



# Best Practices Review

A publication on National Register Bulletin guidance

## Removing Properties from the National Register

### Introduction

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The National Historic Preservation Act authorizes the Secretary of the Interior not only to expand but to maintain a National Register of Historic Places. Removals are part of that maintenance work.

Removals of properties from the National Register are extraordinarily rare. As of this writing, approximately 2,500 properties, of over 100,000 listed, have been removed since the National Register's formal establishment in 1966.

Nevertheless, there may be a good reason for a property to be removed. Federal regulations at 36 C.F.R. § 60.15 provide four reasons for removal:

- 1) the property has ceased to meet the criteria for listing in the National Register because the qualities which caused it to be originally listed have been lost or destroyed, or such qualities were lost subsequent to nomination and prior to listing;
- 2) additional information shows that the property does not meet the National Register criteria for evaluation;
- 3) error in professional judgment as to whether the property meets the criteria for evaluation; or
- 4) prejudicial procedural error in the nomination or listing process.

*National Register Bulletin: Completing the National Register Registration Form* further explains that

[u]nder very special circumstances, such as deterioration or loss of historic integrity, a property can be removed from the National Register. These circumstances are explained in 36 CFR Part 60. To request removal, provide the SHPO and FPO with an explanation of the reasons for removal and any supportive items such as photographs and news clippings.

(Form Bulletin, p. 72.)

This issue of the *Best Practices Review* discusses the process for, and provides examples of, removals of listings from the National Register of Historic Places for these four reasons.

### Evaluating Loss of Integrity

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Perhaps the easiest of the above reasons to understand and the most common is the loss of those "qualities which caused [the property] to be originally listed:" that is, the property has lost the integrity which allowed it to convey its significance (36 C.F.R. § 60.15(a)(1)). The National Register Information System (NRIS) has tracked

#### A few notes about this issue's content.....

- Removal of a property from the National Register for an unapproved move will be addressed in a future issue.
- A change to a property's contributing resources—for example, the demolition of a building within a historic district—is addressed through a listing update, discussed in detail in [Best Practices Review Issue 3, April 2023: Amending National Register Documentation](#).
- A National Historic Landmark is not addressed by 36 C.F.R. Part 60; it is de-designated by action of the Secretary of the Interior pursuant to 36 C.F.R. § 65.19, and thus is administratively removed from the National Register. No action by a S/THPO is required.

the reasons for removal only since 2016 and all removed properties from then until now—a total of 430—were removed due to loss of integrity, typically as a result of fire, weather damage, or demolition.

The following examples of recent removals present the documentation standards expected by the National Register Program. A request for removal need not be long, but it should at a minimum include the name of the property and National Register reference number; a description of its significance; the cause and extent of the damage; and photos of the property's current condition.

For example, the **Oregon Commercial Company Building**, listed in the National Register of Historic Places in 1992, was largely destroyed by arson in 2019. In May 2025, the Oregon SHPO submitted a tightly written, seven-page request for removal of the property from the National Register:

- page 1 is the completed Modified Continuation Sheet 10-900-a, with the SHPO certification;
- page 2 includes the National Register reference number and original listing date, and describes in a single, short paragraph the cause of the damage and current condition of the building; and
- pages 3 through 7 include embedded images of a news article and the before-and-after photographs of the building.

The building was removed from the National Register in June 2025.



Oregon Commercial Company Building, Huntington, Oregon. The image at the right shows the building's front façade in May 2019, shortly after the fire that destroyed most of the building. This surviving portion was subsequently razed. (Above image by Gary Halvorson for the Oregon State Archives; right image by Baker County (OR) Sheriff's Department)



Stratton House-Orem City Hall, Orem, Utah. The image above shows the condition of the building circa 1998, when the property was listed in the National Register. The images to the right show the refinished façade and large additions in 2009. (Photographs by Cory Jensen)



Likewise, the removal request for the **Jacob Hebeisen House** is brief yet it presents the information required for the Keeper to make a decision. Listed in the National Register in 1980, the building was demolished in 2002. A single page captures the National Register name and reference number, the reason for the removal request, the date and nature of the changes to the property, and a short narration of the situation that led to its demolition.

Not all removals are the result of total loss. A removal may also occur due to a loss of integrity from the replacement or addition of material, such as extensive façade resurfacing, or the construction of large or multiple additions. For example, the circa 1924 **Stratton House-Orem City Hall**, listed in the National Register in 1998, was extensively remodeled in 2008. Although the building was previously expanded in 1997 with a rear addition (described in the nomination in section 7, page 2 as “large [but] not intrusive, and barely apparent from the street”), the 2008 changes resulted in a building that no longer conveyed its significance for its role in the establishment and growth of the city of Orem. As described in the 2009 removal request,

[t]he building recently received an extensive addition and underwent a major renovation that completely covered the exterior of the original building with new brick and stucco.

(Stratton House-Orem City Hall removal request transmittal letter dated July 13, 2009.)

This removal request to the Keeper attaches an excellent example of the sort of information that must be provided to a petitioner and owner. The property was removed from the National Register in September 2009.

Although neither the Hebeisen House nor the Stratton House-Orem City Hall removal requests were submitted on Modified Continuation Sheet 10-900-a, both concisely present the information required by the Keeper to make a decision. Still, a best practice to ensure a clear administrative record is to make a removal request on Modified Continuation Sheet 10-900-a and Continuation Sheet 10-900-a.

## **Evaluating Whether the Property Meets the Criteria**

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Reasons 2 and 3 for removal are similar yet subtly different: both address whether the property meets “the National Register criteria for evaluation;” that is, whether the property is significant for the reasons described in the nomination. However, Reason 2 (“additional information”) may be understood as a request made as a result of the discovery of additional information that demonstrates that the property does not meet the criteria whereas Reason 3 (“error in professional judgement”) may more accurately be applied to a property that never should have been nominated and listed in the first place (36 C.F.R. § 60.15(a)(2-3)).

Please note that these reasons cannot be used to remove a property listed before December 13, 1980. Those properties may be removed only for a loss of integrity (36 C.F.R. § 60.15(b)). If a property listed prior to that date is believed to meet one of these two reasons for removal, the listing is addressed by updating it through the “additional documentation” process, described in [Best Practices Review Issue 3, April 2023: Amending National Register Documentation](#).

Both of these removal reasons are rare, so hypothetical examples are provided here.

- Reason 2 Hypothetical: Removal as a result of additional information

A building is nominated and listed for its significant association with a particular person. However, decades later, research demonstrates that this building is not in any way associated with this individual. Rather, it is a building 500 yards farther down the street that is significantly associated with this person. Removal of the listed building would be pursued under Reason 2 and nomination of the correct building would be through the typical proponent-review board-S/THPO-NPS process (36 C.F.R. § 60.6).

- Reason 3 Hypothetical: Removal for an error in professional judgement

An exposed rock wall was nominated and listed in 1981 for the significance of its Native American carvings. The nomination cited several published papers documenting Native American petroglyphs in what is now the Northeastern United States. The Tribe to whose ancestors the carvings are attributed recently learned of the listing and disputed the authenticity of the carvings, asserting that their history says nothing of this feature or of a tradition of creating petroglyphs, and that the “carvings” are natural deformations in the stone. Removal would be pursued under Reason 3.

For either of the above reasons, the removal request documentation should consist at a minimum of the property name, National Registration reference number, and a description of the error. Photographs are not typically required for these actions but may certainly be included if helpful. Again, submission of the removal request on a Modified Continuation Sheet 10-900-a and Continuation Sheet 10-900-a is a best practice.

## Evaluating Prejudicial Procedural Error

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The fourth reason for removal is “prejudicial procedural error” (36 C.F.R. § 60.15(a)(4)). This process starts when a SHPO or THPO receives a description of the procedure that an owner or other party believes was not followed prior to listing. (A S/THPO may initiate a procedural error removal if a lapse was discovered in-house.) The S/THPO must determine if the error had the potential to influence the decision that resulted in listing the property in the National Register.

For example, for a proposed historic district with more than 50 property owners, an error in the language of the required general notice, or the timing of its publication, may constitute a procedural error as National Register regulations are clear about providing an opportunity for public comment as well as for private property owners to object to the nomination (36 C.F.R. § 60.6(d)). Note that the failure of a property owner to actually be aware of the notice—to actually *see* the notice—does not constitute a procedural error.

Unlike other reasons for removal, properties removed from the National Register for procedural error are required by regulation to be reconsidered for listing by the Keeper after a correction is processed by the S/THPO according to the typical proponent-review board-S/THPO-NPS process. While the reconsideration is pending, any property removed from the National Register for procedural errors is considered by the National Register Program to be *eligible* for inclusion in the National Register (36 C.F.R. § 60.15(a)(4)).

## Formatting the Removal Request

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A letter from a S/THPO to the Keeper is no longer sufficient as a removal request as it typically does not provide the level of documentation needed to create a solid administrative record.

The National Register Program provides Modified Continuation Sheet 10-900-a to assist S/THPOs in preparing removal requests, and a S/THPO may opt to attach any number of documents, including whatever form their office uses to document a removal. For example, the removal request for the Stratton House-Orem City Hall includes the Utah State Historic Preservation Office’s “National Register Request for Removal Form—State of Utah” which efficiently presents key information, including the National Register listing name and number; owner and petitioner name, address, and contact information; and the reason for the requested removal. Photographs need not be submitted as separate files and may be embedded in the document.

### Removal Key Concepts

- A best practice is to complete removal requests on Modified Continuation Sheet 10-900-a and Continuation Sheet 10-900-a.
- A removal request need not be lengthy but it must include the reason for removal.
- Review Board consideration is not required, and may be unnecessary if the property has been demolished or destroyed.

NPS Form 10-900-a OMB Control No. 1024-0018  
expiration date 03/31/2026

**United States Department of the Interior**  
National Park Service

**National Register of Historic Places**  
**Continuation Sheet**

Name of Property \_\_\_\_\_

County and State \_\_\_\_\_

NR Reference Number \_\_\_\_\_

10-900-a Continuation Sheet, Modified Continuation Sheet, available at [National Register Forms \(NPS.gov\)](https://www.nps.gov/nr/forms)

NPS Form 10-900-a OMB Control No. 1024-0018  
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**United States Department of the Interior**  
National Park Service

**National Register of Historic Places**  
**Continuation Sheet**

Name of Property \_\_\_\_\_

County and State \_\_\_\_\_

NR Reference Number \_\_\_\_\_

**State Certification**

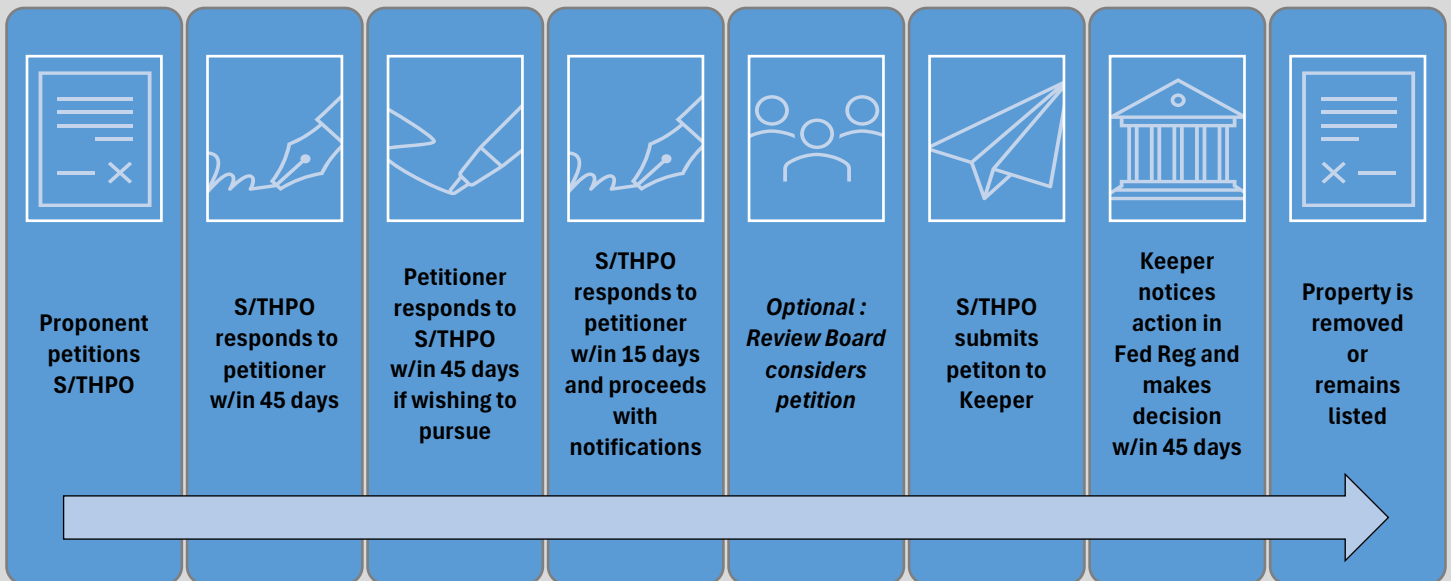
As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that this \_\_\_ additional documentation \_\_\_ additional documentation: name change \_\_\_ move  removal \_\_\_ other meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

\_\_\_\_\_  
Signature of Certifying Official/Title Date of Action

## Processing a Removal

Anyone may petition a S/THPO for the removal of a property from the National Register or a S/THPO may opt to pursue a removal. A best practice is to require the petitioner to submit their petition in writing. The petitioner must cite one of the four reasons for removal and describe the problem (36 C.F.R. § 60.15(c)). This action initiates a back-and-forth between the S/THPO and the petitioner:

- The S/THPO must respond to the petitioner, in writing, within 45 days of receipt of the petition, advising the petitioner of the S/THPO’s views on the petition (36 C.F.R. § 60.15(e)).
  - While not required by regulation, a best practice is for the S/THPO to include in their response a description of the removal process (including timelines) should the petitioner choose to pursue the petition.
- The petitioner must respond to the S/THPO within 45 days of receipt of the S/THPO comments, indicating whether they wish to pursue the removal request (36 C.F.R. § 60.15(f)).
- If the petitioner does indeed wish to move forward, the S/THPO must respond to the petitioner within 15 days, advising them whether (and when) the petition will be reviewed by the review board or, alternatively, whether the petition will be sent directly to the Keeper (36 C.F.R. § 60.15(h)).
  - Review board consideration is not mandatory (36 C.F.R. 60.15(g)) and it is a step a S/THPO may consider skipping if the property has been completely destroyed, as the condition is self-evident.



From there, the process mirrors the typical S/THPO-to-NPS process of 36 C.F.R. § 60.6:

- The S/THPO notifies the affected owner(s) and chief elected local official and provides them an opportunity to comment on the removal petition (36 C.F.R. § 60.15(d)).
- The S/THPO *may* choose to schedule the removal petition for consideration by the Review Board, but Review Board consideration is not required (36 C.F.R. § 60.15(g)).
  - Again, review board consideration is a step a S/THPO may consider skipping if the property has been completely destroyed, as the condition is self-evident.
- The S/THPO submits the petition to the Keeper (36 C.F.R. § (h)) on Modified Continuation Sheet 10-900-a and Continuation Sheet 10-900-a via the Cultural Resources Submission Portal (CRSP).
  - The submission should include a cover letter describing the process the S/THPO has followed in preparing and submitting the petition. Alternatively, the S/THPO may opt to include this information on a Continuation Sheet.

The Keeper will respond to both the S/THPO and the petitioner within 45 days of receipt of the petition; the S/THPO, in turn, must notify the petitioner, owner(s), and chief elected local official of the Keeper’s decision (36 C.F.R. § 60.15(j)).

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

For copies of the nominations referenced in this document, please visit our [Sample Nominations](#) page.

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All images are from National Register nominations unless otherwise noted.

[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.

