

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 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).

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. 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
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

Fujifilm USA: www.fujifilm.com

The Epson Company: www.epson.com/northamerica.html

California Digital Library Digital Format Standards (2001):

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

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

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

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