HOW-TO GUIDE



HOW TO APPLY FOR THE NATIONAL REGISTER OF HISTORIC PLACES

The nomination process for the National Register of Historic Places can be daunting, but it is often one of the first steps toward gaining both recognition for African American historic sites in our communities and applying for federal funds to help facilitate the preservation of these historic places. This guide will introduce you to the process and help you navigate the steps you need to take in South Carolina to have your property listed on the National Register of Historic Places.

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WHAT IS THE NATIONAL REGISTER?



The National Register, which is maintained by the National Park Service, was designed to identify and document historic places across the country whose preservation should be encouraged. It is a list of buildings, sites, structures, objects, and districts significant in our nation's past. National Register listed properties must retain their historic character and be important in American history, architecture, archaeology, engineering, or culture at the local, state, or national level.

Why is the National Register important to your preservation efforts?

There are a number of benefits to pursuing a National Register listing. First, the preparation of the nomination leads to a detailed history of the property you are listing. Secondly, you can use recognition from the listing to help promote knowledge of and support for your project. Finally, and most importantly, while a National Register listing does not guarantee the preservation of the listed property, it does provide limited protections from state or federally-assisted projects and is often a stepping stone to acquiring state, federal and even private grants and loans for the preservation of the listed property.

What you should know about the National Register process before you begin

Although the program is overseen by the National Park Service on the national level, the program is administered by the <u>State Historic Preservation Office</u> (SHPO) in South Carolina. Once you have completed the various steps designated by SHPO to have your historic property listed, they, in turn, are the ones to pass the nomination onto the national level.

The nomination process is long and complicated. Be prepared for the following:

At least a year for the entire process, not counting the initial time to conduct research and write the initial proposal. Plan for a year and a half to be safe. For a great timeline of how a National Register nomination fits into a grant-funded preservation initiative check out the Sandy Island Cultural Intiative's <u>Overview of its NPS Civil Rights Grant</u> for the Sandy Island School. Scroll down for the timeline.

Lots of research & writing. The nomination requires both a detailed architectural overview of the historic site as well as a statement of significance, usually 5-7 pages long, fully cited, that places the property in context to local, regional and national historical events. Check out the nomination forms for the Seashore Farmers' Lodge #767 Nomination Form and the Pine Grove Rosenwald School Nomination Form to see examples of the type of research and writing required for National Register nominations.

Hire help! While SHPO staff will review and suggest edits to the nomination, they cannot conduct the initial research or write the nomination for you. If you do not have a trained historian or professional writer on staff you will want to secure funding and hire a historian, preferably with National Register experience, to conduct the research and write the nomination. To find an expert who can help you complete your national register nomination, check out the <u>Toolkit's Experts Database</u>



Sims HS National Register Nomination at SCDAH presented by Nate Johnson
Photo Timika M. Wilson



TIP:



Check with the history or historic preservation departments at your local university or with larger universities such as the University of South Carolina, the College of Charleston or Clemson. They may have students who can work on the nominations as an internship or for a class project.

At least 3 major reviews before final approval.

In South Carolina, there are 3 stages of review:

- 1. You must first submit a Preliminary Information Form that will be reviewed by SHPO staff.
- 2. Then after completing the official nomination, it will also be reviewed by SHPO staff before being submitted to the SC State Board of Review for approval.
- 3. Finally, if approved at the state level, the nomination will be sent to the National Park Service for approval at the national level.

A STEP-BY-STEP GUIDE TO THE NOMINATION PROCESS

Before You Begin

Make sure your property qualifies for the National Register.

In order to qualify your site MUST be associated with an important historic context (associated with an important person, event, time period,etc.) AND retain historic integrity of those features necessary to convey its significance (the structure can't have been significantly altered).

Make sure to consult <u>National Register Bulletin 15</u> for more details on what would qualify or disqualify your site for the National Register. Eg: modern windows can be a sticking point for buildings like Rosenwald schools.

SHPO's <u>Preliminary Information Form</u> (PIF) is designed to help you determine if your property is eligible before you embark on the official nomination process. See more information about the PIF below.

Understand what the process entails TIME, ASSISTANCE, MONEY, REVIEW PROCESS.

Time - It may take at least a year and a half or more to complete the entire process from initial research to final approval from the National Park Service (NPS).

Assistance - It may be necessary to hire a professional historian or National Register consultant to research and write the nomination to the specifications required by SHPO and NPS. See SHPO's <u>Projects Professionals List</u> or to see the experts listed with the SC Preservation Toolkit, click here.

Money - While there are no fees charged by SHPO or NPS as a part of the nomination and listing process there may be fees associated with hiring a consultant and/or associated research fees. To find a grant that will help you cover the costs of hiring a consultant for the National Register process click here.

Review Process - The are several stages to the review process including:

- 1) Submitting a PIF, then if SHPO determines your property is eligible...
- 2) Complete the official nomination, review by SHPO staff, make changes then...
- 3) Review by SC State Board of Review and if approved...
- 4) Review by National Park Service



To fully understand the process beforehand:

Review the information posted by SHPO on their <u>National Register Resource</u> page, especially <u>Listing a Property</u> and the <u>Frequently Asked Questions</u>, as well as SHPO's <u>Preservation Hotline #1 - How to Nominate a Property to the National Register</u>.

Look at examples of recent National Register nominations to get an idea of the work that will be required. Check out the "NRHP Nomination" for the <u>Allendale Training School</u> and the <u>Sandy Island School</u> to see recent examples.

Ask questions of your SC SHPO representatives! The National Register process is a collaborative effort and their job is to help you understand the process and facilitate the nomination of our state's historic properties to the National Register. Find the names of the current SHPO National Register staff contacts at the bottom of <u>SHPO's National Register webpage</u>.

WARNING! All of the above will give you a good idea of the time, assistance and money you may have to plan for to complete the process. Don't commit too many resources, however, before completing Step 2 below - SHPO's Preliminary Information Form which is the first step to determining eligibility.

Make sure you have property owner buy-in.

If you/your organization are the legal owners of the property - you're good to go! However, if you are leasing the property or are just an interested party looking to preserve a historic site in your community you will want to determine who legally owns the property and get their approval for the process.

How can you get approval from the legal property owner?

- a. Make sure to include them in the process from initial decisions to try and nominate the property to fulfillment.
- b. Make sure they are aware of their rights as property owners and the advantages of having a property listed.



Key facts for property owners:

- a. The National Register DOES NOT impose restrictions on private homeowners listed properties can be renovated, remodeled, sold or even demolished.
- b. The National Register DOES NOT negatively affect your property value.
- c. The National Register DOES make a property eligible for tax incentives and grants, as well as provide some legal protection from state and federally-assisted projects.
- d. A property owner CAN object to the listing of the property, in which case the National Park Service

For more information about the rights of property owners and the benefits of having a property listed see:

- a. The Results & Owner Information section of NPS's How to List a Property page.
- b. The Frequently Asked Questions from SC's SHPO.
- c. <u>The Devil's Advocate Guide to National Register Listing</u> a great source which tackles many myths that property owners may have that keep them from wanting their properties listed on the National Register.

Before you begin, make sure you can answer the fundamental question:

Why does this place matter? You should be able to answer this question within the parameters of the National Register guidelines so that anyone reading your nomination can also answer the question.



STATE HISTORIC PRESERVATION OFFICE

SHPO's Preliminary Information Form (PIF)

What the PIF is: An informal application which allows the SC State Historic Preservation Office (SHPO) to make a recommendation on whether your property is eligible for the National Register or not BEFORE you commit a significant amount of time and/or resources.

- a. The PIF is essentially a shorter, less formal version of the official nomination.
- b. It asks you to gather basic information about the site's ownership, history, and appearance, as well as provide images and maps showing the location and condition of the site.

What the PIF isn't: It IS NOT a formal nomination and does not constitute a formal application for listing your property in the National Register.

THE PROCESS

- a. Fill out the PIF (may take a few weeks to make sure you have time to gather the documents, images and maps that must be submitted)
- b. Submit the form to SHPO.
- c. SHPO staff will review the form and send a written response as to whether they believe the property is or is not eligible for the National Register.
- d. Make an informed decision as to whether or not to pursue an official, formal nomination.

THE OFFICIAL NATIONAL REGISTER NOMINATION

As you begin the process keep the following two documents handy for reference:

- a. National Register Bulletin 16A How to Complete a National Register Registration Form
- b. SHPO's <u>Supplemental Instructions for National Register Nominations</u>
- c. The two documents together provide a thorough step-by-step guide to completing a National Register nomination.

Qualifications for Eligibility - Historical Significance, Integrity, Age

To qualify for the National Register a property must demonstrate historical significance in one of four areas:

- Association with historic events or activities
- · Association with important persons
- · Distinctive design or physical characteristics
- Potential to provide important information about history or prehistory
- See Page 2 (PDF Page 8) of the <u>National Register Bulletin 15</u> for additional qualification criteria for religious buildings, cemeteries, properties less than 50 years old, burial sites of famous individuals and more.

An additional qualification for the National Register is that a property demonstrates integrity through historic qualities such as:

- Location, design, setting, materials, workmanship, feeling and association.
- Properties must be at least 50 years old, although cases may be made for more recent properties.

Research

Who will do the research and write the report? Often these will be the same person and should be someone with experience conducting research in historical archives and in online databases, as well as someone familiar with historical writing and citation. It could be:

- a. Someone in your organization with the requisite skills.
- b. A graduate student in History or Historic Preservation from a local University.
- c. A hired consultant or consulting agency specializing in National Register nominations.

This part of the process could take time and money to complete depending on whether you have to hire someone to do the research and writing, whether they're working full-time or part-time and depending on how much documentation exists on the property before you begin.



Narrative Description vs. Statement of Significance

Much of the actual writing in the nomination will be contained in one of these two sections.

- Narrative Description This is essentially a description of how the building looked during its time
 period of significance and what its condition is today. It is heavily architectural in nature and is
 concerned with making sure that the property has not been changed significantly since its period of
 importance, i.e. has maintained "historical integrity." Usually 2-10 pages.
- Statement of Significance This is an in-depth look at the historical significance of your site. It should directly address how the site meets the qualifying conditions described above, as well as how the significance of the property fits within the context of local and regional history. It must contain historical citations referencing works listed later in the bibliography. This is the longest section of the nomination, which can be between 10 30 pages.
- See <u>National Register Bulletin 16A</u> for more details about the Narrative Description (pg 28, PDF pg 35) and the Statement of Significance (pg 45, PDF pg 52).

Documentation & Additional Materials

- **Bibliography** a bibliography must be included referencing books, articles, and additional sources used to prepare the nomination.
- Geographical Data you must provide an address, GPS coordinates, acreage, description of the boundary, etc.
- Maps the nomination asks for a number of different maps showing the property location, as well as the layout for properties with multiple buildings to be included.
- **Photographs** a number of descriptive photographs showing relevant exteriors and interiors of the property and relevant structures.

Submitting the Application

- If you hired a consultant to write the nomination, make sure you and other members of your
 organization review the document so that you're familiar with the contents, can suggest edits and
 make sure the nomination properly captures the significance of your property.
- Review SHPO's <u>National Register Submittal Requirements Checklist</u> to determine if you're ready to submit and make any necessary final additions or edits.
- Submit the nomination to the SHPO representative designated at the end of SHPO's National Register Submittal Requirements Checklist.



THE REVIEW PROCESS

Multi-Stage Review Process

Your final nomination will be reviewed several times at both a state and national level. Here's what you can expect after you submit your nomination:

- Initial review by SC SHPO to make sure nomination is complete. If incomplete, SHPO will request a revised nomination.
- Second review by SC SHPO staff regarding nomination content. SHPO will then provide comments back within 30 days.
- Nomination scheduled for review at next State Board of Review meeting. This review includes a
 presentation by the nomination preparer about the property and its significance.
- If approved by the SC State Board of Review, the nomination is sent to Washington, D.C. for approval by the Keeper of the National Register. If not approved, nomination will be returned with comments and may be resubmitted to NPS after comments are addressed.

State vs Federal Review

State Review - The majority of the review process is handled at the state level to make sure the nomination is as complete and polished as possible before being sent to the national level. State review occurs at two levels:

- Review by SHPO staff SHPO staff review the Preliminary Information Form and the Official Nomination, making comments and suggestions at several different stages of those processes.
- Review by the <u>SC State Board of Review</u> The SC State Board of review is a team of professionals in preservation, history, archaeology, architecture and related fields. They review official nominations on the recommendation of SHPO staff. Nominations are also listed on the State Board of Review website (linked above) for public comment before review by the board. See our blog post about the State Review Board process here.

Federal Review - Nominations are submitted to the National Park Service and the Keeper of the National Register for final review. Decisions are usually made within 45 days.

 Although NPS may return the nominations with comments, at this level and with the backing of the SC State Board of Review and the previous multiple-levels of review, this will happen in very few circumstances.

Edits and Changes to the Official Nomination

There will be several occasions where you may be asked to make edits to your nomination including:

- When you first submit your official nomination to SC SHPO they may ask you to make revisions if your nomination is not complete.
- After you have submitted a complete nomination, SC SHPO staff will review your nomination for content and may make suggested edits before the nomination goes to the SC State Board of Review
- The State Board of Review may suggest edits or changes to the nomination.
- The Keeper of the National Register may make comments and suggestions during the final stage of the nomination process.

Timeline

- Completion of Preliminary Information Form (PIF) and the Official Nomination depend on the circumstances of the preparer but could take a month or more (PIF) to a half-year or more (official nomination).
- Review by SC SHPO and SC State Board of Review up to 90 days.
- Review by NPS 45 days.
- Overall, depending on individual circumstances the entire process could take 1.5 2 years to complete.



APPROVAL VS REJECTION

What are the conditions under which your nomination might be rejected or your property not be listed on the National Register?

SC SHPO's Preliminary Information Form (PIF), described in an earlier section, is designed to make sure that once you begin the official nomination process that there is little chance of rejection.

- The PIF allows SHPO to inform you whether your property is eligible or not before you commit time and major resources to an official nomination.
- Your property can be rejected at this point in the process if it does not meet the qualifying criteria for the National Register.

If you do not own the property in question and have not gotten the goodwill of the property owner, they can oppose its nomination.

 If the property owner opposes the nomination the Keeper of the National Register will mark the property as eligible for listing, but it will not be officially listed in the National Register.

If your nomination is approved by SC's State Board of Review and the Keeper of the National Register it will be listed on the official National Register of Historic Places, making your historic site eligible for a number of benefits.

YOU'RE LISTED ON THE NATIONAL REGISTER! NOW WHAT?

Benefits of Official National Register Listing

Once your nomination has been accepted you receive the following benefits:

- a. Your property is listed in several searchable databases including the <u>National Register Archive</u> & the <u>SC Historic Properties Record</u>
- b. Your property is eligible for a number of preservation incentives such as Federal & State tax credits, preservation grants, preservation easements and international building code fire and life safety code alternatives.
- c. Involvement by the Advisory Council on Historic Preservation when a Federal Agency may affect your historic property.
- d. Become eligible for historic networks such as the <u>African American Civil Rights Network</u>, the <u>Reconstruction Era National Historic Network</u> or the <u>Underground Railroad Network to Freedom</u>.

Your historic property can receive a beautiful bronze plaque that helps bring recognition to the site. You can <u>order your plaque</u> directly through the SC State Historic Preservation Office.

Opportunities for Funding Rehabilitation Work

There are a number of financial incentives for having your property listed in the National Register of Historic Places.

Tax Incentives

- State Check out these <u>tax incentive programs</u> from SHPO, as well as their <u>Tax Savings for Owners</u> <u>of Historic Buildings</u> Preservation Hotline.
- Federal Check out the National Park Service's tax incentives page.

Preservation Grants

- State There are a number of <u>preservation grants</u> that can become available to you once your property is listed in the National Register.
- Federal Check out the <u>Historic Preservation Fund Grant Program</u> administered through the National Park Service.
- You can also find a number of funding opportunities through the SC Preservation Toolkit by clicking here.

Gain Recognition & Support for Your Project

Take advantage of a great opportunity to let people know about your project with the following:

- Send out a press release to local papers about your achievement.
- Share your good news on your project's website and social media.
- Hold a celebration at your property or another location to share the incredible research uncovered during the nomination process.
- Use the research generated by the nomination to create a visual presentation on your property that
 you can take to local council meetings, share at meetings with potential partners or at state
 conferences.

ENJOY YOUR HARD WORK!



ADDITIONAL RESOURCESRESOURCES

SC State Historic Office of Preservation (SHPO) Resources

- SHPO's National Register Webpage
- <u>Listing a Property in the National</u>
 <u>Register of Historic Places</u>
 - SHPO's Preliminary InformationForm (PIF)
 - SHPO's Supplemental Instructions
 for National Register Nominations
 - SHPO's Submittal Requirements
 Checklist
- SC Historic Properties Record
- SHPO Preservation Hotlines
- SHPO National Register FAQs
- Tax Savings for Owners of Historic
 Buildings

National Park Service Resources

- NPS's National Register Webpage
- How to List a Property
- National Register Archive
- NPS National Register FAQs

Publications of the National Register of Historic Places

These are key documents outlining the National Register process, best practices and detailed guidelines on every aspect of the National Register.

- Main <u>NRHP Publications Page</u> (20+ publications)
- Includes National Register <u>Bulletin 15</u>
 (How to Apply the National Register
 Criteria for Evaluation) and <u>Bulletin 16a</u>
 (How to Complete the National Form)
- As well as <u>Bulletin 39</u> (Researching a Historic Property) and <u>Bulletin 41</u> (Guidelines for Evaluating and Registering Cemeteries and Burial Places)
- And MUCH MORE

Resources from the National Trust for Historic Preservation

- 11 Tips to Build Your National Register
 Knowledge by the National Trust for
 Historic Preservation
- The National Trust for Historic
 Preservation's <u>National Register of</u>
 <u>Historic Places Guide</u> (series of informative videos about the process)

Sample Nominations & Timelines

- NPS Sample Nominations
- A few South Carolina Nominations from the last 20 years:
 - Seashore Farmers' Lodge #767
 Nomination
 - Pine Grove Rosenwald School
 Nomination Form
 - Allendale Training School
 - Sandy Island School
- Timelines showing National Register
 Nominations as part of the preservation process:
 - Pine Grove Rosenwald School, see under the section entitled "History of the Pine Grove Rosenwald School" near the end.
 - Sandy Island Cultural Intiative's
 Overview of its NPS Civil Rights
 Grant for the Sandy Island School.
 Scroll down for the timeline.

EXPLORE RELATED RESOURCES IN THE TOOLKIT

Need help researching & writing your nomination? <u>Check out the Experts Database.</u>

Want to explore funding opportunities? Check out our Grants & Funding page.

Want to pair your National Register Listing with a South Carolina Historical Marker?

Check out our How-To Guide on How To Get a

State Historical Marker.