

NRHP E-Blasts

Electronic Blasts from the National Register of Historic Places (NPS – WASO), sharing news and information with the Historic Preservation Community

September 2018

Tips, Resources, and Miscellaneous Factoids

National Register Redesigned Website

The National Register of Historic Places has changed its homepage from www.nps.gov/nr to www.nps.gov/subjects/nationalregister. This new site is designed to fit within the overall National Park Service digital strategy. In the coming months, the NR Program will be converting more and more of our old pages to this new look in addition to making other improvements such as creating associated Bulletins and guidance available in formats that meet current accessibility formats.

State Insurance Commissioners

A frequent question asked National Register staff involves insurance coverage for properties listed in the National Register of Historic Places (NR). The misconceptions about insuring NR-listed properties occur when insurance companies, individual agents, and prospective purchasers are not properly informed about federal, state, and local laws pertaining to historic preservation. Questions regarding insurance coverage can be addressed by the State Insurance Commission. One good resource for contacting the individual State Insurance Commissioner offices throughout the nation can be found online at the National Association of Insurance Commissioners (NAIC) at <https://www.naic.org/index.htm> (and select “map” on the header). NAIC is the U.S. standard-setting and regulatory support organization created and governed by the chief insurance regulators from the 50 states, the District of Columbia, and U.S. Commonwealths and territories.

National Register Nominations: Who Signs What and Where

Recently, the National Register program has received nominations on which the signatures of certifying and commenting officials are either transposed or incomplete. As this introduces a readily avoidable technical error, and one frequently warranting a return, it is worth reviewing the process in order to ensure that the correct official signs the nomination in the correct place in Section 3 of the form. Information on this topic can be found in Appendix VII of National Register Bulletin 16A, *How to Complete the National Register Registration Form* and the National Register regulations found at 36 CFR 60.

Who signs a nomination as the certifying official depends on two factors: who initiated the nomination and where the nominated property is located. If the property is wholly within the jurisdiction of a Federal agency, who initiates the nomination process dictates who serves as the certifying official and who the commenting official is. For example, a Federal agency might contract with a consultant to produce a nomination for a single Federally-owned building. Upon completion of its own agency review of the resulting nomination, the Federal Preservation Office (FPO), who is acting as a *certifying* official, then sends a draft of the completed nomination to the appropriate State Historic Preservation Officer (SHPO), requesting review and comment of the nomination. After reviewing the nomination and agreeing that it is complete and accurate as written, the SHPO would then sign and date the cover sheet as the commenting official. Simply not responding, in keeping with Title VIII (National Historic Preservation Amendments Act) of the National Park Service Centennial Act (P.L.114-289, signed December 16, 2016), is now understood as objecting to the listing. Section 802(c) (2) of that law specifies that:

“(2) within 45 days of receiving the completed nomination, the State Historic Preservation Officer has made a recommendation regarding the nomination to the Federal Preservation Officer, except that failure to meet this deadline shall constitute a recommendation to not support the nomination;

Of course, should the SHPO have concerns about the nomination those should be provided in writing. Under the terms of Title VIII of the Centennial Act, the National Register program will publish the SHPO comments—or objection as now indicated by the lack of a response—in the Federal Register notice associated with the proposed listing. With this exception, the procedures for Federal nominations are outlined in regulation at 36 CFR 60.9

The larger point being made here is, of course, that in this instance, the FPO acts and signs as the certifying authority whereas the SHPO assumes the role of commenting authority.

Revisions to National Register Bulletin 16A Temporarily on Hold

The effort to revise National Register Bulletin 16A is temporarily on hold pending hiring a permanent replacement as Chief of the National Register & National Historic Landmarks program. An update on this initiative will be provided upon its resumption.

Miscellaneous Tips:

- **Transmittal Letters:** Please provide a cover or transmittal letter with all nominations and related actions. The cover letter should specify all relevant information, whether it is a nomination, owner objection, resubmission, boundary increase or decrease, removal or additional documentation. A checklist of transmitted items is acceptable in lieu of a cover letter. National Register Review Checklists (items the National Register reviewers look for when reviewing each nomination), consisting of a Technical Review Checklist and a Substantive Checklist, can be linked to from the following page on the National Register website: <https://www.nps.gov/nr/publications/forms.htm>
- **The Importance of Presentation:** Please be sure to check for spelling and editing errors before submitting nominations for listing. Typographical errors in resource counts

warrant generation of Supplementary Listing Reports (SLRs), and those can be minimized with careful editing.

- **Previously-Listed Resources:** When a nomination includes resources previously listed in the National Register, it is helpful to list those properties separately, either on a separate continuation sheet for Section 5 or at the beginning of the Section 7 text. Each previously listed property should be identified by the name under which it was listed, the Multiple Property Submission name (if applicable), and the resource count for each previously listed property. This will help ensure that resource counts for all the properties are accurate. (As these counts may have implications for subsequent cultural resource compliance, this is not an academic exercise.)
- **Criteria Considerations:** For districts containing resources that fall under Criteria Considerations (e.g., churches, moved buildings, etc.), it is not necessary to check the Criteria Considerations if the resources are not predominant features of the district. For example, a large district with a handful of churches does not need to invoke Criterion Consideration A; however, a district established as a religious community with a dominant church still extant would have to meet the exception requirements. (See *National Register Bulletin: How to Apply National Register Criteria for Evaluation*, pp. 25-41, for examples under each Criteria Consideration.)
- **Section 7 of the NR Form:** When recording historic and current resource functions in Section 7, please be sure to include functions and sub-functions for all significant resources such as outbuildings or farms, plantations, and similar resources. (Note: Detailed discussion of functions and examples can be found in NR Bulletin 16A, pp. 18-23.)
- **Maps:** A map drawn to a scale of at least 1" = 200 feet may be used in place of a narrative verbal description. When using a map, note under the "Verbal Boundary Description (Section 10) that the boundaries are indicated on the accompanying base map. The map must clearly indicate the boundaries of the property in relation to standing structures or natural or manmade features such as rivers, highways, or shorelines. Plat, local planning, or tax maps may be used. Maps must include metric (measurement and not textual as in "one inch is equal to one mile") scale and a north arrow.
- **Photographs:** Submit clear and descriptive electronic photographs with each electronic registration form. It is recommended that the first photo in the series represent the property or site as a whole, illustrating the qualities discussed in the description and statement of significance, since this will be the first electronic visual representation the public will see. Please do not include superfluous photos that are not immediately relevant to documenting the historic significance and integrity of the property.