteristics, and the historic integrity of the property, and is **not an introduction** to the narrative text that follows. The summary paragraph should stand alone, similar to an abstract, and provide readers with a general understanding of the property, and include, at a minimum:

- the address of the property (street address, city or township, county, and state);
- a summary of the essential and character-defining features of the exterior **and** interior property;
- date(s) of construction and any major alterations;
- the number and type of contributing and noncontributing resources present within the property (this count must match the count(s) and classification(s) in Section 5, and in any associated maps);
- a notation of the architect, builder, designer, landscape architect, or artist; and
- a summary of the historic integrity of the property.

Setting and Environment

Often overlooked in preparing a narrative description of the property is the need to describe the environment and setting in which a property is located. "Setting" can be defined as the immediate surroundings of the property, while "environment" is the broader geographical and topographical context.

The Narrative Description must include a section describes the general physical location of the property (its setting) and its surrounding area (its environment), the geographical location (street, city or township, county, and state) topography, vegetation, whether the property is in an urban or rural location, whether the property is in a commercial or residential location, and other important or character-defining features of the setting and environment.

The setting and environment section must also address how the setting has changed over time. If, for example, a current parking lot was a field historically, or held a resource related to the property, this should be discussed as it is an important part of the development of the property, its change over time, speaks to the historic integrity of the property, and may inform the count of resources within a property.

Exterior

The exterior description should begin with details such as the general shape of the plan and form of the property, the number of stories or scale, the number of bays, the roof form, principal construction materials, and the structural system of the property, if known. Additions, demolitions, and significant alterations should be discussed, and the dates of the changes should also be noted, if known. The exterior description must describe each elevation in a logical sequence, beginning with the primary elevation or façade. Attention should be given to features such as fenestration patterns, window details, cornices, chimneys, architectural detailing (e.g., pilasters, bargeboards, brackets, half-timbering, sculptural relief, balustrades, corbelling, etc.), other historic and character-defining features, and those features that contrast with the general characteristics of the property, as described in that section. Variations in materials should also be noted.

When describing windows, it is important to describe the configuration, type, division(s), groupings, material(s), number, location, and if they are original or replacement. If windows have been replaced, the text should note when that occurred and if the form, arrangement, and materials changed, if known.

When describing brick masonry, attention should be given to the bond used. The type of masonry should be described, if known.

Identify all exterior materials by type and color (e.g., red brick with orange sandstone trim). For stone, list specific stone if known (Portage Entry or Waverly sandstone, Indiana limestone, etc.). For masonry walls, indicate bond (such as coursed or random ashlar) and finish (such as smooth or rockface). If side and rear walls are different from the front, provide the same information for those elevations. If the foundation is visible, describe its material, color, and finish. The description for the roof should list special materials such as slate or metal shingles if roof is visible. When describing cornices, cresting, and other non-stone trim, be sure to indicate if it is wood, metal, or other material.

For commercial buildings, descriptions of ground floor shops and storefronts should provide the general form (e.g., “three bays with slant-sided recessed central entry, second-story entry at west end”) and finishes (e.g., “Aluminum-trim single-light shop windows above modern red brick bulkheads; vertical T-111 siding in transom location; ceramic tile floor in entry containing name ‘Fowler.’”).

Interior

The description of the interior of a property is as important as the description of the exterior of the property and should be given equal attention. The general plan of the interior and all important spaces, spatial relationships, corridors, and character-defining and significant features must be described. **Particular attention should be paid to tying the description of the property to its stated significance(s).** The text should identify important spaces where important functions essential to the significance of the property occurred. The text must describe what features are essential for conveying the significance of the property, which features are present, which features have been lost, and how changes over time have impacted the property and its integrity. The text should also describe which features must be retained in order for the property to continue to convey its significance.

Significant events or patterns of events that occurred within a building are often tied to the specific spaces or to the spatial arrangements of the interior of the building. The text must describe those spaces and features and relate them to the significant event or events.

When a building is significant for its association with a significant person, the spaces where that person conducted their significant activities must be identified and described.

The description of the interior of a property should follow a logical flow, as one might proceed through the property. Attention should be given to the entrance sequence, floor plan, and relationship of primary spaces. The interior description should also describe historic and character-defining features such as doors,

staircases, fireplaces, ceilings, wainscoting, flooring, paneling, beams, vaulting, architraves, moldings, and any special materials (e.g., Pewabic tile) present.

Furnishings and decoration should not be described unless those elements or features contribute to a designed interior that has been identified as part of the significance of the property.

SHPO recommends submitting historical (as available) and current floor plans of primary floors of an individual property, preferably with a *National Register of Historic Places Preliminary questionnaire*. Current floor plans may be hand drawn but must clearly illustrate the spaces and features noted.

Outbuildings and Additional Features

If additional, significant resources are present within the property, they must be described under a separate heading. Such resources must also be described prior to discussing the integrity of the property. Not all outbuildings must be included in the resource count. Please review page 17 of Bulletin 16A for more information on counting resources.

Archaeological Features and Potential

The Michigan SHPO encourages and recommends, but does not require, the consideration and discussion of known or potential archaeological features in National Register nominations. This discussion may take a number of forms, and does not necessarily mean the property is significant under Criterion D. Nor does it mean that archaeological investigations should be undertaken. The presence of building foundations, structural remnants, and even artifact scatters may not have historic significance and important research potential, but the consideration and discussion of known or potential archaeological features fosters a holistic and comprehensive understanding of the historic fabric of the property, our communities, and our state. When known or potential archaeological features are discussed that information should be set under a separate heading. Please contact SHPO for examples of including known or potential archaeological features in National Register nominations.

Historic Integrity

Preparers are encouraged to read National Register Bulletin 15, particularly pages 44 through 49, and National Register Bulletin 16A prior to beginning this section.

Historic integrity is a key component of the historic significance of a property. For this reason, the narrative text must address whether a property possesses

integrity, and it must describe how and why that is the case. In other words, **an argument for historic integrity must be made.**

All seven aspects of integrity – **location, design, setting, materials, workmanship, feeling, and association** – must be addressed in each nomination. Some aspects of integrity may take precedence over others, and not all aspects of integrity need be present for a property to possess integrity. For this reason, preparers should identify those aspects of integrity that are more important than others and explain why this is so. Preparers should also explain why those aspects of integrity that are less important or nonexistent do not affect the ability of the property to convey its significance.

Preparers should note that interior integrity is as important as exterior integrity. Properties, especially buildings, are evaluated as a whole and exterior and interior work together to convey the significance of the property. Interior spaces and spatial relationships must be able to reflect the historic function(s) and significance(s) of the property. Historic functions must be readable through extant spaces, materials, and features.

When addressing the integrity of a property, keep in mind that **there are no levels or degrees of integrity. A property either possesses historic integrity or it does not.** In other words, **a property can either convey its significance or it cannot.** The National Register does not have a hard scale of measurement that a property must meet, nor is integrity evaluated in a one-size-fits-all manner. The evaluation of integrity is tied to the criterion or criteria, area(s) of significance, period(s) of significance, and level(s) of significance under which a property will be nominated. Please note that integrity and condition are separate and distinct concepts and one does not mean the other.

Additionally, integrity is evaluated and determined based on the property as it exists at the time of nomination. Integrity cannot be determined – and significance cannot be established – on the basis of ideas, plans, or intent.

The addition of materials that attempt to recreate the historic appearance of a property must be based on historical evidence and must relate to the period of significance. The addition of materials from periods outside the period of significance or from disparate periods, or an amalgamation of historical periods may render a property ineligible for listing in the National Register. Historicized creations will generally render a property ineligible for listing in the National Register.

Preparers should take care to evaluate alterations that have become significant in their own right. In those cases, discuss how these changes have attained significance and how the changes have affected the historic integrity of a

property. As one example, the first-story storefronts of commercial buildings in traditional commercial districts were often modernized in the mid-twentieth century. Such modifications may be significant and should not necessarily be viewed as detrimental to integrity and significance.

Narrative Descriptions for Complexes

A “complex” is not an official NPS classification but is commonly used to describe properties that contain multiple related resources. Examples of complexes include farms, factory and industrial campuses, some educational campuses, or a group of ecclesiastical buildings. Depending on the number of resources within a property, a complex may be classified as either “Building(s)” or “Historic District” in Section 5 of the registration form.

Whether classified as “building(s)” or as a “historic district,” the major resources of a complex require both exterior and interior description.

When a property has multiple major resources, the Narrative Description must contain an inventory of resources, much like a historic district nomination. The inventory must include a heading for each resource that includes the name of the resource, date(s) of construction and significant alteration, the architect or builder (if known), whether it is a contributing, noncontributing resource, and the type and number of resources present. For example:

Horse Barn; 1899, 1927; 1 Contributing Building

Corn Crib; 1902; 1 Contributing Structure

Former Pasture; n.d.; 1 Contributing Site

Garage; 1994; 1 Noncontributing Building

The resource count and classification of the inventory must match the resource count and classification in Section 5 and the resource map (see [Map Requirements for National Register Nominations in Michigan](#) for more information about maps for National Register nominations). Please be sure to review each of these items to ensure they match.

Narrative Descriptions for Historic Districts

Narrative descriptions for historic districts differ from those of individual properties in a few, important ways. The following chart identifies the various sections that should be included in each nomination type:

	Individual Property	Complexes	Historic District
Summary Paragraph	X	X	X
Setting and Environment	X	X	
General Characteristics	X	X	
Overview			X
Exterior of each resource	X	X	X
Interior of each resource	X	X	
Historic Integrity	X	X	X

The *Overview* section in a historic district nomination should, essentially, combine the *Setting and Environment* and *General Characteristics* sections found in an individual property nomination into one section. In a historic district nomination, the “General Characteristics” should be taken to mean the general physical characteristics of the district, including architectural forms and styles, building heights, materials, and so on. The *Overview* section should also discuss how the district as a whole has changed over time.

Another important difference between individual property and historic district nominations is that **nominations of historic districts must contain an inventory of resources**. In most cases, the inventory provides descriptive information about the exterior of each contributing and noncontributing resource within the property, whether building, site, structure, or object.

Interior descriptions of resources within a historic district are not required, generally, but may be warranted in some instances. Some, though not all, of the reasons for describing the interior of a resource within a historic district are:

- If two or more buildings were built as separate buildings and later combined. In this case, the descriptive text must explain when, how, and where the circulation and structural systems of the building have been combined.
- If a building built as a single building has been divided into multiple buildings. In this case, the descriptive text must explain when, how, and where the circulation and structural systems of the building have been separated.

- If a building is individually eligible for listing in the National Register or of primary architectural or historical importance to the historic district.
- If the interior of a resource is of exceptional significance or contains unusual or under-documented features.

Preparers should review pages 33 and 34 of Bulletin 16A for general guidance on preparing a narrative description for historic districts. Preparers are also encouraged to review National Register bulletins for particular property types when those resource types are located within a historic district. The inventory entry for these particular resource types will not be as extensive as an individual nomination, but the bulletins should be reviewed to determine if any key information should be included. The bulletins contain important and useful information about describing and evaluating those resources that should be considered. For example, National Register Bulletin 13, *How to Apply the National Register Criteria to Post Offices*, calls specific attention to artwork and murals commissioned by the federal government, especially those works created during the 1930s. When a post office within a historic district contains such important artwork, it should be noted in the descriptive text.

If questions arise as to whether interior descriptions are warranted, please contact SHPO.

Summary Paragraph

Like the Narrative Description for an individual property, the Narrative Description for a historic district begins with a summary paragraph. This text must be a **summary** of the environment and setting, the physical characteristics, and the historic integrity of the historic district as a whole and is **not an introduction** to the narrative text that follows. The summary paragraph should stand alone, similar to an abstract, and provide readers with a general understanding of the property, and include, at a minimum:

- the location of the historic district (primary streets and boundaries, city or township, county, and state);
- a summary of the essential and character-defining features of the historic district;
- a summary of the predominant architectural styles, building forms and types, and typical dates of construction;
- the number and type of contributing and noncontributing resources (this count must match the counts and classifications in Section 5 and the resource map);
- a notation of any significant architects, landscape architects, artisans, and builders; and
- a summary of the historic integrity of the property.

Overview

Narrative Descriptions for historic districts are somewhat different than those of individual properties.

The section should begin with an overview of the physical characteristics of the historic district that essentially combine the “Environment and Setting” and “General Characteristics” sections of an individual property nomination. The overview should describe the general physical attributes of the entire historic district but should not discuss the historical development of the district (that comes in Section 8). The goal here is to describe the physical appearance of the district, describe the changes to its physical appearance over time, and make a case that the district does or does not retain historic integrity.

The overview section must discuss its general location (area of the municipality, county, and state) as well as topography, vegetation, whether the district is in an urban or rural location, whether the district is in a commercial or residential location, what natural and man-made attributes define it, and so on. The overview section must also address how the district has changed over time. The overview should note which historical or historic buildings have been demolished or altered, where parking lots have been installed, where new buildings have been constructed, and so forth.

Useful topics and questions to consider when describing a historic district include:

- Location
 - Where is it located within the state of Michigan?
 - Where is it located within its county?
 - Where is it located in relation to the broader community?
- Environment and Setting
 - What is the environment and setting of the district like? Is it flanked by older residential neighborhoods, fields, highways, hills, a body of water, open space, or something else? Is it adjacent to an industrial or rural area?
 - What distinguishes the historic district from its surroundings? What characteristics give the district its identity?
- Historical Development
 - When was the area in the proposed historic district established? How has its spatial arrangement changed over time? What factors (local, state, national, and even global, as applicable) contributed to that change?

- General character of district
 - Is it exclusively commercial or does it include other types of buildings, such as residential, civic, religious, social or industrial?
 - How big is the district and what is its general form? Include information about the acreage, approximate maximum dimensions, orientation direction (north-south, east-west, etc.).
 - What is the ratio of contributing to noncontributing resources? Have any resources been listed previously in the National Register of Historic Places?
 - Are classes of outbuildings present in the district?
 - How have broader development trends in the community, region, state, or nation affected the development of the district?
 - How does the historic district compare to other, similar districts within the community, state, or nation (depending on level of significance)?
 - Are periods of development evident in the buildings?
 - Are any patterns of development discernible?
- Topography and natural features
 - What are the general topographic features of the district, and how do rivers, hills, or other physical features within or adjacent to the district affect its physical form? Specific attention should be given to important topographic or natural features.
 - What changes, if any, have occurred over time?
- Street plan and public spaces
 - How is the street grid arranged within the district, what is the character of the streets in general, are there boulevards or other special streetscapes, and are there squares or other public spaces? Do the street plan and public spaces result in vistas and visual focal points within the district?
 - What are the main thoroughfares in the district?
 - Are any man-made features, such as canals, railroads, irrigation systems, bridges, and so forth present?
- Trees and plantings, pavements, and street furniture
 - Do trees or other plantings along the streets form a significant part of the district's character?
 - Can any of the trees or plantings be considered significant or historical?
 - Are unusual historic street or sidewalk paving, retaining walls, ornamental fencing, fountains, outdoor public sculpture, old horse blocks or hitching posts, street lighting, or other historic street furniture present?
- Building stock
 - What is the general character of the building stock the district in terms of architectural styles, building forms, and property types

(such as stores, banks, hotels, public buildings, fraternal halls, and churches) as well as the ages, exterior cladding materials, and scale?

- How do the architectural styles, building forms, and property types contribute to the feeling of the district?
- How have demolitions, alterations, and new construction affected the historic integrity of the district? That is, how have these factors affected feeling of the district? How have significant changes affected the ability of the district to convey its significance?
- How have architectural or design trends affected the physical characteristics of the district?
- What are the most important buildings, sites, structures, objects or other features from a visual standpoint?
- What was the appearance of the district during the period(s) of significance? What significant changes or modifications have occurred since that time?
- Did any parking lots or vacant spaces once contain important buildings, sites, structures, etc.?
- Have any individual buildings, sites, or structures been listed in the National Register? Have any listed resources within the district been demolished?
- Why does the district look the way it does at present, and how has the district, as a whole, changed over time?
- Presence of archaeological resources
 - Does the district contain any known or potential archaeological features?
 - Has any portion of the district been surveyed for archaeological resources? When? By whom?
 - What is the potential of the district to yield important information through archaeological investigation?

Prior to submitting a draft nomination, preparers should consider whether the description of the district as a whole and the descriptions of the individual resources would allow an unfamiliar reader to identify a particular resource in a historic district without the aid of photographs. If doing so would be difficult, a more detailed description will likely be necessary.

A useful approach to describing a historic district may be to picture yourself describing it to someone you have encountered on a trip and who has never been to the district. How would you explain to them, in an organized fashion, what the district looks like, what is visually distinctive about it, and what is important about it?

Inventory

Each historic district nomination must contain an “inventory” of resources. That is, a list of all contributing, noncontributing, and previously listed resources (includes buildings, sites, structures, and objects) within the historic district boundaries. The form of this list may vary, but in most cases, each resource will need to be described. Exceptions may apply to historic districts with very large numbers of resources or districts that contain identifiable classes of resources.

Preparers or communities working with historic districts should contact SHPO as early as possible to determine the appropriate format for the inventory.

For all inventories, the resource count in the inventory **must match** the resource count in *Section 5 - Number of Resources within Property* **and must match** the contributing and noncontributing resource map for the district. Preparers should review page 16 of Bulletin 16A for more guidance on determining contributing and noncontributing resources.

Resource Evaluation Methodology

In any historic district nomination, the inventory must begin with an explanation of the evaluation framework or methodology used to determine the contributing or noncontributing classification of each resource. The evaluation methodology should explain what characteristics or qualities a resource must possess or embody in order to be classified as a contributing resource. Resources within the district must be evaluated consistently. Creating and applying an evaluation framework or methodology will aid in consistent evaluation. This section should allow reviewers and general readers to understand the approach and logic used in determining the classification of resources. Preparers should not give short shrift to this section. Preparers should refer to but not simply copy the text from Bulletin 16A, nor should the methodology be generic. Instead, the methodology used to evaluate resources within a historic district must be specific to the particular district, its history, development, and, most importantly, its significance.

The Resource Evaluation Methodology section should also include an explanation of how the headers for each inventory entry are arranged. See the “Resource Headings” section that follows for more information.

Resource Headings

In standard historic district nominations, the inventory will consist of a description of each resource. Each of these descriptions will be preceded by a heading that must contain: the address of the resource, the historic name of the

resource, common name(s) of the resource (if any), dates of construction and significant alteration, the architect or builder (if known), whether it is contributing, noncontributing, or listed previously, and the type and number of resources present.

The inventory entry heading format preferred by SHPO is as follows: Historic Name (Common Name); Date of Construction, Dates of Significant Alterations; Architect or Builder; Resource Quantity and Type. For example:

3408 Woodward Avenue; Evans-Winter-Hebb Printing Company Building (Detroit School of Applied Art, Detroit Movie Operators School, Bonstelle School of Dance, Michigan State University Detroit Center); circa 1917, circa 1956; John Smith, architect; 1 Contributing Building

or

Third Street Bridge (at Main Street); 1937; Public Works Administration; 1 Contributing Structure

or

607 Michigan Avenue; Kotlewaska, Joseph and Franciska, House; 1890; 1 Contributing Building, 1 Noncontributing Building

or

1300 Adams Street; Park City Hotel; 1903; K. F. Helmuth, architect; 1 NRHP Listed Building

In some cases, a modified format may be necessary. In cases where a modification may be necessary, please contact SHPO before deviating from the format above.

Resource Descriptions

In a typical historic district nomination, each inventory entry must describe: the resource type (e.g., house, commercial building, school); the number of stories; the architectural style (Queen Anne, Greek Revival, Tudor Revival, etc.); the form (upright and wing, four square, etc.), if applicable; the general shape of the building (rectangular, T-shaped, etc.); the roof structure (gambrel, cross-gabled, hip, etc.); and exterior materials. For commercial buildings, descriptions should also address any division of commercial spaces. All visible elevations must be described. Physical change over time must be described, when known.

Identify all exterior materials by type and color (e.g., red brick with orange sandstone trim). For stone, list specific stone if known (Portage Entry or Waverly sandstone, Indiana limestone, etc.). For masonry walls, indicate bond (such as coursed or random ashlar) and finish (such as smooth or rockface). If side and rear walls are different from the front, provide the same information for those elevations. If the foundation is visible, describe its material, color, and finish. Window form, material, arrangement, grouping, and detailing should all be described. The description for the roof should list special materials such as slate or metal shingles if roof is visible. For standard rear-slanting flat-roof downtown commercial buildings, notes on roofing material are not important. When describing cornices, cresting, and other non-stone trim, be sure to indicate if it is wood, metal, or other material. Descriptions of ground floor shops and storefronts should provide the general form (e.g., “three bays with slant-sided recessed central entry, second-story entry at west end”) and finishes (e.g., “Aluminum-trim single-light shop windows above modern red brick bulkheads; vertical T-111 siding in transom location; ceramic tile floor in entry containing name ‘Fowler.’”).

Preparers should not dismiss or overlook squares, parks, parking lots, historic pavements, landscapes, or historic streetlight fixtures when assessing and describing historic districts. Descriptions of resources like parks, monuments, parking lots, etc. should describe the salient features of those resources. Such entries should include brief descriptions of significant resources within the square or park (monuments, fountains, etc.).

Minor resources may be described with one entry for each class or category of resource (e.g., historic streetlights). Such entries should provide a descriptive overview of the resource group, explain where they are located, provide historical background on the type of resource, and provide information on the construction or erection of the resource(s). The general character of modern fixtures within the district should be noted in the overview of the district but not given separate inventory entries.

Old trees, plantings, and other historic landscape features may be significant features – either of the district as a whole (e.g., public parks) or for specific resources. These features should not be discounted or dismissed and may warrant discussion.

Historic pavements such as old brick streets should be included in the inventory as a structure and described as a contributing resource. Standard modern asphalt or concrete pavements should be noted in the overview but not given separate inventory entries.

Description of resource interiors is generally not required in a historic district nomination. When resources (most often buildings) retain significant interior spaces and features, however, some description may be warranted. Providing description of important, character-defining, or unusual historical interior features such as a backbar, pressed metal ceilings, or store furnishings and fittings also indicates the importance of those features in future historic preservation tax credit projects and other rehabilitation work.

Stating why a resource contributes to the significance of the district is useful and recommended. This is especially useful when the significance of a resource is not obvious or when a district is significant under multiple criteria and areas of significance. Including this information is also useful for historic preservation tax credit project purposes and for later re-evaluation of the district.

A Note on Inventory Entries for Noncontributing Resources

Inventory entries too often give scant attention to noncontributing resources, whether they are considered noncontributing because they were constructed less than fifty years ago or are older properties viewed as having lost integrity. Inventory entries must describe both contributing and noncontributing resources and provide enough data on noncontributing resources to make clear what they are and why they are classified as noncontributing. **Inventory entries for noncontributing resources must explain why they do not contribute to the significance of the historic district and are classified as noncontributing.**

Assessing Historic Integrity for Historic Districts

When preparing a nomination for a historic district, the discussion of integrity considers the district as a whole. Naturally, the integrity of individual resources contributes to the integrity of the district, but a discussion of integrity for each resource is not necessary. Rather, consider how the resources work together to convey the significance(s) of the district. How have changes to the district since its period of significance affected the ability of the district to convey its significance? Are important resources extant or missing? Do modern materials cover important historical materials?

In some cases, the integrity of an individual resource that could be substantial or pivotal or of exceptional importance to the district may be warranted so as to illustrate a particular point or to support the overall discussion of integrity.

Like individual properties, the discussion of integrity for historic districts should evaluate the district against the seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. The discussion of

integrity should be an analysis of those aspects relative to the significance of the district.

Vacant parcels, parking lots, and large open spaces are typically not counted as resources in a National Register nomination unless they contribute to the significance of the property. These resources should be noted in the narrative description, however, and depicted on district maps.

Archaeological Resources and Potential in Historic Districts

As with individual properties, SHPO encourages and recommends, but does not require, the consideration and discussion of known or potential archaeological features in National Register nominations for complexes and historic districts. Please contact SHPO to discuss including a discussion of known or potential archaeological features in National Register nominations for historic districts.

Narrative Descriptions for Traditional Cultural Properties, Archaeological Properties, Cemeteries, Landscapes, and Other Special Property Types

Prior to beginning a Narrative Description for a traditional cultural property, archaeological properties, landscapes, and other special property types, preparers should review pages 24 through 34 of Bulletin 16A and the applicable additional bulletins provided by the National Park Service. These property types have specific requirements that are described in the relevant bulletins. Among the most commonly used special bulletins are:

- [*Guidelines for Evaluating and Documenting Traditional Cultural Properties*](#); National Register Bulletin 38
- [*Guidelines for Evaluating and Registering Archeological Properties*](#), National Register Bulletin 36
- [*Guidelines for Evaluating and Registering Cemeteries and Burial Places*](#), National Register Bulletin 41
- [*How to Evaluate and Nominate Designed Historic Landscapes*](#); National Register Bulletin 18
- [*Guidelines for Evaluating and Documenting Rural Historic Landscapes*](#); National Register Bulletin 30

These, and many other bulletins, are available at the NPS National Register of Historic Places website, www.nps.gov/subjects/nationalregister/index.htm. We recommend contacting SHPO prior to proceeding with special nominations.

Section 8 – Statement of Significance

Section 8, like Section 7, begins with several data categories: “Area of Significance,” “Period of Significance,” “Significant Dates,” “Cultural Affiliation,” and “Architect/Builder.” Preparers should read pages 35 through 51 of Bulletin 16A before beginning this section of the registration form, and are encouraged to refer to the appropriate sections in Bulletin 16A and this guide when completing each subsection. **Do not delete unused lines in the data category sections.**

Applicable National Register Criteria

Preparers should read Bulletin 15 and Bulletin 16A prior to beginning a National Register nomination, and even prior to submitting a *National Register of Historic Places Preliminary Questionnaire*.

Select all National Register Criteria that apply and are supported by the Narrative Statement of Significance.

Criteria Considerations

Criteria Considerations must be met and justified when the property or resource(s) are typically not eligible for listing in the National Register of Historic Places. These property types include cemeteries, religious buildings, moved properties, reconstructed properties, and others. Preparers are encouraged to review pages 25 through 43 of Bulletin 15, which discuss the Criteria Considerations individually.

When one or more Criteria Considerations must be met, stating that a property meets a Criteria Consideration is not enough, the text must explain how the property meets a particular Criteria Consideration. Likewise, the summary paragraph must provide this information in summary form.

For historic districts, select only those Criteria Considerations that apply to the entire district or to a significant number of resources within the district.

Areas of Significance

Select only those Area(s) of Significance that express the **essential historic significance** of the property, whether an individual property, complex, or historic district. The essential significance of a property may not reflect every historical function or use of the property. For example, the presence of a religious building in an otherwise residential district, generally, will not constitute

significance in religion, but that same religious building may be classified as a contributing building under the theme of architecture. Please be sure to critically examine the property, its history, and its context.

Each Area of Significance, or theme, selected must be documented thoroughly and fully supported in the Statement of Significance. A list of significant themes, with brief descriptions, can be found on pages 38 through 41 of Bulletin 16A. Any theme listed in the registration form must be substantiated in the Narrative Statement of Significance.

If Commerce is listed in this section, then the Statement of Significance must address how the property is **significant** under the theme of commerce, not just associated with that theme. If Architecture, Commerce, Community Development and Planning, Government, Social History, and Transportation are selected, then the Statement of Significance must be clear and persuasive in its support of each theme.

Quite often, less is more in National Register nominations. Experience suggests that nominations that attempt to address several or many areas of significance, rather than the essential area(s) quickly become unwieldy and convoluted and do not provide a sufficient argument for the significance of a place.

Period of Significance

The Period of Significance for a property is the period in which the property was significant under one or more significant themes. The period of significance may or may not correspond to the period of use for property, may or may not reflect all uses and history of a property, and may or may not reflect the entire age or history of a property. A period of significance must generally end fifty years prior to the present year.

If a property is significant only under the theme of architecture the Period of Significance is typically limited to the year it was constructed. If significant additions or alterations were made, those years may also be considered significant dates.

A property may have more than one period of significance, but when periods of significance overlap or when a gap of only a few years exists between multiple periods of significance, those periods should be combined into one period of significance.

The beginning and ending dates for the Period of Significance must be explained in the text of the *Statement of Significance Summary Paragraph* and

the *Narrative Statement of Significance*. Provide some context and history for the property before and after the period of significance in order to justify the selection of the beginning and ending dates, but that information should be concise.

Periods of significance must reflect the dates of extant properties or the time an important entity was associated with the subject property. Though an organization may have been established before a property was constructed, and that organization may be significant in the history of a community, the period of significance can only begin at the date of construction of the extant property. The period of significance may not predate the property or its extant resources. A building constructed in 1915 on the site of a building constructed in 1875 but that has since been demolished would have a beginning period of significance date of 1915, even when the same entity was responsible for both buildings.

Preparers should review pages 42 and 43 of Bulletin 16A for more information on identifying a period of significance.

Significant Dates

Preparers should review pages 42 and 43 of Bulletin 16A for more information on selecting significant dates.

A significant date is a **year** (do not enter months or days) in which a significant event **directly related to the significance of the property** occurred and that falls **within** the period of significance. This means that a significant date **cannot** occur outside of the Period of Significance. A property may have several significant dates or none. Dates of major alterations and events may be significant. Minor alterations are typically not considered significant. Do not write why a significant date is entered in this section. Instead, address and justify each significant date in the narrative text.

Do not enter the beginning and ending years of the Period of Significance, as these are assumed to be significant.

Significant Person

This section should be completed only when a nomination is prepared under Criterion B. If Criterion B is not selected, please enter "N/A" on the first line in this section.

Please note that historic districts are rarely eligible for listing in the National Register under Criterion B. Note, too, that properties that possess architectural significance as the “work of a master” are evaluated under Criterion C, even when the architect is Frank Lloyd Wright, Alden B. Dow, or Eero Saarinen.

Any names entered in this category must be entered by last name first and record the full name of the individual.

Use the full, legal name for the significant person. Do not enter nicknames. For example, “Frostic, Sara Gwendolen,” (not Gwen Frostic or Frostic, Gwen) or “Franklin, Clarence LaVaughn” (not C. L. Franklin or Franklin, C. L.)

Preparers should review page 43 of Bulletin 16A for additional information on completing this section.

Cultural Affiliation

Complete this field only if the property will be nominated under Criterion D. If the property will be nominated under Criterion D, please review page 44 of Bulletin 16A.

Architect/Builder

List only the names of significant architects, builders, designers, and artisans when they relate to the significance of the property. Do not enter the names of subcontractors.

Any names entered in this category should be entered by last name first and record the full name of the individual. Do not enter nicknames. For example, “Birkerts, Gunnar.”

Firm names should be listed when a specific person is not known. If a firm name is entered in this section, it should be listed by the business name. For example, “Nathan Johnson & Associates,” not “Johnson, Nathan, and Associates.”

Ampersands and other punctuation should be used only when it is used in the formal name of the firm. If a firm name contains an ampersand, do not replace that mark with the word “and.” For example, write “Eero Saarinen & Associates,” not “Eero Saarinen and Associates.”

Multiple architects or builders, as is typically the case in historic districts, should be entered in order of their importance to the district.

If the architect or builder is unknown, enter “Unknown” on the first line in this section. If the field does not apply, as may be the case with an archaeological property, enter “N/A” on the first line in this section.

A Note on Significance

In all cases, **significance is not assumed or self-evident**. Ownership of, or association, with a property, property type, or use do not automatically result in a certain level of significance. Some property types and uses are often assumed to have what may be called *ipso facto* significance, or significance by the very fact that it was designed by a well-known or important architect, that it is old, that it was occupied by someone famous, that it is an archaeological site, that it is a lighthouse, and so on. This is not the case. Significance cannot be assumed or implied and must be demonstrated for all properties, criteria, and areas of significance. An *argument* for significance must be made for each criterion, area of significance, period of significance, and level of significance selected in Section 8.

Statement of Significance Summary Paragraph

Like the Narrative Description summary paragraph, the Statement of Significance Summary Paragraph serves as a summary of the narrative Statement of Significance. The text must summarize the National Register Criteria, Criteria Considerations, if applicable, and each historic context under which the property is significant. **The summary paragraph is not an introduction to the narrative text that follows, but a summary of why the property is significant.** The summary paragraph should also provide, in summary form, support or evidence for the criteria and themes under which the property will be nominated. In other words, it is not enough to say that a property is eligible for listing in the National Register under Criterion A for its contributions to the development commerce in a particular city; the summary must also include a brief justification for that significance. Likewise, the summary paragraph must include a brief justification for the period of significance and the level of significance. The summary paragraph must specifically provide:

- The National Register Criterion or Criteria under which the property gained significance (A, B, C, or D)
- The Area(s) of Significance under which the property gained significance
- The Period(s) of Significance in which the property gained significance
- The Level(s) of Significance in which the property gained significance
- Brief justifications for each of these

Narrative Statement of Significance

The Narrative Statement of Significance should use headings and subheadings, as appropriate, to organize the text. The headings and subheadings used should be guided by the selected National Register Criterion or Criteria and the historic context(s) for the property. When the text contains information that precedes or follows the Period of Significance that information should be identified clearly and separated by an appropriate heading.

The Narrative Statement of Significance is a specific form of history. It is not simply a chronological history or a biography, nor is it an academic paper, a monograph, a term paper, or a popular history article. Rather, the Narrative Statement of Significance connects the history and facts of a property to one or more historic contexts that, together, present an argument for how the subject property has attained significance within the particular historic context(s) and how the property is eligible for listing in the National Register. **Significance and eligibility are never assumed or self-evident.** The significant themes (areas of significance), the period(s) of significance, the level(s) of significance – and even the boundary – must all be explained and supported by the text of the nomination. The narrative text must provide a historic context for each National Register Criteria and theme, or Area of Significance, selected. Please see *The Importance of Historic Context* below for additional information on drafting a historic context.

A National Register nomination is also a formal text. The Narrative Statement of Significance should be written in objective, clear, and precise text that follows a logical sequence. Generally, that “logical sequence” will be chronological, though the narrative should not be a simple chronology. Superlatives (i.e., “best”) and subjective, excessive, and unsubstantiated praise (i.e., “renowned,” “genius,” “brilliant,” “outstanding,” etc.) of individuals, organizations, periods of time, and places should be avoided. The narrative text should let the facts show how a place, person, or event gained significance.

The narrative text should also demonstrate through historic context and comparative analysis how a particular property illustrates aspects of a theme that related examples do not. In other words, a nomination must show explicitly why a property is **significant**. To do this, comparison with related properties is usually necessary. See the *Comparative Analysis* section that follows for more information.

Conjecture must be avoided when describing significant people or events. This most often occurs when attributing unverified influence or motive to something or someone. For example, the text should not claim an architect was influenced

by a person or an event unless the architect has said or written as much. Rather, writing that an architect may have been influenced or appears to have been influenced by a person or an event is more accurate, if an explanation of why this may be the case is included.

If the narrative text introduces an individual, briefly note who they are and why they bear mentioning. Likewise, provide a brief introduction to concepts, events, ideologies, theories, movements, policies, and so on, even when it is assumed to be widely known and understood.

Before sending a nomination to SHPO, preparers should consider if the narrative text provides enough context so someone unfamiliar with the property, place, or events has a clear understanding of why the property is significant. Providing a history of the property, no matter how extensive or detailed, is not a substitute for historic context and not enough to make a case for significance.

Preparers should review National Register Bulletin 16A, *How to Complete the National Register Registration Form*, pages 35 through 51, for more information on what should be included in the Narrative Statement of Significance.

The Importance of Historic Context

The development of one or more historic contexts is critical to a National Register nomination and its importance cannot be overstated. As described previously in this document, and in the many National Register Bulletins, one of the keys to understanding the significance of a property, and thus establishing its eligibility for listing in the National Register, is historic context. In fact, the [Secretary of the Interior's Standards for Preservation Planning](#) states that it is "the foundation for decisions about identification, evaluation, [and] registration."

National Register Bulletin 16A elaborates on this by noting that historic context is:

information about historic trends and properties grouped by an important theme in the prehistory or history of a community, State, or the nation during a particular period of time... they link historic properties to important historic trends. In this way they provide a framework for determining the significance of a property and its eligibility for National Register listing...

National Register Bulletin 16A also guides that "it is within the larger picture of a community's history that local significance becomes apparent." This idea is applied to all levels of significance: local, state, or national. This means that

properties significant at the state or national level must provide context at that level.

Historic contexts describe the historical development of the subject area (community, state, or nation); identifies and describes the significant historical trends, patterns, and events that were significant in the development of the subject area; and identifies significant property types associated with the theme(s). Other parts of the registration form, then, describe how the property to be nominated is associated with those events, and, importantly, why that association is significant.

This means that the key to establishing significance for a property is not the accumulation and recitation of historical facts. Facts or general history alone will not establish the significance of a property. Facts in relation to time, theme, and place will. Drafting a historic context requires analysis and synthesis and connection. The goal of a historic context is to connect the nominated property to local, regional, national, and even international historical events and trends.

Examples of questions to consider when developing a historic context include,

- What historical themes (areas of significance) are important in the development of the community, area, state, or nation?
- Why are those themes significant to the community (or state, or nation)?
- What historical events have impacted or influenced the development of those themes?
- What property types within the same geographic area are also associated with the important theme or themes?
- What historical theme or themes does the property represent?
- Is the property type important in illustrating the theme? Why? How?
- Is the property merely associated with the context or is it significant within that context? How? Why?
- Does the property reflect change or continuity within the theme(s)? How?
- What other properties within the same geographic area are also related to the theme?
- How does the property compare to other, similar properties?
- When compared to other, similar properties why can it be considered significant?

Note: some of these questions also address the topic of comparative analysis, described previously.

Historic contexts are organized by theme, place, and time. Contexts must describe how and why a theme developed, describe the relevant historical factors (economic, governmental or political, settlement, social, etc.) that

influenced the theme, and describe how the property in question relates to and illustrates that theme. The geographic scope to be covered by the historic context is related directly to its level of significance. In other words, for properties significant at the local level of significance, a historic context for a particular community (or sometimes, region) should be developed, a statewide context for the state level of significance, and a national context for the properties significant at the national level of significance. When applicable, historic contexts should draw connections to significant regional themes. For example, a property located in West Michigan significant for its association with the packaging industry should connect that industry to the broader wood products history and industries of West Michigan.

Developing a context will likely require some amount of general reading on the topic(s) at hand. For example, if a property is significant for its role in the agricultural history of a community, the context will need to discuss the general agricultural history of the community, the county, and the state of Michigan. State, county, and local histories and other books written on the topic should be consulted for this type of information. Local libraries and historical societies are also quite useful for such research.

Historic contexts should, at minimum:

- Define the geographical area addressed in the context.
 - This may be a city, a part of a city, a township, a county, a part of a county, multiple counties, the state of Michigan, the United States, etc.
 - In some cases, such as a small, rural town or a small municipality in a larger metropolitan area, a regional approach may be necessary for the geographical area to make sense.
- Describe the general historical development of that geographical area.
 - Define and describe periods of development; important local, state, national, or international factors that affected that development
- Identify important themes associated with the area.
 - The text must explain how these themes developed and why they were important.
- Identify associated property types

The text should then use the factual history of the property to relate it to the historic context and demonstrate why the property is significant within that context or contexts.

Architectural contexts for styles, forms, and periods should address, at minimum:

- The architectural style(s), form(s), and trend(s), and building technologies reflected in the property;
- The historical development of those styles and forms; and technological developments that spurred architectural changes.
- Historical factors that affected the development of style(s), form(s), and trend(s), and building technologies.
- Identify associated property types

A good place to start when developing a historic context is with existing National Register nominations. SHPO recommends reviewing nominations of properties that are similar in significance, use, and geography. The *Researching the National Register in Michigan* page of the SHPO website, <https://www.miplace.org/historic-preservation/programs-and-services/national-register-of-historic-places/researching-the-national-register-in-michigan/>, has instructions and links for finding existing National Register nominations.

Preparers should also review the *Michigan Thematic Historic Contexts* page at the SHPO website, <https://www.miplace.org/historic-preservation/programs-and-services/national-register-of-historic-places/michigan-thematic-contexts/>, to determine if a thematic document has been prepared for the area in which the subject property is located. These documents have had different names over time and may be referred to as Multiple Resource Area (MRA), Thematic Resource (TR), Multiple Property Submission (MPS), and Multiple Property Documentation Form (MPDF). As with individual nominations, the amount and extent of information may vary.

Preparers will also find an extensive collection of materials beyond National Register nominations in the files available at SHPO. Historic contexts may also be found in survey reports and other documents on file at SHPO. Preparers are encouraged to submit a research request via the online tool at the SHPO website, here: <https://www.miplace.org/historic-preservation/research-resources/consultant-resources/schedule-a-research-appointment/>.

Before sending a draft nomination to SHPO, preparers should consider if the narrative text provides enough context so someone unfamiliar with the property has a clear understanding of why the property is significant. Providing a history of the property or facts about the property, no matter how extensive, is not enough to make a case for significance.

Comparative Analysis

An important aspect of historic context and establishing the significance of a property is the identification of property types. Identifying the types of places

that illustrate a particular context helps to understand the relative importance of the subject property and facilitates comparison.

As stated in the [Secretary of the Interior's Standards for Preservation Planning](#), “decisions about the identification, evaluation, registration and treatment of historic properties are most reliably made when the relationship of individual properties to other similar properties is understood,”

To understand, and make the case for, the significance of a property, it is often necessary to compare a property with related properties, that is other properties that would reasonably be included within its historic context. This is the case for all property types, whether an individual property or a historic district.

For example, a house significant as the embodiment of a particular architectural style must be compared to other houses of the same style within the same geographical area. Likewise, a factory building significant for its association with local industry must be compared to other local factory buildings. A historic district significant for its association with the ethnic heritage of a particular ethnic group must be compared to other areas that are or were reasonably associated with that area of significance. When no such places are present, the text should clearly describe that.

The geographic scope of comparison is related to the level of significance under which the property will be nominated. In metropolitan areas made up of many small municipalities or in rural areas, this analysis may need to extend beyond the borders of the municipality and consider a wider area. Properties significant at the local level do not need to be compared with similar properties across the state or the nation.

Properties significant under Criterion A in the area of Ethnic Heritage, for example, should provide comparison with enough related properties based on the level of significance under which the property will be nominated. The analysis must show why the subject property is significant, not simply that it is associated with certain events or trends. The text must also make an argument for significance that is specific to the subject property and not assume significance due to an association.

Comparative analyses under Criterion C should likewise be appropriately tailored to the argument(s) for significance. If the argument is made for “work of a master” the analyses should compare the subject property to other works by the master. It is important to remember that “a property is not eligible as the work of a master... simply because it was designed by a prominent architect.” Rather, a property “must express a particular phase in the development of the

master's career, an aspect of his or her work, or a particular idea or theme in his or her craft," as noted in NPS Bulletin 15.

If the argument is made that the property embodies the distinctive characteristics of a type, period, or method of construction, then the comparative analysis must consider other properties of the type, period, or method of construction located within the geographic area identified by the level of significance.

Comparative analysis may be addressed in a separate section or as part of the overall Narrative Statement of Significance.

In some cases, SHPO may hold survey document or National Register materials that can provide some comparative information. In other cases, the preparer must evaluate the general area in which the property is located to determine if other, similar properties exist and how they compare to the subject property.

Considerations for Historic Districts

The Narrative Statement of Significance for historic districts, like individual properties, argues a specific case, or cases, for how the district meets one or more of the criteria for listing in the National Register, marshalling historical facts to make the case. The statement of significance for a historic district is not a catalog of historical events or noteworthy citizens, it does not provide a comprehensive community history, nor does it focus on the specific history of the individual resources within the district. Rather, the Statement of Significance for a historic district provides comprehensive information on the broad and significant historical trends that are illustrated by the historic district as one cohesive property. Particular resources should be used to illustrate important aspects of a historic context.

The task with a historic district is to identify its essential significance(s). The presence of resources that are fifty or more years old does not mean they automatically contribute to the significance of the district. All resources must be evaluated within the historic context(s) of the historic district. **Whether an individual property or a historic district, significance is never considered self-evident.** The significant themes (areas of significance), the period(s) of significance, the level(s) of significance – and even the boundary – must all be clearly and sufficiently explained and supported by the text of the nomination.

If the property is significant under the themes of commerce, social history, and government, then a historic context is needed for each of those themes. Some amount of general reading will be required for each theme. State, county and

local histories and other books written on the topic should be consulted for this type of information. Local libraries and historical societies as well as college and university libraries are also quite useful for such research. The Library of Michigan and the Archives of Michigan each hold many useful resources.

Notes on writing a Narrative Statement of Significance

National Register of Historic Places nominations deal with places, events, and people from our past. Historical writing should be written in the past tense, generally. Tenses should be consistent.

Do not assume that reviewers and readers are familiar with concepts, people, and places used in the text. Concepts, people, and places must be defined or explained when they first introduced in the narrative text.

Statements of significance should not just summarize historical facts, provide a chronological list of events, or narrate historical events, but synthesize those facts and events and provide some analysis of their meaning within the theme or themes identified in the registration form.

Bulleted lists should not be used and are not a substitute for narrative writing.

Do not use colloquialisms, neologisms, jargon, puffery, cliches, and other informal language in National Register nominations unless such language is part of a quotation.

Association with a Multiple Property Documentation Form

A Multiple Property Documentation Form (MPDF) is a document that is used to nominate thematically related properties. An MPDF is not a nomination and, by itself, does not result in listed properties. Instead, it is a “cover” document that provides important thematic, contextual, and historical information about the related properties, as a class, and provides a framework for evaluating properties that are associated with the themes and periods discussed in the MPDF. An MPDF also provides information that facilitates comparative analysis by identifying associated property types. The SHPO website, www.michigan.gov/shpo, contains a list of thematic nominations and other contextual documents.

When a property is nominated under an MPDF, the nomination must: discuss how the property relates to the MPDF, summarize and synthesize the relevant aspects of the MPDF, and demonstrate how the property meets the registration requirements described in the MPDF. The name of the MPDF must be provided

in Section 1 of the registration form and in the Statement of Significance Summary Paragraph. If a theme is not fully addressed in an MPDF or if new information is available, the Narrative Statement of Significance for the property to be nominated should include such information as part of the argument for significance.

Note: older thematic cover documents may be referred to Multiple Resource Area (MRA) or Thematic Resource (TR). These documents should all be considered alike and used in the same manner. Though older thematic documents have many of the same shortcomings as nominations of the era in which they were written, they may still provide important information about a place, period, or theme. Unlike the modern, MPDF, these older nominations lack registration requirements and cannot be used in the same manner as an MPDF. Likewise, these older thematic documents may not fully document the themes they address or neglect other important themes that are now apparent. In these instances, a property may still be nominated under the cover document, but a complete historic context and argument(s) for significance will be required.

Section 9: Major Bibliographic Resources

Section 9 comprises three subsections: "Bibliography," "Previous documentation on file (NPS)," and "Primary location of additional data." Please review pages 52 and 53 of Bulletin 16A before completing this section.

Bibliography

The National Park Service requires that preparers include a bibliography of "major bibliographical references" used during the preparation of a National Register nomination. This is not supplanted by, nor does it replace, the SHPO requirement that all sources used in the preparation of a nomination be cited using footnotes. Conversely, the SHPO citation requirement does not remove or supplant the NPS requirement for a bibliography. Rather, the footnotes will provide detailed citations, while the bibliography will be those "major sources."

By way of example, a county history that describes the development of a city and provides a biography of an individual involved with the subject property is a major source and should be both used in a footnote and entered in the bibliography. A newspaper article that provides an obituary is not a major source and is cited in a footnote only. When several issues of a particular periodical are used, a summary entry for that source should be included in the bibliography in Section 9. For example:

- *Detroit Free Press* (Detroit, MI), 1921-1964.
- *Bay City Times* (Bay City, MI), June 1943-October 1956.
- *Commercial Messenger and British Canadian Literary Gazette* (Montreal, Canada), Jun. 7, 1840-Nov. 16, 1840.
- *Progressive Architecture*, May 1963-June 1966
- *Michigan Manufacturer and Financial Record*, Jan. 10, 1921-Sept. 17, 1923

Examples of citations for common sources is found in Appendix B.

Notes on Bibliographies

Even though newspapers may be entered in summary form in the bibliography, full citations are required in footnotes. In bibliographic entries, the *Chicago Manual of Style* (CMOS) abbreviates the month, as shown in the third example above. Preparers may abbreviate or enter the full month name, at their discretion, but citations and entries must be consistent.

Citations should follow the SHPO [Style Guide](#) and CMOS, but take note that the *Style Guide* supersedes CMOS, so preparers should first familiarize themselves

with the style guide before referencing CMOS. Preparers should default to CMOS when a particular topic is not addressed the *Style Guide*.

Citations for maps, figures, and historical photographs must be entered in the bibliography if the information they have provided has made a “major” contribution to the development of the nomination. In other words, if these types of resources have contributed in a significant way to the development of one or more historic contexts, to the understanding of the property, to the development of the narrative description, or to the narrative statement of significance, the appropriate citation(s) should be entered in the bibliography. If these resources are embedded within the nomination for illustrative purposes only, they need not be entered in the bibliography, though they must contain a caption and credit, as described above.

SHPO recommends that preparers begin creating the bibliography at the beginning of a nomination project. It is much easier to prepare a citation as the source is used or reviewed than to try to do so after the fact.

Previous documentation on file (NPS)

Preparers should review page 52 of Bulletin 16A for information on completing this section. Please do not skip or ignore this section. Please enter a “X” on the line of any applicable item. Enter the survey or record number, as appropriate. If none of these items are applicable, please leave those lines blank. There is no need to enter “N/A.”

Enter an “X” on the “preliminary determination of individual listing (36 CFR 67) has been requested” line when a federal Part 1 tax credit application for the property has been submitted to the National Park Service.

Primary location of additional data

Preparers should review page 53 of Bulletin 16A for information on completing this section. Please do not skip or ignore this section. If this is not applicable, please leave all lines blank.

Historic Resources Survey Number (if assigned)

If applicable, the database reference number from the SHPO database should be entered here. Please contact SHPO to determine if the property is included in a historic resource survey.

Section 10: Geographical Data

Section 10 is composed of four subsections: “Acreage of Property,” “Geographic Coordinates,” “Verbal Boundary Description,” and “Boundary Justification.” Guidance for completing Section 10 is provided on pages 54 through 58 of Bulletin 16A and in [Defining Boundaries for National Register Properties \(with Appendix, Definition of National Register Boundaries for Archeological Properties\)](#) (Bulletins 21 & 12). Preparers are encouraged to review these materials, in addition to reading this guide, before completing this section.

Be sure to mark all appropriate blanks in the “previous documentation” section. Please use a capital “X” when selecting “Previous documentation on file (NPS)” and “Primary location of additional data.”

Acreage of Property

The acreage must be given precisely to the nearest acre. Fractions to the nearest hundredth acre should be given, if known.

Bulletin 16A guides that when the acreage is 0.99 acre or less, “Less Than One” should be entered in the space provided. SHPO requests but does not require the acreage, when available, be entered parentheses in addition to the required text. For example:

Acreage of property Less Than One (0.314 acres)

Do not include properties already listed in the National Register in the acreage calculation (or the total count of resources to be listed).

Latitude and Longitude Coordinates

The *National Register of Historic Places Registration Form* requires geographical coordinates for the nominated property. This may take the form of either a single point for properties of less than ten acres or a polygon for properties of ten or more acres. Preparers should review National Register Bulletin 16A, *How to Complete the National Register Registration Form*, pages 54 through 58, for further guidance on geographical coordinates, verbal boundary descriptions, and boundary justifications.

While Bulletin 16A addresses Universal Transverse Mercator (UTM) references and the registration form contains a section to enter these references, **do not use UTM references in preparing nominations in Michigan**. Rather, the National Park

Service now prefers, and the Michigan SHPO **requires**, that geographical coordinates be entered in latitude and longitude decimal degree format. These coordinates should be entered in the appropriate section in the registration form. **Please note that latitude and longitude coordinates must be to six (6) decimal places** (e.g., 48.223486, -88.365982). Please be aware that some Geographic Information Systems only provide coordinates to the fifth decimal. Preparers must make accommodations for the sixth decimal place.

Latitude and longitude coordinates must be in the correct order (latitude first followed by a comma, and then longitude. See example in preceding paragraph) and must omit cardinal directions, degree marks, and any other marks except the minus sign preceding the longitude coordinate. Reversing the order of the coordinates will result in incorrect mapping, and the nomination will be returned for revision.

When the total acreage of a property is less than ten acres, enter only one latitude and longitude point derived from the center of the property or the center of the primary resource.

When the total acreage of the property is ten or more acres, the property must be enclosed in a polygon of at least three sides and the latitude and longitude points must be derived from the vertices (intersecting points) of the polygon.

Polygons should be drawn as tightly as possible around the actual property. Some intervening space is permissible for legibility but should not be excessive. Polygons with excessive space result in inaccurate geographical references and will be returned for revision.

Selecting Boundaries

Selecting appropriate boundaries for a property is an essential part of evaluating a property and preparing a National Register of Historic Places nomination. For many individual properties, such as a house, the boundaries are easy to determine and are typically defined by the legal description of the property. Other properties, like factory complexes or historic districts, may be more difficult and require judgement. In these cases, the boundaries must be accurately described in the Verbal Boundary Description and the reasons the boundary was selected must be made clear and must be supported in the narrative text and in the Boundary Justification.

When selecting boundaries for historic districts, the boundaries should be simple, clear, and easily understood. Overly complex boundaries complicate nominations and do not lend themselves to easy understanding by the public.

To the extent possible, historic district boundaries should follow easily identifiable markers like streets, alleys, and natural features. **Historic district boundaries should not resemble pieces of a jigsaw puzzle.** This means that it may be better for a boundary to extend to the nearest street, rather than end mid-block, simply to exclude a noncontributing resource. Please consult with SHPO when selecting historic district boundaries or when boundaries for any property may be difficult to identify.

Verbal Boundary Description

The Verbal Boundary Description describes the physical extent of the nominated property and must carefully and fully define the boundaries of the nominated area. Accurate and complete boundary descriptions and justifications are essential to a National Register nomination. Boundaries are directly related to the significance of a property. Boundaries also may have legal, financial, and administrative implications for current and future property owners. For example, only those resources within the boundaries of a property may be considered part of the property for the purposes of historic preservation tax incentives. Properties (and thus resources) listed in, or eligible for listing in, the National Register of Historic Places enjoy consideration in planning for federal, federally funded, federally licensed, and federally assisted projects under the Section 106 review and consultation process described in the National Historic Preservation Act of 1966, as amended.

Bulletin 16A provides several methods for describing property boundaries, including the use of a map. SHPO **does not** accept maps as substitutes for a written, accurate, and a precise Verbal Boundary Description. Several examples of a boundary description are provided on page 58 of Bulletin 16A and in the *Defining Boundaries* bulletin. Sample nominations are available as well and upon request.

Legal descriptions may be used for individual properties. Descriptions from GIS systems are sometimes inaccurate and should be reviewed carefully and not just copied into the registration form.

Tax parcel numbers or property identification numbers are not acceptable as the sole means of describing a property, as these numbers are subject to change over time. Tax parcel numbers or property identification numbers may be included in addition to a proper boundary description. **When these numbers are included, the year in which they were obtained and the source from which they were obtained must be included.**

Please note that while SHPO does not accept a map in lieu of a written Verbal Boundary Description, maps are required for each nomination. Please see the *Additional Documentation* section that follows and *Map Requirements for National Register Nominations in Michigan* for additional information and requirements.

Boundary Justification

Provide a specific explanation of the reasons for selecting the boundaries, based on the historic significance and integrity of the property, and explain the methods used to determine the boundaries. For complexes and historic districts, boundary justifications must also explain in specific terms why areas outside the selected boundaries were excluded.

Section 11: Form Prepared By

Enter the name(s) of the individual(s) who were **primarily** responsible for completing the nomination. Do not enter the names of assistants, researchers, photographers, map makers, and so forth.

When a draft nomination is used as the basis of a current nomination, the author of the draft nomination is not entered in this section but may be listed in the bibliography if the draft nomination made a “major” contribution to the current nomination, otherwise a footnote is sufficient when the draft nomination is used as source material.

Additional Documentation

Maps

Map requirements for National Register nominations are provided in [Map Requirements for National Register Nominations in Michigan](#), available from the National Register page of the SHPO website. Preparers should review this document prior to preparing maps for National Register nominations. It describes the type of maps that are required and the information they must contain for nominations in Michigan.

Photographs

Photograph requirements for National Register nominations are provided in [Photograph Requirements for National Register Nominations in Michigan](#), also available from the National Register page of the SHPO website. Preparers should review this document prior to taking or submitting photographs for a National Register nomination. Preparers are also encouraged to review and consult the following prior to beginning a nomination project:

- [National Register Bulletin 16A](#), pages 63 through 65;
- [National Register Bulletin 23](#), *How to Improve the Quality of Photographs for National Register Nominations*; and
- NRHP and NHL [Consolidated and Updated Photograph Policy 2024](#).

National Register photographs must be current. A National Register nomination is a record of a historic property at the time it is nominated, and the photographs must reflect that. This means that photographs more than two years old or photographs that do not depict a property as it exists at the time the nomination is prepared cannot be accepted.

Please note that while printed photographs may be submitted with a *National Register of Historic Places Preliminary Questionnaire*, they are not accepted for National Register nominations.

National Register nomination photographs must be submitted as individual, digital TIFF, RAW, or JPEG files, and not embedded on continuation sheets. The file names must conform to the NPS naming convention: MI_County Name (with "County" included)_Property Name_0001, etc. For example:

MI_Wayne County_Vaughn's Book Store_0001

A Note on Historical Photographs

Historical photographs do not meet the requirements of National Register nomination photographs. They can be useful, however, for illustrating important aspects of the physical characteristics of the property or its history or significance. Although historical photographs are not submitted as part of the final set of National Register photographs, they may accompany the nomination as figures that are included as separate pages. See the following discussion of *Figures* for more information on including figures with nomination.

A limited number of historical photographs may also be embedded within the narrative text portions of the registration form. **Please contact SHPO before embedding historical photographs or other figures in the narrative text.**

Photo Log

The Additional Documentation section of the registration form contains a Photo Log, which must be completed by the preparer. Each entry in the photo log must include the file name of that particular photograph in addition to the information requested in the instructions in the form. For example:

1 of 12. North elevation (façade). Looking south. MI_County Name_Property Name_0001.

2 of 12. East elevation. Looking west. MI_County Name_Property Name_0002.

If the photographs submitted with the nomination were taken by multiple photographers, or were taken on multiple dates by the same photographer, that relative information should be noted in the photo log header information, and described in the individual entries. For example:

Name of Property: Property Name

City or Vicinity: Sample City

County: Sample County

State: Michigan

Photographer: as noted below

Date Photographed: as noted below

1 of 12. North elevation (façade). Photo by Photographer A, June 2018. MI_County Name_Property Name_0001.

2 of 12. East elevation. Looking west. Photo by Photographer B, April 2019. MI_County Name_Property Name_0002.

As discussed in [Photograph Requirements for National Register Nominations in Michigan](#), the National Park Service (NPS) prefers digital photographs in TIFF or RAW format with dimensions of 2,000 by 3,000 pixels. SHPO does not have a preference between JPEG, TIFF, or RAW file format. SHPO, however, **requires** digital photographs to be a **minimum** of 2,000 by 3,000 pixels. So long as the photographs are not manipulated, any modern digital camera (including smartphone cameras) should meet and exceed that standard. Submit photographs as they were downloaded from your device. **Please do not reduce or compress digital photographs prior to submitting them.** Reduced or compressed photographs will be returned for revision. SHPO cannot accept digital photographs in formats other than JPEG, TIFF, or RAW (e.g., HEIC, PNG, GIF, DWG, etc.) format photographs. Any digital photographs submitted in files other than those specified will be returned for revision.

Figures

Figures may be used within the narrative text to illustrate an important physical aspect or historical point related to the significance of a property. The use of figures, however, should be minimal. If figures are used, they must appear on the same page as and adjacent to the text to which they relate. SHPO may remove any or all figures prior to submitting a nomination to the National Park Service, at its discretion.

Figures must be labeled and include a caption and a credit line, as appropriate. All figures must be referenced at the appropriate point within the narrative text (e.g., See Figure 1, See Figure 5). If figures are used, a Figure Log or Figure Index, similar to the Photo Log, is recommended. Figure Logs may be provided on a separate page.

If images, maps, or other figures are used in a nomination, the preparer must obtain permission from the repository, owner, or copyright holder prior to submittal of the nomination form, and **a copy of that permission must be included with the submitted materials.** While some institutions allow free use of digital materials, some allow use only with written permission, and others may require a fee for usage. It is up to the preparer to determine the use requirements of the respective repository. Materials in the public domain must be cited and credit given to the respective institution.

Do not embed photographs or images of documents (e.g., property deeds, genealogical records, tax records, etc.), historical or otherwise, within the narrative text. These items should be used as reference materials, cited where appropriate using footnotes, and included in the bibliography when constituting a “major” source.

Amending National Register Forms

National Register nominations may be amended, or updated, at any time. Preparers should review pages 71 through 72 of Bulletin 16A before completing documentation for amending a National Register nomination and in [Amending National Register Documentation](#) from NPS. In addition to the guidance provided by NPS, preparers should also review the following information. Please contact SHPO prior to submitting documentation for any of the following reasons.

With the passage of time, additional information, new understanding, or new perspectives may bring to light additional significance(s) for a property previously listed in the National Register. This may result in the desire or necessity to update an existing nomination. This type of action is referred to as “Additional Documentation.”

Please note that the National Register of Historic Places is not a vehicle for recording the complete history of a property. Providing additional history or context is most appropriate ONLY when that information relates to the significance of the property.

Please consult with SHPO before preparing any additional documentation.

Technical Amendments

Technical corrections, such as a spelling error in a property name or an incorrect address, are a rather straightforward matter and easy to correct. Technical corrections may also include revised or updated descriptions, new photographs, and new maps. Additional documentation that supplements existing criteria, areas of significance, periods of significance, or levels of significance are also considered technical amendments.

When information should be corrected, revised, or supplements, please provide sufficient documentation to SHPO to allow staff to determine that the established information is incorrect. When the documentation has been accepted by SHPO, it will be forwarded to the Keeper of the National Register. When the documentation has been approved by the Keeper, SHPO will provide notification to the property owner indicating the documentation has been accepted and the record has been corrected.

Substantive Amendments

When additional documentation changes the existing criteria, area(s) of significance, period(s) of significance, level(s) of significance, or the boundary (increase, decrease, or modification) of the boundary the additional documentation must be presented to the State Historic Preservation Review Board

Boundary Increases or Decreases

According to NPS, there are four justifications for altering the boundary of a listed property: 1) professional error in the initial nomination; 2) loss of historic integrity; 3) recognition of additional significance; and 4) additional research documenting that a larger or smaller area should be listed.

Boundary changes, by federal regulation, constitute a new nomination. A complete nomination must be prepared and submitted to SHPO for review. The *Historic Name* (Section 1) of the new nomination should correspond to the historic name of the existing nomination, with the addition of (Boundary Increase) or (Boundary Decrease), as appropriate. For example, "Main Street Historic District (Boundary Increase)."

Boundary increases can occur for a number of reasons, but typically address areas adjacent to properties listed in the National Register that were previously ignored or omitted for any number of reasons. Adjacent areas should be evaluated critically to determine if the history and significance of the subject area is, in fact, related to the listed property, or if the significance of that area should be addressed in a distinct nomination.

Boundary decreases can occur for properties, typically historic districts, in which sections, parts, or areas of the property have lost integrity but a significant core remains.

Nominations that alter the boundaries of a listed property must be presented to the State Historic Preservation Review Board and SHPO must notify the affected property owner(s) and local officials.

The text must describe how the additional property and its boundaries relate to the original property and boundary. The associated maps must also depict and differentiate the original and modified boundaries.

Reevaluating Resources in Historic Districts

Communities, and historic properties, are not static. Historic districts, due to their nature as a collection of resources, may need to be reviewed after a period of time to update the inventory of resources, adjust classifications, document additional significant themes, and revise the boundaries. It is often best to begin the reevaluation of a historic district by conducting a historic resources survey. Periodic survey provides communities with the information they need to understand how historic districts and individual historic properties have changed over time. Some properties that may have been previously determined ineligible may be found to be eligible for listing in the National Register, and vice versa. More information about historic resource surveys can be found at the Historic Resources Survey Program page SHPO website, <https://www.miplace.org/historic-preservation/programs-and-services/historic-resources-survey-program/>.

Please contact SHPO prior to beginning a historic resources survey or preparing additional documentation for a previously listed historic district.

Moving Properties

Properties listed in the National Register of Historic Places may be moved at the property owner's discretion. **If the property owner wishes the property to remain listed in the National Register of Historic Places, however, the property owner must receive approval to move the property from the Keeper of the National Register prior to moving the property.** By federal regulation, properties moved without approval are automatically removed from the National Register of Historic Places.

Please review page 72 of Bulletin 16A for general guidance on how to obtain approval to move a National Register-listed property and what documentation is required. Please contact SHPO staff to discuss the move prior to beginning the documentation.

How to Prepare Additional Documentation

If the additional documentation is minor in nature a 10-900a Continuation Sheet or 10-900a Modified Continuation Sheet that facilitates such revisions are available. If the type of additional documentation is broader in scope (e.g., an additional Criterion or Area of Significance), a new nomination form may be required. Please contact SHPO prior to beginning to determine the best form to use.

The *Historic Name* (Section 1) of an additional documentation nomination should correspond to the historic name of the existing nomination, with the addition of “(Additional Documentation).” For example: “Pickle Barrel House (Additional Documentation).”

For historic districts or properties with multiple resources, a “sketch map indicating the contributing status of all resources is required. New photographs depicting the current conditions of the property should also be submitted.”

The additional documentation forms, photographs, maps, and associated materials should be submitted to SHPO on a flash (USB, thumb, etc.) drive.

Please contact SHPO staff with any questions regarding preparing additional documentation.

PART 3

APPENDICES

APPENDIX A

Statement of Owner Intent

(form on following page)



National Register of Historic Places Statement of Owner Intent

Revised March 27, 2023

Before a National Register of Historic Places nomination for an individual property will be placed on the agenda of the State Historic Preservation Review Board, the owner(s) of record must complete the following form and return it to the State Historic Preservation Office at the address below. One form must be completed for each full or partial owner.

I, _____, am the ____ full ____ partial owner of the
(print or type owner name)

property historically known as _____
(print or type historic name of property as entered in Section 1 of the registration form)

and located at _____
(print or type the street number, street name, municipality, county, and state of property as entered in Section 2 of the registration form)

I ____ support the nomination of this property for listing in the National Register of Historic Places.

I ____ oppose the nomination of this property for listing in the National Register of Historic Places and have included the required letter that either meets the requirements of 28 U.S.C. 1746 *Unsworn Declarations Under Penalty of Perjury*, or that has been notarized by a notary public.

(signature)

(date)

(title, if applicable)

(organization, if applicable)

Mailing Address: _____

APPENDIX B

Chicago Manual of Style Sample Citation Formats

The following citation format examples cover the most common documents used in National Register of Historic Places nominations only. Please refer to the *Chicago Manual of Style* 17th Edition for additional information. Citation formats guides may also be found at various websites. College and university library websites are particularly helpful.

Please note that bibliographic and footnote formats are presented differently. Both formats are presented here. Please refer to the appropriate format when preparing the *National Register of Historic Places Registration Form* or the *Multiple Property Documentation Form*.

Note: bibliographies are entered in alphabetical order.

B: Bibliography; F: Footnote; S: Shortened footnote

Book

F: First Name Last Name, *Title of Book* (Place of Publication: Publisher, Year), Page(s).

S: Last Name, Short Title, Page(s).

B: Last Name, First Name. Title of Book. Place of Publication: Publisher, Year.

Government Document

F: First Name Last Name (as applicable), Agency/Department/Committee (as applicable), *Document Title* (Place of Publication: Publisher, Year): Page(s).

B: Last Name, First Name (as applicable). Agency/Department/Committee (as applicable). Document Title. Place of Publication: Publisher, Year.

Notes: 1) printed federal documents are typically published by the Government Printing Office; 2) Congressional documents should include the number of the Congress as well as the sessions and report or document numbers; 3) documents from websites should include the URL.

Journal Article

F: First Name Last Name, "Title of Article," *Title of Journal* Volume, Edition (Date of Publication): Page(s).

S: Last Name, Short Article Title, Page(s).

B: Last Name, First Name. "Title of Article." *Title of Journal* Volume, Edition (Date of Publication): Page(s).

Note: for bibliographic entries, when citing online articles please include the website URL or DOI.

Map

F: First Name Last Name (or organization), *Title*, Map, Scale, Place of Publication: Publisher, Date.

B: Last Name, First Name (or organization). *Title*. Map. Scale. Place of Publication: Publisher, Date.

Note: maps obtained from websites or repositories should include a URL.

Oral History

F: "Title of Interview" by First Name Last Name (of interviewer) in Location of Interview, Date of Interview.

B: "Title of Interview" by First Name Last Name (of interviewer) in Location of Interview, Date of Interview.

Notes: If the interview is held by an institution, the citation should include the name of the institution, the name of the collection (as applicable), and the URL of the website (as applicable).

Periodicals (newspaper, magazines, etc.)

F: First Name Last Name, "Title of Article," *Title of Publication*, Publication Date (including month, day, and year, as known), Page Number.

S: Last Name, "Short Article Title," Page(s).

B: Last Name, First Name. "Title of Article." *Title of Publication*, Date of Publication (including month, day, and year, as known).

Notes: 1) specific newspaper articles are typically cited in footnotes only. National Register nomination bibliographic entries typically include summary entries when multiple issues of the same publication is used. Please see page 63 of [General Guidance and Requirements for National Register of Historic Places Nominations in Michigan](#) for more information on bibliographic entries; 2) page numbers for newspapers may be included but are not necessary; 3) major newspapers (e.g., *New York Times*, *Los Angeles Times*, *Chicago Tribune*, *Detroit Free Press*, etc.) need not include the place of publication. Smaller newspapers should include the place of publication in parentheses after the place of publication. States should be abbreviated using the two-digit state code or a standard abbreviation (e.g., MI or Mich.). All abbreviations should be consistent throughout the footnotes and bibliography. For example:

First Name Last Name, "Title of Article," *Title of Publication* (City, State Abbreviation), Publication Date (including month, day, and year, as known), Page Number.

F: Charles Wartman, "Oakdale Gardens Opens First of 1464 Units," *Michigan Chronicle* (Detroit, Mich.), January 13, 1945.

B: Wartman, Charles. "Oakdale Gardens Opens First of 1464 Units." *Michigan Chronicle* (Detroit, Mich.), January 13, 1945.

Personal Communication (e.g., email, interview, oral history)

F: First Name Last Name, message to author, Date of Message (Month Date, Year).

Note: 1) personal communications are usually cited in footnotes but not included in a bibliography; 2) the "message to author" section may include brief information that indicates how the message was received (e.g., "email message to author").

Photographs

F: First Name Last Name (or organization), Title, format, scale, Place of Publication, Date.

B: Last Name, First Name (or organization). *Title*. Format. Scale. Photograph Number (as applicable). Place of Publication. Date.

Note: 1) "format" should describe the type of photograph, such as aerial, birds-eye, etc.; 2) photographs obtained from websites or repositories should include a URL.

Theses and Dissertations

F: First Name Last Name, "Title" (thesis/dissertation, College or University Name, Year), Page(s).

B: Last Name, First Name. "Title." Thesis/Dissertation, College of University Name, Year.