



Best Practices Review

A quarterly publication on National Register Bulletin guidance

Considering Parking Lots

Introduction

Surface parking lots for motorized vehicles have been part of the landscape for more than a hundred years. From single properties to historic districts, surface parking lots are ubiquitous. Large surface parking lots may be purpose-constructed according to building and zoning codes; others may be repurposed former building lots. As such, surface parking lots may influence the historicity and architectural quality of both single properties and historic districts.



Bell Laboratories-Holmdel—now a mixed-use complex known as Bell Works—is well known to viewers of the popular series “Severance” as the headquarters of the mysterious Lumon Industries. The property was designed by Eero Saarinen and Associates in partnership with Hideo Sasaki and Peter Walker of Sasaki, Walker and Associates. It was listed in 2017 at the state level of significance with a period of significance of 1959–1985 under Criterion C for architecture and landscape architecture. In this nomination, the “site” is a contributing resource and the authors choose to include the parking lots and roads as features of the sites as opposed to identifying them as “structures” (Lee Beaumont, Flickr, <https://creativecommons.org/licenses/by-sa/2.0>, color corrected).

National Register of Historic Places nominations often ignore surface parking lots in the resource count, narrative description, and evaluation of significance and integrity. In some cases, surface parking lots are dismissed as “vacant lots,” even if they exhibit substantial construction in terms of paving, curbing, retaining walls, and other infrastructure or site furnishings. But a parking lot is not a vacant lot, something defined by Merriam-Webster as “a piece of land that is not being used.” A surface parking lot is indeed a use and it may have an impact on the character and streetscape of a historic district. Additionally, these resources are increasingly coming of age for consideration as 50-year-old-plus resources.

This guidance is not intended to be an argument for the preservation of acres of asphalt, but because the National Register was designed to be and is administered as a planning tool (36 C.F.R § 60.2(a)), *considering* surface parking lots in a National Register nomination is a best practice. This issue of the *Best Practices Review* addresses classifying, describing, and evaluating surface parking lots in National Register nominations.

Identify the Resource Type

National Register Bulletins have limited guidance on parking lots, leaving nomination proponents and reviewers to rely on other National Register references for direction. For example, *National Register Bulletin: How to Evaluate and Nominate Designed Historic Landscapes* advises that transportation-supporting resources such as “parkways, drives and trails” are a type of designed historic landscape—typically classified as a district or site—but does not provide further guidance on whether those individual resources within the landscape are structures or sites (pp. 2-3, 10). Likewise, *National Register Bulletin: Guidelines for Evaluating and Documenting Rural Historic Landscapes* discusses the components of a rural landscape, including “circulation networks,” but is silent on just how a surface parking lot might be classified (p. 5).

This passage from *National Register Bulletin: How to Complete the National Register Registration Form* (Form Bulletin) has been cited as a reason to exclude parking lots from consideration as resources, considering them as “vacant lots” in historic districts:

Count gardens, parks, vacant lots, or open spaces as “sites” only if they contribute to the significance of the property.

(Form Bulletin, p. 17.)

But if parking lots are considered vacant lots, nomination proponents assume they do not need to be inventoried or described. In some cases, district nominations have been submitted where the existence of a large surface parking lot was only evident from the sketch map.

This publication compliments the guidance provided in National Register Bulletins by providing examples on specific topics. Your feedback is welcome; please contact Sherry Frear, Chief & Deputy Keeper, sherry_frear@nps.gov.

For copies of the nominations referenced in this document,
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All images are from National Register nominations
unless otherwise noted.

Key Concepts

- A surface parking lot typically should be
 - ✓ categorized as a structure (improved) or site (unimproved)
 - ✓ counted either as a contributing or a noncontributing resource
 - ✓ identified on the sketch map
- A surface parking lot may be a *feature* of a contributing or non-contributing *site*.

Vacant lots certainly include former building lots and lots that were never developed with buildings. By contrast, surface parking lots typically exhibit substantial construction, often including several tons of asphalt or concrete, and perhaps bollards, walls, fencing, and planted beds. These resources, being far from vacant, are properly classified and counted as “structures,” following the Form Bulletin’s description of structures as “those functional constructions made usually for purposes other than creating human shelter” (p. 15). Among the examples of structures are roadways, as well as systems of roadways and paths. Surface parking lots are not expressly identified in the Bulletin, but as a property type that is not constructed for habitation and is similar in construction to a roadway, surface parking lots meet the definition of a structure. By contrast, an unimproved surface parking lot (grass, gravel, dirt) where vehicles are parked or stored should typically be classified as a site.

However, it would not be wrong to identify parking lots as features within a contributing “site.” For example, at Bell Laboratories-Holmdel, discussed at page 1, the relationship among the building, roads, parking lots, and natural elements—the design of the *site*—supports the significance of the property and the parking lots (and roads and natural elements) are identified as *features* of the contributing resource “site.”

Surface parking lots associated with a building or other structure should be considered within that context. In these situations, consider that the *size and significance* of the surface parking lot may be a factor in whether that lot is identified, evaluated, and documented. As the Form Bulletin advises:

[c]ount all buildings, structures, sites, and objects located within the property's boundaries *that are substantial in size and scale*. Do not count minor resources, such as small sheds or grave markers, unless they strongly contribute to the property's historic significance.

(Form Bulletin, p. 17, emphasis added.)

Determination of the relative size or significance of a surface parking lot is highly variable and within the discretion of the nomination proponent. For example, a small area set aside for parking may (or may not) be of sufficient size or importance to be identified and documented as a structure, either contributing or non-contributing. Nevertheless, individual surface parking lots with a property owner and legal description, and without an associated building or other structure, should be categorized, counted, and assessed as either contributing or non-contributing regardless of size. If a surface parking lot or lots are not categorized, counted, and assessed either contributing or non-contributing, the resource inventory in Section 7 should explain this omission, including a discussion of what impact this lot or lots have on the property.

Evaluate and Document the Resource

Generally, a surface parking lot should be identified, evaluated, and documented as either a contributing or non-contributing resource, and its impact on the integrity of the property—be it a single property or a district—should be discussed. Doing so for a historic district is especially important as ignoring surface parking lots can create holes in the district; acknowledging them can capture important information about a district’s

design and evolution. For example, a surface parking lot may have originated as the yard of a carriage works; as a district evolved, it may have supported a car dealership or served an important community role by providing space for a farmer’s market.

Numerous surface parking lots in a historic district may suggest an integrity problem, so it is essential to include a description of their physical state and an evaluation of their impact on the district. The description should address any previous uses of lot, if known, and identify the approximate date of construction of the parking lot. If numerous surface parking lots in a historic district share a common general history or character, it may be advisable to describe them as group, rather than individually; nevertheless, the individual lots should be listed in the resources inventory in Section 7 and labeled on the sketch map. The discussion should include an evaluation of the impact of the lot on the streetscape and the character of the property or the historic district.

A surface parking lot should be evaluated as a noncontributing resource if its construction post-dates the property’s period of significance or if it is not relevant to the property’s criteria and area(s) of significance; likewise, it should be evaluated as a contributing resource if it was built during the period of significance and its significance pertains to the property’s criteria and area(s) of significance.

Note that the archeological potential of a surface parking lot may be significant, particularly if the lot is the site of an earlier building or use. An archeological site found below, adjacent to, or overlapping a parking lot should be independently counted (as a “site”) and evaluated for its significance and integrity.

Finally, as for any nominated property, a surface parking lot’s owners must be notified of a proposed nomination.

Example: Single Property Commercial Building

Urbana-Lincoln Hotel/Lincoln Square Mall

Urbana, Champaign County, Illinois, NR Ref. 06000778

Listed in 2006 at the national level of significance with a period of significance of 1923-1964 under Criteria A and C for commerce, architecture, and community planning and development



Lincoln Square Mall view (Google, March 2025, accessed April 13, 2025).

The nationally significant Urbana-Lincoln Hotel/Lincoln Square Mall is comprised of one building and one structure. It was built in two distinct phases: the Tudor Revival style Urbana-Lincoln Hotel was constructed in 1923 from a design by noted local architect, Joseph Royer; and the adjoining shopping mall was erected in 1964 from plans by nationally known architect and planner, Victor Gruen. Section 7 carefully and clearly describes the surface parking lot, counted as a contributing structure, in approximately one page.

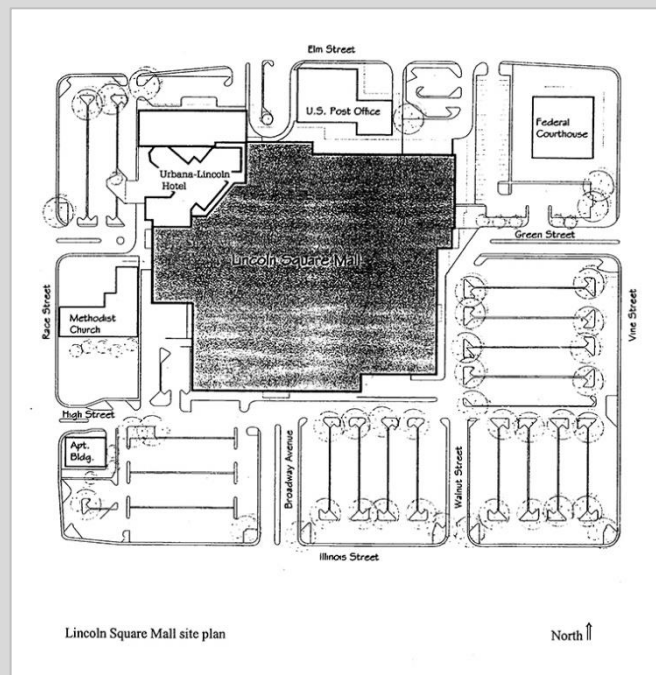
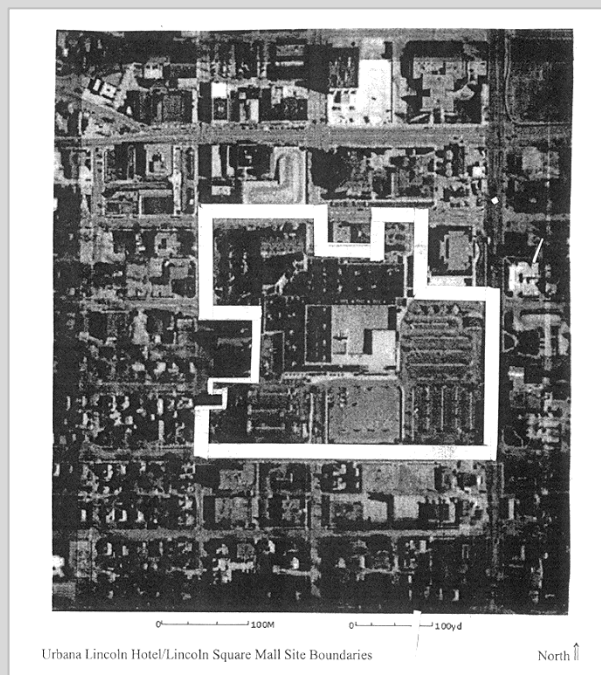
As highlighted here

[t]he area surrounding the Lincoln Square Mall and the Urbana-Lincoln Hotel was planned and developed at the same time as the mall, as parking was integral to Gruen's plan for the mall. Large city-owned parking lots continue to operate on the east side of the mall, along Vine Street and south of East Green Street and continue along the length of East and West Illinois streets. A large parking lot that historically has served the Urbana-Lincoln Hotel is at the corner of Elm and Race streets. All of these lots were conceived and developed as part of the original mall plan. Construction of the federal courthouse in 1994 removed parking from the northeast corner, but a small original lot remains between the courthouse and the Post Office along Elm Street. The parking areas are surfaced in asphalt with concrete curbs, medians, and landscape islands. Both diagonal and straight parking slots are painted on the surface and tall metal, dual arm streetlights illuminate the lots. Six entries lead into the mall complex four of which are original streets that are still owned as streets by the city: East Green, South Broadway (two different sections), West High, and West Green. These four entries align with the mall's entries.

(Urbana-Lincoln Hotel/Lincoln Square Mall Registration Form, Section 7, p. 26.)

Section 8 places the surface parking lot into context, in a single paragraph:

Parking was an essential ingredient for the success of the shopping center and was part of the mall's concept from the beginning. One of Gruen's main concerns in planning revitalization projects was to keep the automobile from choking downtowns. In Urbana, the city-owned parking lots and perimeter street improvements were integral to the plan. Charles Webber explained the role of the automobile in Urbana's downtown renewal program. Lincoln Square was "showing the country what can be done to prevent devaluation of the downtown district." By buying deteriorated property and using it for



Lincoln Square Mall boundary map (left) and site plan (right) (Urbana-Lincoln Hotel/Lincoln Square Mall nomination).

development and parking, Urbana is the "only city in the country where the problem has been met by construction of a new shopping area and related parking facilities in the heart of downtown." He contrasted Lincoln Square Mall with other cities' business district shopping areas that had merely closed off a few main streets, but ignored the parking problem. Land for parking was included in the nine block area purchased for redevelopment. The BXL holding company sold the area around the shopping center building to the City of Urbana, whose contribution to the project was the development of this land into public parking lots. Revenue bonds for \$3.2 million were sold and the Champaign Asphalt Company was awarded the contract for the 1,100 car parking lot. Clark, Dietz, Painter and Associates were the parking design engineers. The primary streets leading to Lincoln Square, Race, Illinois, and Vine streets were widened to fifty-eight feet and upgraded to four-lane roads with center medians and left turn lanes in the vicinity of the mall; the engineering arm of Victor Gruen Associates designed these changes. They also had new traffic controls and lighting installed. These streets became "loop/ring roads" to the mall, a transportation concept promoted by Gruen. A fortuitous transportation development was occurring at the same time with the construction of Interstates 74 and 57, which would supply a regional link to the new shopping center.

(Urbana-Lincoln Hotel/Lincoln Square Mall Registration Form, Section 8, p. 63.)

Example: Residential Historic District

Lake Anne Center Historic District

Reston, Fairfax County, Virginia, NR Ref. 100001041

Listed in 2017 at the national level of significance with a period of significance of 1963-1967 under Criteria A and C for art, architecture, community planning and development, and social history.



Lake Anne Village Center, as shown in a circa 1970 postcard. The large surface parking lot is to the left of the tall building in the upper center of the image (L.B. Prince Co.).

The Lake Anne Village Center Historic District is a mid-century mixed-use planned development described in the nomination as "shockingly sophisticated and modern in a Virginia countryside where single-family Williamsburg-like Colonial Revival houses dominated the landscape" (Lake Anne Registration Form, p. 25). The sizeable surface parking lot that supports both the retail and residential components of the district is one of the district's 101 contributing resources and is classified as a "structure."

In Section 7 "Narrative," the parking lot's physical presence is contextualized within the district's design:

Automobiles are relegated to a recessed and landscaped parking lot north of Washington Plaza as well as parking areas outside of the plaza.

(Lake Anne Registration Form, p. 4.)

The parking lot is identified in Section 7's resources inventory:

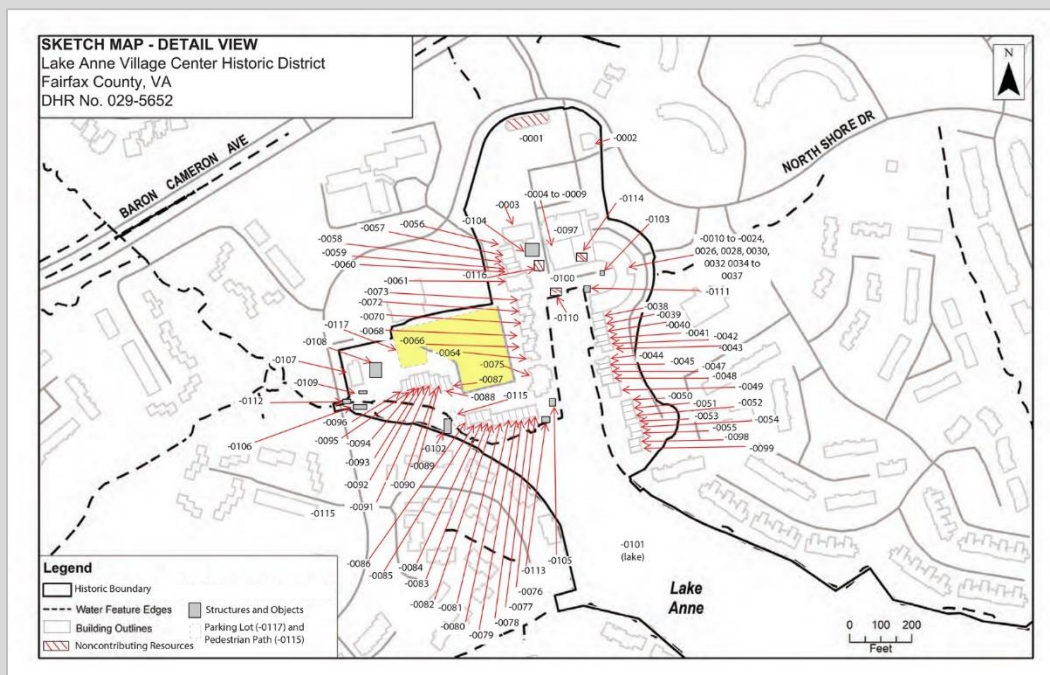
Lake Anne Village Parking Lot

Lake Anne Village Parking Lot 029-5652-0117 Other DHR Id#:

Primary Resource: Parking Lot (Structure), Stories [blank], Style: No discernible style, 1965

Contributing Total: 1

Not addressing this sizeable structure would have resulted in an inexplicable empty space in the historic district's sketch map. Accounting for all properties within a historic district's boundary is a best practice in better ensuring a National Register listing functions as intended by regulation, that is, as a planning tool. For example, for a project where a federal agency must identify and assess the effects its actions may have on historic properties, the interested parties and the public will be better able to understand the historic properties which may be adversely affected by the work.



Lake Anne Village Center Historic District sketch map, annotated to highlight the large surface parking lot identified as a contributing structure (Lake Anne Historic District Registration Form).

Example: Residential Historic District

East Plaza Apartments Historic District

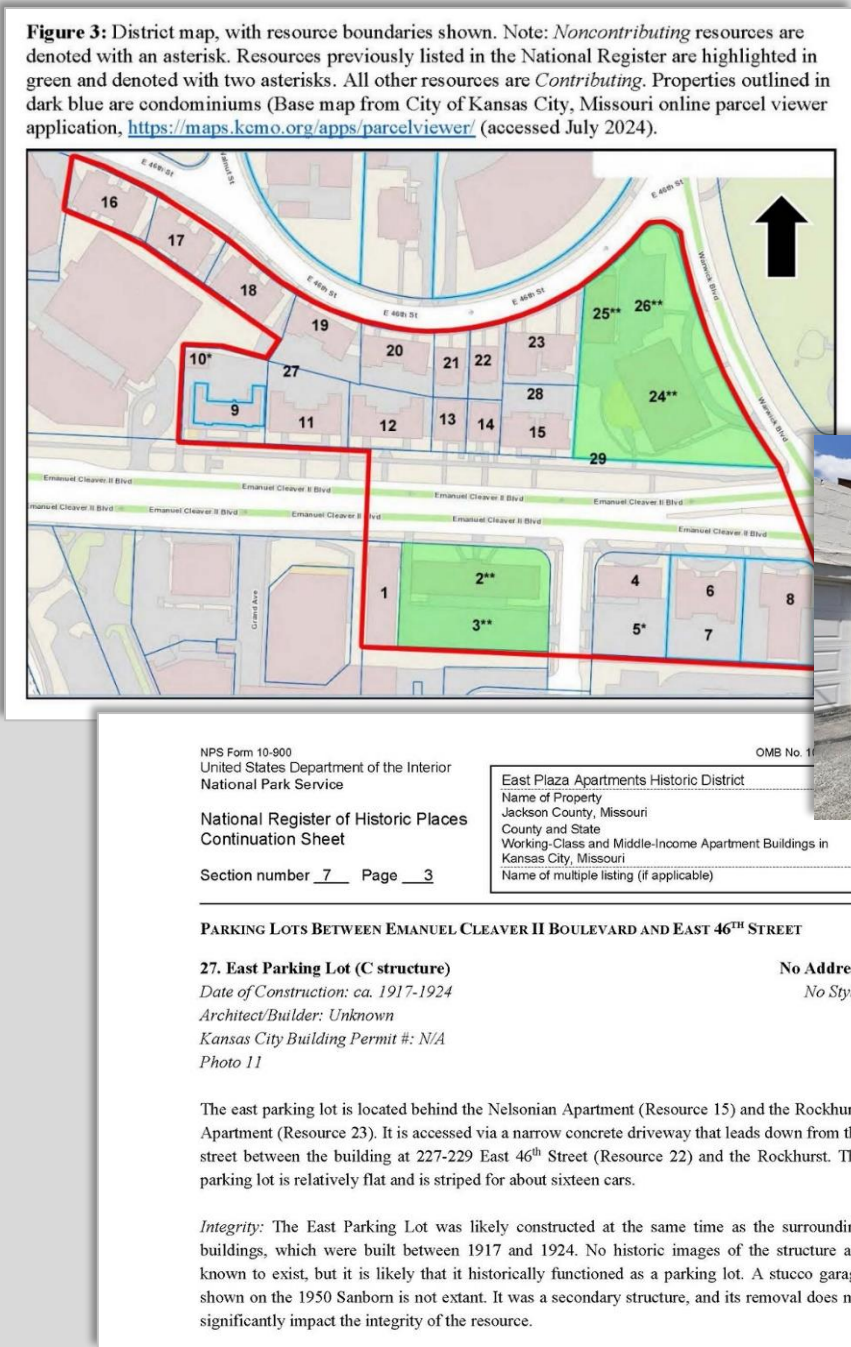
Kansas City, Jackson County, Missouri, NR Ref. 100011650

Listed in 2025 at the local level of significance with a period of significance of 1917-1950 under Criteria A and C for architecture and community planning and development under "Working-Class and Middle-Income Apartment Buildings in Kansas City, Missouri"

Multiple Property Documentation Form

The East Plaza Apartments Historic District occupies approximately 7.51 acres in Kansas City, Missouri, and is comprised of 29 resources, including 20 apartment buildings, 2 garages, 6 parking lots, and 1 retaining wall, all built between 1917 and 1950. The registration form admirably documents what is too often easily overlooked: the numerous parking lots associated with the many buildings in this district. Section 7 enumerates, captions,

and describes each resource, and a clearly labeled map identifies all resources, both contributing and non-contributing.



“Resource 27, East Parking Lot” as described, mapped, and photographed (East Plaza Apartments Historic District)(Brad Finch).

[The National Register of Historic Places](#)
is the official list of buildings, structures, objects, sites, and districts
significant in American history, architecture, archeology, engineering, and culture.

