



# Best Practices Review

A quarterly publication on National Register Bulletin guidance

## Evaluating Garages and Outbuildings in Historic Districts

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### Introduction

As explained in *National Register Bulletin 16A: How to Prepare National Register Registration Forms*, the physical characteristics and historic significance of a district provides the basis for evaluating component resources. A contributing building, site, structure, or object adds to the historic associations, historic architectural qualities, or archeological values for which a property is significant because

- it was present during the period of significance, relates to the documented significance of the property, and possesses historic integrity or is capable of yielding important information about the period; or
- it independently meets the National Register criteria.

The most common ancillary buildings and structures in urban and suburban areas are garages (and their antecedent, carriage houses) and sheds or specialized structures, from small enclosures for firewood to larger facilities for work or recreation. Common ancillary buildings and structures typically found in rural areas include chicken coops,

animal pens, and greenhouses. None of these ancillary buildings and structures should be considered unworthy of documentation if they are substantial in size and scale. Whether a building or structure is “substantial” is a matter of professional judgement but simply ignoring them—not addressing them at all in a nomination—creates an incomplete historical record and may lead to later challenges in historic tax credit certifications and federal undertaking consultations.

*Bulletin 16A* 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.” (*Bulletin 16A*, p. 17.) The phrase “substantial in size and scale” is bolded in the *Bulletin*, emphasizing its importance. A nomination proponent may certainly make reasonable judgments about what “substantial size and scale” means in the context of a particular district, but National Register guidance does not

### Key Concept

Count 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.

Excerpted from *National Register Bulletin 16A: How to Prepare National Register Registration Forms*, p. 17.

This publication compliments the guidance provided in National Register Bulletins by providing examples on specific topics. Your feedback is welcome; contact Sherry Frear, Chief & Deputy Keeper, [sherry\\_frear@nps.gov](mailto:sherry_frear@nps.gov).

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All images are from National Register nominations unless otherwise noted.

support the wholesale exclusion of a category of resources—like garages and other outbuildings—if those resources are “substantial in size and scale.” It does, however, rule out the need to document and count small-scale resources like benches and light poles.

## **“Building” and “Structure” Defined**

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As defined in *Bulletin 16A*, a building, such as a house, barn, church, hotel, or similar construction, is created principally to shelter human activity. Examples of buildings include houses, barns, stables, sheds, garages, courthouses, city halls, social halls, commercial buildings, libraries, factories, mills, train depots, stationary mobile homes, hotels, theaters, schools, stores, and churches.

The term “structure” is used to distinguish from buildings those functional constructions made for purposes other than creating shelter. Examples of structures include bridges, tunnels, gold dredges, firetowers, canals, turbines, dams, power plants, corncribs, silos, roadways, shot towers, windmills, grain elevators, kilns, mounds, cairns, palisade fortifications, earthworks, railroad grades, systems of roadways and paths, boats and ships, railroad locomotives and cars, telescopes, carousels, bandstands, gazebos, and aircraft.

## **The Importance of Garages**

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*National Register Bulletin 46: Historic Residential Suburbs* recognizes the impact of automobile travel on suburban development, and pays particular attention to the introduction and proliferation of garages. As noted at page 56, “[s]helter for the automobile became an increasingly important consideration after 1900.” *Bulletin 46* explains that nominations should include descriptions of architectural styles and types represented by both dwellings and garages. The latter are particularly important if the pattern of suburban development clearly accommodated automobile storage.

Garages are frequently mentioned in the multiple property documentation form “Historic Residential Suburbs in the United States, 1830-1960” (NR Ref. 64500838). Both *Bulletin 46* and this multiple property cover discuss the importance of the garage as a resource of considerable historic merit, despite its sometimes humble appearance. Garages that appear to date from a district’s period of significance and display the materials, styles, and forms of the primary buildings should be given consideration in a nomination.

## **Transparency in Nominations**

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Ancillary buildings and structures should be addressed in a nomination with transparency. While there is no single way to address these resources, “best practices” are discussed here for several different situations.

Generally, all identifiable ancillary buildings and structures—whether described or not—should be acknowledged in the nomination and, to the extent possible, evaluated as either contributing or noncontributing resources. For example, the

### **Misconceptions**

Nomination proponents that have never included garages and other ancillary buildings and structures in nominations should reconsider this practice. Reasons given for their exclusion include

- inflation of the total number of non-contributing resources
- an inability to see all ancillary buildings and structures from the public right-of-way
- their lack of aesthetic appeal
- the cost of surveying and evaluating them

The first two situations may be addressed as described in examples provided in this document. The second two are not acceptable reasons for ignoring resources.

nomination for the **Jones Home Subdivisions Historic District** in Ohio, discussed below, includes an effective hand-drawn sketch map that shows all buildings and structures within the district and delineates contributing and non-contributing resources.

Contributing resources in a historic district typically outnumber non-contributing resources but there are appropriate exceptions. Concern about inflating the total number of non-contributing resources by counting ancillary buildings and structures may be addressed with a sentence or two in the narrative summary paragraph at Section 7 of the nomination form. This text may succinctly explain that the large number of noncontributing resources is due to the number of ancillary buildings and structures that, for example, post-date the period of significance or have lost integrity. The nomination for the **Lead Historic District** in South Dakota, discussed at page 4, does this well. Additional details may be included in the history and development of the district presented in Section 8.

If ancillary buildings and structures cannot be seen from the public right-of-way, or reliably deduced from other resources, this too may be explained in Section 7. For example, if an inventory is included in the nomination, the text should indicate the limitations of the inventory due to an inability to identify all ancillary buildings and structures, and that evaluations for these resources will be conducted on a case-by-case basis. The nomination for the **West Hill Residential Historic District** in Wisconsin, discussed at page 5, uses this strategy in its treatment of carriage houses and garages.

If, however, the nomination proponent determines that the omission of ancillary buildings and structures is appropriate—that is, if certain outbuildings are intentionally uncounted and unevaluated—the nomination should include a statement that acknowledges the existence of these resources in the district and explains why none have been included in the inventory. The National Register will not approve a nomination that has ignored potentially eligible resources, without a

reasonable explanation and an acknowledgement of the need for future evaluations. Suggested language is provided in the box below.

Evaluations made after a district is listed can be submitted as additional documentation or a boundary increase/decrease, as was done for the **Lead Historic District**, discussed at page 4. The documentation must include a description of the ancillary buildings or structures, dates of construction (or best estimates), evaluations of integrity, and at least one photo of each resource. In a large district, representative photos can be submitted.

## **Example: Sketch Map Representations**

### **Jones Home Subdivisions Historic District**

Cleveland, Ohio, NR Ref. 12000031

Listed 2012 with a period of significance of 1872–1930 under Criteria A for Community Planning and Development and C for Architecture

The Jones Home Subdivisions Historic District is locally significant for the growth of a prosperous second-generation middle class on Cleveland's west side, developed in conjunction with the advent of

### **Suggested Language**

If not including ancillary buildings and structures in a nomination, consider including a statement like this:

Garages and other outbuildings that are substantial in size or scale have not been included in the inventory because a majority are not visible from the public right-of-way. Rather than include a partial inventory, this nomination has omitted these resources from the counts of resources but acknowledges that some were built during the period of significance, retain integrity, and contribute to the historic district. All garages and other outbuildings that are substantial in size or scale are considered contributing until documentation that demonstrates otherwise is approved by the National Register.

streetcars serving the area; and as a microcosm of well-preserved examples of American architectural styles during its period of significance, from 1872, when the area was first subdivided, through the 1920s, when the area was completely developed. The district is comprised of 451 primary buildings and 297 garages, rear houses, and other outbuildings. This nomination demonstrates the effectiveness of a hand-drawn sketch map that delineates the resources and clearly marks non-contributing resources.

Of the 748 properties within the district, 18 primary buildings and 34 garages are non-contributing. As described in the nomination at Section 7, page 2, many of the garages are contributing resources as most date from the same early 20th century period as their associated houses. Some are former carriage barns, with a few being two stories in height; however, most are plain, simple frame buildings. Non-contributing garages post-date the period of significance although some are of the same form and type of construction as the older (contributing)

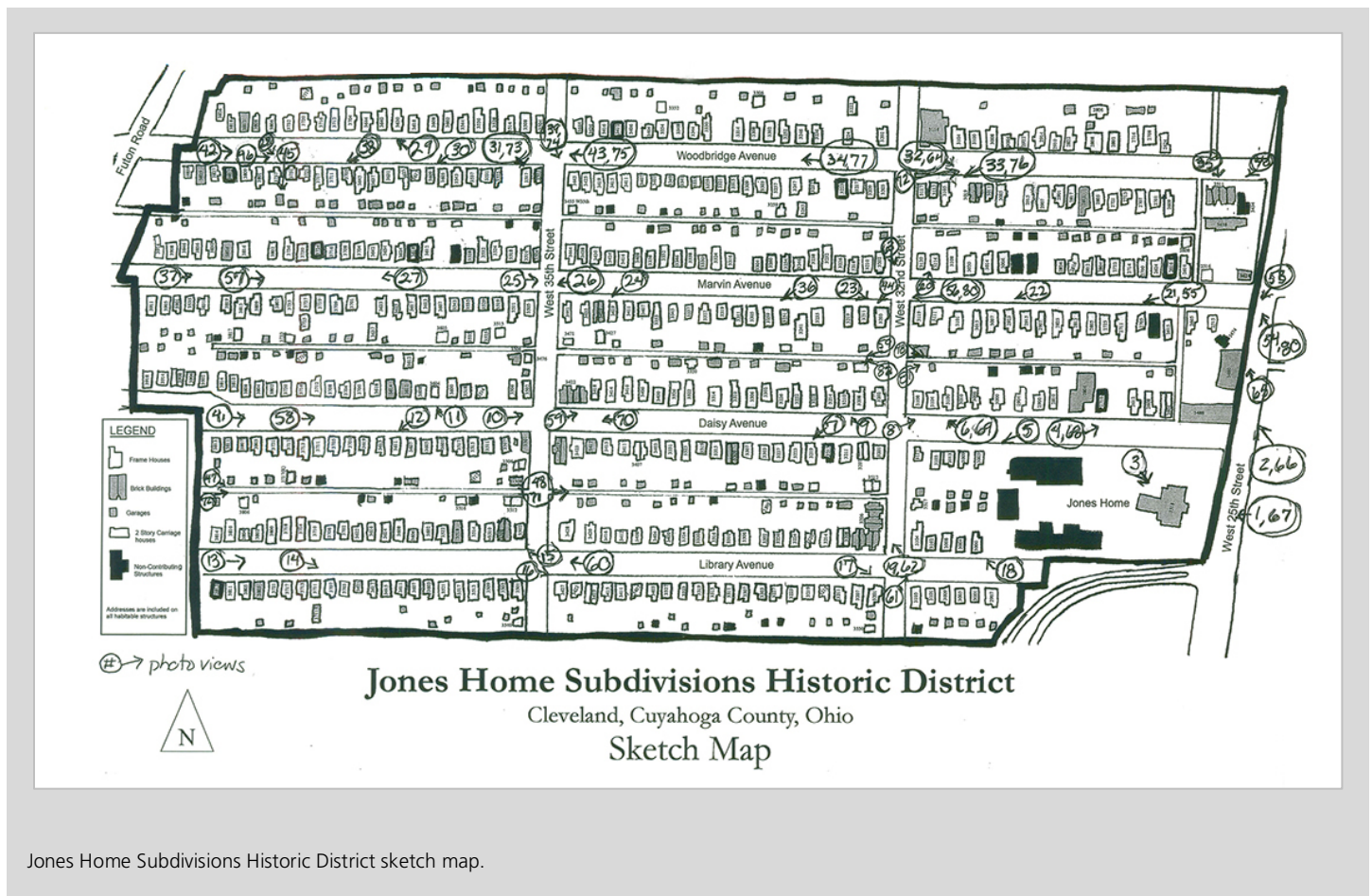
garages. The hand-drawn sketch map in the nomination delineates all identifiable buildings within the boundary, with non-contributing resources' footprints shaded in black.

## Example: Post-Listing Evaluations

### Lead Historic District

2021 Boundary Decrease/Increase  
 Lead, South Dakota, NR Ref. 100006688  
 Listed 1974 (updated 2021) with a period of significance of 1876–1942 under Criteria A for Industry and C for Architecture, and Criteria Considerations A for religious properties, B for moved properties, and F for commemorative properties

The Lead Historic District in Lead, South Dakota, was listed in the National Register in 1974. The original documentation is thin: the district boundary is unclear and only 10 of approximately 800 resources are identified. Updated documentation in the form of a boundary increase/decrease, approved in 2021, clarifies the district boundary and distinguishes contributing and non-contributing resources.



Jones Home Subdivisions Historic District sketch map.

The Lead Historic District is significant at the state level as an outstanding example of a “company town” associated with the Homestake gold mine, once one of the largest gold mines in the world and one of South Dakota’s largest industries for decades; and for its outstanding collection of

vernacular architecture, including cube cottages, foursquare, a variety of gable forms, as well as examples of Folk Victorian, Queen Anne, Bungalow/Craftsman, Commercial, and Colonial Revival architectural styles.

The district contains 412 contributing resources and 455 non-contributing resources, something that might suggest the area lacks integrity as a district. However, as explained in the nomination at Section 7, page 7, non-contributing garages (167) outnumber contributing garages (70) by over a 2:1 ratio, thus appearing to inflate the number of noncontributing resources.

This nomination’s sketch map distinguishes primary from ancillary contributing buildings: the footprints of primary contributing resources are shaded while ancillary contributing resources are marked with a dot. This strategy graphically reinforces the unique nature of the Lead Historic District, where the architecture has been adapted to the steep landscape: garages and carports are suspended from one terrace to another or built into the hillside. Even where a lot’s house may be non-contributing due to a lack of integrity, as seen in the image on this page, the associated garage may be contributing to the district.

### Example: Annotated Inventory

#### West Hill Residential Historic District

Chippewa Falls, Wisconsin, NR Ref. 100006503  
Listed 2021 with a period of significance of 1870–1958 under Criterion C for Architecture

The West Hill Residential Historic District is locally significant for its grouping of architectural styles and buildings types that constitute a well-defined and visually distinct geographic and historic entity. As documented in the nomination, the district contains many of the best examples of Italianate, Queen Anne, and Colonial Revival style houses in the city of Chippewa Falls.

Most of the buildings in the district have carriage houses or garages; however, as discussed in the nomination at Section 7, pages 2 and 3, while these



Lead Historic District: top, non-contributing house and contributing garage at 319 Bleeker Street; bottom, portion of sketch map, distinguishing primary and secondary contributing resources and non-contributing resources.

	Address	Historic Name	Date	Style/Form	Class
1	321 Carson St.*	House	1920	Side Gabled	C
2	501 W. Central St.	House	1893	Queen Anne	C
3	503 W. Central St.	House	1885	Bungalow	C
4	504 W. Central St.**	Nels Hokenstrom House	1918	Bungalow	C
5	507 W. Central St.	House	1922	Bungalow	C
6	510 W. Central St.*	Ole Emerson House	1925	Bungalow	C
7	515 W. Central St.*	House	1912	American Foursquare	C
8	516 W. Central St.*	E.F. McKenna House	1916	Craftsman	C
9	524 W. Central St.**	Christopher and Helena Sundet House	1915	Bungalow	C
-1-	535 W. Central St.	House	1901/c1970	Gabled Ell	NC
10	604 W. Central St.**	Elzear and Eleanor LeDuc House	1875	Italianate	C
11	605 W. Central St.*	House	1915	Bungalow	C
12	617 W. Central St.*	House	1901	Cross Gabled	C
13	618 W. Central St.*	J.H. Kelley House	1924	Bungalow	C
14	620 W. Central St.*	Chris Larson House	1885	Italianate	C

Portion of resources inventory for West Hill Historic District, with asterisks used to note the presence of ancillary buildings or structures associated with the primary resource.

ancillary resources are important to the historic character of the district and in illustrating the animal-to-auto shift that transformed residential development here, the majority of the carriage houses and garages are not individually identified in the district’s resources inventory but they are addressed. As the nomination explains,

[a] comprehensive survey was not completed in this community, and even with a survey it is difficult to conclusively arrive at an accurate accounting of these resources since some may not be visible from the public right of way, and online observation (through Google Street View or Satellite View for example) is not reliably accurate. (p. 2)

The nomination further acknowledges that “this resource type is well represented in the district and if future preservation activities require it, on a case-by-case basis, carriage houses and garages may be further evaluated for historic significance.” (p. 3)

Ancillary buildings and structures are addressed in the inventory, as shown above: double asterisks indicate carriage houses and garages that are clearly visible from the public right-of-way and appear to date from the year the associated house was constructed. Single asterisks indicate those associated with contributing buildings but appear to be of modern construction, or due to limited visibility, the age or appearance of the garage is unknown. (Four carriage houses are individually listed in the inventory due to their scale and prominence.)

This strategy is useful where there are limitations on visibility from the ROW or there is a lack of information through other sources. In addition to documenting the historic record, this strategy may be helpful in providing answers to questions raised in historic tax credit certification actions and federal undertaking consultations.

[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.

