

**MEMORANDUM OF AGREEMENT**

**BETWEEN THE U.S. GENERAL SERVICES ADMINISTRATION  
AND THE  
WEST VIRGINIA STATE HISTORIC PRESERVATION OFFICER  
REGARDING THE HUNTINGTON FEDERAL BUILDING MODERNIZATION,  
CITY OF HUNTINGTON, CABELL COUNTY, WEST VIRGINIA**

**WHEREAS**, pursuant to the American Reinvestment and Recovery Act of 2009 (ARRA), the U.S. General Services Administration (“GSA”) plans to modernize the Huntington Federal Building (“Undertaking”) in cooperation with the sole tenant, the U.S. Army Corps of Engineers, Huntington District (Huntington District); and

**WHEREAS**, to meet both GSA’s ARRA requirements and the Unified Facility Criteria (UFC) 4-010-01: Department of Defense Minimum Anti-Terrorism Standards for Buildings; the Undertaking consists of modernizing the existing building, including structural security modifications, the removal and replacement of the existing façade, interior alterations, upgrades to the mechanical plant, and the installation of solar panels on the roof of the building and

**WHEREAS**, the Undertaking also includes GSA’s procurement and build out of separate temporary leased space in Huntington, to be occupied by the Huntington District during construction at the Huntington Federal Building; and

**WHEREAS**, pursuant to ARRA, GSA anticipates commencing the Undertaking in Summer 2011; and

**WHEREAS**, GSA and the West Virginia State Historic Preservation Officer (SHPO) agree on the Area of Potential Effect (APE) for the Undertaking as depicted and described in Attachment I; and

**WHEREAS** GSA has determined that the Undertaking will have an Adverse Effect on the Downtown Huntington Historic District, which is listed in the National Register of Historic Places, and has consulted with the SHPO pursuant to 36 C.F.R. part 800, of the regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. § 470f); and

**WHEREAS**, GSA has consulted with the Huntington District regarding the effects of the Undertaking on historic properties and has invited them to sign this MOA as a concurring party (“Concurring Party”); and

**WHEREAS**, the Huntington District has deferred lead agency status to GSA pursuant to 36 C.F.R. Part 800(a)(2) and GSA is the responsible party for all costs associated with resolving adverse effects to historic properties for this Undertaking; and

**WHEREAS**, GSA has informed the Huntington Historic Landmark Commission, Cabell County Historic Landmarks Commission, the Madie Carroll House Preservation Society, and the Preservation Alliance of West Virginia of the Undertaking, and received no response from these

groups regarding the Undertaking; and

**WHEREAS**, pursuant to 36 C.F.R. § 800.6(a)(1), prior to beginning consultation to resolve adverse effects, GSA notified the Advisory Council on Historic Preservation (ACHP) of GSA's adverse effect finding by providing the documentation specified in 36 C.F.R. § 800.11(e), and the ACHP declined to participate; and

**WHEREAS**, GSA has consulted with the SHPO in accordance with 36 C.F.R. § 800.6(b)(1), "Resolution without the Council;" and together GSA and SHPO are the signatories to this MOA ("Signatories"); and,

**WHEREAS**, GSA consulted upon the concept plan for the new Huntington Federal Building façade with the SHPO and the Huntington District, as depicted in Attachment II, and both parties have declared that they are amenable to the design; and

**WHEREAS**, in accordance with 36 C.F.R. § 800.6(b)(1)(iv), GSA will submit this MOA, along with the documentation specified in 36 C.F.R. § 800.11(f), to the ACHP prior to approving the Undertaking in order to meet the requirements of Section 106 and 36 C.F.R. § 800.6(b)(1); and

**NOW, THEREFORE**, GSA and the SHPO agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the Undertaking on historic properties.

## **I. STIPULATIONS**

GSA shall ensure that the following measures are carried out:

I. GSA shall continue consultation with the SHPO regarding the procurement and build out of leased space to temporarily house the Huntington District for the extent of the construction period at the Huntington Federal Building, should the procurement and build out of temporary leased space have the potential to affect historic properties.

II. GSA shall continue consultation with the SHPO regarding the design of the new Huntington Federal Building façade, which shall be based on the concept drawing (Attachment II). The SHPO has declared that it is amenable to the proposed design as being sympathetic to the Downtown Huntington Historic District.

1. GSA shall submit the 65% and 95% relevant exterior facade design drawings to the SHPO for review and comment prior to commencing the Undertaking to demonstrate that no significant changes have occurred to the design presented in the concept drawings (Attachment II).
2. The SHPO shall provide any comments in writing within thirty calendar (30) days of their receipt of the design drawing submissions.
3. Should the SHPO not comment within 30 days after receipt of the 95% design drawings, GSA shall assume no comments are forthcoming and finalize the design documents.

III. GSA shall conduct a public meeting and open house to inform the public about the Undertaking.

The meeting is anticipated to be held in Fall 2011.

IV. GSA shall prepare a documentation package for the existing Huntington Federal Building that will include a narrative history, the original construction drawings, historic photographs as available, as-built drawings, and existing condition photographs. Further, GSA shall ensure:

1. The documentation package will be prepared in HABS / HAER Short Format narrative report, Level 3, in accordance with the “Secretary of the Interior’s Standards and Guidelines for Architectural and Engineering Documentation: HABS / HAER Standards” (revised 1990) as described in Attachment III; excepting that photographs included in the documentation package will be digital and comply with the “Proposed Updated Photograph Policy National Register of Historic Places” (Revised March 2008) as described in Attachment IV.
2. Archival copies of the documentation package will be produced in accordance with the “Secretary of the Interior’s Standards and Guidelines for Architectural and Engineering Documentation: HABS / HAER Standards” (revised 1990) and “Proposed Updated Photograph Policy National Register of Historic Places” (revised March 2008) as described in Attachments III and IV.
3. Archival hard and digital copies of the documentation package will be deposited with the SHPO, West Virginia State Archives, Cabell County Library, Huntington Historic Landmark Commission, Cabell County Historic Landmark Commission, and Silling Associates, Inc.
4. The documentation package will be made available for download in.pdf format by GSA on a publicly accessible website.
5. GSA shall submit the documentation package to SHPO for review and comment prior to commencing the Undertaking.
  - a. The SHPO shall provide comments and / or final acceptance in writing within thirty calendar (30) days of their receipt of the draft documentation package for review.
  - b. Should the SHPO not comment within 30 days after receipt of the draft documentation package, GSA shall assume it has been accepted and finalize the documentation package.

V. GSA shall produce a video presentation on the Huntington Federal Building project.

The video will include annotated, animated views of 3D models of the building as designed, as existing prior to implementation of the Undertaking, and as proposed.

1. The video presentation shall be displayed in rotation on the video displays in the lobbies of the Huntington Federal Building and the Sidney L. Christie Federal Building for a period of five (5) years after the conclusion of the Undertaking.
2. GSA shall submit the video to the SHPO for review and comment prior to finalization.
  - a. The SHPO shall provide comments and / or final acceptance in writing within thirty calendar (30) days of their receipt of the draft video for review.
  - b. Should the SHPO not comment within 30 days after receipt of the video, GSA shall assume it has been accepted and finalize the video.

VI. GSA shall produce a brochure on the existing building to be made available in the lobbies of the Huntington Federal Building and the Sidney L. Christie Federal Building. Further, GSA shall ensure:

1. The brochure will be made available for download on a publicly accessible website.
2. Copies of the brochure will be deposited with the SHPO, West Virginia State Archives,

Cabell County Library, and Huntington Historic Landmark Commission.

3. GSA shall submit the brochure to the SHPO for review prior to finalization.
  - a. The SHPO shall provide comments and / or final acceptance in writing within thirty calendar (30) days of their receipt of the draft brochure for review.
  - b. Should the SHPO not comment within 30 days after receipt of the draft brochure, GSA shall assume it has been accepted and finalize the brochure

VII. With the exception of Stipulations II and IV, which must be completed prior to commencement of the Undertaking, the remainder of the stipulations may continue in development and review concurrent with the Undertaking.

## **II. DURATION**

This MOA will expire if its terms are not carried out within five (5) years from the date of its execution. Prior to such time, GSA may consult with the other Signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation VIII below.

## **III. MONITORING AND REPORTING**

Each year following the execution of this MOA until it expires or is terminated, GSA shall provide all parties to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in GSA's efforts to carry out the terms of this MOA.

## **IV. DISPUTE RESOLUTION**

Should any Signatory or Concurring Party to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, GSA shall consult with such party to resolve the objection. If GSA determines that such objection cannot be resolved, GSA will:

A. Forward all documentation relevant to the dispute, including the GSA's proposed resolution, to the ACHP. The ACHP shall provide GSA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, GSA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, Signatories and Concurring Parties, and provide them with a copy of this written response. GSA will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, GSA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, GSA shall prepare a written response that takes into account any timely comments regarding the dispute from the Signatories and concurring parties to the MOA, and provide them and the ACHP with a copy of such written response.

C. GSA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

## **V. AMENDMENTS**

This MOA may be amended when such an amendment is agreed to in writing by all Signatories. The amendment will be effective on the date a copy, signed by all of the Signatories, is filed with the ACHP.

## **VI. TERMINATION**

If any Signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Stipulation VIII, above. If within thirty (30) days (or another time period agreed to by all Signatories) an amendment cannot be reached, any Signatory may terminate the MOA upon written notification to the other Signatories.

Once the MOA is terminated, and prior to work continuing on the Undertaking, GSA must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. GSA shall notify the Signatories as to the course of action it will pursue.

Execution of this MOA by the GSA and SHPO and implementation of its terms evidence that GSA has taken into account the effects of this Undertaking on historic properties and afforded the ACHP an opportunity to comment.

**Memorandum Of Agreement Regarding The Huntington Federal Building Modernization,  
City Of Huntington, Cabell County, West Virginia**

**SIGNATORIES:**

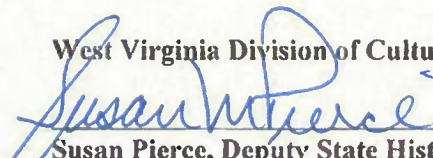
**U.S. General Services Administration**

 Date 9/26/2011  
**Rob Hewell, Public Buildings Service Mid-Atlantic Regional Commissioner**

**U.S. General Services Administration**

 Date 8/8/11  
**Beth L. Savage, Federal Preservation Officer**

**West Virginia Division of Culture and History**

 Date 9/19/11  
**Susan Pierce, Deputy State Historic Preservation Officer**

**CONCURRING PARTY:**

**U.S. Army Corps of Engineers**

\_\_\_\_\_ Date \_\_\_\_\_  
**Robert D. Peterson**  
**Colonel, Corps of Engineers**  
**District Engineer**

**ATTACHMENTS:**

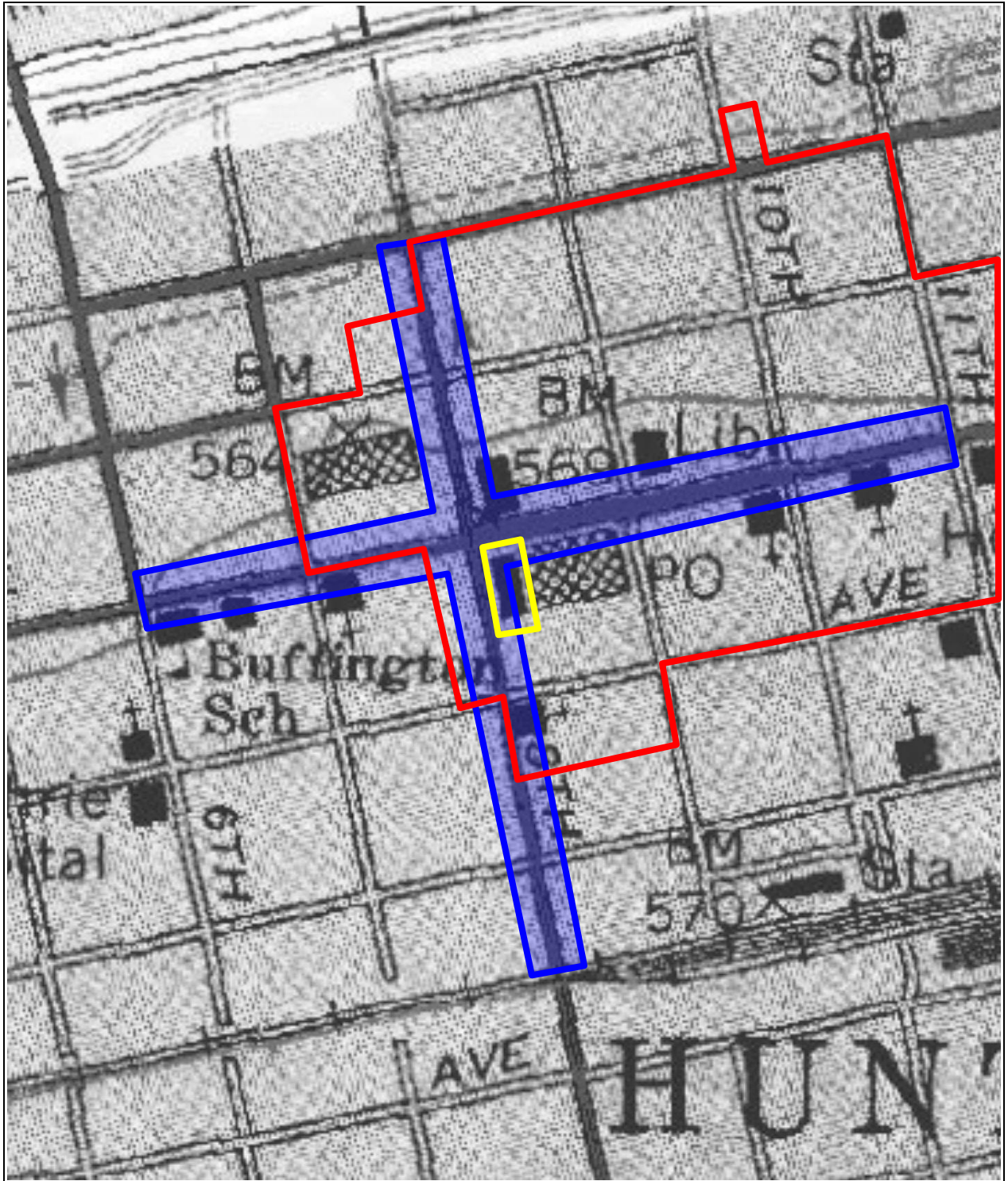
- Attachment I: APE
- Attachment II: New Huntington Federal Building Façade Concept Plan
- Attachment III: Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation: HABS / HAER Standards (revised 1990)
- Attachment IV: Proposed Updated Photograph Policy National Register of Historic Places (Revised March 2008)
- ~~Attachment V: Modern Federal Building Brochure Examples (3)~~

## **ATTACHMENT I**

### **APE**

The Area of Potential Effect (APE) for Direct Effects for this Undertaking is limited to the physical boundaries (legal description) of the subject property, the Huntington Federal Building, as delineated in the map below. The proposed Undertaking will not include any below-grade work likely to disturb any archaeological resources. For the purposes of Direct Effects, the APE is limited to the structure of the building itself. For the purposes of Indirect Effects, the APE incorporates the view sheds along 8th Street and 5th Avenue in the Downtown Huntington Historic District. The APE includes 8th Street from 3rd Avenue to the railroad tracks just north of 7th Avenue, and 5th Avenue from 6th Street to 11th Street, City of Huntington, Cabell County, West Virginia.

**ATTACHMENT I: APE**



Portion of the Huntington, WV-OH U.S.G.S. 7.5' Quadrangle depicting the subject property and APE for Direct Effects (outlined in yellow), the APE for Indirect Effects (shaded in blue) and the boundaries of the Downtown Huntington Historic District (outlined in red).



**ATTACHMENT II**

**New Huntington Federal Building Façade Concept Plan**

# FACADE DESIGN STUDY

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CONCEPT Ja - 5TH AVE. & 8TH ST. STREET LEVEL VIEW

HUNTINGTON FEDERAL BUILDING  
HUNTINGTON, WV

# FACADE DESIGN STUDY

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CONCEPT J a - VIEW OF NORTH ELEVATION

HUNTINGTON FEDERAL BUILDING  
HUNTINGTON, WV

# FACADE DESIGN STUDY

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CONCEPT J a - VIEW OF WEST ELEVATION

HUNTINGTON FEDERAL BUILDING  
HUNTINGTON, WV

**ATTACHMENT III**

**Secretary of the Interior's Standards and Guidelines for Architectural and Engineering  
Documentation: HABS / HAER Standards (revised 1990)**



On the cover: Virginia State Capitol section drawing, drawn by Gerhard Pfundner, 1989.  
Back Cover: Troy Gas Light Co. Gasholder House, in Troy, New York, drawn by Eric DeLony.

Acknowledgements: These standards were compiled and reissued in 1990, by Caroline H. Russell and the staff of the HABS/HAER Division. Thanks to Ronald M. Greenberg who reviewed the manuscript and to all the staff involved in the production.

SECRETARY OF THE INTERIOR'S  
STANDARDS AND GUIDELINES  
FOR  
ARCHITECTURAL AND ENGINEERING  
DOCUMENTATION:  
HABS/HAER STANDARDS

Originally published in the **Federal Register**, Vol. 48, No. 190,  
(Thursday, September 29, 1983), pp. 44730-34.

Historic American Buildings Survey/  
Historic American Engineering Record  
Cultural Resources Program  
National Park Service  
U.S. Department of the Interior  
Washington, D.C. 20013-7127

1990



Secretary of the Interior  
Asst. Secretary, Fish & Wildlife & Parks  
Director of the National Park Service  
Deputy Director  
Assoc. Director for Cultural Resources  
Deputy Assoc. Director for Cultural Resources  
Chief, HABS/HAER Division  
Acting Deputy Chief, HABS/HAER Division  
Chief, HAER  
Principal Architect, HABS  
Senior Historian, HABS

Manuel Lujan, Jr.  
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Jerry L. Rogers  
Rowland T. Bowers  
Robert J. Kapsch  
John A. Burns  
Eric N. DeLony  
Paul D. Dolinsky  
Allison K. Hoagland

The Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) a division of the National Park Service is responsible for documenting the historic buildings, sites, structures, and objects of this country by producing measured drawings, large format photographs, and written histories. The Library of Congress, Prints and Photographs Division is the repository for these documents. The American Institute of Architects, the American Society of Civil Engineers, and the other founding engineering societies provide technical guidance. The regional offices of the National Park Service in Philadelphia, Atlanta, Denver, San Francisco, and Anchorage administer the mitigation documentation program.

## Preface

This booklet contains the Secretary of the Interior's Standards for Architectural and Engineering Documentation as published in the *Federal Register* on September 29, 1983 - commonly known as the HABS/HAER Standards for the Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) program of the National Park Service.

These performance standards are intended to define the products acceptable for inclusion in the HABS/HAER collections within the Library of Congress.

Those products include:

- Measured Drawings
- Large Format Photographs
- Written Data

These standards are as originally published in the *Federal Register* on September 29, 1983 except that the Recommended Sources of Technical Information and Annotated Bibliography contained in the notice of 1983 have been updated to reflect current availability of publications and other printed materials. These standards are not intended to be used alone but in conjunction with guidelines and other publications listed in the bibliography included here.

These standards will be used to produce for the following reasons, documentation that meets HABS/HAER standards:

- In preparing mitigation documentation in accordance with the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 *et seq.*).
- In preparing documentation to be donated to the HABS/HAER collection.
- In preparing documentation as part of a HABS/HAER recording project.

Additional information concerning the HABS/HAER program is available by writing the Chief, HABS/HAER Division, National Park Service, P.O. Box 37127, Washington, D.C. 20013-7127.

Robert J. Kapsch  
Chief  
Historic American Buildings Survey/  
Historic American Engineering Record  
National Park Service

# **SECRETARY OF THE INTERIOR'S STANDARDS for ARCHITECTURAL AND ENGINEERING DOCUMENTATION<sup>1</sup>**

These standards concern the development of documentation for historic buildings, sites, structures, and objects. This documentation, which usually consists of measured drawings, photographs, and written data, provides important information on a property's significance for use by scholars, researchers, preservationists, architects, engineers, and others interested in preserving and understanding historic properties. Documentation permits accurate repair or reconstruction of parts of a property, records existing conditions for easements, or may preserve information about a property that is to be demolished.

These standards are intended for use in developing documentation to be included in the Historic American Building Survey (HABS) and the Historic American Engineering Record (HAER) Collections in the Library of Congress. HABS/HAER in the National Park Service, have defined specific requirements for meeting these Standards for their collections. The HABS/HAER requirements include information important to development of documentation for other purposes such as State or local archives.

## **Standard I. Documentation Shall Adequately Explicate and Illustrate What is Significant or Valuable About the Historic Building, Site, Structure or Object Being Documented.**

The historic significance of the building, site, structure or object identified in the evaluation process should be conveyed by the drawings, photographs and other materials that comprise documentation. The historical, architectural, engineering or cultural values of the property together with the purpose of the documentation activity determine the level and methods of documentation. Documentation prepared for submission to the Library of Congress must meet the HABS/HAER Guidelines.

## **Standard II. Documentation Shall be Prepared Accurately From Reliable Sources With Limitations Clearly Stated to Permit Independent Verification of the Information.**

The purpose of documentation is to preserve an accurate record of historic properties that can be used in research and other preservation activities. To serve these purposes, the documentation must include information that permits assessment of its reliability.

## **Standard III. Documentation Shall be Prepared on Materials That are Readily Reproducible, Durable and in Standard Sizes.**

The size and quality of documentation materials are important factors in the preservation of information for future use. Selection of materials should be based on the length of time expected for storage, the anticipated frequency of use and a size convenient for storage.

## **Standard IV. Documentation Shall be Clearly and Concisely Produced.**

In order for documentation to be useful for future research, written materials must be legible and understandable, and graphic materials must contain scale information and location references.

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<sup>1</sup> *Federal Register*, Vol. 48, No. 190, Thursday, September 29, 1983, pp. 44730-44731.

# SECRETARY OF THE INTERIOR'S GUIDELINES for ARCHITECTURAL AND ENGINEERING DOCUMENTATION<sup>2</sup>

## Introduction

These Guidelines link the Standards for Architectural and Engineering Documentation with more specific guidance and technical information. They describe one approach to meeting the Standards for Architectural Engineering Documentation. Agencies, organizations or individuals proposing to approach documentation differently may wish to review their approaches with the National Park Service.

The Guidelines are organized as follows:

- Definitions
- Goal of Documentation
- The HABS/HAER Collections
- Standard I: Content
- Standard II: Quality
- Standard III: Materials
- Standard IV: Presentation
- Architectural and Engineering Documentation  
Prepared for Other Purposes
- Recommended Sources of Technical Information  
and Annotated Bibliography

## Definitions

These definitions are used in conjunction with these Guidelines:

- Architectural Data Form-a one page HABS form intended to provide identifying information for accompanying HABS documentation.
- Documentation-measured drawings, photographs, histories, inventory cards or other media that depict historic buildings, sites, structures or objects.
- Field Photography-photography other than large-format photography, intended for the purpose of producing documentation, usually 35mm.
- Field Records-notes of measurements taken, field photographs and other recorded information intended for the purpose of producing documentation.

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<sup>2</sup> *Federal Register*, Vol. 48, No. 190, Thursday, September 29, 1983, pp.44731-34.

- Inventory Card-a one page form which includes written data, a sketched site plan and a 35mm contact print drymounted on the form. The negative with a separate contact sheet and index should be included with the inventory card.
- Large Format Photographs-photographs taken of historic buildings, sites, structures or objects where the negative is a 4 X 5", 5 X 7" or 8 X 10" size and where the photograph is taken with appropriate means to correct perspective distortion.
- Measured Drawings-drawings produced on HABS or HAER formats depicting existing conditions or other relevant features of historic buildings, sites, structures or objects. Measured drawings are usually produced in ink on archivally stable material, such as mylar.
- Photocopy-A photograph, with large-format negative, of a photograph or drawing.
- Select Existing Drawings-drawings of historic buildings, sites, structures or objects, whether original construction or later alteration drawings that portray or depict the historic value or significance.
- Sketch Plan-a floor plan, generally not to exact scale although often drawn from measurements, where the features are shown in proper relation and proportion to one another.

### **Goal of Documentation**

The Historic American Buildings Survey (HABS) and Historic American Engineering Record (HAER) are the national historical architectural and engineering documentation programs of the National Park Service that promote documentation incorporated into the HABS/HAER collections in the Library of Congress. The goal of the collections is to provide architects, engineers, scholars, and interested members of the public with comprehensive documentation of buildings, sites, structures and objects significant in American history and the growth and development of the built environment.

The HABS/HAER Collections: HABS/HAER documentation usually consists of measured drawings, photographs and written data that provide a detailed record which reflects a property's significance. Measured drawings and properly executed photographs act as a form of insurance against fires and natural disasters by permitting the repair and, if necessary, reconstruction of historic structures damaged by such disasters. Documentation is used to provide the basis for enforcing preservation easement. In addition, documentation is often the last means of preservation of a property; when a property is to be demolished, its documentation provides future researchers access to valuable information that otherwise would be lost.

HABS/HAER documentation is developed in a number of ways. First and most usually, the National Park Service employs summer teams of student architects, engineers, historians, and architectural historians to develop HABS/HAER documentation, under the supervision of National Park Service professionals. Second, the National Park Service produces HABS/HAER documentation in conjunction with restoration or other preservation treatment, of historic buildings managed by the National Park Service. Third, Federal agencies, pursuant to Section 110(b) of the National Historic Preservation Act, as amended, record those historic

properties to be demolished or substantially altered as a result of agency action or assisted action (referred to as mitigation projects). Fourth, individuals and organizations prepare documentation to HABS/HAER standards and donate that documentation to the HABS/HAER collections. For each of these programs, different Documentation Levels will be set.

The standards describe the fundamental principals of HABS/HAER documentation. They are supplemented by other material describing more specific guidelines, such as line weights for drawings, preferred techniques for architectural photography, and formats for written data. This technical information is found in the HABS/HAER Procedures Manual.

These guidelines include important information about developing documentation for State or local archives. The State Historic Preservation Officer or the State library should be consulted regarding archival requirements if the documentation will become part of their collections. In establishing archives, the important questions of durability and reproducibility should be considered in relation to the purposes of the collection.

Documentation prepared for the purpose of inclusion in the HABS/HAER collections must meet the requirements below. The HABS/HAER office of the National Park Service retains the right to refuse to accept documentation for inclusion in the HABS/HAER collections when that documentation does not meet HABS/HAER requirements, as specified below.

### **Standard I: Content**

1. Requirement: *Documentation shall adequately explicate and illustrate what is significant or valuable about the historic building, site, structure or object being documented.*

2. Criteria: Documentation shall meet one of the following documentation levels to be considered adequate for inclusion in the HABS/HAER collections.

- a. Documentation Level I;
  - (1) Drawings: a full set of measured drawings depicting existing or historic conditions.
  - (2) Photographs: photographs with large-format negatives of exterior and interior views; photocopies with large-format negatives of select existing drawings or historic views where available.
  - (3) Written data: History and description.
- b. Documentation Level II;
  - (1) Drawings: select existing drawings, where available, should be photographed with large-format negatives or photographically reproduced on mylar.
  - (2) Photographs: photographs with large-format negatives of exterior and interior views, or historic views, where available.
  - (3) Written data: history and description.
- c. Documentation Level III;
  - (1) Drawings: sketch plan.
  - (2) Photographs: photographs with large-format negatives of exterior and interior views.
  - (3) Written data: architectural data form.

d. Documentation Level IV: HABS/HAER inventory card.

3. Test: Inspection of the documentation by HABS/HAER staff.

4. Commentary: The HABS/HAER office retains the right to refuse to accept any documentation on buildings, sites, structures or objects lacking historical significance. Generally, buildings, sites, structures or objects must be listed in, or eligible for listing in the National Register of Historic Places to be considered for inclusion in the HABS/HAER collections.

The kind and amount of documentation should be appropriate to the nature and significance of the buildings, site, structure or object being documented. For example, Documentation Level I would be inappropriate for a building that is a minor element of a historic district, notable only for streetscape context and scale. A full set of measured drawings for such a minor building would be expensive and would add little, if any, information to the HABS/HAER collections. Large format photography [Documentation Level III] would usually be adequate to record the significance of this type of building.

Similarly, the aspect of the property that is being documented should reflect the nature and significance of the building, site, structure or object being documented. For example, measured drawings of Dankmar Adler and Louis Sullivan's Auditorium Building in Chicago should indicate not only facades, floor plans and sections, but also the innovative structural and mechanical systems that were incorporated in that building. Large format photography of Gunston Hall in Fairfax County, Virginia, to take another example, should clearly show William Buckland's hand-carved moldings in the Palladian Room, as well as other views.

HABS/HAER documentation is usually in the form of measured drawings, photographs, written data. While the criteria in this section have addressed only these media, documentation need not be limited to them. Other media, such as films of industrial processes, can and have been used to document historic buildings, sites, structures or objects. If other media are to be used, the HABS/HAER office should be contacted before recording.

The actual selection of the appropriate documentation level will vary, as discussed above. For mitigation documentation projects, this level will be selected by the National Park Service Regional Office and communicated to the agency responsible for completing the documentation. Generally, Level I documentation is required for nationally significant buildings and structures, defined as National Historic Landmarks and the primary historic units of the National Park Service.

On occasion, factors other than significance will dictate the selection of another level of documentation. For example, if a rehabilitation of a property is planned, the owner may wish to have a full set of as-built drawings, even though the significance may indicate Level II documentation.

HABS Level I measured drawings usually depict existing conditions through the use of a site plan, floor plans, elevations, sections and construction details. HAER Level I measured drawings will frequently depict original conditions where adequate historical material exists, so as to illustrate manufacturing or engineering processes.

Level II documentation differs from Level I by substituting copies of existing drawings, either original or alteration drawings, for recently executed measured drawings. If this is done, the drawings must meet HABS/HAER requirements outlined below. While existing drawings are rarely as suitable as-built drawings, they are adequate in many cases for documentation purposes. Only when the desirability of having as-built drawings is clear are Level I measured drawings required in addition to existing drawings. If existing drawings are housed in an accessible collection and cared for archivally, their reproduction for HABS/HAER may not be necessary. In other cases, Level I measured drawings are required in the absence of existing drawings.

Level III documentation requires a sketch plan if it helps to explain the structure. The architectural data form should supplement the photographs by explaining what is not readily visible.

Level IV documentation consists of completed HABS/HAER inventory cards. This level of documentation, unlike the other three levels, is rarely considered adequate documentation for the HABS/HAER collections but is undertaken to identify historic resources in a given area prior to additional, more comprehensive documentation.

## **Standard II: Quality**

1. Requirement: *HABS and HAER documentation shall be prepared accurately from reliable sources with limitations clearly stated to permit independent verification of information.*

2. Criteria: For all levels of documentation, the following quality standards shall be met:

a. Measured drawings: Measured drawings shall be produced from recorded, accurate measurements. Portions of the building that were not accessible for measurement should not be drawn on the measured drawings but clearly labeled as not accessible or drawn from available construction drawings and other sources and so identified. No part of the measured drawings shall be produced from hypothesis or non-measurement related activities. Documentation Level I measured drawings shall be accompanied by a set of field notebooks in which the measurements were first recorded. Other drawings prepared for Documentation Levels II and III, shall include a statement describing where the original drawings are located.

b. Large format photographs: Large format photographs shall clearly depict the appearance of the property and areas of significance of the recorded building, site, structure or object. Each view shall be perspective-corrected and fully captioned.

c. Written history: Written history and description for Documentation Levels I and II shall be based on primary sources to the greatest extent possible. For Levels III and IV, secondary sources may provide adequate information; if not, primary research will be necessary. A frank assessment of the reliability and limitations of sources shall be included. Within the written history, statements shall be footnoted as to their sources, where appropriate. The written data shall include a methodology section specifying name of researcher, date of research, sources searched, and limitations of the project.



3. Test: Inspection of the documentation by HABS/HAER staff.

4. Commentary: The reliability of the HABS/HAER collections depends on documentation of high quality. Quality is not something that can be easily prescribed or quantified, but it derives from a process in which thoroughness and accuracy play a large part. The principle of independent verification of HABS/HAER documentation is critical to the HABS/HAER collections.

### **Standard III: Materials**

1. Requirement: *HABS and HAER documentation shall be prepared on materials that are readily reproducible for ease of access; durable for long storage; and in standard sizes for ease of handling.*

2. Criteria: For all levels of documentation, the following material standards shall be met:

- a. Measured Drawings:  
Readily Reproducible: Ink on translucent material.  
Durable: Ink on archivally stable materials.  
Standard Sizes: Two sizes: 19 X 24" or 24 X 36".
- b. Large Format Photographs:  
Readily Reproducible: Prints shall accompany all negatives.  
Durable: Photography must be archivally processed and stored. Negatives are required on safety film only. Resin-coated paper is not accepted. Color photography is not acceptable.  
Standard Sizes: Three sizes: 4 X 5", 5 X 7", 8 X 10".
- c. Written History and Description:  
Readily Reproducible: Clean copy for xeroxing.  
Durable: Archival bond required.  
Standard Sizes: 8½ X 11".
- d. Field Records:  
Readily Reproducible: Field notebooks may be xeroxed. Photo identification sheet will accompany 35 mm negatives and contact sheets.  
Durable: No requirement  
Standard Sizes: Only requirement is that they can be made to fit into a 9½ X 12" archival folding file.

3. Test: Inspection of the documentation by HABS/HAER staff.

4. Commentary: All HABS/HAER records are intended for reproduction; some 20,000 HABS/HAER records are reproduced each year by the Library of Congress. Although field records are not intended for quality reproduction, it is intended that they be used to supplement the formal documentation. The basic durability performance standard for HABS/HAER records is 500 years. Ink on mylar is believed to meet this standard, while color photography, for example, does not. Field records do not meet this archival standard, but are maintain in the HABS/HAER collections as a courtesy to the collection user.

#### **Standard IV: Preservation**

1. Requirement: *HABS and HAER documentation shall be clearly and concisely produced.*

2. Criteria: For levels of documentation as indicated below, the following standards for presentation will be used:

- a. Measured Drawings: Level I measured drawings will be lettered mechanically (i.e., Leroy or similar) or in a handprinted equivalent style. Adequate dimensions shall be included on all sheets. Level III sketch plans should be neat and orderly.
- b. Large format photographs: Level I photographs shall include duplicate photographs that include a scale. Level II and III photographs shall include, at a minimum, at least one photograph with a scale, usually of the principal facade.
- c. Written history and description: Data shall be typewritten on bond, following accepted rules of grammar.

3. Test: Inspection of the documentation by HABS/HAER staff.

#### **Architectural and Engineering Documentation Prepared for Other Purposes**

Where a preservation planning process is in use, architectural and engineering documentation, like other treatment activities, are undertaken to achieve the goals identified by the preservation planning process. Documentation is deliberately selected as a treatment for properties evaluated as a significant, and the development of the documentation program for a property follows from the planning objectives.

Documentation efforts focus on the significant characteristics of the property, as defined in the previously completed evaluation. The selection of a level of documentation and the documentation techniques (measured drawings, photography, etc.) is based on the significance of the property and the management needs for which the documentation is being performed. For example, the kind and level of documentation required to record a historic property for easement purposes may be less detailed than that required as mitigation prior to destruction of the property. In the former case, essential documentation might be limited to the portions of the property controlled by the easement, for example, exterior facades; while in the latter case, significant interior architectural features and non-visible structural details would also be documented.

The principles and content of the HABS/HAER criteria may be used for guidance in creating documentation requirements for other archives. Levels of documentation and the durability and sizes of documentation may vary depending on the intended use and the repository. Accuracy of documentation should be controlled by assessing the reliability of all sources and making that assessment available in the archival record; by describing the limitations of the information available from research and physical examination of the property and by retaining the primary data (field measurements and notebooks) from which the archival record was produced. Usefulness of the documentation products depends on preparing the documentation on durable materials that are able to withstand handling and reproduction, and in sizes that can be stored and reproduced without damage.

## Recommended Sources of Technical Information and Annotated Bibliography<sup>3</sup>

*Recording Historic Structures* is available through AIA Press, request publication #ISBN 1-55835-018-7 (hardcover - \$26.95) or #ISBN 1-55835-021-7 (softcover - \$19.95), plus \$3.00 shipping charge, and D.C. or Maryland sales tax, if applicable. AIA Order Department, 9 Jay Gould Court, P.O. Box 753, Waldorf, Maryland 20601.

*Recording Historic Structures.* John A. Burns, editor. Washington, D.C.: The AIA Press, 1989.

With over 200 photographs, drawings, illustrations, a bibliography, and an index, this handbook discusses each aspect of the documentation of historic structures, using examples from the HABS/HAER collection.

The following printed materials are available by writing to: HABS/HAER - National Park Service, P.O. Box 37127, Washington, D.C. 20013-7127. Please send check or money order made out to the U.S. Treasury, to cover the cost of reproduction and handling. Availability and price accurate as of June 1, 1990.

*Guidelines for Recording Historic Ships.* Richard K. Anderson, Jr. Washington, D.C.: Historic American Buildings Survey/Historic American Engineering Record, National Park Service, 1988. Free, limited quantity.

This document marks the revival of the 1930's Historic American Merchant Marine Survey and provides the definitive guide to maritime recording.

*HABS Field Instructions for Measured Drawings.* Washington, D.C.: Historic American Buildings Survey/Historic American Engineering Record, National Park Service, 1981. \$5.00  
Gives procedures for producing measured drawings of historic buildings to HABS/HAER standards.

*HABS Historian's Procedures Manual.* Washington, D.C.: Historic American Buildings Survey/Historic American Engineering Record, National Park Service, 1983. \$2.00  
Provides guidelines for producing written data on historic buildings to HABS/HAER standards.

*HAER Field Instructions.* Washington, D.C.: Historic American Buildings Survey/Historic American Engineering Record, National Park Service, 1981. \$5.00  
Provides guidelines for documenting to HABS/HAER standards, historic engineering and industrial sites and structures with measured drawings and written data.

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<sup>3</sup>The original recommended sources of technical information contained in the *Federal Register* notice of September 29, 1983 have been omitted since most are out of print and/or superceded. The above recommended sources of technical information represent information available and current as of 1990.

*Specifications for the Production of Photographs.* Washington, D.C.: Historic American Buildings Survey/Historic American Engineering Record, National Park Service, 1984. \$2.00  
Provides criteria for the production of large format photographs for acceptance to the HABS/HAER collection.

*Transmitting Documentation to HABS/HAER WASO.* Washington, D.C.: Historic American Buildings Survey/Historic American Engineering Record, National Park Service, 1985. \$2.00

Provides transmittal procedures and archival requirements of documentation for acceptance to the HABS/HAER collection.

*Industrial Eye* is available from (request publication #ISBN 0-89133-124-7): Decatur House Museum Shop, 1600 H Street, NW, Washington, D.C. 20006. Please enclose a check or money order made out to the National Trust for \$34.95 plus \$3.00 for postage and handling.

*Industrial Eye. Photographs by Jet Lowe from the Historic American Engineering Record.* Washington, D.C.: National Trust for Historic Preservation, 1987.

Photographs of the county's engineering and industrial landmarks, illustrating the use of large format photography to document historic engineering works and interpret industrial processes. All photographs meet HABS/HAER standards.

*A Record in Detail* is available for \$34.95 plus \$2.50 postage and handling from:  
University of Missouri Press, 200 Lewis Hall, Columbia, Missouri 65211.

*A Record in Detail: The Architectural Photographs of Jack E. Boucher.* Columbia: University of Missouri Press, 1988.

A selection of the works of HABS photographer Jack E. Boucher, demonstrating the effective use of large format photography to record historic buildings. All photographs meet HABS/HAER standards.

*Architectural Graphic Standards, Eighth Edition.* American Institute of Architects. New York: John Wiley & Sons, Inc., 1988.

The standard reference for architectural information, this edition is the first to have a chapter on historic preservation, including four pages on HABS.

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For further information about HABS/HAER contact:

Historic American Buildings Survey/  
Historic American Engineering Record  
National Park Service  
P.O. Box 37127  
Washington, D.C. 20013-7127

## Appendices

### Appendix A



#### Measured Drawings:

Measured drawings shall be produced from recorded, accurate measurements. Portions of the building that were not accessible for measurement should not be drawn on the measured drawing but clearly labeled as not accessible or drawn from available construction drawings and other sources and so identified. Since measured drawings must be readily reproducible and durable, HABS/HAER standards call for ink on translucent and archivally stable materials, such as mylar. As illustrated in the reductions above, drawings are produced in two standard sizes, 19 X 24" and 24 X 36".

### Large Format Photographs:

HABS/HAER standards require that large format (cameras that produce 4 X 5", 5 X 7", or 8 X 10" negatives) photographic documentation be done with black and white film. A print must accompany each negative. The negatives and contact prints are archivally treated and the contact paper is fiber-based instead of resin-coated (RC). The paper and negatives must have had sufficiently long washings in water in order to remove all processing chemicals.

Written History and Description:

Written history and description are based on primary sources to the greatest extent possible and should include an assessment of the reliability and limitations of the sources. Within the written history, statements shall be footnoted as to their sources, where appropriate. The written data shall include a methodology section specifying the name of the researcher, date of research, sources researched, and limitations of the project. The histories will be submitted on 8½ X 11" archival bond.

## MITIGATIVE DOCUMENTATION PROGRAM

Under the provisions of the amended National Historic Preservation Act, Federal agencies are required to produce documentation to HABS/HAER standards on buildings, structures, sites, and objects that are listed in or eligible for listing in the National Register of Historic Places and that are threatened with demolition or substantial alteration by projects with Federal involvement. The five National Park Service regional offices charged with external historic preservation responsibilities administer the HABS/HAER mitigative documentation program. The actual work is usually conducted by contractors and supervised by the responsible Federal agency. The documentation produced is reviewed by the regional coordinator and transmitted to the HABS/HAER Washington office for inclusion in the HABS/HAER collections at the Library of Congress.







**ATTACHMENT IV**

**Proposed Updated Photograph Policy National Register of Historic Places (Revised March  
2008)**

PROPOSED UPDATED PHOTOGRAPH POLICY  
NATIONAL REGISTER OF HISTORIC PLACES

Revised March 2008

As of January 2, 2009, in accordance with U.S. National Archives and Records Administration (NARA), the National Register of Historic Places program will require that all photographs submitted as official documentation be expected to last seventy-five years or longer before showing significant signs of fading, deterioration, or discoloration. This standard (hereafter referred to as the “seventy-five year permanence standard”) is intended to ensure the longevity of National Register documentation and applies to all forms of photodocumentation, including those types of photographs currently available and any introduced in the future. Photographs that are improperly processed or incorrectly labeled will be returned.

At present, the following types of photographs are acceptable as official documentation for National Register nominations:

- black-and-white prints produced from digital images that have demonstrated an expected longevity of at least seventy five years. (Preferred Method)
- black-and-white images printed on silver-emulsion resin-coated (RC) papers.
- black-and-white images printed on silver-emulsion fiber-based papers.

No photographs printed on chromogenic papers are acceptable.

For digital prints there is a partial list of photographic ink and paper combinations that have been demonstrated to meet this standard available at: [www.nps.gov/history/nr/photoshortcut.htm](http://www.nps.gov/history/nr/photoshortcut.htm) and in the further ‘Further Information’ section of this policy. This list is not intended to be comprehensive. The National Register program is unable to conduct in-depth research on new photographic materials as they become available. Photographs produced using other ink and paper combinations that can be documented to meet the seventy-five year permanence standard will be accepted, provided that verifiable information attesting to their anticipated longevity can be provided. Prior approval by NPS is required.

Prints produced from digital photographs submitted as official documentation must be accompanied by corresponding electronic image files. The National Register program has adopted electronic image file standards based on current guidance issued by the U.S. National Archives and Records Administration (see [www.archives.gov/records-mgmt/initiatives/digital-photo-records.html](http://www.archives.gov/records-mgmt/initiatives/digital-photo-records.html)).

Electronic images submitted to the National Register program must

- be first generation,
- (Tagged Image File Format, file extension .tiff or .tif), Original-capture .tiff or raw converted to .tiff
- have a pixel array (also referred to as pixel depth or pixel dimension) of at least 3000 x 2000,
- have a resolution of 300 ppi (pixels per inch), and
- be RGB color mode. RGB color mode provides maximum detail even when printed in black-and-white.

CD-Rs or DVD-Rs submitted with a nomination containing the electronic images should be

- Recorded on CD-R gold or DVD-R gold disks
- labeled with the name of the property,
- labeled with the associated multiple property documentation form (if applicable), and
- labeled with the names of the county and state where the property is located. If the label is handwritten, disks and cases should be labeled with CD/DVD labeling markers, not with permanent markers.

The file name for each electronic image on the CD-R and DVD-R must correspond with the photo log included in the nomination and the information labeled on the back of each photograph, and it should also reference the county and state in which the property is located. For example, the image files for the James Smith House in Jefferson County, Alabama, would be saved as “AL\_JeffersonCounty\_SmithHouse\_0001.tif,” “AL\_JeffersonCounty\_SmithHouse\_0002.tif,” “AL\_JeffersonCounty\_SmithHouse\_0003.tif,” etc.

### Basic Requirements

Photographs must be

- unmounted (do not affix photographs to archival paper or any other material using staples, paper clips, glue, or other means),
- at least 3½ x 5 inches,
- properly processed and thoroughly washed (if applicable), and
- labeled in pencil or archival photo-labeling pen.

Photographs with adhesive backed labels will not be accepted. Such labels will eventually deteriorate and detach from the photograph, and their acidity may cause damage.

One copy of each photograph must be submitted to the National Register. The SHPO, TPO, or FPO may require one or more additional sets of photographs.

### Labeling Photographs

Two methods of labeling photographs are acceptable. In both cases all images will contain the name of the nomination, the multiple name if appropriate, the county, the state and the image number.

First method:

Labeling may be done by printing in pencil (soft lead, #1, works best) or with an archival photo-labeling pen on the back of each photograph. The following information must be included.

1. Name of the property or, for districts, the name of the building or street address followed by the name of the district.
2. County and state where the property is located.
3. Name of the photographer.
4. Date of photograph.
5. Location of original negative (if film is used).

6. Description of view indicating direction of camera.
7. Photograph number. For districts, use this number to identify the vantage point on the accompanying sketch map. To correspond with images on disk the use of leading zeros is required, ex. 0001, 0002, 0003 etc.

Second Method:

Labeling may also be done in combination with a continuation sheet(s). The photographs should be labeled in the manner described above with the name of the property, city and state, and photo number (items 1, 2, and 7). Then, on a separate continuation sheet, list the remaining information (items 3-6). Information common to all photographs, such as the photographer's name or the location of negatives, may be listed once in a statement on the continuation sheet.

Use of National Register Photographs

By allowing a photograph to be submitted as official documentation, photographers grant permission to the National Park Service to use the photograph for publication and other purposes, including duplication, display, distribution, study, publicity, audiovisual presentations, and display on and distribution via the Internet.

### Guidelines for Photographic Coverage

Photographs submitted to the National Register of Historic Places as official documentation should be clear (in focus), well-composed, and provide an accurate visual representation of the property and its significant features. They must illustrate the qualities discussed in the description and statement of significance. Photographs should show historically significant features and any alterations that have compromised integrity.

The number of photographic views needed depends on the size and complexity of the property. However, for an individual building it is recommended that no more than 16 images be included in the nomination. For a district it is recommended no more than 35 images be included with the nomination. For districts, views of whole or partial streetscapes are appropriate. Prints of historic photographs may be included to supplement the photographs noted above. Historic photographs may be particularly useful in illustrating changes that have occurred over time.

Embedding of images within the text of the nomination is discouraged. Embedding of COLOR images within the text of the nomination is not acceptable. Placing Historic images, black-and-white only, on continuation sheets is acceptable.

Buildings, structures, and objects:

- Submit photographs showing the principal facades and the setting in which the property is located.
- Additions, alterations, intrusions, and dependencies should appear in the photographs.
- Include views of interiors, outbuildings, landscaping, or unusual features if they contribute to the significance of the property.

Historic and archeological sites:

- Submit photographs showing the condition of the site and any above-ground or surface features and disturbances.
- If relevant to the evaluation of significance, include drawings or photographs illustrating artifacts that have been removed from the site.



- At least one photograph should show the physical environment and topography of the site.

Architectural and Historic Districts:

- Submit photographs depicting examples of major building types and styles, pivotal buildings and structures, and representative noncontributing resources.
- Streetscape and landscape views are recommended. Aerial views may also be useful. Views of significant topographic features and spatial elements should also be submitted.
- Views of individual buildings are not necessary if streetscape views clearly illustrate the significant historical and architectural qualities of the district.
- Key all photographs to the sketch map for the district.

Archeological Districts:

- Submit photographs of the principal sites and site types within the district following the guidelines for archeological sites (see above).

## Background

Several types of photographic prints are acceptable under the terms of this policy. For more than two decades, the National Register has accepted black-and-white photographs printed on silver-emulsion resin-coated (RC) and fiber-based papers. These remain acceptable. In March 2005, the National Register began accepting black-and-white prints made from digital images, provided that their anticipated longevity is comparable to or better than conventional black-and-white prints, which can be expected to last at least seventy-five years (and usually much longer).

Black-and-white prints have been required since inception of the National Register because of their superior archival characteristics. Ensuring the longevity of official documentation, including photographs, is essential for the administration of Federal historic preservation programs. In addition to the regulatory protections and grants and tax incentives available under Federal law to properties listed in the National Register, the nomination files for these programs constitute an irreplaceable archive of American history. When the National Register was established, black-and-white prints were generally made using silver-emulsion fiber-based paper, which has outstanding archival stability. If stored under proper conditions, black-and-white prints on fiber-based paper will easily last 150 years or more. In the late 1970s, resin-coated (RC) papers became popular because of their lower cost and ease of processing. Use of fiber-based papers consequently became limited to specialized applications. In response to these changes, the National Register began accepting photographs printed on RC paper in the early 1980s. Thus, as the policy on photographic documentation evolved over time, it came to be based on two specific types of commercially produced products, not a minimum requirement for longevity. The limitations of this policy became clear in recent years with the advent of digital photography, the introduction of black-and-white films that can be developed and printed using color (c-41) processing, and the declining popularity of conventional black-and-white photography.

The seventy-five-year permanence standard for all forms of photodocumentation, no matter what methods are used to produce the photographs in question, is designed to ensure that the photo policy will continue to be applicable as manufacturers introduce new products and discontinue others. It provides a basis for evaluating all currently available photographic materials and those

introduced in the future. Nominating authorities and nomination preparers are advised that manufacturers' claims sometimes overstate the expected longevity of products. In some cases, nominating authorities may be required to provide verifiable information referencing tests conducted by an independent laboratory to demonstrate that the prints in question meet the seventy-five year permanence standard. This does not mean that nominating authorities will be expected to contract with independent laboratories to test photographic materials or required to submit test data with each nomination. It may, however, be necessary to research the expected permanency of photographs when evaluating new photographic materials or processing methods. Nominating authorities are advised to consult the sources listed at the end of this document in seeking to identify photographic materials and processing methods that meet the seventy-five year permanence standard (see "For Further Information"). Other valuable sources of guidance include curators and archivists who specialize in photographs at state archives, libraries, and colleges and universities. In addition, manufacturers sometimes make available results of independent testing.

Nominating authorities and nomination preparers should also be aware that the proliferation of so-called "archival" products has made it difficult to identify products that meet the National Register standards for photodocumentation. No firm definition of archival exists, and many manufacturers now use the term for marketing purposes. In some instances, products labeled archival will last considerably longer than non-archival products but may not meet the seventy-five year permanence standard. Independent testing has shown that some popular photographic papers marketed as archival, for example, will begin deteriorating in less than seventy-five years and therefore cannot be accepted as official documentation. Therefore, archival products should not be accepted at face value but only if they meet the seventy-five year permanence standard.

Because of continual changes in photographic technology, the National Register Historic cannot undertake detailed study of new products as they become available. SHPOs, FPOs, and THPOs are encouraged to bring new imaging technologies that appear to meet the seventy-five year permanence standard to the attention of the National Register staff. Nominating authorities may have additional requirements for photodocumentation beyond the standards for the National

Register. Nomination preparers and other interested parties should consult SHPOs, FPOs, and THPOs to ensure compliance with all applicable standards.

### Digital Photographs

Several options are available for nominating authorities who wish to submit photographic prints produced from digital images. Consulting a photo lab in your area that offers professional services is a good starting point. A number of commercial processing methods produce high-quality prints from digital images that meet the seventy-five year permanence standard. If digital services that produce acceptable images at reasonable cost are locally available, this may prove satisfactory for many nominating authorities.

Another option is to produce prints in-house with an inkjet or dye-sublimation photo printer that can use special archival inks and photo papers. While most photo printers made for the consumer market are designed to produce color prints that last only a few years before fading, a number of manufacturers now offer models which, with the correct inks and papers, can produce prints with an expected lifespan comparable to or better than traditional black-and-white prints on RC paper. These printers can be obtained at reasonable cost. Producing photographic prints in-house may result in long-term cost savings and also offers the important advantage of providing control over the imaging process.

### Photographic Technology

The new technologies and photographic materials introduced in recent years have produced the most dramatic changes in photography since the advent of color films and printing papers in the 1960s. One consequence of these changes is the reduced availability of conventional black-and-white films, papers, and processing. In many cases, photographic labs capable of producing high-quality black-and-white photographs can be found only in major metropolitan areas. Declining demand for traditional black-and-white photography has resulted in significantly higher costs, which places an added burden on nominating authorities and nomination preparers. At the same time, improvements in digital technology have resulted in the availability of black-

and-white prints that can be obtained at reasonable cost and meet the seventy-five year permanence standard.

The longevity of a photograph depends on the materials and processing methods used and the conditions under which it is stored. The National Register collection is maintained at the National Park Service offices in Washington, D.C., and are stored under climate-controlled conditions. Each nomination is placed in an acid-free file folder, with photographs stored in a separate acid-free sleeve. The conditions under which nominations are stored are designed for archival longevity. To make certain that nominations last as long as possible, it is essential that nomination preparers and nominating authorities submit photographs that meet the photo-documentation standards.

An explanation of different types of photographic film can be found on our website: [www.nps.gov/history/nr/policyexpansion.htm](http://www.nps.gov/history/nr/policyexpansion.htm). The direction of technology appears to be going to completely digital. Photographic films are becoming a specialty item used by a small group of enthusiasts and artists. The National Register will continue to accept black-and-white photographs for the near future. However we anticipate most nominating authorities will switch to the digital policy because of its ease and compatibility with their own requirements.

Black-and-white photographic prints, produced by traditional film or digital printing, have markedly better permanency than color prints. Most color prints will begin showing signs of deterioration within only a few years, even if stored under ideal conditions. Color prints also are subject to uneven fading and color shifts. For these reasons, the National Register has always required black-and-white photographs.

Like conventional photographs, the longevity of prints made with digital imaging technology depends largely on the materials and ink used. Initially, the market for digital photographs focused on inexpensive color prints, which generally had poor longevity. Improvements in technology and growing demand for digital prints have led manufacturers to introduce new photo papers, inks, and printing systems, and it is now possible to obtain photographs made from digital images that equal or surpass the longevity of conventional black-and-white photographs

on RC paper. Prints made from digital images are available from photo labs that offer digital services or can be produced using printers and photo materials available to consumers. Available types of digital printing papers include versions similar to traditional RC and fiber-based black-and-white papers. As with conventional photographic materials, the National Register recommends that nominating authorities conduct careful research and check manufacturers' claims against independent laboratory testing before selecting digital photo products. It should be remembered that products marketed as "archival" will not necessarily meet National Register standards for photo documentation; nomination preparers and nominating authorities must ensure that photographs made from digital images will last at least seventy-five years before showing signs of deterioration.

Determining the expected longevity of photographic materials will continue to be challenging because of ongoing changes in the marketplace and technological innovation. The information provided above is intended only as a brief overview of basic photographic technologies. Although not exhaustive, it is provided to assist nomination preparers and nominating authorities obtain photographs that meet the standards for photodocumentation.

#### For Further Information

The National Register encourages nominating authorities and nomination preparers to consult reputable sources of information in selecting photographs to be submitted as official documentation. The most current information can usually be found online. In developing revised standards for photodocumentation, the National Register has found the following websites helpful.

American Institute for Conservation of Historic and Artistic Works: <http://aic.stanford.edu/>  
*Professional membership organization for conservators, including specialists with photographic materials. A public guide to caring for photographs is available at:*  
<http://aic.stanford.edu/library/online/brochures/photos.html>. *See also the "Find a Conservator" link for access to an online database of AIC members, which is a quick and easy way to find a trained photo conservator in your area.*

Wilhelm Imaging Research: [www.wilhelm-research.com](http://www.wilhelm-research.com)  
*Henry Wilhelm is widely recognized as a leading authority on the stability and preservation of traditional and digital photographs. He conducts research on photo materials and provides*

*consulting services to museums, archives, and commercial clients. The Wilhelm Imaging Research website includes data from permanence studies and articles by Wilhelm. This data is particularly useful when trying to determine if a particular type of photographic print will meet the National Register standards.*

Manufacturers' websites provide useful information about commercially-available products.

Eastman Kodak Company: [www.kodak.com](http://www.kodak.com)

Fujifilm USA: [www.fujifilm.com](http://www.fujifilm.com)

The Epson Company: [www.epson.com/northamerica.html](http://www.epson.com/northamerica.html)

California Digital Library Digital Format Standards (2001):

[www.cdlib.org/about/publications/CDLImageStd-2001.pdf](http://www.cdlib.org/about/publications/CDLImageStd-2001.pdf)

*Standards published by the California Digital Library at the University of California. Provides recommendations for image quality, file formats, and storage media.*

Columbia University Libraries, Technical Recommendations for Digital Imaging Projects (1997): [www.columbia.edu](http://www.columbia.edu)

*Digital imaging recommendations prepared by the Image Quality Working Group of ArchivesCom, a joint effort of Columbia University Libraries and Academic Information Systems at Columbia University.*

National Archives and Records Administration Guidance on Digital Photographic Records:

[www.archives.gov/records-mgmt/initiatives/digital-photo-records.html](http://www.archives.gov/records-mgmt/initiatives/digital-photo-records.html)

*Provides guidance on digital photographic records, including images captured by digital cameras.*

National Archives and Records Administration Guidance on Scanned Images of Textual Records: [www.archives.gov/records-mgmt/initiatives/scanned-textual.html](http://www.archives.gov/records-mgmt/initiatives/scanned-textual.html)

*Although concerned only with scanned images of textual records, this document includes guidance on digital file formats.*