Evaluation of Multiple Property Documents (MPDs) in the State of Oregon







Prepared for the Oregon State Historic Preservation Office

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Prepared by Northwest Vernacular and SJM Cultural Resource Services Prepared for the Oregon State Historic Preservation Office



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Introduction

The Oregon State Historic Preservation Office (SHPO), within the Oregon Heritage Division of the Oregon Parks and Recreation Department, contracted with Northwest Vernacular, Inc. (NWV) to evaluate the use of Multiple Property Documentation (MPD) forms in the state of Oregon. NWV partnered with Sarah J. Martin Cultural Resource Services LLC (SJM) to work on this project. NWV staff consists of Katie Pratt, project lead, and Spencer Howard; SJM staff consists of Sarah Martin.

The acronyms associated with Multiple Property Documents (MPDs) are often used interchangeably, but they mean different things:

- MPD, Multiple Property Documentation Form (10-900b)—a cover document that evaluates NRHP eligibility of related properties.
- MPS, Multiple Property Submission—a combination of the MPD form (10-900b) with one or more individual NRHP registration forms (10-900). This is the current format used by the NRHP for multiple property documentation.
- MRA, Multiple Resource Area—no longer active, but may be amended.
- TR, Thematic Group Resources—no longer active, but may be amended.

Overview of Multiple Property Documentation Process

The common understanding of listing a property to the National Register of Historic Places (NRHP) is through the preparation of a National Register Registration Form (10-900) for an individual property or a historic district, which addresses a subject property's significance, which may include multiple thematic groups, and its physical characteristics. The MPD process, however, offers a different way to nominate properties that ultimately reduces the amount of documentation needed for each nomination. An MPD form serves as a cover document that identifies common themes, trends, and patterns of history for related properties to evaluate their NRHP eligibility. These related properties do not have to be nominated all at once and they can be limited to a single community or neighborhood or cover a broad geographic range. Ultimately, an MPD provides the framework for either the simultaneous or future listing of these related properties.

According to the <u>National Register Bulletin 16B</u>, How to Complete the National Register Multiple Property Documentation Form:

The National Register of Historic Places Multiple Property Documentation Form (NPS 10-900-b) nominates groups of related significant properties. On it, the themes, trends, and patterns of history shared by the properties are organized into historic contexts and the property types that represent those historic contexts are defined.

The Multiple Property Documentation Form is a cover document and not a nomination in its own right, but it serves as a basis for evaluating the National Register eligibility of related properties. It may be used to nominate and register thematically related historic properties simultaneously or to establish the registration requirements for properties that may be nominated in the future. The nomination of each building, site, district, structure, or object within a thematic group is made on the National Register Registration Form (NPS 10-900). The name of the thematic group, denoting the historical framework of nominated properties, is the multiple property listing. When nominated and listed in the National Register of Historic Places, the Multiple Property Documentation Form, together with individual registration forms, constitute a multiple property submission.

According to National Register Bulletin 32, Guidelines for Evaluating and Registering Archeological Properties:

*Multiple Property Submission (MPS) is the format currently used by the National Register for multiple property documentation, together with individual registration forms. In the past, the National Register has used the Multiple Resource Area (MRA) and Thematic Group Resources (TR) formats, however, these formats are no longer active. Nominations may still be submitted under previously accepted MRAs and TRs if they are submitted on National Register individual registration forms and meet the current standards for listing. For more information on multiple property submissions, refer to the National Register bulletin How to Complete the National Register Multiple Property Documentation Form. MRAs and TRs may also be updated and/or amended. For guidance on preparing an amendment please see the National Register bulletin, How to Complete the National Register Registration Form, Appendix VI.

Prior to the current MPS format, which uses which uses both a Multiple Property Documentation Form (10-900b) and a National Register Registration Form (10-900) to nominate resources, Thematic Group Resources (TR) and Multiple Resource Areas (MRAs) nominations were the standard and used intensive-level survey forms created by each state (versus the federal 10-900 form). TRs and MRAs were used in the 1980s, before being replaced by MPDs in the early 1990s.¹

Early TR and MRA nominations were the result of a comprehensive survey or study. A survey or study was conducted with development of a relevant historic context and intensive-level survey forms for each property. Individual properties were then listed or determined eligible under that context using the intensive-level survey forms. This process established an efficient way to complete survey-related documentation.

Use of TR and MRA cover documents also supported further survey work that might uncover additional properties. For example, MRA or TR cover documents on Carnegie libraries or public schools would include sufficient detail to understand the theme or group, but would not include every eligible example. New NRHP nominations using intensive-level survey forms could be prepared later under those MRA or TR covers as additional properties were surveyed. These older TR and MRA cover documents may still be used if properties align with the thematic and geographical parameters, but instead of using an intensive-level survey form, NPS requires the use of the standard 10-900 registration form. The NPS found that the 10-900 forms provide more consistent and thorough data over the various state-specific intensive-level survey forms. These older TR and MRA cover documents may also still be amended.

Project Methodology

The Oregon SHPO tasked NWV and SJM with the following:

- Identify successful MPD forms utilized in Oregon (NWV and SJM then worked through how success is defined and what factors contribute to usage).
- Identify any MPDs that are ready to use now.
- Identify any MPDs that require revisions to improve their usage, and the relative level of effort required to complete said revisions.
- Evaluate the feasibility of creating a standardized set of registration requirements for MPDs with similar historic contexts and property types (e.g., downtown commercial resources in small or mid-sized Oregon cities).

The history of the transition from TRs and MRAs to the current MPS format was outlined to the authors of this report by Paul Lusignan, Historian with the NRHP.

- Recommend a plan to prioritize revisions and updates to existing Oregon MPDs in alignment with the goals of the 2024–2033 Oregon Historic Preservation Plan.
- Recommend data management strategies including, but not limited to, ways that existing and future MPDs can be entered to the Oregon Historic Sites Database and made more easily accessible to database users.

NWV and SJM began this project with a kickoff meeting with Oregon SHPO staff (Kuri Gill, Oregon Heritage Grants & Outreach Coordinator; Caity Abrahms, National Register Program Coordinator; and Val C. Ballestrem, Preservation Bureau Assistant) on January 21, 2025. Following this meeting, NWV and SJM reached out to Paul Lusignan, Historian with the NRHP, and asked the following questions:

- 1. What SHPOs, THPOs, or Federal agencies are most active in producing MPDs and continue to use them over time?
- 2. For what reasons do you see SHPOs, THPOs, and agencies creating and using MPDs?
- 3. What are some of the most/best-utilized MPDs within your purview?
- 4. Is the Excel spreadsheet list of MPS covers on the NPS website generally up-to-date and comprehensive?

Lusignan's responses made it clear that MPDs are used by several SHPOs, with many more recent MPDs resulting from funding from Underrepresented Community and African American Civil Rights (AACR) grants from the National Park Service (NPS). Large states like California and New York have submitted high numbers of MPDs in the last five years (2020–2025)—six each. Other states with several submitted include Kansas (five), Maryland (five), and Oregon (five). Utah submitted seven, but that number is more a reflection on how that state prioritizes city-intensive survey work over thematic studies. SHPOs are the primary proponents of MPDs in recent years and the emphasis has been on developing new nominations for groups or resources with limited listings in the NRHP.

Lusignan's email response also included two Excel spreadsheets, the first listing all the MPDs submitted between 1/1/2020 and 1/1/2025, and the second listing all the individual properties listed in the NRHP under an MPD (or MRA or TR). Since 2020, 104 MPDs have been submitted to the NPS (a few have been returned or are still in review). And over 28,000 properties have been listed in the NRHP under an MPD (or MRA or TR).

Lusignan confirmed that the Excel spreadsheet list of MPDs on the NPS website is regularly updated.

NWV and SJM utilized this national-level data and compared it to trends with Oregon's use of MPDs. We perused a selection of SHPO websites as well to identify examples of how other SHPOs communicate about MPDs. Alaska, Arizona, California, Idaho, Kansas, and Texas are examples of SHPOs with websites that provide easily accessible lists of their state's MPDs with links to full-text documents. Most states do not prioritize space on their websites for MPDs. Some states, like Oregon, store full-text MPDs in online survey databases.

Oregon has 55 MPDs (including multi-state MPDs), which is higher than the national average of 45 per state and the median of 40. The earliest completed MPD in Oregon is the Oregon Covered Bridges TR (1979), which has 40 properties listed under the cover document. The Native American Archeological Sites of the Oregon Coast MPS (1997) has the most properties listed under it with 96.

The Oregon SHPO charged NWV and SJM with identifying "successful" MPD forms utilized in Oregon. At first glance, this appears to be an easily quantifiable, metrics-based task related to the number of listings associated with each MPD. However, the assessments made by NWV and SJM, as well as our conversations with Oregon National Register and compliance staff, indicate there are several nuanced uses of MPDs on the part of agencies, local governments, reviewers, and consultants that make "success" a challenge to clearly define. Further, success

isn't necessarily a function of the quality or age of MPDs but rather on how well they are promoted to those who may find them useful.

NWV and SJM concluded that success is rooted in the reasons why MPDs are generated in the first place and if the MPDs generated, and their subsequent promotion, align with those reasons. These reasons include providing a streamlined way to evaluate and nominate properties, enabling mitigation efforts, and offering valuable context for reviewers making Determination of Eligibility (DOE) arguments. Beyond these reasons, they also serve as valuable reference documents for any nomination preparer, compliance reviewer, or interpretive specialist.

Analysis of Oregon MPDs

This analysis and evaluation of Oregon MPDs is organized by the scope of work into five subsections:

- Identification of Successful MPDs
- Identification of MPDs Ready for Use
- Identification of MPDs Requiring Revisions
- Feasibility of Standardized Registration Requirements
- Recommendations

In addition to identifying "successful" MPDs in Oregon, it is also critical to understand how the Oregon SHPO desires to utilize MPDs. Currently, MPDs are intended to help increase the number of National Register-listed properties in Oregon, to expand ethnic, racial, and geographic representation in Oregon's listings, to broaden the types of listed properties, and to inform Section 106 (of the NHPA) compliance reviews.

In analyzing the previous period's preservation plan (2018–2023), the current Oregon Historic Preservation Plan 2023–2033 discusses MPDs

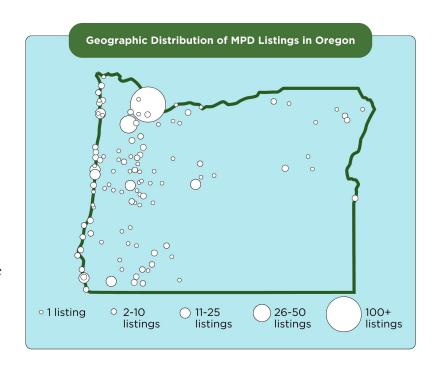


Figure 1. Geographic Distribution of MPD Listings in Oregon

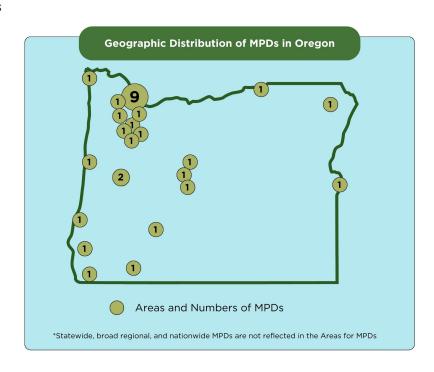
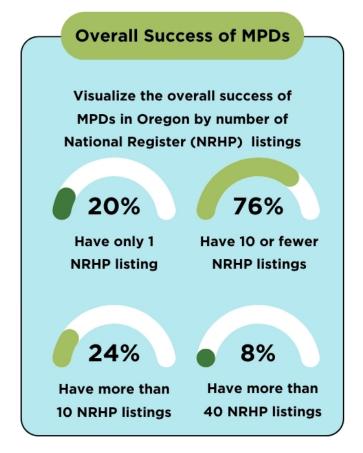


Figure 2. Geographic Distribution of MPDs in Oregon



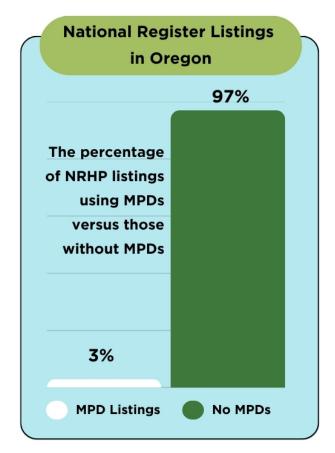


Figure 3. Success of Oregon MPDs

Figure 4. National Register Listings in Oregon

under the heading of "Listing Diverse Properties in the National Register" and states, "These [MPD] documents make it easier to list properties in the National Register by describing the history of a group of properties and what makes them eligible for listing in the National Register." This underscores the attribution of "success" based on the number of resulting NRHP listings. However, when MPDs are cited as making it "easier" to list properties, how does SHPO define "easier?" Is it easier in the sense that establishing registration requirements within an MPD increases access to the NRHP for properties that might not otherwise be eligible? Or is it easier because utilizing an MPD should (in theory) decrease the amount of work that is required to prepare a nomination for a resource that aligns with an MPD's context(s) and registration requirements? Both are reasonable definitions of "easier," but in the latter case, is that SHPO's experience with subsequent nominations under an MPD? Or are those nominations just as robust as typical nominations?

Over 480 properties across 110 communities are listed in the National Register under an MPD. Most communities (93) have five or fewer NRHP listings associated with an MPD, and of these, 57 have only one NRHP listing associated with an MPD. Unsurprisingly, Portland—as the state's largest city—has the most NRHP listings associated with MPDs, with 115 listings or 24% of all MPD-associated listings in the state. The top four themes or contexts associated with MPDs in Oregon are: architecture; commerce; community planning and development; and industry. A combination of some or all of these are often used in a neighborhood or city-wide MPD.

² Oregon Parks and Recreation Department, Heritage Division Oregon State Historic Preservation Office, "Oregon Historic Preservation Plan: 2024-2033," (Salem, OR: June 2024), 72, https://www.oregon.gov/oprd/OH/Documents/2024 OR PreservationPlan %20English web.pdf.

A Closer Look at Oregon's MPDs

NWV and SJM analyzed Oregon's MPDs to identify which ones have the most NRHP listings, the most potential for future listings, and are the most used for compliance purposes.

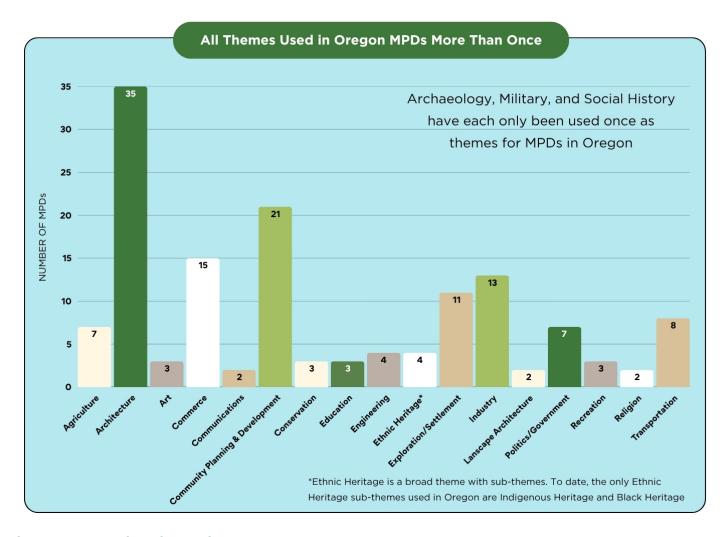


Figure 5. Recurring Themes in Oregon MPDs

The MPDs with more than one NRHP listing associated with them are:

- Residential Architecture of Eugene, Oregon, 1850–1950 MPS—six listings, last used in 2008
 - » This MPS covers the entirety of Eugene, with hundreds iof properties potentially eligible for listing. Any residential property constructed 1850-1950 and seeking NRHP listing in Eugene should utilize this MPS.
- Historic Resources in Downtown Portland, Oregon MPD (2004, 2008)—nine listings, last used in 2024
 - » First MPD submittal in 2004 included one context. A second context was submitted in 2008.
- The Oregon Trail, Oregon, 1840–1880 (2021)—two listings
 - » This is an expansive document with significant primary source references to Oregon Trail records. Many of the property types identified in this MPD will need to utilize Criterion D for their likelihood to reveal important information about Oregon history so this document seems best suited for regulatory review or nominations related to archaeology.
- African American Resources in Portland, Oregon from 1851 to 1973 (2020)—seven listings, last used in 2024
 - » Wide-reaching both in subject matter and timeframe. The registration requirements are also written in such a way as to clarify integrity thresholds, which is critical given the particular systemic pressures on these resources.
- <u>Carey and Reclamation Acts Irrigation Projects in Oregon, 1901–1978</u> (2017)—two listings, last used in 2019
 - » This MPD has had two nominations listed in association with it. Others are possible and this is likely helpful for Section 106 reviews.
- Settlement and Abandonment of the Crooked River Grasslands, 1868–1937 (2015)—two listings
 - » This MPD is well-detailed but is primarily archaeological in nature.
- <u>Settlement-era Dwellings, Barns and Farm Groups of the Willamette Valley MPD</u> (2015)—three listings, last used in 2019
 - » This MPD is detailed and includes information from survey data on the number of potential properties associated with the context (238 as of 2013). The registration requirements are also written in a way to allow for sufficient integrity, which is critical given the age of the eligible resources.
- <u>Historic Resources of Downtown Enterprise</u>, 1888–1956 MPS (2012)—three listings
 - » This MPD, specific to Enterprise, covers a range of property types and can easily be used again and again. Property types include commercial, transportation-related, and institutional (educational, civic and public, religious, and fraternal). It also includes a district as a property type.
- Willamette River Highway Bridges of Portland, Oregon MPS (2012)—four listings
 - » This is a tight MPD organized around a single property type in Portland and its temporal context includes all extant bridges for a total of 10. Four out of the 10 bridges have been listed using this MPD.
- Historic Architecture in Silverton, Oregon, and Its Environs MPS (2011)—seven listings, last used in 2019
 - » Although only focused on residential properties, this MPD can be broadly used in Silverton and the surrounding area.

- McCullough, C.B., Major Oregon Coast Highway Bridges MPS (2005)—11 listings
 - » All 11 bridges identified in the historic context of this MPD were listed. There is no need for an update or continued use.
- Taylor Process Hollow Concrete Wall Construction in Forest Grove, Oregon MPS (2005)—three listings
 - » Rather narrowly focused; the MPD itself states "It is unknown at this time how many additional Taylor Process Hollow Concrete Wall buildings were built and how many have survived." Thirteen were identified in the MPD and only just three have been listed.
- Mining Resources of the Upper Illinois Valley, Oregon MPS (2001)—20 listings
 - » This MPS, which includes good references to Indigenous people and Chinese laborers, identifies 20 associated properties and BLM used the MPS to list all 20 in one fell swoop. This MPS is unlikely to be used again unless other associated properties are identified, but it may be a good example of when an MPS is an appropriate tool to support mitigation efforts.
- Barns of Linn County, Oregon MPS (1999)—seven listings, last used in 2015
 - » Thorough context; property type and subtype descriptions are very clear. Six initial nominations, but only one additional nomination since 1999. Over 180 barns are included in the OHSD, so there is potential for continued use of this MPS. It may require updating.
- Architecture of Ellis F. Lawrence MPS (1999)—22 listings, last used in 2007
 - » Although much shorter than more recent MPDs, this MPS has been used over a span of 17 years. After the initial 13 listings associated with the original submission, the MPS was then used nine more times. The most recent nomination is tight (less than 20 pages not counting graphics) and demonstrates the efficiency element of MPDs in listing properties to the NRHP.
- Craftsman Bungalows in Deschutes County MPD (2000)—three listings, last used in 2001
 - » This MPS relies on a survey conducted in the late 1990s that identified nearly 600 Craftsman Bungalows in Deschutes County. This MPS could be used to list dozens of additional residential properties throughout the county.
- <u>US Forest Service Historic Structures on the Rogue River National Forest MPS</u> (2000)—14 listings
 - » The MPS identified and listed 14 structures, which constitute the total amount of resources of their types known to qualify at this time.
- Historic and Architectural Properties in the Eliot Neighborhood of Portland, Oregon (1999)—11 listings, last used in 2020
 - » This MPD has 11 listed properties. Hundreds of individual properties are present within the district with the potential for at least seven historic districts.
- <u>City of Echo and The Meadows Historic Resources MPD</u> (1997)—10 listings
 - » Although this MPD has not been used since its initial listing in 1997, 10 (20%) of the 50 identified associated properties were listed.
- Native American Archeological Sites of the Oregon Coast MPS (1997)—96 listings (one was delisted)
 - » Although this MPS has not been used since its initial listing, it represents a decade of archaeological investigation and is the MPD in the state with the greatest number of associated NRHP listings. There were originally 97 listings, but one resource has been delisted, so now there are only 96.

- <u>Historic Cemeteries of Ashland, Oregon & Environs, 1851–1925 MPD</u> (1995)—three listings, last used in 1998
 - » Focused more on town history and development and provides very little information on cemetery trends. Only five cemeteries were identified in the MPD and three of those were listed.
- Historic Development of the Bend Company in Bend, Oregon MPS (1993)—five listings
 - » This MPD identifies five associated properties, all of which were listed. Although not central to the MPD purpose, the "Pre-history" and "Early History" sections could use an update.
- <u>Lighthouse Stations of Oregon MPS</u> (1993)—four listings
 - » Although not used since its initial listing, four of the nine extant light stations identified in the MPD were listed.
- Coquille Historic Resources MPD (1992)—five listings
 - » This MPD has not been used since its initial listing, which included five resources; however, over 80 were identified.
- <u>USDA Forest Service Administrative Buildings in Oregon and Washington Built by the CCC MPS</u>
 (1991)—15 listings
 - » This MPD has not been used since its initial listing but has a robust list of registration requirements and could likely be used for regulatory review moving forward.
- Pipes, Wade, Residences for John and Elizabeth Bates MPD (1990)—four listings
 - » This MPD had a finite number of properties; no more to designate.
- Portland Oregon's Eastside Historic and Architectural Resources, 1850–1938 MPD (1989)—41 listings, last used in 2019
 - » This MPD has been well used.
- Blodgett Tract MPS (1989)—one listing
 - » Only one property was identified as having enough integrity to be listed, so this MPD has been used but is not relevant for re-use.
- Historic Resources of Crater Lake National Park MRA (1988)—eight listings, last used in 1997
 - » Appears to have been used to list additional properties.
- Historically and Architecturally Significant Properties in Dayton, Oregon MRA (1987)—45 listings
 - » Listed numerous properties at the time of the original MPS. Unclear if more could be listed.
- Oregon Historic Wooden Carousels TR (1987)—two listings
 - » Five carousels were identified, and all were listed (three have been delisted).
- Oregon Covered Bridges TR (1979)—40 listings, last used in 2013
 - » This MPD identified 56 wooden covered bridges and initially listed 46.

SHPO compliance staff informed NWV and SJM that MPDs are relevant to their work and that of others doing compliance reviews in Oregon. Existing MPDs are most useful as contextual documents with NRHP registration requirements that can aid reviewers in evaluating properties and making Determination of Eligibility arguments. Existing MPDs also facilitate mitigation efforts that require NRHP listings for adverse effects on eligible properties and expand the types of Oregon properties added to the National Register, such as power substations and irrigation canal resources. SHPO staff suggested that producing new MPDs for mitigation purposes is not always recommended and should involve close consultation.

The following list includes MPDs that are used most often in current compliance review circles:

- Bonneville Power Administration (BPA) Pacific Northwest Transmission System MPD (2012 DOE)—1 listing, last used 2025
 - » This MPD is used "all the time" by compliance staff of the Bonneville Power Administration to evaluate potentially eligible properties, according to Oregon SHPO staff. This MPD has not been formally approved through the National Register program, but was formally determined eligible in 2012.
- Carey and Reclamation Acts Irrigation Projects in Oregon, 1901-1978 MPS (2017)—one listing, one DOE
 - » This MPD includes two associated listings and one determined-eligible property. Beyond the scope of the MPD, the document is useful to compliance reviewers in evaluating irrigation properties that are not associated with the Carey and Reclamation Acts, as well as other types of linear resources.
- The Oregon Trail, Oregon, 1840–1880 (2021)—two listings
 - » This MPD is useful to reviewers for its broad and useful contexts and registration requirements.
- Oregon National Guard Armories 1888–1978 MPD (2023)—one listing
 - » This new MPD was completed as part of compliance efforts but is receiving broader interest beyond the agency-based reviewers. One listing is associated with this MPD, but it has potential for broad usage in the future.
- Settlement and Abandonment of the Crooked River Grasslands, 1868–1937 (2015)—two listings
 - » SHPO staff suggested that this MPD is underused but has great potential to be useful for compliance reviewers and to aid in future listings.
- Native American Archeological Sites of the Oregon Coast MPS (1997)—96 listings and one delisting
 - » Although no properties have been nominated as part of this MPD since 1997, SHPO staff is currently reviewing a recently submitted nomination. The MPD represents a decade of archaeological investigation and is often referenced in archaeological reports.
- National Park Service Mission 66 Era Resources (2015)—zero listings (Oregon)
 - » This nationwide MPD focuses on resources built in national parks. It is often referenced by compliance reviewers in Oregon but does has not been used to facilitate any Oregon listings.

Identification of MPDs Ready for Use

This section explores the variety of MPDs that are "ready to use"—for either their historic context material or due to the usability of their registration requirements for assessing National Register eligibility. Some of the MPDs listed are useful in both applications. Under the name of each MPD, we've provided a brief explanation of the MPD and have listed for which application(s) it is best suited. While there may be some reduction in the time needed to prepare a nomination, it ultimately depends on the expertise of the preparer and the complexity and history of the individual resource nominated. Properties eligible under less complex MPDs, for example those with narrower thematic geographic scopes and fewer associated property types, will be more efficiently nominated, particularly if their individual histories are easily researched and documented.

The following MPDs are ready for use (and promotion) by the Oregon SHPO to increase listings in the NRHP:

- African American Resources in Portland, Oregon from 1851 to 1973
 - » The MPD's registration requirements provide clear guidance to a nominator on how to evaluate properties that are potentially eligible under the MPD. The level of effort to complete a nomination

- is likely reduced with this MPD given the usability of its registration requirements and smaller geographic range, allowing a preparer to focus the Section 8 text on individual property history and comparative analysis. This MPD has a narrowly defined geographic scope but a broad temporal scope. Given the broad temporal scope, nomination preparers should immediately identify the parts of the document most relevant to their property and identify comparative examples to maximize efficiency.
- » Approximately 500 Portland properties informed this MPD. It has seven associated listings, with great potential for many more. In addition to the excellent historic context information, with hundreds of references, the registration requirements identify nine property types eligible under the MPD. Each property type provides discussion of eligibility under each of the four NRHP criteria for evaluation with a clear discussion of the seven aspects of integrity and their importance. Any properties associated with African American or Black history in Portland should reference this MPD.

• Black Historic Resources in Oregon, 1788–2022

- » The MPD's registration requirements provide clear guidance to a nominator on how to evaluate properties that are potentially eligible under the MPD. The level of effort to complete a nomination is likely reduced with this MPD given the usability of its registration requirements; however, as it is a statewide MPD, a preparer will still need to provide area/community history in addition to the individual property history and comparative analysis in Section 8. Further, it has broad geographic, temporal, and historical scopes that could make the document challenging for some to navigate. Preparers should immediately identify the parts of the document most relevant to their property and identify comparative examples to maximize efficiency. Consultation with SHPO staff will be important for preparers, particularly as there are few associated nominations for guidance.
- » This statewide MPD can be used throughout Oregon wherever there is at least one historic resource related to Black history. Its broad historical and geographic scope offers great potential for many dozens or even hundreds of future listings. This well-researched document can be an invaluable source for understanding the built environment through the lens of Oregon's Black history. As any property (sites, structures, objects, buildings, and districts) may be associated with Black history, the authors of this MPD organized the registration requirements around nine associations with property types, including properties associated with patterns of Black migration; Civil Rights laws and violations, politics, and activism; and prominent individuals. In order to be eligible under this MPD, properties must meet the MPD's general registration requirements as well as the specific requirements outlined under each property type association. This provides a methodical way to analyze the significance and eligibility of properties and should be a valuable MPD in both survey and inventory work in the state as well as evaluating NRHP eligibility.

Oregon National Guard Armories, 1888–1978 MPD

- » The MPD's registration requirements provide clear guidance to a nominator on how to evaluate properties that are potentially eligible under the MPD. The level of effort to complete a nomination will be reduced with this MPD given the usability of its registration requirements and single property type, allowing a preparer to focus the Section 8 text on individual property history and comparative analysis. The narrowly defined subject matter scope somewhat offsets the broad geographic and temporal scope in terms of usefulness and approachability to nomination preparers. Preparers should first look for examples of the same time period for the most efficient comparison.
- » This statewide MPD is relevant to communities with National Guard Armories built before 1978. It identified 59 extant armories built before 1978, meaning there is the potential for several dozen to be listed. This MPD should be used not only for its historic context but to assess the eligibility of any National Guard Armory built prior to 1978. While the SHPO may use this MPD for assessing

eligibility for regulatory purposes, if an individual or organization wishes to pursue designation for any National Guard Armory in the state, this MPD should be used to ensure consistency in evaluation.

Oregon New Deal Resources from the PWA or WPA, 1933–1943 MPD

- » The MPD's registration requirements provide clear guidance to a nominator on how to evaluate properties that are potentially eligible under the MPD. The level of effort to complete a nomination is likely reduced with this MPD given the usability of its registration requirements, allowing a preparer to focus the Section 8 text on individual property history and comparative analysis. The MPDs narrowly defined temporal and subject matter scope somewhat offsets the broad geographic scope, making this a usable and approachable document for nomination preparers. The property types are ones that are found in many communities which should aid preparers in comparative analysis.
- » The federal government's New Deal programs touched all corners of Oregon. This statewide MPD addresses resources with roots in the PWA and WPA programs. Its broad scope of property types offers great opportunity for potentially hundreds of resources that could be evaluated under this MPD. This MPD provides a compact overview of the PWA and WPA programs in the state, but the bulk of the MPD document is dedicated to Section F Associated Property Types. It provides descriptions and registration requirements for more than 20 property types. This MPD applies to properties both constructed or substantially improved by these two New Deal programs.

Craftsman Bungalows in Deschutes County MPD

- » The MPD's registration requirements provide clear guidance to a nominator on how to evaluate properties that are potentially eligible under the MPD. The level of effort to complete a nomination will be reduced with this MPD given the usability of its registration requirements and smaller thematic and geographic range, allowing a preparer to focus the significance on individual property history and comparative analysis. This MPD benefits from strong, narrowly defined geographic, temporal, and subject matter scopes. Nomination preparers should focus on documenting the property's significance beyond the typical examples. While example properties are plentiful for comparison, the three associated nominations limit this somewhat.
- » This MPD relies on two surveys conducted in the late 1990s that identified nearly 600 Craftsman bungalows in Deschutes County. The historic context presents a broad development history of Deschutes County, but ultimately the focus is on early 20th century Craftsman bungalows. The document identifies seven property types that are based on common bungalow building forms found in Deschutes County. This MPD is quite approachable and useable, both in its scope and the way it defines property types by physical attributes. Only three properties have been listed under this MPD, which could be used to list dozens of additional residential properties throughout the county.

All these MPDs were prepared specifically for resources located in Oregon. There are a handful of MPDs that have a broader geographic distribution beyond Oregon that are available for use by Oregon properties—some have already been used, and others could easily be used with increased promotion. For example, the "Historic Residential Suburbs in the United States, 1830–1960" MPD has been used to list four historic districts in Oregon and could likely be used again. These include:

- Historic Residential Suburbs in the United States, 1830–1960 MPD
- United States Forest Service Recreation Facilities MPD
- Public Housing in the United States MPD
- National Park Service Mission 66 Era Resources MPD

Identification of MPDs Requiring Revisions

Revisions to existing MPDs should be approached strategically and with clearly defined goals and objectives. NWV and SJM found no MPDs *requiring* revisions but did identify key reasons to *consider* revisions. These include revising MPDs to expand time periods, add resource types, and update registration requirements or to produce additional contexts that lead to new property types. Some examples of potential revisions:

- Oregon New Deal Resources from the PWA or WPA, 1933–1943 MPD: This MPD does not cover New Deal-era resources beyond the PWA and WPA; however, the CCC was active in Oregon and could be the focus of an additional context.
- Several MPDs omit important contributions of underrepresented people that are significant to the greater story of Oregon. For example, the Historic and Architectural Properties in Nyssa, Oregon MPD (1996) discusses the local sugar beet industry, but makes no reference to the contributions of Japanese Americans, many of whom were incarcerated there during World War II. The various residential-focused MPDs include little demographic information about the people who lived in the properties discussed. One example includes the Historic and Architectural Properties in Early Kenton Neighborhood of Portland, Oregon MPS, which focuses on one of the city's earliest factory districts but includes little demographic information about the people who lived in Kenton. The Early French-Canadian Settlement, Marion County, Oregon MPD includes very little about the Indigenous people of that region and should have a more robust discussion of Métis people.
- The <u>Residential Architecture of Eugene, Oregon, 1850–1950 MPS</u> is an example of an MPD that could be expanded to document Modern-era resources.

Feasibility of Standardized Registration Requirements

NWV and SJM did not see feasibility in standardizing existing MPD registration requirements. However, some standardization can be achieved going forward if SHPO staff prioritizes providing examples of strong registration requirements to those preparing new MPDs.

When Is an MPD the Appropriate Choice?

It is important to consider when it would be most appropriate to create or amend an MPD as opposed to simply producing an historic context. Factors to consider include how useful and approachable Oregon's existing MPDs are to nomination preparers and why.

The geographic, temporal, and subject matter scopes vary widely among Oregon's MPDs, resulting in a range of overall effectiveness in their efficiency in assisting nomination preparers. MPDs with tighter geographic parameters, such as a community- or county-wide scope, can be more approachable to nomination preparers due to the proximity of surveyed properties and those example properties cited within the MPD. Similarly, in terms of temporal scope, MPDs with focused timeframes and periods of significance, perhaps spanning at most several decades, will allow for targeted, succinct contexts and analyses of property types that result in more approachable documents for nomination preparers. This isn't to say that statewide and national MPDs or those with broader timeframes are not recommended or approachable. These, too, are useful and effective, especially with consultation between SHPO staff and nomination preparers.

An MPDs subject matter scope is a strong determining factor in how accessible MPDs are to nomination preparers, especially novices. For example, MPDs grounded in arguments based on a property's tangible, physical characteristics (usually arguing Criterion C) are likely to be more accessible to nomination preparers than those focused on associative significance such as those with social, cultural, or historical themes (usually Criterion A) for

a few reasons. First, nominations focused on a property's physical characteristics will likely require less intensive property-specific research, instead relying more on comparative analysis that will demonstrate the property's significance beyond typical examples. An MPD rooted in strong survey-based methodology should provide at least some baseline comparative analysis that can be expanded upon with each new associated nomination. Second, nominations arguing social, cultural, and/or historical significance (usually under Criterion A) are reliant on more intensive property-specific research that is used to clearly articulate the nominated property's significant contributions to themes outlined in the MPD. Example nominations can help preparers see what level of research and analysis is required to be successful. However, if the associated MPD has broad temporal and geographic scopes, these tasks could become quite unapproachable to nomination preparers, especially novices.

An important consideration in preparing an MPD is to determine if there is capacity to fully identify—to the extent reasonable, while allowing for future survey work and research to identify other properties—as many resources as possible to streamline the MPD process. The historic resources and the associated survey must drive the conversation about preparing an MPD, not the subject matter. The greater the geographic and temporal scope, the more important it is to have surveyed resources to identify regional nuance and trends.

As to the question of whether preparing an MPD is the appropriate choice, first, creating or amending an MPD is a good pathway if there is a large number of related properties that share a common history, theme, or architectural style *and* if the goal is to nominate these properties to the National Register or evaluate their significance for compliance purposes. Second, if there is a group of related properties or a particular property type that pose challenges to reviewers when assessing National Register eligibility, an MPD could be a useful tool that provides a framework for integrity analysis and registration requirements that can address the unique eligibility challenges of a particular group of resources.

Conversely, creating or amending an MPD may not be the best approach if little survey data is available to facilitate a comparative analysis of related properties or if few National Register nominations or Determinations of Eligibility will result. In these cases, efforts may be better spent completing surveys and producing targeted historic contexts. The corresponding decision tree is set up to aid in thinking through whether an MPD is the best course of action in considering next steps with nominating properties that have related histories.

It is worth emphasizing that MPDs are not interchangeable with historic districts. For example, a concentration of resources in a defined area, like a neighborhood or commercial district, is best evaluated as a potential historic district in which resources are evaluated for their contribution to the grouping of resources. MPDs, on the other hand, are best suited for evaluating and nominating groups of thematically related properties. Each property or district listed under an MPD must be able to stand on its own as eligible for the National Register, rather than as a contributor to a broader district.

Recommendations

The following is an initial set of recommendations related to MPDs and their use in Oregon.

• Improve the visibility of MPDs on the Oregon SHPO website.

Currently, there is no mention of MPDs on the National Register program webpage.

Recommended Action: Add a basic description of MPDs with a list of Oregon MPDs to the National Register webpage, with instructions on where to find the full-text documents and the associated listings in the Oregon Historic Sites Database (OHSD). Consider including links to the various MPD tutorial videos and related Heritage Bulletins.

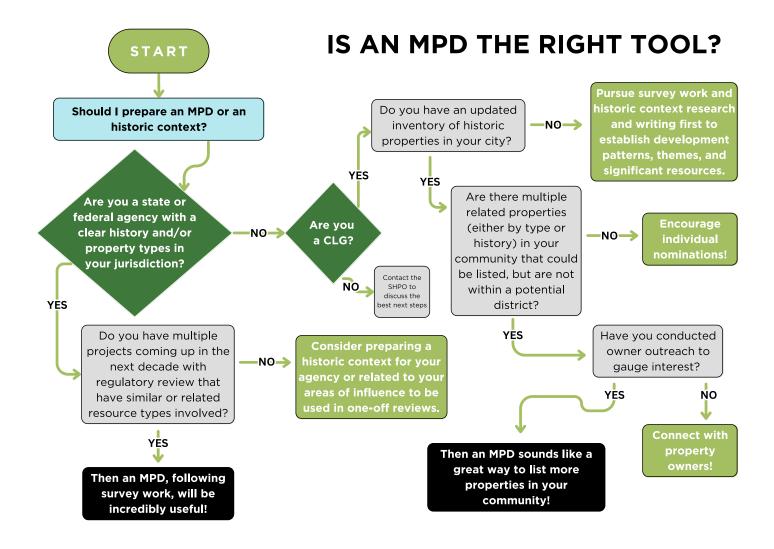


Figure 6. "Is an MPD the Right Tool?" Decision Tree.

• Update the Oregon Historic Sites Database (OHSD) to improve searches for MPDs.

Currently, the OHSD allows for searches under "Group Name," however, this includes numerous surveys as well as MPDs. Additionally, the OHSD has three categories for searching NRHP-listed properties, but none reference MPDs.

Recommended Action: Separating surveys from MPDs in the Group Name (either by creating a separate search field for each or removing MPDs) and adding MPD listings under the NRHP search will make it easier for researchers and nominators to a) identify any existing MPDs and b) immediately reference any properties already listed or formally determined eligible under that MPD. Improving the OHSD search function may have the following positive outcomes:

- » Nominators may identify a recent listing that utilized a relevant MPD and use it as a template to format their nomination. This will help non-professionals prepare NRHP nominations and can reduce the cost for professionals who prepare them.
- » This will raise awareness about the existence of MPDs and assist researchers and NRHP preparers to more easily identify if any MPDs exist, which can expedite and improve their nomination preparation process.

• Establish priorities related to the use of MPDs.

MPDs can serve a variety of purposes for a state historic preservation office, from providing a streamlined way to evaluate and nominate properties through clear registration requirements to offering valuable context for Section 106 reviewers making arguments. SHPO staff should consider all of these purposes when establishing MPD priorities.

Recommended Action: For MPDs that are funded by or required by Oregon SHPO through mitigation agreements, the SHPO should consider a policy establishing a minimum number of nominations to be submitted alongside the MPD as a full MPS to maximize the value of time and resources allotted.

Recommended Action: Consider targeting new MPDs and NRHP listings under existing MPDs to provide more balanced geographic distribution throughout Oregon.

Recommended Action: Review the nationwide MPDs and consider targeting Oregon properties to nominate as part of these multiple property submissions.

• Suggest ways to promote MPDs:

Promotion of MPDs not only will educate partners about what MPDs are available and how to use them but could generate interest in pursuing nominations.

Recommended Action: Consider training current and future members of the State Advisory Committee on Historic Preservation (SACHP) on the various uses of MPDs, where to find them, and how they should be used by nomination preparers.

Recommended Action: Make the training videos available and offer regular trainings to CLG and agency partners.