

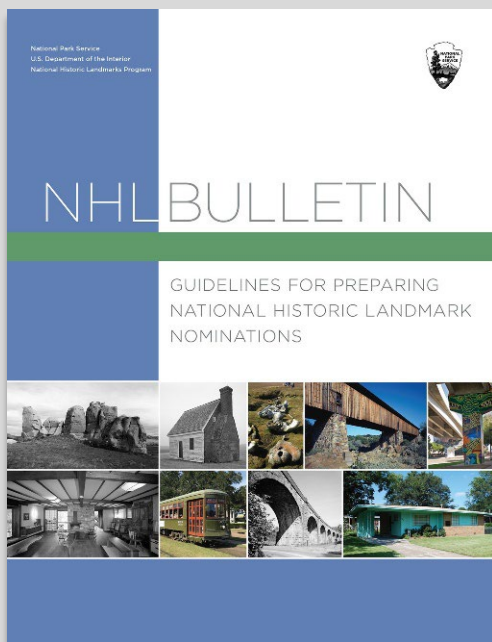


Best Practices Review

A quarterly publication on National Register Bulletin guidance

Special Edition: Updating National Historic Landmarks

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[*NHL Bulletin: Guidelines for Preparing National Historic Landmark Nominations*](#) (2023).

Introduction

The National Historic Landmarks (NHL) Program and the National Register of Historic Places (National Register) are administered together by the National Park Service and share many similarities. Both recognize places significant in American history and culture; however, they are the products of different laws and are administered under different regulations.

- NHLs are authorized by the Historic Sites Act of 1935 and are administered pursuant to 36 C.F.R. Part 65. NHLs are properties determined by the Secretary of the Interior to have exceptional national significance in illustrating the history of the United States; additionally, NHLs are by regulation required to have high integrity.
- The National Historic Preservation Act of 1966 (NHPA) formally authorized a National Register of Historic Places. The National Register is administered pursuant to 36 C.F.R. Part 60. National Register-listed properties are those determined by the Keeper of the National Register to have local, state, or national significance; however, those listed at the national level are not held to the high integrity standard that is regulatorily required for NHL designation.

As of this writing, there are over 98,000 National Register listed properties; by contrast, there are approximately 2,600 designated NHLs. More than 85 percent of NHLs were designated by the Secretary more than 25 years ago and documentation for these older NHL designations often lacks key information helpful for effective management and preservation. This *Best Practices Review* addresses how to update NHL documentation.

This special edition of the *Best Practices Review* addresses frequently asked questions about just how National Historic Landmark designations are updated. For additional information on National Historic Landmarks, please visit the [NHL Program](#) website.

As always, your feedback is welcome; please contact Sherry Frear, Chief & Deputy Keeper, sherry_frear@nps.gov.

For National Register Bulletins and other guidance, please visit the National Register [Publications](#) webpage.

All images are from NHL or National Register nominations unless otherwise noted.

Understand the Process



NHL designations are not, strictly speaking, “updated” but rather an entirely *new* NHL nomination is prepared and presented to the Secretary of the Interior for action. Nevertheless, in practice, the new NHL nomination that is prepared to update an existing NHL’s documentation is typically referred to by historians and proponents as “an update,” “updated documentation,” or “an updated nomination” and will be referred to as such in this *Best Practices Review*.

Owners or other proponents may decide to prepare and submit an NHL update for a variety of reasons, such as adding additional areas of significance, expanding the period of significance, correcting inaccurate or supplementing incomplete information, or revising the boundary. For example, the boundary of one early NHL was described simply as the same as that of the state park in which it is located.

The official record of an NHL has evolved in ways that mirror the growth and increased professionalism of cultural resource management, from brief statements of national significance in the 1960s, to additional historical and boundary information in the 1970s and 1980s, to more complete resource inventories and more robust analyses in the 1990s. Today, NHL nominations are grounded in peer-reviewed scholarship and include thorough resource inventories, comparative analyses, and geographic and visual information. Updated NHL nominations typically

- expand the historic context for an NHL to reflect current scholarship and new research,
- add additional areas of national significance, or NHL criteria,
- change the NHL boundary, and/or
- improve the inventory of contributing and noncontributing resources.

Updated documentation is reviewed by NHL Program staff. It then proceeds along the typical path to designation, from peer review to the NHL Committee to the National Park System Advisory Board and, finally, to the Secretary of Interior.

Prepare the Update

The earliest NHL nominations were often only a few pages long. Today, updated documentation is expected to meet the same standards as new nominations, including a thorough justification for national significance based on scholarly sources; a clear description assessing the high historic integrity of the property; and a thoughtful analysis of comparable properties. After passing fully through the NHL process and being approved by the Secretary of the Interior, the updated nomination replaces the original documentation as the NHL’s official record.

“Listed” or “Designated” or Both? Understanding the Terminology

A property designated by the Secretary of the Interior as a National Historic Landmark is, in fact, *listed* in the National Register of Historic Places upon designation (36 C.F.R. § 65.2(b)). This is what it means when an NHL is referred to as having been *administratively listed*. However, preservation professionals typically differentiate between NHLs and other National Register-included properties as “designated properties” for the former and “listed properties” for the latter.

Like new designations, the first step in updating an NHL is to send a letter of inquiry (LOI) to NHL Program staff, either in the appropriate regional office or Washington, D.C. headquarters. (Contact information is found on the [NHL Program](#) website.) Although the national significance of an NHL was established by the original designation, the LOI formally initiates the process of updating an NHL. It contributes to a clear administrative record and provides an opportunity for NHL staff to provide guidance in a written response. The LOI should address the current integrity of the property, the status of the NHL boundary and any contemplated changes, and the intention to reaffirm or expand the national significance and/or the period of significance. As with proposed new designations, owner consent is required to update NHL documentation and should be confirmed at the beginning of the update process.

Following approval by NHL Program staff to pursue the update, the original documentation and updated information is combined to create a single narrative, on NHL nomination form (NPS Form 10-934) following the detailed guidance found in [NHL Bulletin: Guidelines for Preparing National Historic Landmark Nominations](#) (2023). (The step-by-step instructions included in Chapter 9 of the *NHL Bulletin* for completing an initial nomination also apply to updated documentation.) Owners and proponents should stay in touch with NHL Program staff throughout preparation of the draft to insure a smooth process.

NHL updates need not present a definitive or comprehensive history of a property but should utilize current scholarship in restating the national significance of the NHL. For example, some of the earliest NHL nominations’ statement of significance is a single page, with no citations. New areas of national significance or additional criteria will likely require an expanded comparative analysis and revised period of significance. Section 5 “Significance Statement and Discussion” of the nomination should start with an explanation of why and how the NHL designation is being updated, and note key changes from the original nomination such as an expanded context, revised boundary, new NHL criteria, or updated resource inventory. Section 6 “Property Description and Statement of Integrity” should address any changes to the property since its initial NHL designation and explain how it continues to retain high integrity. Current maps and photographs, and other graphics, such as historic images, should be included as part of the updated documentation.

Striving for Balance

As proponents strive to tell the fuller story of a property’s significance, nominations have become longer, often including information that, while interesting, is not directly relevant to a place’s *national* significance. A successful update balances the desire for expanded context and more inclusive information with a clear focus on the property’s national significance under the [NHL Criteria](#) and, if applicable, [Criteria Exceptions](#). Property owners or stewards are encouraged to contact an NHL staff member for advice when contemplating an update to existing NHL documentation.

Making Technical Corrections

Technical corrections to NHL designations are only available in very limited situations. This differs from National Register listings, for which both technical and substantive amendments may be made under the authority delegated by the Secretary to the Keeper of the National Register. NHL regulations do allow technical corrections for boundary issues in specific cases, with appropriate notification procedures. Please contact NHL Program staff if you have questions.

Following completion of a draft, the updated nomination proceeds through the same process as a proposed new designation, with revisions made as needed along the way. First, it is peer-reviewed by one or more independent scholars and, if required, Tribal outreach or consultation is conducted by the NPS. It is then revised accordingly and presented to the NHL Committee of the National Park System Advisory Board (NPSAB) at one of its semiannual meetings. The Committee discusses the updated nomination and may make recommendations for changes and improvements; and votes on whether (or not) to refer it to the NPSAB. If referred, the NPSAB reviews the updated nomination, likewise at one of its semiannual meetings, along with all other NHL actions referred by the NHL Committee; and votes on whether (or not) to refer it to the Secretary. Throughout the entire process, the same owner and elected official notification requirements for NHL new designations and withdrawals applies to NHL updates. Upon approval by the Secretary, the updated nomination replaces the original nomination.

Examples

Updating NHL documentation is a way to recognize parts of the story overlooked in the original designation and may be inspired by new scholarship that presents a more complete understanding of nationally significant historic events or patterns, individuals, and architectural or artistic movements. Many recent updates for NHLs in NPS units were intended to support park interpretation, planning, and resource management. The examples below highlight several NHL updates approved by the Secretary of the Interior in 2023.

[Strentzel-Muir Ranch NHL](#) (update to John Muir House and Martinez Adobe NHL)

This NHL in Martinez, California, was designated as nationally significant in 1962 under NHL Criterion 1 (events) for significance in the history of the conservation movement and under Criterion 2 for its association

Counting and Classifying Resources

It was not until the 1986 amendments to the Tax Reform Act of 1976 that resources in National Register and NHL nominations were required to be specifically identified as contributing or non-contributing. This distinction became important with the 1986 amendments to determine eligibility for federal historic preservation tax incentives. For NHLs designated prior to 1986 which do not have updated documentation approved by the Secretary of the Interior, all resources within the boundary of the NHL are considered contributing if they are within the period and areas significance identified in the nomination.

UNITED STATES
DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE
NATIONAL SURVEY OF HISTORIC SITES AND BUILDINGS

1. STATE: California 2. THENCE: IF ARCHES OR OTHER WHITE MARKS, BEFORE THENCE NO. (see also IX - XIX - Conservation of Natural Resources Literature)

3. NAME(S) OF SITE: John Muir House (and Martinez Adobe) 4. APPROX. ACREAGE: 5 Acres

5. EXACT LOCATION (County, township, range, etc.): 4140 Alhambra Ave., Martinez, Contra Costa County

6. NAME AND ADDRESS OF PRESENT OWNER (Label attached to different form as usual): Mr. and Mrs. Henry Sax (Adobe by Louis Stein)

7. IMPORTANCE AND DESCRIPTION (Describe briefly in 500 words or less; repeat over a different sheet if needed):
The ranch at Martinez was John Muir's home from 1880 until his death in 1914, the period during which he emerged as one of the most important national leaders in the Conservation Movement.
From 1889 to 1914, John Muir played a critical and vital role in the drive to establish national parks, national forests, and to apply scientific methods of sustained-yield management to the federal forests. As a recognized and leading authority on the glaciers, mountains and forests of West, and as an able and popular writer on Nature, John Muir devoted his talents and nationwide prestige to forwarding the cause of National Conservation. In this task he served as an important, although unofficial, adviser to Presidents Grover Cleveland, Theodore Roosevelt, and William Howard Taft. Specific conservation achievements with which Muir was closely associated include: the creation of Yosemite National Park, General Grant National Park, and the enlargement of Sequoia National Park in 1890; advice on the establishment of the first national forest reserved in 1891; a leading role, working with the National Forest Commission, 1896-97, in securing the National Forest Management Act of 1897, and defending the 13 new forest reservations established by President Cleveland, 1897-98; an adviser to President Roosevelt 1901-1909; supporting the establishment of the U. S. Forest Service and the transfer of National Forest Reserves to that agency, 1901-1905; securing the completion of Yosemite National Park, 1903-1906; and defending the Hetch Hetchy Valley section of Yosemite National Park from 1901 to 1913.

Condition of the Site:
This site includes the Martinez adobe, a two-story adobe built about 1851, which served John Muir's residence from 1880 to 1890; the "Manor", a large two-story frame house built in 1881, which served as Muir's residence from 1890 until (Continued on attached sheet)

8. BIBLIOGRAPHICAL REFERENCES (Cite best sources; get headings of manuscripts and rare works): Linnie Marsh Wolfe, The Life of John Muir, Son of the Wilderness (New York, 1945); William F. Bate, The Life and Letters of John Muir (2 vols., Boston and New York, 1924); Hans Ruth, Nature and the American (Berkeley and Los Angeles, 1957), 103-104; Robert Underwood Johnson, Remembered Yesterday (Boston, 1923), 278-300; Samuel F. Hays, Conservation and the Gospel of Efficiency: The Progressive Conservation Movement, 1890-1920 (Cambridge, 1959), 192-194; Wilfred S. Hooser, W.P.C. H. Henshaw, and Ethel G. Rensch, revised by Ruth Teisner, Historic Spots in California (Stanford, 1958), 236.

(For 9 - see attached page)

10. PHOTOGRAPHS: yes ☒ no ☐ 11. COMMENTS: Little Altered 12. PRESENT USE (Agriculture, etc.): Residences 13. DATE OF VISIT: Oct. 18, 1962

14. NAME OF RECORDED SIGNATURE: Charles W. Small 15. TITLE: Reg. Chief, Branch Hist. Sites 16. DATE: Nov. 26, 1962

17. EXPLANATION OF PHOTOGRAPH: (Caption by view and name of the site; date of photograph and name of photographer; size, location of subject; if attached, include in figure captioned page 100)

(IF ADDITIONAL SPACE IS NEEDED USE SUPPLEMENTARY SHEET, 10-317a, AND REFER TO ITEM NUMBER)

Many early NHLs were documented on "National Survey of Sites and Historic Buildings" forms. This image shows the first page of the original documentation for the John Muir House, designated in 1962 and updated in 2023 as the Strentzel-Muir Ranch NHL.

with influential naturalist John Muir. Since 1964, the John Muir House NHL has been part of the larger John Muir National Historic Site (NHS). The updated NHL documentation was completed on behalf of John Muir NHS to update the name, boundary, period of significance, resource and landscape descriptions, and discussion of national significance in accordance with current scholarship and NHL guidelines. The boundary of the NHL was expanded to include two additional discontinuous parcels—Mount Wanda and the Strentzel-Muir gravesite—that are part of the John Muir NHS.

The updated documentation also addresses current scholarship on the conservation movement and on Muir as a complicated and multifaceted individual with responsibilities as a husband, father, agriculturalist, author, and advocate for the natural world. The period of significance was expanded to 1880 to 1914, to encompass the full period of Muir's residence, starting with his marriage to the wealthy Louise Strentzel. Finally, the name of the NHL was changed to Strentzel-Muir Ranch to better reflect the expanded boundary based upon Strentzel's contributions to the property and John Muir's work.



Strentzel-Muir Ranch NHL (update to John Muir House and Martinez Adobe NHL), Martinez, California. (Christopher E. Johnson)

Carter G. Woodson Home NHL

The Carter G. Woodson House NHL in Washington, D.C., was designated in 1976. In 2003, the Carter G. Woodson Home National Historic Site was created. The property was initially designated as an NHL as nationally significant under NHL Criterion 2 (persons) for its association with Woodson, an educator and historian known as the “Father of Black History.” In addition to expanding the discussion of Woodson’s nationally significant career, the 2023 update successfully added NHL Criterion 3 (American ideals) to the designation, documenting Woodson’s work to promote Black history, debunk racist histories, and present education as a central tool in combatting all forms of discrimination. The NHL update also included a minor name change, replacing “house” with “home” to align the name of the NHL with the NHS, and a revised period of significance, starting in 1922 when Woodson purchased the property and continuing to his death in 1950. The NPS worked with the Association for the Study of African American Life and History (ASALH), originally founded by Woodson, and two consulting historians to prepare the update.



Form No. 10-500 (Rev. 10-74) **THEME 8: CONTEMPLATIVE SOCIETY, Education and Intellectual Currents**
UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

**NATIONAL REGISTER OF HISTORIC PLACES
INVENTORY -- NOMINATION FORM**

FOR NPS USE ONLY
RECEIVED
DATE ENTERED

SEE INSTRUCTIONS IN HOW TO COMPLETE NATIONAL REGISTER FORMS
TYPE ALL ENTRIES -- COMPLETE APPLICABLE SECTIONS

1 NAME
HISTORIC
Carter G. Woodson House
AND/OR COMMON
Carter G. Woodson House

2 LOCATION
STREET & NUMBER
1338 Ninth Street, Northwest
CITY, TOWN
Washington
STATE
D.C.
VICINITY OF
CODE
11
COUNTY
001
CODE
001

3 CLASSIFICATION

CATEGORY	OWNERSHIP	STATUS	PRESENT USE
<input type="checkbox"/> DISTRICT	<input type="checkbox"/> PUBLIC	<input type="checkbox"/> OCCUPIED	<input type="checkbox"/> AGRICULTURE
<input checked="" type="checkbox"/> BUILDING(S)	<input checked="" type="checkbox"/> PRIVATE	<input checked="" type="checkbox"/> UNOCCUPIED	<input type="checkbox"/> COMMERCIAL
<input type="checkbox"/> STRUCTURE	<input type="checkbox"/> BOTH	<input type="checkbox"/> WORK IN PROGRESS	<input type="checkbox"/> EDUCATIONAL
<input type="checkbox"/> SITE	<input type="checkbox"/> PUBLIC ACQUISITION	<input type="checkbox"/> ACCESSIBLE	<input type="checkbox"/> ENTERTAINMENT
<input type="checkbox"/> OBJECT	<input type="checkbox"/> IN PROCESS	<input type="checkbox"/> YES, RESTRICTED	<input type="checkbox"/> GOVERNMENT
	<input type="checkbox"/> BEING CONSIDERED	<input checked="" type="checkbox"/> YES, UNRESTRICTED	<input type="checkbox"/> INDUSTRIAL
		<input type="checkbox"/> NO	<input checked="" type="checkbox"/> MILITARY
			<input type="checkbox"/> TRANSPORTATION
			<input checked="" type="checkbox"/> OTHER

4 OWNER OF PROPERTY
NAME
Association for the Study of Afro-American Life and History
STREET & NUMBER
1401 - 14th Street, Northwest
CITY, TOWN
Washington
STATE
D.C.

5 LOCATION OF LEGAL DESCRIPTION
COURTHOUSE, REGISTRY OF DEEDS, ETC.
Recorder of Deeds
STREET & NUMBER
515 D Street, Northwest
CITY, TOWN
Washington
STATE
D.C.

6 REPRESENTATION IN EXISTING SURVEYS
TITLE
None Known
DATE
FEDERAL STATE COUNTY LOCAL
DEPOSITORY FOR SURVEY RECORDS
CITY, TOWN STATE

150

Left: Carter G. Woodson Home, Washington, D.C., c. 1975. (NPS)
Right: The original NHL nomination for the Carter G. Woodson Home was prepared in 1975 on a National Register “Inventory – Registration Form,” as were all NHL nominations at that time. It was not until 2016 that the NHL Program had its own registration form.

Waterford Historic District NHL

Waterford Historic District NHL in Loudoun County, Virginia, was designated in 1970 as an exceptionally intact agricultural village landscape that evokes the economic, architectural, aesthetic, and cultural patterns characteristic of eighteenth- and nineteenth-century America. The original documentation lacked an inventory of contributing and noncontributing resources. To support preservation planning, local officials worked with the NPS and a consultant to prepare updated NHL documentation that included a resource inventory and maps. The updated documentation more fully articulates Waterford's national significance under NHL Criteria 4 (architecture) and 5 (district), with a period of significance of 1733 to 1936. In addition, the update adds Criterion 1 (events and broad patterns of history) and Exception 8 (properties less than 50 years old) for the sustained and creative twentieth-century historic preservation campaign that ensured Waterford Historic District's current high degree of integrity. A second period of significance for Criterion 1 is 1931 to 1992, encompassing the date of the first house restorations in the village to the completion of a series of pioneering studies guiding Waterford's preservation.



View of Waterford Historic District NHL, Waterford, Virginia. (Michael J. Emmons, Jr.)



Historic Moravian Bethlehem Historic District, Second Single Brethren's House. (Catherine Turton)

[Historic Moravian Bethlehem Historic District NHL](#)

Designated in 2011 as an outstanding example of an eighteenth-century communal religious settlement built by the German Moravians, Historic Moravian Bethlehem Historic District in Bethlehem, Pennsylvania, received a targeted NHL update. The boundary was redrawn, and the inventory revised to include the 1748 Second Single Brethren's House as a contributing resource. Previous questions regarding integrity for this building that led to it being noncontributing in the original nomination were reconsidered and resolved. Furthermore, there was interest in incorporating the Second Single Brethren's House into the NHL district prior to its pending inclusion in a multinational Moravian Church settlements UNESCO World Heritage listing. The discussion of national significance under NHL Criteria 1 and 4 and the period of significance of 1741 to 1810 were unchanged in the updated documentation.

[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.

