

MICHIGAN HISTORIC PRESERVATION
CERTIFIED LOCAL GOVERNMENT
GRANT MANUAL

FOR

EDUCATION, IDENTIFICATION
REGISTRATION & PLANNING

Catalog of Federal Domestic Assistance #15.904

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Introduction

The National Historic Preservation Act of 1966 (Chapter 16, U.S. Code, section 470 et seq.) provides matching funds for projects designed to facilitate the preservation of historic resources significant in American history, architecture, archaeology, engineering and culture. In Michigan, the program is administered by the Michigan State Housing Development Authority pursuant to Public Act 271 of 1913, section 399.1 et seq. of the Michigan Compiled Laws. Federal law requires that 10 percent of the annual federal Historic Preservation Fund allocation provided to the State Historic Preservation Office (SHPO) to operate its programs be set aside for Certified Local Governments (CLGs). Of the \$1,00,000 estimated to be allocated to the Michigan SHPO, approximately \$100,000 will be sub-granted to CLGs. Awards have a 60/40 matching requirement and are paid on a reimbursement basis.

The purpose of the CLG grant program is to help local communities develop or strengthen their historic preservation program. CLG grants can be used to identify, register, rehabilitate, and protect resources that are listed in or eligible for listing in the National Register of Historic Places. The grants can also be used for preservation planning and education.

To become a CLG, a local unit of government must apply to the SHPO and be certified by the National Park Service. The local government must have in place a local historic district ordinance pursuant to Michigan's Local Historic District Act, Public Act 169 of 1970, as amended, and a historic district commission with binding design review authority before it can be certified. A full description of the CLG program and how to apply for certification is found in The Certified Local Government Program in Michigan. This manual can be requested from the SHPO or obtained from our website at www.michigan.gov/shpo.

Who Can Apply

Only Michigan CLGs may apply for CLG grant funds. CLGs may sponsor projects for nonprofit organizations and public entities within their jurisdictions. Note that when a CLG sponsors an application, the CLG is the applicant. If a grant is awarded, the CLG organization is the grant recipient.

How To Apply

The historic preservation fund CLG grant manuals are available on the SHPO website at www.michigan.gov/shpo. Applications must be prepared according to the instructions in the grant manuals.

Completed applications must be **postmarked no later than 5:00 p.m. on Monday, October 3, 2016**. Send one original of the applications to:

**Joelle Letts, Grants Manager/Budget Analyst
Michigan State Housing Development Authority
State Historic Preservation Office
PO Box 30740
702 West Kalamazoo Street
Lansing, Michigan 48909-8240**

For UPS, Federal Express or DHL deliveries:

**Joelle Letts, Grants Manager/Budget Analyst
Michigan State Housing Development Authority
State Historic Preservation Office
702 West Kalamazoo Street
Lansing, Michigan 48915**

You are encouraged to discuss your proposed project with SHPO staff. SHPO staff will also review draft applications and provide recommendations. If you would like your draft application

reviewed, please send one copy of the proposed scope of work and the project budget. Draft proposals must be received at the SHPO no later than six weeks before the application submission deadline.

Questions regarding the application process should be addressed to:

Joelle Letts - phone: 517.373.1904 or email: LettsJ1@michigan.gov

Questions regarding Certified Local Governments should be addressed to:

Jessica Flores - phone: 517.241-6062 or email: FloresJ3@michigan.gov

Grant Awards

As soon as the SHPO receives notification from the National Park Service of its annual Historic Preservation Fund award, we will notify applicants about the status of their applications.

If an application is selected for funding, the Michigan State Housing Development Authority, through the SHPO, prepares a grant agreement officially awarding the funds. Work must be under agreement during the current fiscal year (October 1 to September 30) and must be completed by June of the following year unless a formal project extension is requested by the CLG and approved by the SHPO. Work cannot begin before a grant agreement between the SHPO and the local unit of government has been executed. Expenses incurred prior to the execution of a grant agreement are not allowable costs. Typically, grant agreements will be executed in the spring following the application deadline.

CLG grants are paid on a reimbursement basis and the CLG must have sufficient funds available to complete project work. After financial documentation has been approved, payment is processed for project costs up to 60 percent, not to exceed the federal funds reserved for the project.

Grant Requirements

Work must be done by a person that meets the 36 CFR 61 Professional Qualifications developed by the National Park Service (See Appendix F)

A publication education component must be a part of every project. At a minimum, this would include one public meeting. Your application must describe how this requirement will be met.

Consultants must be competitively selected. The Michigan State Housing Development Authority through the SHPO, must approve subcontracting at each step as it occurs.

Scoring Criteria

SHPO staff will review and competitively score all applications. Each application will be scored with the appropriate Program Scoring Criteria. Final selections will be based on the highest scores as adjusted by administrative capability.

The scoring criteria used by the SHPO are included in Appendix A for your information.

Program Priorities

Projects undertaken in association with one or more of the following priority programs identified by the SHPO will receive more points: Projects undertaken in association with resource identification and designation in support of economic development and community planning activities; the revitalization of traditional downtowns; cultural heritage tourism; and Mid-Century Modern resources (1940-1970).

CHAPTER 1

Grant Application Instructions

The applicant should consult the chapters on General Conditions, Allowable Costs, Matching Share, and Project Completion before completing the following information.

1. PROJECT NAME AND ADDRESS

2. PROJECT COORDINATOR CONTACT INFORMATION

This primary contact for the project should have complete knowledge of the progress of the project work. The Project Coordinator must be an individual directly associated with the day to day activities associated with the proposed grant funded work.

- Name and title
- Address
- Telephone number
- Fax number
- Email address

3. GRANT RECIPIENT CONTACT INFORMATION.

The grant recipient must be an authorized CLG organization in good standing with the State Historic Preservation Office.

- Name
- Address
- Telephone number
- Fax number
- Email address

4. CLG SPONSORSHIP FOR A NON-PROFIT ORGANIZATION OR OTHER PUBLIC ENTITY

Indicate if the CLG is sponsoring a grant application for a non-profit organization or other public entity. The non-profit or other public entity must be located within the CLG's legal jurisdiction. The CLG is required to be the grant recipient. A written agreement between the CLG and the non-profit or other public entity is required prior to the execution of a grant agreement between the CLG and MSHDA. The agreement between the CLG and the non-profit or public entity must describe the following:

- The fiscal and administrative relationship between the CLG and the non-profit or public entity
- The roles of each organization relative to the grant project
- Which organization will provide the match funds?
- Which organization will administer the grant project?
- Which organization will solicit bids and pay vendors?
- Which organization will submit the final project report and final reimbursement request along with all required documentation?

If a CLG sponsors a grant application for a non-profit organization or other public entity, the grant application must contain the required documents from both the CLG and the non-profit organization or public entity. Refer to each section to determine which documents are needed from both the CLG and the non-profit or other public entity.

5. PROPERTY OWNER CONTACT INFORMATION

- Name
- Address
- Telephone Number

6. CONGRESSIONAL DISTRICTS

List the districts in which property located in and/or those that will be affected by the project. Include:

- U.S. congressional district(s), Name of U.S. Senator/Representative
- State senate district(s), Name of State Senator

- State house district(s), Name of State Representative

7. DATA UNIVERSAL NUMBER SYSTEM (DUNS) NUMBER

List the CLG organization's 9 digit DUNS Number. The Federal Funding Accountability and Transparency Act (FFATA), requires SHPO to report CLG grantees that have been awarded a grant of \$25,000 or more. The Federal Funding Accountability and Transparency Act Subaward Reporting System (FSRS) utilizes the CLG's DUNS Number to report grant information.

8. W-9 REQUEST FOR TAXPAYER IDENTIFICATION NUMBER AND CERTIFICATION

Complete the W-9 Request for Taxpayer Identification Number and Certification form. (Appendix B.) List the name and federal identification number of the CLG which will be paid the grant funds.

The CLG is the only organization that can be paid federal CLG funds.

9. DEED AND OWNERSHIP INFORMATION

For single resource projects, such as a National Register Nomination of one building, submit a copy of the deed and

- For nonprofit owned structures, a title commitment
- For publicly owned structures, a legal opinion

10. FEDERAL REQUEST AND MATCH

The federal funding request may be up to 60 percent of the project budget. Indicate the total matching share in the following format:

- Donor organization (city, nonprofit, etc.)
- Source (private, city general fund, etc.)
- Kind (cash, in-kind, volunteer)
- Amount

11. BUDGET

Be specific about the items included in the budget. Indicate whether they relate to the federal share or your matching share. Show your method for determining costs. Example:

| | Federal | Match |
|--|---------|---------|
| Clinton M. Auer - Project Director | | |
| \$3,000/month X 20% X 12 months | | \$7,200 |
| Total Paid salaries | | \$7,200 |
| Chris McMillen - Research | | |
| \$5.50/hour x 20 hours for 10 weeks | | \$1,100 |
| Total Donated salaries | | \$1,100 |
| Indicate the type of fringe benefit and total. Example: | | |
| Group Health Insurance: \$25/month/person X 12 months | | \$300 |

| | | |
|--|----------|----------|
| Life Insurance: \$10/month X 12 months | | \$120 |
| Retirement 8% | | \$576 |
| TOTAL FRINGE BENEFITS | | \$996 |
| Consulting Services (estimate) | \$10,000 | \$10,000 |
| Travel (List number of miles and rate per mile): 500 miles @ \$0.32/mile | | \$160 |
| Other Costs: List other budget items not listed above that are needed to complete the project (i.e. printing, supplies, photocopies, film, etc.). Be specific, especially about any item over \$500. | | |

11. MATCH CERTIFICATION

Provide proof of the availability and source of the match through a certification from an appropriate organization or official. This can be a statement included in a resolution from city council, a bank statement signed by an appropriate official, or a letter from a financial institution indicating that the appropriate amount of funds are available. (See Chapter 6.)

12. FINANCIAL CERTIFICATION

Include a certification from your financial manager that your organization has an adequate accounting system in place with appropriate internal controls to assure accuracy and reliability of accounting data and to encourage compliance with management standards set out in A-102 for local units of governments, A-110 for nonprofit institutions, or A-21 for educational institutions. The financial certification shall state the following items.

The financial management system shall:

- Provide accurate, current and complete disclosure of the financial results of each grant.
- Provide records that identify the source and application of funds for grant supported activities.
- Provide for effective control of all grant assets.
- Compare actual and budget amounts for the grant.
- Establish procedures for determining reasonableness, allowability, and allocability of costs in accordance with the provisions of the applicable cost principles and the terms of the grant agreement.
- Support accounting records by source documentation such as canceled checks, paid bills, payrolls, contract documents, etc. Separate project records must be established and identified by the grant name and number.
- Follow a systematic method to assure timely and appropriate resolution of audit findings. Recipients shall comply with federal Circular A-133 Audits of States, Local Government and nonprofit organizations.

If the CLG is sponsoring an application for non-profit or other public entity, submit this information for both the CLG and the other organization.

13. SCOPE OF WORK/PROJECT NARRATIVE

Describe in detail the scope, methods, and anticipated results of the project. It may be necessary to work with SHPO staff to refine the project scope and define the work products so they are consistent with state and federal standards. The project description should include, at a minimum, the information described in Chapter 2.

14. WORK SCHEDULE

Develop a work schedule. *Assume that grant agreements will be executed no sooner than June 1.* Work cannot begin until a grant agreement is executed. Work schedules become an attachment to the grant agreement.

Grant agreements that include the hiring of a consultant or contractor should include dates for the following bidder solicitation activities:

- Execution of grant agreement
- Submit draft RFP, solicitation letter, and advertisement to SHPO for approval
- Quarterly progress report due (quarterly report due dates are January 15, April 15, July 15, and September 15)
- SHPO approval of RFP, solicitation letter and advertisement (allow 30 days)
- Solicit bids
- Bids due (allow 30 days)
- Submit bids, rationale for bidder selection
- Submit draft consultant contract to SHPO for approval (allow 30 days)
- SHPO comments and recommends changes for consultant contract

Grant agreements for architectural/historical surveys should include, in addition to bidder solicitation items, dates for the following items:

- Execution of grant agreement
- Conduct historic resource survey
- Evaluate historic resource survey data and write survey report
- Local governmental unit submit historic resource survey data and report to SHPO for review (allow 30 days)
- Study committee write preliminary report
- Study committee officially transmits preliminary study committee report to SHPO and other review bodies
- SHPO/review bodies review preliminary study committee report (allow 30 days)
- Study committee hold educational workshop
- Hold public hearing (60 days after transmittal of preliminary report)
- Study committee write draft historic district ordinance
- Study committee write final study committee report and submits with draft ordinance to SHPO for review
- SHPO comment on final study committee report and draft ordinance (allow 30 days)
- Study committee submits final study committee report and historic district ordinance to city council
- Submit copy of adopted ordinance to SHPO

Grant agreements for nominations to the National Register of Historic Places should include, in addition to bidder solicitation items, dates for the following items:

- Execute consultant contract
- Submit copy of executed consultant contract to SHPO
- Begin work
- Quarterly progress report due (quarterly report due dates are January 15, April 15, July 15, and September 15)
- *For District Nominations only:* Submit photo inventory to SHPO for review. See *So You Want to List Your Commercial District in the National Register of Historic Places? How to Do It – What Is Required?* (Appendix J)
- Submit first draft of National Register nomination to SHPO for review
- SHPO comments on first draft of National Register nomination (allow 30 days)
- Submit electronic list of property owners and addresses to SHPO for preparation of public notification letters regarding presentation of the National Register nomination at the State Historic Preservation Review Board meeting (45 days prior to Review Board meeting)
- Submit final National Register nomination to SHPO
- Quarterly progress report due (quarterly report due dates are January 15, April 15, July 15, and September 15)
- Public information meeting about nomination
- Consultant presents National Register nomination to State Historic Preservation Review Board
- Submit completion report

- Submit final reimbursement request with financial documentation to SHPO

15. PRODUCTS AND DELIVERABLES

Provide a list of the products that will result from the project and indicate the medium. Example:

| | |
|--|---|
| National Register Nomination for <i>Willenholly Building</i> | 1 printed original document that meet specifications as outlined in <i>How to Complete the National Register Registration Form (16A)</i> . 1 set of CDs containing information in Word. (See information below regarding electronic format.) |
| <i>Willenholly Building</i> Survey Data | 2 sets of CDs containing survey data in MS Access, Excel or GIS shapefile – 1 for NPS and 1 for SHPO. (See information below regarding electronic format.) |
| <i>Willenholly Building</i> Survey Report | 2 printed spiral bound original reports and 2 sets of CDs containing survey report in Word - 1 for NPS and 1 for SHPO. (See information below regarding electronic format.) |

Electronic versions of all *reports* must be in Word 2007 (or later) and must be provided to the SHPO on a DVD. Historic resource survey data must be submitted in electronic format. MS Access and Excel are acceptable formats. Survey data may also be submitted as GIS data. ArcGIS shapefile format is acceptable.

16. PHOTOGRAPHS

Applicants should note that there are varying photographic requirements for each type of grant project addressed in this manual, as well as different requirements for the **application** and **completion** phases of these projects. Completion phase photographic requirements are addressed in *Chapter 7: Completion and Reimbursement* in this manual.

- **Education Grant Projects**
 - Applicants are NOT required to submit any photographs in the application phase of Education grant projects.
- **Identification Grant Projects**
 - Applicants must submit a number of 4" x 6" color photographs that adequately document the predominant buildings and features of the prospective survey area. Please see *Appendix I: Photograph Technical Information* for further information on submitting photographs.
- **Registration Grant Projects**
 - Applicants must submit a number of 4" x 6" color photographs that adequately document the features of the individual resource, or the predominant buildings and features of the prospective district. Please see *Appendix I: Photograph Technical Information* for further information on submitting photographs.

- **Planning Grant Projects**

- Applicants submitting an application that addresses resource management must submit a number of 4" x 6" color photographs that adequately document the historical resources included in the plan area. Please see *Appendix I: Photograph Technical Information* for further information on submitting photographs.
- Applicants submitting an application that seeks to develop a community preservation plan must submit a number of 4" x 6" color photographs that adequately document the community's historic resources – including general/streetscape views, individual property views, and detail views when deemed appropriate.

17. PROJECT STAFF/CONSULTANTS PROFESSIONAL QUALIFICATIONS (36 CFR 61)

Work must be done by a person that meets professional criteria (36 CFR 61) established by the National Park Service. A least one member of the work force must meet the federal qualifications that are appropriate for a particular project. You must submit proof that the person doing the work, whether it is staff or a paid consultant, meets these federal qualifications. Resumes are acceptable. If you don't know which consultant will be hired for the project, acknowledge in your grant application that any consultants hired as part of the grant project work will meet the required professional qualifications. The 36 CFR 61 Professional Qualifications are found in Appendix F.

18. CONSULTANTS MUST BE COMPETITIVELY SELECTED

The SHPO must approve subcontracting at each step as it occurs. The following must be submitted to SHPO during the contracting process:

- Request for Proposal (RFP)
- List of consultants to whom the RFP was sent
- Copies of all proposals received
- Analysis of all proposals and the reason a specific consultant was selected and proof of how that consultant meets federal requirements
- Executed contract

19. HISTORIC DISTRICT COMMISSION SUPPORT LETTER AND OTHER SUPPORT LETTERS AND RESOLUTIONS

Certified Local Government grant applications must include a letter from the historic district commission supporting the application. Letters and/or resolutions supporting the project and its objectives from agencies and organizations interested in the property or area and its future should be provided to indicate public support for the project and what is hoped the project will accomplish for the property/area and community.

20. FEDERAL FUND ADMINISTRATION

Provide a brief description of the experience your organization has in administering federal funds.

If the CLG is sponsoring an application for non-profit or other public entity, submit this information for both the CLG and the other organization.

21. RESOLUTION AND BY LAWS OF GOVERNING BODY

Include a resolution authorizing acceptance of the grant, execution of the required grant agreement and designating authorized signatorie(s). The resolution must include the name(s) of the individuals authorized to sign the grant agreement, any grant agreement amendments, and any grant agreement related documents which might be necessary. The resolution must include the fund source for the required matching funds.

If a CLG sponsors an application from a non-profit or other public entity, the CLG is required to be the grant recipient and sign the CLG grant agreement. *The non-profit or public entity must also submit a resolution.* The non-profit or other public entity resolution must include the name(s) of the individuals authorized to sign the agreement between the CLG and itself and any grant agreement related documents which might be necessary. If the non-profit or other public entity is providing the match funds, this must be authorized in the resolution and the fund source must be identified.

The Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion must be signed and dated by the authorized grant agreement signatory or another appropriate individual and returned with the application (Appendix C.)

If the CLG is sponsoring an application for a non-profit or other public entity, submit this information for both the CLG and the other organization.

24. CERTIFICATE VERIFYING KEY PERSONS

The Certificate Verifying Key Persons of the Contractor/Subgrantee must be completed, signed and dated by the authorized grant agreement signatory or another appropriate individual and returned with the application (Appendix D.)

If the CLG is sponsoring an application for a non-profit or other public entity, submit this information for both the CLG and the other organization.

25. OFFICER COMPENSATION REPORTING UNDER THE FEDERAL FUNDING ACCOUNTABILITY AND TRANSPARENCY ACT

The Officer Compensation Reporting form must be completed, signed and dated by the authorized grant agreement signatory or another appropriate individual and returned with the application. This information must be submitted for the CLG only. (Appendix E.)

26. SIGNATURES

Have all authorized signatories sign the application; also type their names, titles, addresses (including city or town, state, and zip code), and telephone numbers.

If the CLG is sponsoring an application for a non-profit or other public entity, authorized officials from both the CLG and the other organization must sign the application.

NOTE: Failure to submit a timely application or failure to provide all information requested above may result in your application not being scored.

Grant Application Checklist

Applications must be **postmarked no later than 5:00 p.m. on Monday, October 3, 2016.**

1. Project Name and Address
2. Project Coordinator Contact Information
3. Grant Recipient Contact Information (must be the CLG)
4. CLG Sponsorship Information
5. Property Owner Contact Information
6. U.S. Congressional, State Senate, & State House District(s)
7. Data Universal Number System (DUNS) Number (must be the CLG)
8. W-9 Request for Taxpayer Identification Number and Certification (must be the CLG)
9. Deed and Ownership Information
10. Federal Funding Request and Match
11. Budget
12. Match Certification
13. Financial Certification
 - If CLG sponsors grant application for a non-profit or other public entity, submit financial certification from both organizations
14. Scope of Work/Project Narrative
15. Work Schedule
16. Products and Deliverables
17. Photographs
18. Project Staff / Consultants Professional Qualifications (36 CFR 61)
19. Consultants Must Be Competitively Selected (nothing to submit)
20. Historic District Commission Support Letter and Other Support Letters and Resolutions
21. Federal Fund Administration
 - If CLG sponsors grant application for a non-profit or other public entity, submit federal fund administration information from both organizations

- 22. Resolution and Bylaws of Governing Body
 - If CLG sponsors grant application for a non-profit or other public entity, submit federal resolution and bylaws from both organizations
- 23. Civil Rights Compliance & EOOEEO – CLG has 25 or more employees **or** applying for \$25,000 or more
 - Work Force Status Report
 - Affirmation of Equal Opportunity
 - Work Force Analysis
 - Equal Opportunity Plan
- Civil Rights Compliance & EEO – CLG has less than 25 employees **and** applying for less than \$25,000
 - Work Force Status Report
 - Affirmation of Equal Opportunity
- If CLG sponsors grant application for a non-profit or other public entity, submit all EEO documents for both organizations
- 24. Debarment Certification and Certificate Verifying Key Persons
 - If CLG sponsors grant application for a non-profit or other public entity, submit Debarment Certification for both organizations
- 25. Certificate Verifying Key Persons of the Contractor/Subgrantee
 - If CLG sponsors grant application for a non-profit or other public entity, submit Certificate Verifying Key Persons for both organizations
- 26. Officer Compensation Reporting
- 27. Signatures
 - If CLG sponsors grant application for a non-profit or other public entity, authorized officials from both organizations must sign the application

CHAPTER 2

Scope of Work

Below are general conditions that apply to the receipt of federal funds. These and all other applicable requirements, laws and regulations are addressed or referenced in the grant agreement that will be executed between the local unit of government and the Michigan State Housing Development Authority.

IDENTIFICATION/SURVEY

1. Requirements

- Identification activities must be conducted, supervised or reviewed by one or more persons who together meet the professional qualifications (36 CFR 61) defined by the National Park Service. These are found in Appendix C.
- Historic resource survey must be conducted in accordance with The Manual for Historic and Architectural Surveys in Michigan. The manual is available from the State Historic Preservation Office's website. Note that this manual was prepared in 2001 and is not up to date concerning the format for electronic property records and concerning photographic requirements – contact the SHPO for current information. Surveys for downtown historic districts must be conducted in accordance with the SHPO's So You Want to List Your Commercial District in the National Register of Historic Places? How to Do It – What is Required (hereafter "So You Want"). See Appendix J.
- Eligibility determinations for historic resources must meet the Secretary of the Interior's National Register Criteria for Evaluation.
- Survey data must be input into MS Access or Excel.
- Survey data may also be submitted as GIS data. ArcGIS shapefile format is acceptable.
- Surveys for national register downtown districts will only require images of all district properties as stated in So You Want. See Appendix J.

2. Scope of Work

Provide a statement of the research objective of the project. Indicate the type of survey that will be undertaken:

- Intensive level survey is photographic documentation of the historic resources in specified area accompanied by detailed research on individual properties that results in historic contexts and the determination of which properties are eligible for the National Register of Historic Places.
- Thematic survey is the same as intensive level survey except that the in field inventory focuses on one property type (lighthouses, bridges) or one historic context (agriculture in Lapeer County from 1830 to 1945). Proposals for thematic surveys must include a detailed description of how the properties to be surveyed were identified and selected.
- Reconnaissance survey is photographic documentation accompanied by research sufficient to place the inventoried properties in historic contexts and to suggest which may warrant intensive level survey.
- **Reconnaissance surveys generally will not be funded because they do not provide concrete results in the way of national register eligibility determinations, but an application for reconnaissance survey may be considered if a compelling purpose and need for such a project can be demonstrated.**
- Describe the survey methodology or research design. Topics to address include, at a minimum, how fieldwork will be conducted, what sources shall be utilized for research, and how assessments of the documented properties shall be conducted (use of the National Register selection criteria).
- Provide a map with the survey project area clearly outlined and a verbal description of the project's boundaries. If the project is an entire city or county, include a written statement of this fact. Provide a brief summary of the overall appearance and history of this survey area, discussing such things as: population; number of settlement areas if a survey will be in a township or county; urban, rural, or neighborhood characteristics.
- Provide a list of the proposed themes that will be addressed in the historic context. A historic context is information about historic trends and properties organized by theme, time period

and geographic area. Projects must use the themes listed in National Register Bulletin 15: How to Apply National Register Criteria for Evaluation but may tailor them further as appropriate.

- Estimate the number of acres that will be surveyed and the number of resources that will be documented.
- Briefly describe prior or subsequent phases of the project, if appropriate.
- Explain the purpose of the project, the survey products, and how the results will be used. When computing budget costs, plan on preparing three sets of survey data; one will be kept at the local level and two will be submitted to the SHPO.

REGISTRATION - NATIONAL REGISTER NOMINATIONS

1. Requirements

- If a historic resource survey is being undertaken in conjunction with the National Register nomination, it must be conducted in accordance with The Manual for Historic and Architectural Surveys in Michigan or So You Want to List Your Commercial District in the National Register of Historic Places? How to Do It – What Is Required (Appendix J). See Section 1, Requirements, under Identification/Survey. These manuals are available on the SHPO website at www.michigan.gov/shpo.
- Eligibility of the property, district, or group of properties for the national register must be accepted by the SHPO prior to the SHPO approval of CLG funding for a nomination project.
- National Register nominations must be written in accordance with National Register Bulletin 16A: Guidelines for Completing National Register of Historic Places Forms, and the SHPO's manual for downtown historic district nomination projects, So You Want to List Your Commercial District in the National Register of Historic Places? How to Do It – What Is Required (Appendix J), if the project is for a downtown district nomination.

2. Scope of Work

- Describe the purpose of the project, the projected products and outcomes, and the proposed use of the products. If the project is being undertaken as part of a larger community revitalization/economic development program, describe how the project will benefit that program.
- Provide a map and a written description of the proposed project area.
- If more than one nomination is to be prepared, provide a tentative list of all the proposed nominations to be prepared, indicating for each, the type of nomination (individual property, district, or multiple property) and the approximate number of resources of each type (buildings, structures, objects, or sites) that each area contains.
- Provide a list of the proposed themes that will be addressed in the historic context. A historic context is information about historic trends and properties organized by theme, time period and geographic area. Projects must use the themes listed in National Register Bulletin 15: How to Apply National Register Criteria for Evaluation.
- Provide a brief description of prior or subsequent phases of the project, if appropriate.

REGISTRATION - LOCAL HISTORIC DISTRICTS

1. Requirements

- The procedures for establishing a local historic district as outlined in Section 399.205 of Michigan's Local Historic Districts Act, Public Act 169 of 1970, as amended must be followed.
- The study committee report shall be written in accordance with the manual Local Historic Districts in Michigan available on the SHPO website at www.michigan.gov/shpo. For study committee reports being prepared for downtown commercial districts, if listing of the same district in the National Register of Historic Places is also planned in the near future, the descriptive and history/historic significance part of the study committee report should also be prepared in accordance with the SHPO's So You Want to List Your Commercial District in the National Register of Historic Places? How to Do It – What is Required. See Appendix J.
- If a historic resource survey is undertaken as part of the process of creating the local historic district, it must be conducted in accordance with The Manual for Historic and Architectural Surveys in Michigan. The manual is available from the SHPO website at www.michigan.gov/shpo. Survey data must be collected electronically using MS Access or Excel. ArcGIS shapefile data is also accepted.

- If a CLG is sponsoring a grant application to use CLG funds to conduct a local historic district study for a community, the non-CLG community must adopt a local historic district ordinance that is pursuant to Public Act 169 of 1970 as determined by the SHPO. If the non-CLG community already has a historic district ordinance in place, then a copy of the non-CLG community's ordinance must be submitted to the SHPO for review no later than at the time of application for CLG funds (earlier submission for review is encouraged). If a non-CLG community has not yet adopted a local historic district ordinance, then a final draft of the ordinance must be submitted with the local historic district study report. The application for CLG funds must include a letter of support from the non-CLG unit of government for the adoption of the local historic district ordinance. For example, if Washtenaw County is the CLG community, Washtenaw County can submit a CLG grant application for the Village of Manchester to conduct a Local Historic District Study.

2. Scope of Work

- Provide a copy of the resolution from the local unit of government authorizing the creation of the historic district study committee.
- Provide a list of the names of the historic district study committee members and short description of their history/preservation affiliation.
- Describe the purpose of the project, the projected products and outcomes, and the proposed use of the products. If the project is being undertaken as part of a larger community revitalization/economic development program, describe how the CLG project will contribute to the goals of the community program revitalization/economic development program.
- Provide a map, a written description, and a brief history of the proposed project area.

REGISTRATION - ARCHAEOLOGICAL SURVEY

1. Requirements

- Applicants must work with the State Archaeologist. Work must be conducted according to The Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation.

2. Scope of Work

- State the objectives of the project and the research, management and/or planning needs the project will address. Specify whether the project is a reconnaissance ("Phase I") survey or a testing ("Phase II") project.
- Describe the research design, including methods and techniques to be used. Sampling methodology, the use of shovel testing and test interval, the use of specialized equipment such as use of sonar equipment for underwater work, and similar topics should be discussed. Mention any documentary research to be conducted (site file searches, historical records etc.). Describe any other sources of information such as oral history, informant interview, and collections study. Types of records to be compiled for the project (e.g., site forms, photographs, USGS maps) should be specified.
- Provide a map with the specific project area clearly outlined.
- Estimate the number of acres to be field checked and number of sites which will be found (example: 10,000 + 500 acres; 100 + 15 sites).
- For sites found on Phase I surveys, give a preliminary assessment of the National Register potential of each site must be made along with recommendations addressing the need for further investigations. For Phase II work, list any sites to be tested, along with evaluation criteria or method of evaluating evaluation criteria.
- National Register forms must be prepared for any sites tested and believed to be eligible.
- Projects involving excavation and planning studies should be discussed with the State Archaeologist prior to submission of an application.
- Specify the repository for project collections and records. The repository must meet the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation.

COMMUNITY BASED PLANNING

1. Requirements

Planning documents must conform to federal standards contained in The Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation and must be developed in coordination with the State Historic Preservation Office. The plan should contain, at a minimum:

- Clear goal statements and the necessary objectives required for their implementation
- Definition of the historic character of the project area and/or community
- A concise summary of past preservation efforts to provide the context for preservation in the community
- The results of a historic resource survey
- Description of how the preservation plan will be integrated into the community's planning process and coordinated with zoning and other land use management tools in the community
- If a historic resource survey is undertaken as part of the planning process, it must be conducted in accordance with The Manual for Historic and Architectural Surveys in Michigan. The manual is available from the State Historic Preservation Office. Survey data must be collected electronically using MS Access or Excel. ArcGIS shapefile data is also accepted.

2. Scope of Work

- Define the type of plan that is being developed. Is it a preservation plan for a community? (Note: Applications for historic resource structure reports, feasibility studies, etc. should use the grant manual for Rehabilitation and Rehabilitation planning.)
- Give a general description of the project area, the historic resources in it and explain why the plan is being undertaken.
- Identify, the critical issues, threats, and opportunities affecting the historic resources in the project area.
- Explain the purpose of this project. What is the community need? Is it the result of development pressure?
- Planning documents should result in historic preservation being integrated into a community's comprehensive or master plan. Demonstrate how the community intends to integrate the preservation plan into its planning process.
- How will the plan result in the identification, registration and/or protection of historic resources? Describe the desired outcomes expected to result from the plan.
- Public participation should be a part of the planning process. Describe how the public will be included in the development of the preservation plan.
- Briefly describe prior or subsequent phases of the project, if appropriate.

PUBLIC EDUCATION

1. Scope of Work

- Explain the purpose of the project. Give a full description of the public education activities that will result from the project, i.e. promotion of a local historic district and its design guidelines, promotion of heritage tourism, development of a preservation website, development of a K-12 preservation program, or a restoration/rehabilitation manual, etc.
- Include a needs assessment statement and explain how the project will benefit preservation in the community, region, or state.
- Describe the target audience. How will the product be distributed? Is its anticipated use one time or continued? Will the final product be available on a website? Will the end product be useful to others outside the immediate community?
- If a publication is to be produced, describe who will use the report, how many copies will be produced, how the report will be distributed, and whether or not a fee will be charged.
- Briefly describe prior or subsequent phases of the project, if appropriate.

CHAPTER 3

General Conditions for Funding

Below are general conditions that apply to the receipt of Federal funds. These and all other applicable requirements, laws and regulations are also addressed or referenced in the agreement which will be executed between your organization and the Michigan State Housing Development Authority.

1. PROJECT PERIOD

Project costs must be incurred between the period the grant agreement is executed (signed and dated by the Michigan State Housing Development Authority) and the end date of the grant agreement. Costs that are incurred prior to the execution of the grant agreement or after the end date are not allowable project costs and will not be used as part of the federal or the matching share.

2. PROJECT SCOPE

The scope of the project work is defined in the grant agreement. Prior to implementing any change, the grant recipient shall notify the SHPO in writing when changes in the scope of the work are necessary. Some changes may be technical in nature and not require a formal grant agreement amendment. Most changes will require a grant agreement amendment. In some cases, federal approval of the proposed change will be required and obtaining this approval may cause delays. So that federal funds are not jeopardized, the grant recipient shall notify the SHPO of changes immediately.

3. PROJECT BUDGET

The subgrantee must notify the SHPO of any major changes in the budget prior to implementing the change.

4. FISCAL YEAR END DATE AND FEDERAL APPROVAL

Department of the Interior policy requires that all financial costs be reported at the end of each fiscal year. To meet federal and state end of fiscal year closing deadlines, grant recipients shall submit to MSHDA, SHPO documentation of expenditures by September 15. The September 15 report shall be accompanied by a report on work progress to date.

5. PROJECT EXTENSIONS

If during the course of the project the grant recipient believes the grant agreement end date cannot be met, a written request for an extension must be submitted to the SHPO prior to the grant agreement end date. This request must state the reason the extension is necessary. Approval of an extension will be dependent upon federal deadlines and other considerations and is not automatic. Note that project extensions may need to be approved by the Department of the Interior. Subgrantees should notify the SHPO as soon as they become aware that a grant agreement extension may be necessary. Grant agreement end dates are extended through a letter signed by the State Historic Preservation Officer.

6. METHOD OF PAYMENT

All grant funds are paid on a reimbursement basis only. Documentation of all expenditures (federal and local matching share) shall be submitted to and audited by the SHPO. Department of the Interior guidelines require that reports be filed for costs within each fiscal year.

7. COMPLETION MATERIAL/REPORT

The completion materials or report will be specified in the grant agreement. Review this section of the grant agreement carefully. Because all survey material, planning documents, and National Register research and nominations must meet state and federal standards, the grant agreement contains specific requirements which must be complied with. Failure to meet these Standards will result in no reimbursement being made.

8. ACKNOWLEDGMENT OF FUNDING AND NON DISCRIMINATION

In all publications, reports, and newsletters, funding through the National Park Service and the Michigan State Housing Development Authority shall be acknowledged. The acknowledgment to be used is included in the grant agreement.

9. AUDIT

Financial documentation must be submitted before reimbursement can be made to the grant recipient. In addition, Federal Circular A 133 requires that local units of government, non-profits, and educational institutions expending \$750,000 or more in federal funds have a single audit completed annually. Each year the SHPO will send a letter requesting the grant recipient to file a form with the SHPO indicating the status of their single audit. The form indicates whether the grant recipient expended \$750,000 or more in federal funds and whether the grant recipient is required to send in a copy of their single audit report to SHPO. If federal funds from a project are questioned during audit, the grant recipient is liable for payback to the Department of the Interior.

10. LOBBYING WITH APPROPRIATED FUNDS

Historic Preservation Fund grants must conform to provisions of 18 USC 1913: "No part of the money appropriated by any enactment of Congress shall, in the absence of express authorization by Congress, be used directly or indirectly to pay for any personal service, advertisement, telegram, telephone, letter, printed or written matter, or other device, intended or designed to influence in any manner a member of Congress, to favor or oppose, by vote or otherwise, any legislation or appropriation by Congress, whether before or after the introduction of any bill or resolution proposing such legislation or appropriation; but this shall not prevent officers or employees of the United States or its Department or agencies from communicating to members of Congress on the request of any member or to Congress, through the proper official channels, requests for legislation or appropriations which they deem necessary for the efficient conduct of the public business." In summary, costs associated with activities to influence legislation pending before the Congress, commonly referred to as lobbying, are unallowable as charges to federally assisted grants.

11. HATCH ACT

No officer or employee whose principal employment is connected with any activity which is financed in whole or in part with grant assistance shall take part in any of the political activity proscribed in the Hatch Political Activity Act, 5 USC 1501 et seq., as amended, with its stated exceptions.

12. POLITICAL ACTIVITIES

No expenditure of grant funds may be made for the use of equipment or premises for political purposes, sponsoring or conducting candidates' meeting(s), engaging in voter registration activity or voter transportation activity, or other partisan political activities.

13. DISCLOSURE OF INFORMATION

Financial records, supporting documents, statistical records, and all other records pertinent to a grant provided by NPS are subject to disclosure to others under the Freedom of Information Act, 5 USC 552.

14. SAFETY PRECAUTIONS

The State of Michigan assumes no responsibility with respect to accidents, illnesses, or claims arising out of any work performed under a grant supported project. The grantee is expected to take necessary steps to insure itself and its personnel and to comply with the applicable local, State, or Federal safety standards, including those issues pursuant to the National Occupational Safety and Health Act of 1970 (see 20 CFR 1910).

15. CONFLICT OF INTEREST

A conflict of interest in the selection, award, or administration of contracts is prohibited. A grant recipient shall not enter into any contract for the performance of project work whereby any current or former employee, officer, or agent of the Federal government, the State or the grant recipient, who has or had authorization to plan, develop, negotiate, accept, approve, or take part in decisions regarding subcontracts, or other agreement in connection with the particular project grant, has a financial or other interest in the recipient selected for the award. This prohibition is also effective if any member of the immediate family of such employee, officer, or agent; his or her partner; or any organization that employs, or is about to employ, any of the aforementioned, has a financial or other interest in the firm selected for the award. All subcontracts awarded pursuant to a grant must be accomplished free from bribery, graft, kickbacks, and other corrupt practices. Employees, officers, and agents of the grant recipient shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to subcontracts.

The grant recipient bears the primary responsibility for the prevention and detection of prohibited conduct and shall promptly notify the State Historic Preservation Officer of the Michigan State Housing Development Authority when such conduct becomes known. Federal and state administrative or other legally available remedies will be pursued to the extent appropriate. A grant recipient shall take appropriate remedial action with respect to the prohibited conduct brought to its attention.

16. CIVIL RIGHTS LAWS

As mandated under Title VI of the 1964 Civil Rights Act and in Executive Directive 1979-4, it is the policy of the state of Michigan to assure that all Michigan citizens receive full and equal access to benefits provided by State supported programs and services without discrimination based upon race, color, creed, religion, national origin, height, weight, marital status, age, sex, or handicap.

It is appropriate that the Michigan State Housing Development Authority, in fulfilling that policy, assure compliance with the non-discrimination laws in connection with the use of grant funds. In furtherance of this policy, it is likewise appropriate that the Michigan State Housing Development Authority not enter into any grant agreement, nor fund or serve as a conduit for funding, programs which may have the effect of creating or perpetrating patterns of discriminatory practice.

All grant recipients shall file affidavits pledging a reasonable representation of minority group representatives, and women, in all levels of their work force and that there exists equal opportunity to participate in and enjoy the benefits of programs and activities without regard to race, color, creed, religion, national origin, height, weight, marital status, age, sex, or handicap.

Subgrantees with grant agreements of \$25,000 or more or employing twenty-five (25) persons or more are also required to complete a written Equal Opportunity Plan.

Forms and instructions for demonstrating Civil Rights Compliance that must accompany the application are part of this manual. If it is determined that the applicant is not in compliance with equal opportunity standards as established by the Michigan Department of Civil Rights, the application will be rejected.

17. BARRIER FREE ACCESS

The U.S. Department of the Interior's Historic Preservation Grant Program, administered by the State Historic Preservation Office, Michigan State Housing Development Authority, requires compliance with state and federal laws, including the Americans with Disabilities Act (ADA), concerning barrier free designs which facilitate access to grant assisted properties by persons with disabilities. The Michigan State Housing Development Authority strongly urges each applicant and other individuals contemplating restorations of historic structures to consider the implications of such compliance at the earliest possible stage. It should be kept in mind that not all preservation work involving extant buildings or structures will trigger the need to meet the barrier free design requirements.

Should a determination be made that barrier free design requirements are applicable, the Michigan Barrier Free Design Board is empowered to grant an exemption to the Michigan requirements when an applicant sufficiently shows that: 1) the proposed repairs, alterations or additions are to be performed on a building or structure listed on or eligible for listing in the National Register of Historic Places or the State Register of Historic Sites; and that 2) adherence to the barrier free design provisions would destroy or diminish a significant feature of the building's or structure's historical character or physical integrity, or both. The applicant will make this showing at an administrative hearing conducted in Lansing by a hearings officer for the Design Board.

The governmental entity having primary administration and enforcement authority over the barrier free design requirements can range from a city building official to various state agencies depending on where the building or structure is located and the type of function for which it is used. If you are unable to determine locally which entity you should be dealing with, you may contact the Michigan Department of Licensing and Regulatory Affairs, Plan Review Division, Barrier Free Design at (517) 241-9328 or Building Division at (517) 241-9317.

18. COASTAL ZONE MANAGEMENT

The Coastal Zone Management Act of 1972 prohibits Federal assistance to local governments that is inconsistent with the requirements of an approved coastal zone management plan. Further information may be obtained from:

Office of Coastal Zone Management
National Oceanic and Atmospheric Administration
Department of Commerce
3300 Whitehaven Street, NW
Washington, D.C. 20235

19. DUAL COMPENSATION

If a grant recipient staff member or consultant is involved simultaneously in two or more projects supported by Federal funds, and compensation on either project is based upon a percentage of time spent, he or she may not be compensated for more than 100 percent of his/her time from any Federal funds during the time of the period of dual involvement.

20. RECORD ACCESSIBILITY AND RETENTION

Grant recipients will submit program, financial or other reports as are required by the Michigan State Housing Development Authority or the National Park Service. On site inspections by the Michigan State Housing Development Authority or the National Park Service will be permitted as required to provide necessary information relevant to compliance with grant conditions.

Documentation, papers and records of the grant recipient and any subcontractor shall be kept for a minimum of three years after federal funds have been reimbursed to the grant recipient or until all claims or audit findings have been resolved.

CHAPTER 4

Grant Agreement

A GRANT RECIPIENT WILL NOT BE REIMBURSED FOR ANY WORK PERFORMED BEFORE THE GRANT AGREEMENT IS EXECUTED. The grant is formally awarded after the grant agreement has been signed by an authorized representative of the grant recipient and is signed and dated by the State Historic Preservation Officer.

The grant agreement written by the SHPO will specify:

- Exact work to be accomplished with the grant award;
- Method of and requirements for disbursement of funds, including any provisions authorizing partial reimbursement prior to the completion of all project work.
- Period for completion of the project;
- Federal and state statutes, regulations, and requirements which must be followed;
- Number and content of the completion report and/or materials.

Attachments to the grant agreement include:

- Work schedule detailing when various tasks will be completed.
- The approved budget.
- Certificate Verifying Key Persons of the Contractor/Subgrantee.

The procedures for signing the grant agreement are:

- Two original grant agreements will be mailed to the project coordinator.
- The authorized individual(s) should sign both original grant agreements.
- Both original grant agreements should be returned to the grants manager/budget analyst, State Historic Preservation Office, Michigan State Housing Development Authority.
- The grant agreements will be signed and dated by the State Historic Preservation Officer.
- One original fully executed grant agreement will be returned to the project coordinator.
- After the CLG authorized individual(s) and the State Historic Preservation Officer has signed the grant agreement, work may begin. No subcontracts should be executed until the grant agreement with the Michigan State Housing Development Authority has been executed.

MAKE COPIES OF THE GRANT AGREEMENT AVAILABLE TO PROJECT STAFF AND TO CONSULTANTS TO ENSURE THAT WORK MEETS THE SPECIFIED REQUIREMENTS.

CHAPTER 5

Allowable and Unallowable Costs

GENERAL

The principles governing which direct costs are allowable are determined in accordance with federal Management and Budget Circular A-87 and A-102, and the National Park Service's Grant Manual. The following factors affect the allowability of costs.

- The cost item must be necessary for proper and efficient conduct of grant supported activities; be reasonable and within the scope of approved work; be allowable under these principles; and, except as otherwise specified in this manual, not be a general expense required to carry out the overall responsibilities of state or local governments.
- The cost item must be authorized or not prohibited under state or local laws or regulations.
- The cost item must conform to any limitations or exclusions set forth in these cost principles, federal laws, this manual, or other limitations included in the grant award as to types or amounts of cost items.
- The cost items must be consistent with policies, regulations, and procedures that apply uniformly to both federally assisted and other activities of the unit of government or organization of which the grantee is a part.
- The cost item must be accorded consistent treatment through application of generally accepted accounting principles and practices appropriate to the particular circumstances.
- The cost item must not be allocable to, or included as, a cost of any other federally financed program in either the current or a prior period.
- The cost item must be net of all applicable credits.
- The cost must be incurred after the execution and before the end date of the grant agreement with the Michigan State Housing Development Authority.

ALLOWABLE COSTS

The SHPO will review and may make changes in the budget line items in the application as submitted. The final budget approved by the SHPO will become an attachment to the grant agreement. Following are some examples of allowable project costs:

- **Paid Staff Time And In-Kind Services**
Compensation for project personnel during the project period including wages, salaries, and supplementary compensation and benefits are allowable costs. Payrolls must be supported by daily time and attendance records that shall indicate the time worked and the work performed, and be signed by the employee and supervisor. See the sample time sheet at the end of this manual. Time in excess of a regular working day is not allowable. It is recommended that time sheets be handwritten, rather than typed.
- **Fringe Benefits**
Fringe benefits for paid or in kind employees in the form of employer's contributions to social security, life and health insurance plans, unemployment insurance coverage, worker's compensation plans, and pension plans are allowable, provided costs are distributed equitably to grant costs and other activities.
- **Volunteer Or Donated Time**
Donated service represents the value of non-cash contributions provided by the local sponsor or non-federal third parties. If donated services are part of the match, the application must include a certification from the volunteer justifying the proposed rate and stating the number of hours to be donated. In addition, a resume for each volunteer shall be submitted. The Michigan State Housing Development Authority must approve proposed rates for volunteers.

A professional is defined as a person who does the work in question for a living and should be assigned a professional rate. A person not meeting this standard must be considered a non-professional and should be assigned the minimum wage as an allowable rate. You would not expect to pay a neighbor for helping paint a house at the same rate that you

would a professional painter. Likewise, a physician may not use his standard charge if he is working as a surveyor. A person's qualifications must be considered along with the tasks in assigning a rate to that work.

Rates assigned for donated services must be consistent with those paid at the state level or, if such services are not provided at the state level, consistent with rates that would be paid if the services were purchased in the labor market. Donated time from individuals or groups other than the grant recipient shall be exclusive of fringe benefits. The time donated will be documented when project work begins by use of time sheets as in the Appendix.

- **Professional/Consultant Fees**

The grant recipient may subcontract all or part of the project work. Free and open competition must be maintained. The SHPO must receive documentation of the procurement at each stage and must approve the subcontractor and the subcontract. The following shall be submitted to the SHPO, and each step must be approved, before the grant recipient proceeds further:

- *Copy of the specifications or request for proposals.*
The RFP shall identify all evaluation factors.
- *Documentation that bids were requested from at least three consultants and a copy of each proposal.*
Federal regulations require that all subcontractors certify that they have not been prohibited from participation in federal programs. Please require all bidders to complete and return the Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion form with their proposals.
- *Documentation of the evaluation of the proposals.*
Grant recipients may develop their own systems for evaluating proposals as long as the award is made to the responsible offer or whose proposal will be most advantageous, price and other factors considered. Unsuccessful bidders should be notified promptly.
- Possible proposal evaluation criteria:
 - **Price (35 percent)**
Favors the least expensive proposal providing an adequate work product.
 - **Capability and qualifications (35 percent)**
Covers the ability of a prospective consultant to meet the terms of the RFP, especially the time constraints, and the quality and relevance of similar projects completed by the consultant. Emphasis will also be placed on the soundness of the consultant's approach to the problem, including the techniques to be used for collecting and analyzing data, as well as the ability to utilize the data collected or recovered from the project to address the research problems involved.
 - **Professionalism (30 percent)**
Refers to the competence of professional personnel who will be assigned to the project by the consultant for both the administrative and infield components of the work. Qualifications of professional personnel will be measured by education and experience (36 CFR 61) with particular reference to experience on projects similar to that described in this RFP and familiarity with and experience in Michigan architecture, history and archaeology. Emphasis will be placed upon the qualifications of the project manager and the amount of dedicated management planned for this project by the consultant. It is the responsibility of the contractor to provide field personnel of sufficient qualifications and training to ensure proper collection of data. The project manager/principal investigator is responsible for the adequate performance of all project work.

The SHPO must approve a consultant you wish to hire before a subcontract is executed.

A copy of the signed subcontract will be submitted to the SHPO at the time it is executed. This contract shall specify the project work and be priced at a set fee or a not to exceed figure and include a debarment certification form. Because the subcontract must include all work as outlined in the grant agreement with the Michigan State Housing Development Authority and also references to laws, regulations, and guidelines which your organization must pass along to the subcontractor, it is recommended that the Michigan State Housing Development Authority grant agreement be an attachment to the subcontract.

NOTE: The SHPO can provide assistance in locating consultants who are qualified to perform project work.

- **Supplies**

The cost of supplies necessary to carry out the grant work is allowable. Purchases made specifically for the grant work shall be charged at their actual prices after deducting all cash discounts, trade discounts, rebates, and allowances received by the grant recipient. Withdrawals from general stores or stockrooms should be charged at cost under a recognized method of pricing consistently applied.

The grant recipient must perform a cost analysis for all purchased supplies. The following is suggested:

| Value of Proposed Contract | Award Process Required |
|----------------------------|---|
| \$0 to \$500.00 | Competition not required but encouraged |
| \$500 to \$4,999.99 | Documentation of competitive pricing through phone, mail, personal shopping, fee schedules. Must use "Documentation of Contract Award" process. If a proposal with a work statement is required, "Small dollar" Request for Proposals (RFP) process must be used. |
| \$5,000.00 or more | "Small Dollar" RFP process required, formal process optional. |

- **Travel**

Travel costs are allowable for expenses for transportation, lodging, subsistence, and related items for project personnel who are in travel status for project related work. Such costs may be charged on an actual basis or on a standard rate basis so long as the standard rate is consistent with state rates. When actual costs are used, documentation must be provided for each cost. All lodging costs must be substantiated with invoices. First-class airfare is not allowable.

- **Publications**

Costs of publication may be allowable if the publication is defined in the application. The grant recipient must delineate how the publication relates to the Historic Preservation Program, how many copies will be printed, estimated cost per copy, and how the publication will be distributed. During the project period, all publications will be distributed

free of charge. Any publication shall contain the acknowledgment of federal funding statement and the statement of non-discrimination.

UNALLOWABLE COSTS

Unallowable costs include but are not limited to:

- **Bad Debts.** Any losses arising from non-collectable accounts and other claims, and related collection costs, are unallowable.
- **Equipment.** The cost of equipment is not allowable.
- **Fundraising.** Expenses and costs of organized fundraising, including financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred solely to raise capital or obtain contributions are unallowable.
- **Interest and Other Financial Costs.** Interest on borrowing is not allowable.
- **Interpretive Expenses.** Staff salaries for interpretive services or maintenance of interpretive devices are unallowable.
- **Entertainment.** Costs of amusements, social activities, and related incidental cost such as meals, beverages, lodgings, rentals, transportation, and gratuities are unallowable. Costs of meals for employees when they are not in travel status are not allowable.
- **Markers.** Historical markers are not an allowable cost.
- **Work Study Students.** Students in a federally funded work/study program cannot contribute donated services as matching share.

CHAPTER 6

Matching Share

The CLG grant program is a 60-40 match program. Forty (40) percent of the total project cost is to be provided by the grant recipient. Certification of the availability of the match must be provided with the final application. Certification may be a statement from a banker that funds are available, a resolution from the city council setting aside specific funds, or similar verification. The certification should specify the amount and source of the funding, that the funds are earmarked for the project, and that the funds will not be used to match other federal funds. Donated time will be certified through a certification from the person donating his/her time that he/she will donate "X" hours at "X" rate.

The matching share is approved prior to the grant agreement. Any changes in the match must be approved by the SHPO.

Matching funds may include the following:

- Private Funds
- Municipal Funds
- State Funds
- Federal Community Development Block Grant Funds. Note that provisions of the Davis-Bacon Act apply if CDBG funds are used as matching share.
- In-Kind Services. The in-kind contributions of paid staff may be valued at the grant recipient's actual cost. Fringe benefits for in-kind salary costs are allowable. In-kind salary costs will be supported by daily time records that indicate the time worked, the work performed and be signed by the employee and the supervisor (a sample timesheet is included in this manual).
- Donated Services. Donated services represent the value of non-cash contributions provided by non-federal third parties. If donated services are part of the match, the project sponsor shall provide documentation of the type, rate, and source of such services. Fringes may not be applied to donated services.
- Rates assigned for donated services must be consistent with those paid in state government or, if services are not available in state government, the rates shall be consistent with those paid if the services were purchased in the labor market. In estimating donated match, a rate must be established at the time of application for each prospective individual donating his/her services. A resume for each worker must be included with the application if the rates charged are above the minimum wage rate. The time donated will be supported by daily time records, which indicate the time worked, the work performed and be signed by the employee and the supervisor (a sample timesheet is included in this manual).
- Donated Equipment or Material. Equipment may be used as match if included in the grant agreement budget. The use of donated equipment and material must be documented. The SHPO can provide sample forms. Donated services, equipment or material are not eligible for reimbursement as if they were cash expenditures. They may be used as match only.

CHAPTER 7

Completion and Reimbursement

Funds will be disbursed to the grant recipient only on a reimbursement basis. Requests for reimbursement must include documentation of both federal and match portions of the grant. Reimbursement shall not exceed the amount of the grant award. No advances shall be made under any circumstances. Please also refer to the chapter on allowable and unallowable costs.

Project coordinators who are part of large institutions should assure that the appropriate personnel are advised of documentation requirements at the beginning of the project work.

1. EXPENDITURE DOCUMENTATION

All documents and supporting entries on the accounting records must be available for inspection by authorized representatives of the U.S. Department of the Interior and the Michigan State Housing Development Authority. All such records must be retained for inspection for three years after the federal reimbursement has been received or until all claims or audit findings have been resolved. Grant projects that cross the September 30/October 1 fiscal year ending will be required to submit the following by September 15:

- A progress report on work accomplished and any completed products.
- A summary of all expenditures through September 30 by cost category and by federal and matching share.
- Copies of invoices, time sheets, and canceled checks.
- All bidding documents for subcontractors must have been approved and a signed copy of the contract with the subcontractor submitted.

At the end date of the grant agreement, the grant recipient shall submit to the SHPO the following:

- Copies of the completion report (as described below).
- A Request for Reimbursement form (see appendix).
- Copies of all invoices, time sheets and canceled checks (see below).

A special project account should be established for each project for auditing purposes. The account should be opened as a single purpose checking account or, in governmental sub-units, through a separate cost account. Copies of canceled checks, time sheets, vouchers, and similar documents shall be used to substantiate expenses. Please group each set of documentation, matching the checks with their corresponding invoices. Attach a summary to each set of documentation itemizing the material such as:

| Description | Amount |
|---|----------------|
| <i>LABOR:</i> | |
| Douglas Quaid-Hauser: 200 hours @ \$10 per hour | \$2,000 |
| <i>SUPPLIES:</i> | |
| John Kimble Photography (film): 10 rolls @ \$5 per roll | \$50 |
| Schaeffer Photo Processing (processing): 10 rolls @ \$10 per roll | \$100 |
| | \$2,150 |

2. SALARIES AND WAGES

Paid

A grant recipient shall submit proof of expenditures (canceled checks) for salaries and wages. This will include in-kind services. Time spent on the project must be documented by timesheets, and the timesheets must be approved by the project coordinator

Donated

Donated time spent on the project must be logged by means of time sheets. Timesheets must indicate work performed and the days and hours worked, and must be signed by the employee and the project director.

Professors who work on a project during the summer and are not paid by a university during this period must consider their time to be donated and must therefore keep timesheets. This time will be exclusive of fringe benefits and indirect costs.

All donated time to be used toward reimbursement must have been approved in the final application. Any pay rate more than minimum rate must be justified in the final application.

Fringe benefits cannot be computed on donated time.

3. SUPPLIES/CONTRACTS

Paid

Itemized invoices must be submitted and supported by copies of canceled checks. If a printout is used, it must be itemized so that all costs can be tracked. Invoices and canceled checks to consultants must be submitted. Cash purchases must be supported by invoices. If invoices are not attainable, itemized purchase orders or check requests from your agency must be submitted. The supporting purchase order or check request must describe each item and its price.

The grant recipient must perform a cost analysis for all purchased supplies.

| Value of Proposed Contract | Award Process Required |
|-----------------------------------|--|
| \$0 - \$499.99 | Competition not required but encouraged |
| \$500 - \$4,999.99 | Documentation of competitive pricing through phone, mail, personal shopping, fee schedules. Must use " Documentation of Contract Award" process. If a proposal with a work statement is required, "Small Dollar" RFP process must be used. |
| \$5,000 - or more | "Small Dollar" RFP process required; formal process optional. |

Donated

Donated equipment and supplies must be listed separately. There must be a letter from the donor (not the grant recipient). This letter shall describe the type of material donated, source of material, rate charged, and a statement on how the value was assigned. All donated supplies or equipment to be used toward reimbursement must have been approved with the final application. Forms for verifying donation may be obtained from the SHPO.

4. TRAVEL

Documentation of travel expenses must be maintained throughout the project. The documentation shall include name of employee, dates of travel, amount of travel, expenses incurred, nature of travel and canceled checks as proof of payment for travel.

If standardized travel rates are used, these should be consistent with the standard state travel rates for mileage, meals and lodging. A paid bill must support lodging charges. Travel charges may only be charged to a project if a project representative is in travel status. Gasoline receipts shall be provided if gasoline costs are to be charged to the grant. Gasoline costs cannot be charged in addition to mileage for the same trip.

5. COMPLETION REPORTS AND MATERIALS

Completion reports materials must meet the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (copies available from the SHPO). The content of such reports will be specified in the grant agreement.

All completion reports/materials must be submitted to the State Historic Preservation Office by the grant agreement end date. For historical/architectural surveys an exit conference to review the completion report/materials will be scheduled by the grant recipient with the appropriate staff. Historical/architectural survey data must be integrated into the state system prior to the grant agreement end date.

HISTORICAL AND ARCHITECTURAL SURVEYS

- All survey work must meet the requirements set for in the Manual for Architectural and Historical Surveys in Michigan.
- A MS Access or Excel file including data for each historic resource identified during the survey, which shall include minimum items of information appropriate to the type of survey conducted, whether or not they are found in a district. If applicable, ArcGIS shapefile data including the same information is acceptable.
- One CDVD of digital images that meets the criteria described in *Appendix H: Photograph Technical Requirements* of this manual.
- Readable maps representing of the areas surveyed and indicating the accurate location of all sites and districts recorded during the survey.
- A final report that meets the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation and shall include the following sections: title page, credits and credentials; overview statement, research design, project area surveyed, acres surveyed, property totals, data location, previous surveys, contexts, property types, categories of information and bibliography, post field work evaluations, assets and problems encountered, planning needs summary, list of properties, and summary statement. The SHPO retains the right to have the grant recipient submit its final report while it is still in draft form for editing and correction. All research materials shall be transferred to the SHPO as part of the final submission.

NATIONAL REGISTER NOMINATIONS

National Register nominations for non-archaeological properties do not require completion reports. Instead, completed nominations with photographs, digital images, maps, and research materials are submitted by the Grantee. Applicants should refer to the SHPO's National Register-specific materials www.michigan.gov/nrhp. Here you will find downloadable guidelines, forms, instructions, policies, and more – including a sample nomination.

PLANNING AND PUBLIC EDUCATION

Because projects are diverse, a grantee working in the areas of planning documents, public education, or restoration planning should consult the SHPO and the grant agreement with the Michigan State Housing Development Authority to determine the nature of the completion report/materials.

ARCHAEOLOGICAL PROJECTS

Every archaeological project must result in a report meeting the Secretary of the Interior's Standards and Guidelines for Archaeological Documentation. In addition, each report will

include a table of contents, a list of tables, figures and plates, a report abstract, and list of references. Reports must be in American Antiquity style (see American Antiquity, 1979, 44:193-205).

Collections shall be catalogued and protected from deterioration. Collections and accompanying records must be curated in a repository meeting the Secretary of the Interior's Standards and Guidelines for Archaeological Documentation. Curation and exhibition costs are an allowable expense only for the duration of the grant.

ARCHAEOLOGICAL SURVEY ("PHASE I") PROJECT SPECIFICATIONS

- A title for the report
- The names of the author or authors of the report, field director and crew members, when the field work was done, and project sponsors
- Brief history of the project, including a statement on the purpose of the investigation and the research questions being addressed
- Description of the project area and its general environmental setting, including an exact location of the project area and its acreage
- Description of previous research in the area, including previously known or reported sites, a statement of whether or not they were visited, and their current status
- Description of the research design, methodology, and field and laboratory techniques employed during the survey
- List of sites discovered during the survey identified with site numbers (e.g., 20SA670), and a description of each site, including a brief evaluation of its size, cultural significance and physical condition, and its exact location marked on a map. Site numbers should be obtained from the State Archaeologist prior to report writing.
- Descriptions and illustrations of diagnostic artifacts
- Interpretations and conclusions derived from the survey work
- Make a preliminary assessment of each site for its National Register potential. Make recommendations for further research (e.g. test excavations) and management of the cultural resources within the project area (e.g. soil stabilization, acquisition, changes in land use, etc.)
- Catalog of all artifactual material recovered during the survey; the location of the permanent repository for the collections, survey notes, photographs, etc
- A map or maps showing the exact location(s) of the parcel(s) surveyed. Ideally, this should be a photocopy of a USGS quadrangle with the precise area(s) surveyed distinctly marked.
- A credit and civil rights statement as required in the grant agreement

ARCHAEOLOGICAL TESTING ("PHASE II") PROJECT SPECIFICATIONS

Archaeological testing projects are designed to provide enough documentation to determine if a site is eligible for the National Register. After field work has been completed, a meeting with the State Archaeologist staff is required to determine which of the tested sites appear to meet the criteria for listing on the National Register. Nomination documents must be prepared for any site identified as eligible.

Reports on projects involving excavation or limited testing will follow the general outline given for survey projects, with these additions:

- Discussion of methodology shall include methods used for artifact analysis. All artifacts shall be described and evaluated, as should be other cultural remains such as floral remains or human skeletal remains. All radiocarbon dates shall be listed.
- The description of each site shall include the precise boundaries, acreage, depth, and stratigraphy of the site. Features and artifacts shall be described. The condition of the site, including sources and degree of disturbance, both natural and human, shall be discussed. The presence of unanalyzed material with research potential (e.g. charcoal, faunal remains, historical records, etc.) shall be noted.
- Interpretation of findings shall address topics such as the age of the site, cultural identity, and site function. Significance must be assessed in terms of site integrity, research potential, and comparison with similar sites in the region.

- A recommendation as to whether the site meets the criteria for listing on the National Register shall be justified by supporting arguments.
- Graphics shall include, but not be limited to, a photocopy of a USGS topographic map showing the precise location of each site; site maps showing boundaries, relationships to landmarks and topography, excavation units and features; and illustrations of representative samples of stratigraphic profiles, features and artifacts.
- If the site is evaluated as potentially eligible for the National Register, management recommendations should address the property owner's plans for the land and his or her attitude toward protection of the site. Potential threats should be noted, and suggestions for enhancing site protection should be made.
- The following items should be placed in an appendix:
 - The precise location of the site
 - Maps showing the precise location
 - The property owner's name, address, telephone and fax number(s), and email address (if applicable)
- Include nomination forms for any sites believed, after consultation with the State Archaeologist, to be eligible for listing in the National Register of Historic Places. For instructions on the completion of National Register nomination forms see *Guidelines for Completing National Register of Historic Places Forms* published by the U.S. Department of the Interior.

Completion Report Checklist

- National Register title and address of National Register eligible or listed property
 - Project number
 - Name and address of subgrantee
 - Final project cost breakdown – including total project cost and approved federal share
 - Donor, source, kind, and amount of other federal and non-federal funds applied
 - A project evaluation, including any unusual techniques, problems, or circumstances
 - Reports received from consultants, including any test results
 - A copy of all electronic data generated during the course of project
 - National Register nomination shall be submitted in MS Word format
 - Survey report shall be submitted in MS Word format
 - Survey data shall be submitted in MS Access or Excel format
 - If applicable, survey data shall be furnished in ArcGIS shapefile format
 - The subgrantee shall consult with the SHPO at the close of the project to determine the final format prior to transfer to the SHPO.
 - Consult grant agreement for list of project specific materials to be submitted with completion report

GRANT MANUAL APPENDIX A (for SHPO use only)

Community-Based Planning Scoring Criteria

The scoring criteria sheets used by the SHPO are included for your information.

Project Name: _____

Applicant: _____

| | | | MAXIMUM POINTS AVAILABLE | TOTAL POINTS RECEIVED |
|---------------------|----|---|---------------------------------|------------------------------|
| CRITERIA | 1) | Is being undertaken in association with one or more of these priority programs: resource identification and designation in support of economic development and community planning activities; revitalization of traditional downtowns. | 20 | |
| | 2) | Increases the knowledge, understanding and appreciation for Mid-Century Modern resources. (1940 - 1970) | 10 | |
| | 3) | Supports cultural heritage tourism. | 10 | |
| | 4) | Results in the creation of a community historic preservation plan or historic preservation section of a master plan. | 20 | |
| | 5) | Project is intended to generate future preservation opportunities such as National Register nominations, local historic districts, historic district ordinance, tax credit applications, community awareness, or other activity to manage and protect historic resources. | 10 | |
| | 6) | Project yields planning documents for areas of the community having a high probability of eligible resources and experiencing developmental pressure or accelerated disinvestment. | 10 | |
| | 7) | Results will be incorporated into the community GIS system. | 10 | |
| | 8) | Results will include a final product that is accessible to the public via the web. At a minimum the final document shall be available in downloadable/printable .pdf form. | 10 | |
| TOTAL POINTS | | | 100 | |

Comments: _____

Reviewer Signature: _____ Date: _____

Identification Scoring Criteria

The scoring criteria sheets used by the SHPO are included for your information.

Project Name: _____

Applicant: _____

| | | MAXIMUM POINTS AVAILABLE | TOTAL POINTS RECEIVED | |
|---------------------|----|---|------------------------------|--|
| CRITERIA | 1) | Is being undertaken in association with one or more of these priority programs: resource identification and designation in support of economic development and community planning activities; revitalization of traditional downtowns. | 20 | |
| | 2) | Increases the knowledge, understanding and appreciation for Mid-Century Modern resources. (1940 – 1970) | 10 | |
| | 3) | Supports cultural heritage tourism. | 10 | |
| | 4) | Intensive level survey that includes, or is the first phase of a plan that will result in, nominations to the National Register, the creation of a local district study committee report, or establish National Register eligibility of HUD targeted neighborhoods. | 20 | |
| | 5) | Project is intended to generate future preservation opportunities such as National Register nominations, local historic districts, historic district ordinance, tax credit applications, community awareness, or other activity to manage and protect historic resources. | 10 | |
| | 6) | Addresses the themes and/or resources determined threatened or under-documented such as agriculture, industry, archaeology, education, depression era, post-World War II resources, historic landscapes, and recreation/entertainment. | 10 | |
| | 7) | Results will be incorporated into the community master plan and GIS system. | 10 | |
| | 8) | Results will include a final product that is accessible to the public via the web. At a minimum the final document shall be available in downloadable/printable .pdf form. | 10 | |
| TOTAL POINTS | | 100 | | |

Comments: _____

Reviewer Signature: _____ Date: _____

Public Education Scoring Criteria

The scoring criteria sheets used by the SHPO are included for your information.

Project Name: _____

Applicant: _____

| | | MAXIMUM POINTS AVAILABLE | TOTAL POINTS RECEIVED | |
|---------------------|----|--|-----------------------------|--|
| CRITERIA | 1) | Is being undertaken in association with one or more of these priority programs: resource identification and designation in support of economic development and community planning activities; revitalization of traditional downtowns. | 15 | |
| | 2) | Increases the knowledge, understanding and appreciation for Mid-Century Modern resources. (1940 - 1970) | 10 | |
| | 3) | Supports cultural heritage tourism. | 10 | |
| | 4) | Increases the knowledge, understanding and application of current green/energy efficiency best practices and preservation technologies. | 15 | |
| | 5) | Product will appeal to and be marketed to a broader audience than the applicant community. | 15 | |
| | 6) | Project has a clearly defined scope of work, audience, and a method and mechanism for distribution. | 15 | |
| | 7) | Promotes better understanding and implementation of the <i>Secretary of Interior's Standards for Rehabilitation</i> and/or the development of design guidelines. | 10 | |
| | 8) | Results will include a final product that is accessible to the public via the web. At a minimum the final document shall be available in downloadable/printable .pdf form. | 10 | |
| TOTAL POINTS | | 100 | | |

Comments: _____

Reviewer Signature: _____ Date: _____

Registration Scoring Criteria

The scoring criteria used by the SHPO are included in Appendix A for your information.

Project Name: _____

Applicant: _____

| | | MAXIMUM POINTS AVAILABLE | TOTAL POINTS RECEIVED | |
|---------------------|--|--|-----------------------------|--|
| CRITERIA | 1) | Is being undertaken in association with one or more of these priority programs: resource identification and designation in support of economic development and community planning activities; revitalization of traditional downtowns. | 20 | |
| | 2) | Increases the knowledge, understanding and appreciation for Mid-Century Modern resources. (1940 – 1970) | 10 | |
| | 3) | Supports cultural heritage tourism. | 10 | |
| | 4) | Is based on intensive level survey data that was the first phase of a plan designed to result in, nominations to the National Register, the creation of a local district study committee report, or establish National Register eligibility of HUD targeted neighborhoods | 10 | |
| | 5) | Project Includes: (maximum of 20 points – categories are mutually exclusive) District Nomination Multiple Property Nomination with at least one district Multiple Property Nomination with no district Individual Property Nomination Archeological Property Nomination | | |
| | | | 20 | |
| | | | 20 | |
| | | | 15 | |
| | | | 10 | |
| | | 5 | | |
| 6) | Addresses the themes and/or resources determined threatened or under-documented such as agriculture, industry, archaeology, education, depression era, and post-World War II resources, historic landscapes, recreation/entertainment. | 10 | | |
| 7) | Demonstrates that project information will be integrated into the community master plan, local GIS and available to the public via the web. At a minimum the final document shall be available in downloadable/printable .pdf form. | 10 | | |
| 8) | Yields Nomination(s) for areas of the community having a high number of eligible resources and experiencing developmental pressure or accelerated disinvestment. | 10 | | |
| TOTAL POINTS | | 100 | | |

Comments: _____

Reviewer Signature: _____ Date: _____

GRANT MANUAL APPENDIX B

| | | |
|---|---|---|
| Form W-9 (Rev. December 2011) Department of the Treasury Internal Revenue Service | <h2 style="margin: 0;">Request for Taxpayer Identification Number and Certification</h2> | Give Form to the requester. Do not send to the IRS. |
| Print or type See Specific Instructions on page 2. | Name (as shown on your income tax return) | |
| | Business name/disregarded entity name, if different from above | |
| | Check appropriate box for federal tax classification: <input type="checkbox"/> Individual/sole proprietor <input type="checkbox"/> C Corporation <input type="checkbox"/> S Corporation <input type="checkbox"/> Partnership <input type="checkbox"/> Trust/estate | |
| | <input type="checkbox"/> Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=partnership) ▶ | |
| | <input type="checkbox"/> Other (see instructions) ▶ | |
| | <input type="checkbox"/> Exempt payee | |
| Address (number, street, and apt. or suite no.) | | Requester's name and address (optional) |
| City, state, and ZIP code | | |
| List account number(s) here (optional) | | |

Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on the "Name" line to avoid backup withholding. For individuals, this is your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the Part I instructions on page 3. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN* on page 3.

Note. If the account is in more than one name, see the chart on page 4 for guidelines on whose number to enter.

| Social security number | | | | | | | | | |
|------------------------|--|--|--|--|--|--|--|--|--|
| | | | | | | | | | |

| Employer identification number | | | | | | | | | |
|--------------------------------|--|--|--|--|--|--|--|--|--|
| | | | | | | | | | |

Part II Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me), and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding, and
3. I am a U.S. citizen or other U.S. person (defined below).

Certification instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions on page 4.

Sign Here Signature of U.S. person ▶

Date ▶

General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

Purpose of Form

A person who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) to report, for example, income paid to you, real estate transactions, mortgage interest you paid, acquisition or abandonment of secured property, cancellation of debt, or contributions you made to an IRA.

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN to the person requesting it (the requester) and, when applicable, to:

1. Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),
2. Certify that you are not subject to backup withholding, or
3. Claim exemption from backup withholding if you are a U.S. exempt payee. If applicable, you are also certifying that as a U.S. person, your allocable share of any partnership income from a U.S. trade or business is not subject to the withholding tax on foreign partners' share of effectively connected income.

Note. If a requester gives you a form other than Form W-9 to request your TIN, you must use the requester's form if it is substantially similar to this Form W-9.

Definition of a U.S. person. For federal tax purposes, you are considered a U.S. person if you are:

- An individual who is a U.S. citizen or U.S. resident alien,
- A partnership, corporation, company, or association created or organized in the United States or under the laws of the United States,
- An estate (other than a foreign estate), or
- A domestic trust (as defined in Regulations section 301.7701-7).

Special rules for partnerships. Partnerships that conduct a trade or business in the United States are generally required to pay a withholding tax on any foreign partners' share of income from such business. Further, in certain cases where a Form W-9 has not been received, a partnership is required to presume that a partner is a foreign person, and pay the withholding tax. Therefore, if you are a U.S. person that is a partner in a partnership conducting a trade or business in the United States, provide Form W-9 to the partnership to establish your U.S. status and avoid withholding on your share of partnership income.

The person who gives Form W-9 to the partnership for purposes of establishing its U.S. status and avoiding withholding on its allocable share of net income from the partnership conducting a trade or business in the United States is in the following cases:

- The U.S. owner of a disregarded entity and not the entity,
- The U.S. grantor or other owner of a grantor trust and not the trust, and
- The U.S. trust (other than a grantor trust) and not the beneficiaries of the trust.

Foreign person. If you are a foreign person, do not use Form W-9. Instead, use the appropriate Form W-8 (see Publication 515, Withholding of Tax on Nonresident Aliens and Foreign Entities).

Nonresident alien who becomes a resident alien. Generally, only a nonresident alien individual may use the terms of a tax treaty to reduce or eliminate U.S. tax on certain types of income. However, most tax treaties contain a provision known as a "saving clause." Exceptions specified in the saving clause may permit an exemption from tax to continue for certain types of income even after the payee has otherwise become a U.S. resident alien for tax purposes.

If you are a U.S. resident alien who is relying on an exception contained in the saving clause of a tax treaty to claim an exemption from U.S. tax on certain types of income, you must attach a statement to Form W-9 that specifies the following five items:

1. The treaty country. Generally, this must be the same treaty under which you claimed exemption from tax as a nonresident alien.
2. The treaty article addressing the income.
3. The article number (or location) in the tax treaty that contains the saving clause and its exceptions.
4. The type and amount of income that qualifies for the exemption from tax.
5. Sufficient facts to justify the exemption from tax under the terms of the treaty article.

Example. Article 20 of the U.S.-China income tax treaty allows an exemption from tax for scholarship income received by a Chinese student temporarily present in the United States. Under U.S. law, this student will become a resident alien for tax purposes if his or her stay in the United States exceeds 5 calendar years. However, paragraph 2 of the first Protocol to the U.S.-China treaty (dated April 30, 1984) allows the provisions of Article 20 to continue to apply even after the Chinese student becomes a resident alien of the United States. A Chinese student who qualifies for this exception (under paragraph 2 of the first protocol) and is relying on this exception to claim an exemption from tax on his or her scholarship or fellowship income would attach to Form W-9 a statement that includes the information described above to support that exemption.

If you are a nonresident alien or a foreign entity not subject to backup withholding, give the requester the appropriate completed Form W-8.

What is backup withholding? Persons making certain payments to you must under certain conditions withhold and pay to the IRS a percentage of such payments. This is called "backup withholding." Payments that may be subject to backup withholding include interest, tax-exempt interest, dividends, broker and barter exchange transactions, rents, royalties, nonemployee pay, and certain payments from fishing boat operators. Real estate transactions are not subject to backup withholding.

You will not be subject to backup withholding on payments you receive if you give the requester your correct TIN, make the proper certifications, and report all your taxable interest and dividends on your tax return.

Payments you receive will be subject to backup withholding if:

1. You do not furnish your TIN to the requester,
2. You do not certify your TIN when required (see the Part II instructions on page 3 for details),
3. The IRS tells the requester that you furnished an incorrect TIN,
4. The IRS tells you that you are subject to backup withholding because you did not report all your interest and dividends on your tax return (for reportable interest and dividends only), or
5. You do not certify to the requester that you are not subject to backup withholding under 4 above (for reportable interest and dividend accounts opened after 1983 only).

Certain payees and payments are exempt from backup withholding. See the instructions below and the separate Instructions for the Requester of Form W-9.

Also see *Special rules for partnerships* on page 1.

Updating Your Information

You must provide updated information to any person to whom you claimed to be an exempt payee if you are no longer an exempt payee and anticipate receiving reportable payments in the future from this person. For example, you may need to provide updated information if you are a C corporation that elects to be an S corporation, or if you no longer are tax exempt. In addition, you must furnish a new Form W-9 if the name or TIN changes for the account, for example, if the grantor of a grantor trust dies.

Penalties

Failure to furnish TIN. If you fail to furnish your correct TIN to a requester, you are subject to a penalty of \$50 for each such failure unless your failure is due to reasonable cause and not to willful neglect.

Civil penalty for false information with respect to withholding. If you make a false statement with no reasonable basis that results in no backup withholding, you are subject to a \$500 penalty.

Criminal penalty for falsifying information. Willfully falsifying certifications or affirmations may subject you to criminal penalties including fines and/or imprisonment.

Misuse of TINs. If the requester discloses or uses TINs in violation of federal law, the requester may be subject to civil and criminal penalties.

Specific Instructions

Name

If you are an individual, you must generally enter the name shown on your income tax return. However, if you have changed your last name, for instance, due to marriage without informing the Social Security Administration of the name change, enter your first name, the last name shown on your social security card, and your new last name.

If the account is in joint names, list first, and then circle, the name of the person or entity whose number you entered in Part I of the form.

Sole proprietor. Enter your individual name as shown on your income tax return on the "Name" line. You may enter your business, trade, or "doing business as (DBA)" name on the "Business name/disregarded entity name" line.

Partnership, C Corporation, or S Corporation. Enter the entity's name on the "Name" line and any business, trade, or "doing business as (DBA) name" on the "Business name/disregarded entity name" line.

Disregarded entity. Enter the owner's name on the "Name" line. The name of the entity entered on the "Name" line should never be a disregarded entity. The name on the "Name" line must be the name shown on the income tax return on which the income will be reported. For example, if a foreign LLC that is treated as a disregarded entity for U.S. federal tax purposes has a domestic owner, the domestic owner's name is required to be provided on the "Name" line. If the direct owner of the entity is also a disregarded entity, enter the first owner that is not disregarded for federal tax purposes. Enter the disregarded entity's name on the "Business name/disregarded entity name" line. If the owner of the disregarded entity is a foreign person, you must complete an appropriate Form W-8.

Note. Check the appropriate box for the federal tax classification of the person whose name is entered on the "Name" line (Individual/sole proprietor, Partnership, C Corporation, S Corporation, Trust/estate).

Limited Liability Company (LLC). If the person identified on the "Name" line is an LLC, check the "Limited liability company" box only and enter the appropriate code for the tax classification in the space provided. If you are an LLC that is treated as a partnership for federal tax purposes, enter "P" for partnership. If you are an LLC that has filed a Form 8832 or a Form 2553 to be taxed as a corporation, enter "C" for C corporation or "S" for S corporation. If you are an LLC that is disregarded as an entity separate from its owner under Regulation section 301.7701-3 (except for employment and excise tax), do not check the LLC box unless the owner of the LLC (required to be identified on the "Name" line) is another LLC that is not disregarded for federal tax purposes. If the LLC is disregarded as an entity separate from its owner, enter the appropriate tax classification of the owner identified on the "Name" line.

Other entities. Enter your business name as shown on required federal tax documents on the "Name" line. This name should match the name shown on the charter or other legal document creating the entity. You may enter any business, trade, or DBA name on the "Business name/disregarded entity name" line.

Exempt Payee

If you are exempt from backup withholding, enter your name as described above and check the appropriate box for your status, then check the "Exempt payee" box in the line following the "Business name/disregarded entity name," sign and date the form.

Generally, individuals (including sole proprietors) are not exempt from backup withholding. Corporations are exempt from backup withholding for certain payments, such as interest and dividends.

Note. If you are exempt from backup withholding, you should still complete this form to avoid possible erroneous backup withholding.

The following payees are exempt from backup withholding:

1. An organization exempt from tax under section 501(a), any IRA, or a custodial account under section 403(b)(7) if the account satisfies the requirements of section 401(f)(2),
2. The United States or any of its agencies or instrumentalities,
3. A state, the District of Columbia, a possession of the United States, or any of their political subdivisions or instrumentalities,
4. A foreign government or any of its political subdivisions, agencies, or instrumentalities, or
5. An international organization or any of its agencies or instrumentalities.

Other payees that may be exempt from backup withholding include:

6. A corporation,
7. A foreign central bank of issue,
8. A dealer in securities or commodities required to register in the United States, the District of Columbia, or a possession of the United States,
9. A futures commission merchant registered with the Commodity Futures Trading Commission,
10. A real estate investment trust,
11. An entity registered at all times during the tax year under the Investment Company Act of 1940,
12. A common trust fund operated by a bank under section 584(a),
13. A financial institution,
14. A middleman known in the investment community as a nominee or custodian, or
15. A trust exempt from tax under section 664 or described in section 4947.

The following chart shows types of payments that may be exempt from backup withholding. The chart applies to the exempt payees listed above, 1 through 15.

| IF the payment is for . . . | THEN the payment is exempt for . . . |
|--|---|
| Interest and dividend payments | All exempt payees except for 9 |
| Broker transactions | Exempt payees 1 through 5 and 7 through 13. Also, C corporations. |
| Barter exchange transactions and patronage dividends | Exempt payees 1 through 5 |
| Payments over \$600 required to be reported and direct sales over \$5,000 ¹ | Generally, exempt payees 1 through 7 ² |

¹ See Form 1099-MISC, Miscellaneous Income, and its instructions.

² However, the following payments made to a corporation and reportable on Form 1099-MISC are not exempt from backup withholding: medical and health care payments, attorneys' fees, gross proceeds paid to an attorney, and payments for services paid by a federal executive agency.

Part I. Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. If you are a resident alien and you do not have and are not eligible to get an SSN, your TIN is your IRS individual taxpayer identification number (ITIN). Enter it in the social security number box. If you do not have an ITIN, see *How to get a TIN* below.

If you are a sole proprietor and you have an EIN, you may enter either your SSN or EIN. However, the IRS prefers that you use your SSN.

If you are a single-member LLC that is disregarded as an entity separate from its owner (see *Limited Liability Company (LLC)* on page 2), enter the owner's SSN (or EIN, if the owner has one). Do not enter the disregarded entity's EIN. If the LLC is classified as a corporation or partnership, enter the entity's EIN.

Note. See the chart on page 4 for further clarification of name and TIN combinations.

How to get a TIN. If you do not have a TIN, apply for one immediately. To apply for an SSN, get Form SS-5, Application for a Social Security Card, from your local Social Security Administration office or get this form online at www.ssa.gov. You may also get this form by calling 1-800-772-1213. Use Form W-7, Application for IRS Individual Taxpayer Identification Number, to apply for an ITIN, or Form SS-4, Application for Employer Identification Number, to apply for an EIN. You can apply for an EIN online by accessing the IRS website at www.irs.gov/businesses and clicking on Employer Identification Number (EIN) under Starting a Business. You can get Forms W-7 and SS-4 from the IRS by visiting IRS.gov or by calling 1-800-TAX-FORM (1-800-829-3676).

If you are asked to complete Form W-9 but do not have a TIN, write "Applied For" in the space for the TIN, sign and date the form, and give it to the requester. For interest and dividend payments, and certain payments made with respect to readily tradable instruments, generally you will have 60 days to get a TIN and give it to the requester before you are subject to backup withholding on payments. The 60-day rule does not apply to other types of payments. You will be subject to backup withholding on all such payments until you provide your TIN to the requester.

Note. Entering "Applied For" means that you have already applied for a TIN or that you intend to apply for one soon.

Caution: A disregarded domestic entity that has a foreign owner must use the appropriate Form W-8.

Part II. Certification

To establish to the withholding agent that you are a U.S. person, or resident alien, sign Form W-9. You may be requested to sign by the withholding agent even if item 1, below, and items 4 and 5 on page 4 indicate otherwise.

For a joint account, only the person whose TIN is shown in Part I should sign (when required). In the case of a disregarded entity, the person identified on the "Name" line must sign. Exempt payees, see *Exempt Payee* on page 3.

Signature requirements. Complete the certification as indicated in items 1 through 3, below, and items 4 and 5 on page 4.

1. **Interest, dividend, and barter exchange accounts opened before 1984 and broker accounts considered active during 1983.** You must give your correct TIN, but you do not have to sign the certification.
2. **Interest, dividend, broker, and barter exchange accounts opened after 1983 and broker accounts considered inactive during 1983.** You must sign the certification or backup withholding will apply. If you are subject to backup withholding and you are merely providing your correct TIN to the requester, you must cross out item 2 in the certification before signing the form.
3. **Real estate transactions.** You must sign the certification. You may cross out item 2 of the certification.

4. Other payments. You must give your correct TIN, but you do not have to sign the certification unless you have been notified that you have previously given an incorrect TIN. "Other payments" include payments made in the course of the requester's trade or business for rents, royalties, goods (other than bills for merchandise), medical and health care services (including payments to corporations), payments to a nonemployee for services, payments to certain fishing boat crew members and fishermen, and gross proceeds paid to attorneys (including payments to corporations).

5. Mortgage interest paid by you, acquisition or abandonment of secured property, cancellation of debt, qualified tuition program payments (under section 529), IRA, Coverdell ESA, Archer MSA or HSA contributions or distributions, and pension distributions. You must give your correct TIN, but you do not have to sign the certification.

Note. If no name is circled when more than one name is listed, the number will be considered to be that of the first name listed.

Secure Your Tax Records from Identity Theft

Identity theft occurs when someone uses your personal information such as your name, social security number (SSN), or other identifying information, without your permission, to commit fraud or other crimes. An identity thief may use your SSN to get a job or may file a tax return using your SSN to receive a refund.

To reduce your risk:

- Protect your SSN,
- Ensure your employer is protecting your SSN, and
- Be careful when choosing a tax preparer.

If your tax records are affected by identity theft and you receive a notice from the IRS, respond right away to the name and phone number printed on the IRS notice or letter.

If your tax records are not currently affected by identity theft but you think you are at risk due to a lost or stolen purse or wallet, questionable credit card activity or credit report, contact the IRS Identity Theft Hotline at 1-800-908-4490 or submit Form 14039.

For more information, see Publication 4535, Identity Theft Prevention and Victim Assistance.

Victims of identity theft who are experiencing economic harm or a system problem, or are seeking help in resolving tax problems that have not been resolved through normal channels, may be eligible for Taxpayer Advocate Service (TAS) assistance. You can reach TAS by calling the TAS toll-free case intake line at 1-877-777-4778 or TTY/TDD 1-800-829-4059.

Protect yourself from suspicious emails or phishing schemes. Phishing is the creation and use of email and websites designed to mimic legitimate business emails and websites. The most common act is sending an email to a user falsely claiming to be an established legitimate enterprise in an attempt to scam the user into surrendering private information that will be used for identity theft.

The IRS does not initiate contacts with taxpayers via emails. Also, the IRS does not request personal detailed information through email or ask taxpayers for the PIN numbers, passwords, or similar secret access information for their credit card, bank, or other financial accounts.

If you receive an unsolicited email claiming to be from the IRS, forward this message to phishing@irs.gov. You may also report misuse of the IRS name, logo, or other IRS property to the Treasury Inspector General for Tax Administration at 1-800-366-4484. You can forward suspicious emails to the Federal Trade Commission at: spam@uce.gov or contact them at www.ftc.gov/idtheft or 1-877-IDTHEFT (1-877-438-4338).

Visit IRS.gov to learn more about identity theft and how to reduce your risk.

What Name and Number To Give the Requester

| For this type of account: | Give name and SSN of: |
|---|---|
| 1. Individual | The individual |
| 2. Two or more individuals (joint account) | The actual owner of the account or, if combined funds, the first individual on the account ¹ |
| 3. Custodian account of a minor (Uniform Gift to Minors Act) | The minor ² |
| 4. a. The usual revocable savings trust (grantor is also trustee) | The grantor-trustee ¹ |
| b. So-called trust account that is not a legal or valid trust under state law | The actual owner ¹ |
| 5. Sole proprietorship or disregarded entity owned by an individual | The owner ³ |
| 6. Grantor trust filing under Optional Form 1099 Filing Method 1 (see Regulation section 1.671-4(b)(2)(i)(A)) | The grantor* |
| For this type of account: | Give name and EIN of: |
| 7. Disregarded entity not owned by an individual | The owner |
| 8. A valid trust, estate, or pension trust | Legal entity ⁴ |
| 9. Corporation or LLC electing corporate status on Form 8832 or Form 2553 | The corporation |
| 10. Association, club, religious, charitable, educational, or other tax-exempt organization | The organization |
| 11. Partnership or multi-member LLC | The partnership |
| 12. A broker or registered nominee | The broker or nominee |
| 13. Account with the Department of Agriculture in the name of a public entity (such as a state or local government, school district, or prison) that receives agricultural program payments | The public entity |
| 14. Grantor trust filing under the Form 1041 Filing Method or the Optional Form 1099 Filing Method 2 (see Regulation section 1.671-4(b)(2)(i)(B)) | The trust |

¹ List first and circle the name of the person whose number you furnish. If only one person on a joint account has an SSN, that person's number must be furnished.

² Circle the minor's name and furnish the minor's SSN.

³ You must show your individual name and you may also enter your business or "DBA" name on the "Business name/disregarded entity" name line. You may use either your SSN or EIN (if you have one), but the IRS encourages you to use your SSN.

⁴ List first and circle the name of the trust, estate, or pension trust. (Do not furnish the TIN of the personal representative or trustee unless the legal entity itself is not designated in the account title.) Also see *Special rules for partnerships* on page 1.

*Note. Grantor also must provide a Form W-9 to trustee of trust.

Privacy Act Notice

Section 6109 of the Internal Revenue Code requires you to provide your correct TIN to persons (including federal agencies) who are required to file information returns with the IRS to report interest, dividends, or certain other income paid to you; mortgage interest you paid; the acquisition or abandonment of secured property; the cancellation of debt; or contributions you made to an IRA, Archer MSA, or HSA. The person collecting this form uses the information on the form to file information returns with the IRS, reporting the above information. Routine uses of this information include giving it to the Department of Justice for civil and criminal litigation and to cities, states, the District of Columbia, and U.S. possessions for use in administering their laws. The information also may be disclosed to other countries under a treaty, to federal and state agencies to enforce civil and criminal laws, or to federal law enforcement and intelligence agencies to combat terrorism. You must provide your TIN whether or not you are required to file a tax return. Under section 3406, payers must generally withhold a percentage of taxable interest, dividend, and certain other payments to a payee who does not give a TIN to the payer. Certain penalties may also apply for providing false or fraudulent information.

GRANT MANUAL APPENDIX C

Instructions for U.S. Department of Interior form DI-2010

Certification Regarding Debarment, Suspension and Other Responsibility Matters, Drug-Free Workplace Requirements and Lobbying

- Subgrantees (Lower Tier Participants) must complete Part B.
 - If the subgrantee is an organization, Part C must also be completed.
 - If the subgrantee is an individual, Part D must also be completed.

NOTE: Part C contains two sections, both of which must be completed if Part C applies.

- The subgrantee authorized certifying official must complete the signature section of this form located after Part E.

NOTE: U.S. Department of the Interior form DI-2010 follows. This form cannot be altered, amended, changed, or modified in any way.

U.S. Department of the Interior

**Certifications Regarding Debarment, Suspension and
Other Responsibility Matters, Drug-Free Workplace
Requirements and Lobbying**

Persons signing this form should refer to the regulations referenced below for complete instructions:

Certification Regarding Debarment, Suspension, and Other Responsibility Matters - Primary Covered Transactions - **The prospective primary participant further agrees by submitting this proposal that it will include the clause titled, "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.** See below for language to be used or use this form certification and sign. (See Appendix A of Subpart D of 43 CFR Part 12.)

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transactions - (See Appendix B of Subpart D of 43 CFR Part 12.)

Certification Regarding Drug-Free Workplace Requirements - Alternate I. (Grantees Other Than Individuals) and Alternate II. (Grantees Who are Individuals) - (See Appendix C of Subpart D of 43 CFR Part 12)

Signature on this form provides for compliance with certification requirements under 43 CFR Parts 12 and 18. The certifications shall be treated as a material representation of fact upon which reliance will be placed when the Department of the Interior determines to award the covered transaction, grant, cooperative agreement or loan.

**PART A: Certification Regarding Debarment, Suspension, and Other Responsibility Matters-
Primary Covered Transactions**

CHECK ___ IF THIS CERTIFICATION IS FOR A PRIMARY COVERED TRANSACTION AND IS APPLICABLE.

- (1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:
 - (a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;
 - (b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;
 - (c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and
 - (d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.
- (2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

**PART B: Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion -
Lower Tier Covered Transactions**

CHECK ___ IF THIS CERTIFICATION IS FOR A LOWER TIER COVERED TRANSACTION AND IS APPLICABLE.

- (1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.
- (2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

This form was electronically produced by Elite Federal Forms, Inc.

DI-2010
June 1995
(This form replaces DI-1953, DI-1954,
DI-1955, DI-1956 and DI-1963)

PART C: Certification Regarding Drug-Free Workplace Requirements

CHECK ___ IF THIS CERTIFICATION IS FOR AN APPLICANT WHO IS NOT AN INDIVIDUAL.

Alternate I. (Grantees Other Than Individuals)

A. The grantee certifies that it will or continue to provide a drug-free workplace by:

- (a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
- (b) Establishing an ongoing drug-free awareness program to inform employees about--
 - (1) The dangers of drug abuse in the workplace;
 - (2) The grantee's policy of maintaining a drug-free workplace;
 - (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
- (c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);
- (d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will --
 - (1) Abide by the terms of the statement; and
 - (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
- (e) Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
- (f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted --
 - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
- (g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a) (b), (c), (d), (e) and (f).

B. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Check ___ if there are workplaces on files that are not identified here.

PART D: Certification Regarding Drug-Free Workplace Requirements

CHECK ___ IF THIS CERTIFICATION IS FOR AN APPLICANT WHO IS AN INDIVIDUAL.

Alternate II. (Grantees Who Are Individuals)

- (a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;
- (b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to the grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

DI-2010
June 1995
(This form replaces DI-1953, DI-1954,
DI-1955, DI-1956 and DI-1963)

PART E: Certification Regarding Lobbying
Certification for Contracts, Grants, Loans, and Cooperative Agreements

CHECK IF CERTIFICATION IS FOR THE AWARD OF ANY OF THE FOLLOWING AND THE AMOUNT EXCEEDS \$100,000: A FEDERAL GRANT OR COOPERATIVE AGREEMENT; SUBCONTRACT, OR SUBGRANT UNDER THE GRANT OR COOPERATIVE AGREEMENT.

CHECK IF CERTIFICATION FOR THE AWARD OF A FEDERAL LOAN EXCEEDING THE AMOUNT OF \$150,000, OR A SUBGRANT OR SUBCONTRACT EXCEEDING \$100,000, UNDER THE LOAN.

The undersigned certifies, to the best of his or her knowledge and belief, that:

- (1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, and officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
- (2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
- (3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

As the authorized certifying official, I hereby certify that the above specified certifications are true.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL

TYPED NAME AND TITLE

DATE

DI-2010
June 1995
(This form replaces DI-1953, DI-1954,
DI-1955, DI-1956 and DI-1963)

GRANT MANUAL APPENDIX D

CERTIFICATE VERIFYING KEY PERSONS OF THE CONTRACTOR/SUBGRANTEE

The Contractor/Subgrantee acknowledges that the following personnel are Key Persons of the Contractor/Subgrantee in accordance with Section II.C of the Agreement:

(1) Name _____
(Print or type Name above line)

Title with Contractor/Subgrantee _____

Is the Key Person a retiree who receives a pension from the Michigan State Employees Retirement System? Yes _____/No _____

(2) Name _____
(Print or type Name above line)

Title with Contractor/Subgrantee _____

Is the Key Person a retiree who receives a pension from the Michigan State Employees Retirement System? Yes _____/No _____

(3) Name _____
(Print or type Name above line)

Title with Contractor/Subgrantee _____

Is the Key Person a retiree who receives a pension from the Michigan State Employees Retirement System? Yes _____/No _____

Print or Type Contractor/Subgrantee Name Above Line

By: _____
Signature Date

Name of Signatory for Contractor/Subgrantee: _____
Print/Type Name of Signatory Above Line

Its: _____

Federal Identification Number: _____

Pensioned Retirees (2007, MCL 38.68) (12/7/07 Rev)
Exhibit - Certificate Verifying Key Persons of the Contractor

GRANT MANUAL APPENDIX E

Federal Funding Accountability and Transparency Act (FFATA)

The Federal Funding Accountability and Transparency Act, P.L. 109-282, as amended by section 6202(a) of P.L. 110-252, requires the State Historic Preservation Office (SHPO) to report first-tier subawards related to federal contracts and grants. In addition, executive compensation of awardees must also be made publicly available.

To comply with federal reporting requirements of FFATA, the SHPO is required to collect and report the following information from each Certified Local Government (CLG) grantee awarded a grant of \$25,000 or more.

Officer Compensation Guidance

The grantee must enter "Yes" or "No" to indicate whether it is required to report its top five most highly compensated officers. Grantee reports "Yes" if:

- (i) In the recipient's fiscal year immediately preceding the year in which the federal award was awarded, the recipient received:
 - a. 80% or more of its annual gross revenues from federal contracts (and subcontracts), loans, grants (and subgrants) and cooperative agreements; and
 - b. \$25 million or more in annual gross revenues from federal contracts (and subcontracts), loans, grants (and subgrants) and cooperative agreements; and
- (ii) The public does not have access to information about the compensation of the senior executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986.

If "No", there is no officer compensation information requirement.

If "Yes", the grantee must provide the names and "total compensation" of the top five most highly compensated officers for the calendar year in which the grant is awarded.

Total compensation means the cash and non-cash dollar value earned by the executive during the grantee's past fiscal year of the following (for more information see 17 CFR 229.402(c)(2)):

- (i) Salary and bonus
- (ii) Awards of stock, stock options, and stock appreciation rights. Use the dollar amount recognized for financial statement reporting purposes with respect to the fiscal year in accordance with FAS 123R.
- (iii) Earnings for services under non-equity incentive plans. Does not include group life, health, hospitalization or medical reimbursement plans that do not discriminate in favor of executives, and are available generally to all salaried employees.
- (iv) Change in pension value. This is the change in present value of defined benefit and actuarial pension plans.
- (v) Above-market earnings on deferred compensation which are not tax-qualified.
- (vi) Other compensation. For example, severance, termination payments, value of life insurance paid on behalf of the employee, perquisites or property if the value for the executive exceeds \$10,000.

Officer Compensation Form

This form must be completed by all agencies receiving \$25,000 or more in funding through the Historic Preservation Fund, Certified Local Government grant program. This form must be completed before the grant agreement can be prepared.

Agency Name: _____

Address: _____

*Dun and Bradstreet DUNS Number: _____ * required

Read the following:

In the grantee's fiscal year immediately preceding the year in which the federal award was awarded, the grantee received:

1. 80% or more of its annual gross revenues from federal contracts (and subcontracts), loans, grants (and sub grants) and cooperative agreements; and
2. \$25 million or more in annual gross revenues from federal contracts (and subcontracts), loans, grants (and sub grants) and cooperative agreements; and
3. The public does not have access to information about the compensation of the senior executives through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986.

Check One: _____ Yes – the above does apply to my agency.

_____ No – the above does not apply to my agency.

If you checked yes above, please complete the following for the top five most highly compensated officers in the previous calendar year:

| Name | Total Compensation |
|------|--------------------|
| | \$ |
| | \$ |
| | \$ |
| | \$ |
| | \$ |

Signature of Authorized Official

Date

Type Name and Title of Authorized Official

GRANT MANUAL APPENDIX F

The Secretary Of The Interior's Standards For Rehabilitation

1. A property shall be used for its historic purpose or be placed in a new use that requires minimal change to the defining characteristics of the building and its site and environment.
2. The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings, shall not be undertaken.
4. Most properties change over time; those changes that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historical features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and other visual qualities. Replacement of missing features shall be substantiated by documentary, physical, or pictorial evidence or structures.
7. Chemical or physical treatments, such as sandblasting, which cause damage to historic materials, shall not be used. The surface cleaning of structures, if appropriate, shall be undertaken using the gentlest means possible.
8. Significant archaeological resources shall be protected and preserved. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size and architectural features to protect the historic integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Professional Qualifications For Project Director (36 CFR 61)

- **HISTORY**

The minimum professional qualifications are a graduate degree in history or a closely related field; or a bachelor's degree in history or a closely related field plus one of the following:

1. At least two years of full time experience in research, writing, teaching, interpretation, or other demonstrable professional activity with an academic institution, historical organization or agency, museum, or other professional institution; or
2. Substantial contribution through research and publication to the body of scholarly knowledge in the field of history.

- **ARCHAEOLOGY**

The minimum professional qualifications are a graduate degree in archaeology, anthropology, or closely related field plus:

1. At least one year of full time professional experience or equivalent specialized training in archaeological research, administration, or management;
2. at least four months of supervised field and analytic experience in general North American archaeology; and
3. Demonstrated ability to carry research to completion. In addition to these minimum qualifications, a professional in prehistoric archaeology shall have at least one year of full time professional experience at a supervisory level in the study of archaeological resources of the prehistoric period. A professional in historical archaeology shall have at least one year of full time professional experience at a supervisory level in the study of archaeological resources of the historic period.

- **ARCHITECTURAL HISTORY**

The minimum professional qualifications are a graduate degree in architectural history, art history, historic preservation, or a closely related field, with course work in American architectural history; or a bachelor's degree in architectural history with concentration in American architecture; or a bachelor's degree in architectural history, art history, historic preservation, or a closely related field plus one of the following:

1. At least two years of full time experience in research, writing, or teaching in American architectural history or restoration architecture with an academic institution, historical organization or agency, museum, or other professional institution; or
2. Substantial contribution through research and publication to the body of scholarly knowledge in the field of American architectural history.

- **HISTORICAL ARCHITECTURE**

The minimum professional qualifications are a professional degree in architecture or a State license to practice architecture, plus one of the following:

1. At least one year of graduate study in architectural preservation, American architectural history, preservation planning or a closely related field; or
2. At least one year of full time professional experience on preservation projects. Such graduate study or experience shall include detailed investigation of historic structures, preparation of historic structures, research reports, and preparation of plans and specifications for preservation projects.

GRANT MANUAL APPENDIX G

**Michigan State Housing Development Authority
Historic Preservation Personnel Log**

Historic Preservation Project Timesheet

| Name: | | | |
|-----------------------------|------------------|----------------------------|--------------------------------|
| Project Name: | | | |
| Project Number: | | | |
| Date | Work Description | Preservation Project Hours | Non-Preservation Project Hours |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |
| Total Hours Worked | | | |
| x Rate Per Hour | | | |
| Total Value of Labor | | | |
| | | | / /20 |
| Employee Signature | | | Date |
| | | | / /20 |
| Supervisor Signature | | | Date |

GRANT MANUAL APPENDIX H

Request For Reimbursement Instructions

1. Reimbursement requests must include the following:
 - The name of the Historic Preservation Fund project
 - The project number
 - The name of the grant recipient
 - The address where the check should be mailed
 - The amount of the grant award
 - The amount of the reimbursement request
 - The amount of the grant award less the amount of the reimbursement request
 - The total matching share for this reimbursement request
 - The source of the matching share.
 - Indicate the source of the cash match, e.g., city general fund, private funds, Community Development Block Grant funds, etc.)
2. Any request for reimbursement must be accompanied by documentation of both the federal and matching shares. Documentation should include an itemization of expenditures, copies of canceled checks or other proof of payment, timesheets, and invoices. The final completion report and/or other finished product must accompany the request for final payment. In the case of a partial payment, a progress report will be required.

This form must be signed by the person who signed the grant agreement or the chief financial officer. The federal identification number must be included. Payment cannot be processed without it.

Michigan State Housing Development Authority Historic Preservation Reimbursement Request

| | | | |
|--|----------------|-------|------------------|
| Project Name: | | | |
| Project Number: | | | |
| Name of Grant Recipient: | | | |
| Address to which reimbursement check should be sent: | | | |
| | STREET ADDRESS | | |
| | STREET ADDRESS | | |
| | CITY | STATE | ZIP CODE |
| Federal ID Number: | | | |
| - SHPO USE ONLY - | | | |
| Grant Amount | \$ | | Verified: |
| Amount of this Request | \$ | | Verified: |
| Grant Balance | \$ | | Verified: |
| Total Matching | \$ | | Verified: |
| Source of Matching Share: | | | |
| Attachments: | | | |
| <input type="checkbox"/> Itemization of Expenditures <input type="checkbox"/> Copies of Invoices <input type="checkbox"/> Copies of Cancelled Checks <input type="checkbox"/> Progress or Completion | | | |
| <i>I certify that all expenditures for the above project have been made during the duration of the grant agreement, are relevant to the project and do hereby request reimbursement. No federal funds have been used as match for the project unless authorized as part of the approved grant budget. Matching funds have not been used to match any other federally assisted project.</i> | | | |

Signature of Responsible Officer

Date

Teleph

State Historic Preservation Officer

Date

SHPO Grants Manager

Date

GRANT MANUAL APPENDIX I

Photograph Technical Requirements and Additional Information

- **Printed Photograph Requirements**
 - Printed photographs must only be printed on photographic paper. Regular copy or office paper is unacceptable.
 - **NOTE:** Either matte or gloss finish is acceptable for SHPO photographs.
 - **NOTE:** Only glossy finish is acceptable for NPS photographs.
 - Printed photographs shall be printed in accordance with the requirements outlined in the individual sections of this manual. Where no specific size is given photos shall be no smaller than 4" x 6".
 - Photographs must be labeled with the following information:
 - Name of property/grant application
 - Photograph number
 - Date of photograph
 - Description of view (e.g. east side, facing south, etc)
 - Brief description of what is shown
 - Photographs must only be labeled on the reverse side of the photograph. Do not write on, or label, the front of the photograph.
 - Photographs must not be mounted or affixed by any means (staples, tape, glue, etc.) to any surface.
 - Photographs may be placed in sleeves or photo pages.
 - Photos must be keyed to a site plan, floor plan, or sketch map, when applicable.
- **Digital Image Requirements**
 - Digital images must be taken at a minimum resolution of 300 ppi (pixels per inch), and have dimensions of at least 1200 x 1600 pixels.
 - Digital images must be burned/written to a DVD in uncompressed TIFF format.
 - Images burned/written to a DVD must be labeled according the following format:
County_City/Town_Historic District Name (if applicable)_Property Name_Image Number.tiff Example: Ingham_East Lansing_Grevstad House_01.tiff
- **Additional Information**
 - Photographers should note the locations or viewpoints from which "before" photographs are taken. Doing so will better facilitate "after" views matching "before" views, as is required.
 -
 - Avery labels 5163 (2" x 4" Shipping Labels) work well for labeling photographs.
 - **NOTE:** The National Park Service's National Register of Historic Places program will not accept photographs with adhesive labels. Please make the appropriate accommodations when submitting photographs that will be used in a National Register nomination.
 - For a comprehensive guide and useful links regarding digital images, you can access the National Park Service's *National Register of Historic Places and National Historic Landmarks Survey Photo Policy Expansion, March 2005* at www.nps.gov/history/nr/policyexpansion.htm.

GRANT MANUAL APPENDIX J

So You Want To List Your Commercial District In The National Register of Historic Places? How To Do It – What Is Required

Issued January 27, 2012; revised May 2012.

This is a guide to the process and requirements for listing Michigan's historic downtown commercial districts in the National Register of Historic Places. Applications are made through Michigan's State Historic Preservation Office (SHPO), an agency of MSHDA, the Michigan State Housing Development Authority. To begin the process, contact the SHPO's national register coordinator, Robert Christensen, by phone at 517/335-2719 or email at christensenr@michigan.gov, or call the SHPO's general number, 517/373-1630.

To Begin

Establishing that there is a national register-eligible historic district and defining its boundaries is the first step. Contact the SHPO's national register coordinator. The SHPO may already have information about a potential district on file and may already have preliminarily defined boundaries for a future district. If not, we will request a map showing your proposed boundaries plus color streetscape photo prints or a CD of color streetscape images that together illustrate the character of the district. The national register coordinator will usually need to make a visit to finalize the determination of eligibility and the precise boundaries.

Who Does the Work?

Generally speaking, not the SHPO! The SHPO's national register staff is comprised of one person, the national register coordinator, so SHPO can rarely offer assistance in preparing nominations beyond reviewing and commenting on nomination materials forwarded to us. Budgets being what they are, neither can the SHPO typically offer grant assistance to help defray project costs. Thus the applicant will be responsible for carrying out the project.

- **Consultants List:** The SHPO maintains a list of historians/architectural historian consultants who do survey and national register nomination work for hire. The list can be found at the main SHPO website, www.michigan.gov/shpo, under Incentives, Tax Incentives, Historic Preservation Consultants, Historians/Architectural Historians.

Components of the Nomination Project

- Photo Inventory
- Descriptive Notes on Buildings and Other Features
- Historical Research
- Preparing the Nomination
 - Description Statement
 - Significance Statement
 - Bibliography
 - Boundary Description
 - Nomination Photographs and CD-Rs
 - Maps
 - Notification List

PHOTO INVENTORY

SHPO will need a photographic inventory in color of **all** buildings, structures, and other features in the district – regardless of age – to review the nomination text and to provide the SHPO with a full record of the district's properties for future tax credit applications and whatever else comes along. The photo inventory should also become a permanent record for your community of the business district's buildings and other features as they currently exist. As you plan the nomination project, develop a plan for how the products of all this work will be housed in the community so that they are available to public officials and the general public for their future use.

What to photograph:

- Each and every building. Don't be stingy with photography – digital photography is CHEAP! Shoot a three-quarter view showing the front and side if the building stands on a street corner or open site, a straight-on frontal view, and one of the front from an angle that better reveals the depth of features such as recessed entries, cornices, and moldings. Shoot additional close-up views of the first-floor storefront and other details such as the main cornice, ornamental brickwork, and window caps so you and SHPO will have a complete record for writing and reviewing the nomination's building descriptions.
- Structures such as bridges.
- Public squares or parks within the district. Include general views and views of individual features such as gazebos and band shells.
- Street furniture and objects such as freestanding clocks, monuments and sculpture, and ornamental fencing.
- Historic brick streets. Document sample street and intersection patterns.

When to photograph:

- Images should be shot when snow is not present on visible roof slopes or ground that shows in the image, if possible.
- Images must be shot in light conditions where details are clearly readable and not obscured by harsh shadows. Take advantage of light conditions: try to shoot the east-facing properties in the morning light, the west-facing ones in the afternoon light. In the winter months, cloudy days tend to work best.

Taking the pictures:

Follow the specs for image file format and resolution set forth in the "Taking the Picture" section of the *National Register Photo Policy Factsheet* at the register's website, www.nps.gov/nr, under Publications, Technical Assistance for Preparing Nominations. Images must be in color and with resolution of no less than 1200 X 1600 pixels at 300 dpi and no greater than 2000 X 3000 at 300 dpi.



Small building, mid-block. Here one straight-on view is adequate.



Typical size 2-story building, mid-block. Straight-on views and some views of details should be shot.



An angled view illustrating the historic storefront details.



A two-story building.



An upper façade detail illustrating the cornice and window caps.



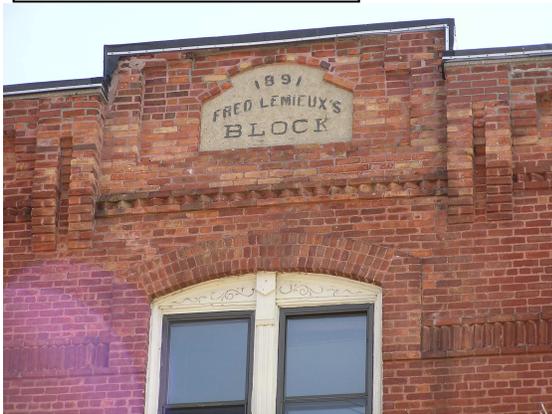
A detail of the same building's historic storefront ironwork, an important feature.



General front view of another basic form but little else.



A separate straight-on front view is also needed here because previous view doesn't show details.



This view shows a name/date plaque and close-up of the brickwork detail on the same building.



Side and rear view of same building, providing additional information about the building's form and finishes.



Mid-block building whose front reflects several eras of building.



Angled view that illustrates the form and finish of the storefront.



General view of remodeled and expanded building.



View showing later rear extension.



Rear view showing the gable-roof rear extension. The same view also provides information about the backs of other nearby buildings.



Rear view of a building row. Rear views can provide information that is not evident in the building fronts.



A large building. A large parking lot directly across the street makes possible a straight-on view.



For large buildings, this kind of angled view is what is more typically available.



For a large building, a detail view of the main entrance may be needed to clearly show the details present there.

Additional views, such as these showing street-level and upper-level façade details, will help in preparing the building description.



For large buildings, a rear view, showing more of the basic form, is important.

CD-Rs with Image Files

The SHPO will require a set of all images in color on CD-Rs as part of the nomination package. The image files on the CDs provided to SHPO should be named in the following format so that they will sort in street and number order:

Street name_Street direction (N, S, E, W)_Address number_Image number (01 etc.) where there are multiple images for the same resource. Use an adequate number of digits for the address numbers to ensure addresses will sort in numerical order.

For example, for 426 W. Smith Street, the first of several images: SmithStreet_W_0426_01.

NB: Images containing embedded dates are **not acceptable**.

DESCRIPTIVE NOTES ON BUILDINGS AND OTHER FEATURES

Equally as important as the photographic documentation – you will find this out when you come to write building descriptions for the nomination’s inventory entries (see discussion under **Description** section) maybe months after the photographic survey – is making careful descriptive notes on each building and other surveyed feature.

What to make note of:

- Exterior materials (front, sides and rear). Is the front brick but the sides and rear concrete block? Is the front red brick but the sides and rear yellow-buff brick? Are there decorative details in additional materials such as stone or terra cotta? If the exterior contains stonework, what kind of stone is it (i.e. sandstone, limestone, granite)? List a specific source for stone (i.e. Ionia, Waverly, or Jacobsville sandstone or Bedford limestone, for example) if it can be identified. Are trim items such as the cornice and window caps of wood, metal, or stone? List any makers’ names on storefront columns or other materials.
- First-floor store or shopfronts: Make note of their character and apparent age. For even “modern” – i.e. c. 1970 and later – shopfronts, the building’s inventory entry in the nomination’s description statement will need to include basic information on the shopfront’s design, materials, and apparent age. Your final description for the nomination will need to make note of the storefront’s configuration – how many storefronts across, where are storefront entrances located, are the entrances recessed, are there access doorways to the upstairs? What are the storefront’s basic elements? Iron storefront columns and cornice with wooden doors, door and window trim, and bulkheads? Aluminum doors and door and window trim? What other finishes are present, such as ceramic tile entry floors containing decorative patterns or old store names in them? Many storefronts contain combinations of features from several time periods.
- Interiors: For the most part, information on interiors is not needed. But: For public buildings and churches that possess notable interior spaces, include descriptive information on these key interior spaces and their features and finishes. For commercial spaces such as stores, barber shops, and bars and restaurants that retain historic features such as old pressed metal ceilings, shelving and fixtures, and backbars and booths, information on these features should be collected and included in the inventory entries.

HISTORICAL RESEARCH

Historical research provides the information necessary for making the case for your business district’s eligibility for the National Register of Historic Places.

The district nomination project will require two types of research:

- Research on the community’s and downtown’s history in general sufficient to establish the applicable historic contexts within which the commercial district will be evaluated and to establish the district’s eligibility within some or all of those contexts. Applicants should become familiar with *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation*, including section V, How to Evaluate a Property within Its Historic Context (find at www.nps.gov/nr).
- Research to document the histories of the specific buildings and other features in the district.

This information is used for two parts of the national register nomination. Building-specific historical background is incorporated into the inventory entries that follow the overview description of the district in the nomination’s description statement. The research on the community’s and downtown’s history, along with building-specific historical information, is used to develop the nomination’s statement of historical significance.

The historical research should utilize whatever documentation is available – to the extent feasible.

- Talk to the property owners, particularly those who have owned their buildings for years. The owners may have documents that provide important historical information on their buildings and may be able to provide important information relating to the construction of the building and about occupants and uses over the years.
- Make use of published sources such as local and county histories and publications issued to commemorate community centennials or other anniversaries. Look at area libraries or historical

societies for published and unpublished histories of businesses, organizations such as clubs, fraternal organizations, and churches that have been part of the business district for a long time.

- City directories are useful tools in documenting building uses over the years. In many smaller towns where directories were published only sporadically, old phone books can be useful. For both the inventory entries and historical narrative, information about original and early uses (the first store in the building, for example), about long time uses (a single store or succession of businesses of the same type that occupied the building for a long period of time), and unusual uses will prove useful.
- Building/remodeling permits. Records of building permits issued by local units of government can provide useful information about new construction and renovations of existing buildings including the date when the permit was issued (usually just prior to the beginning of work), the applicant (the property owner, architect, or contractor), the work to be done, and the estimated cost. Unfortunately local units of government tend to discard building permit records on a regular basis, so that few Michigan communities – Detroit is a wonderful exception, with records dating back to the late nineteenth century – retain these records. Don't expect to be so lucky – but always look for them either with the local government or in local repositories such as historical societies and libraries!
- *Michigan Contractor & Builder*. The issues of this weekly paper, published in Detroit, can be a useful source of information on specific buildings. It provides a wealth of information about construction projects of all kinds in Michigan from about 1910 onward, but keep in mind that the most detailed coverage is from the decades of the 1910s and 20s. The information presented is the most extensive for the Detroit area, with separate columns for Architects Making Plans, Architects Taking Estimates, and Contracts Awarded, but there are also separate columns for building activities in other southern Michigan cities and weekly reports of building activities from around the entire state that often list architects, contractors, and other information useful for a nomination project. For smaller towns and cities, finding information about specific buildings will be a hit-or-miss proposition. Larger projects such as banks, larger commercial buildings, hotels, and public buildings and churches are the most likely subjects to have received coverage. Use the *Contractor & Builder* as one more place from which to seek information on those important buildings for which you're not finding information elsewhere.
- The original plats that encompass the area included in the business district. These were filed with the county register of deeds. The Archives of Michigan in Lansing also has a nearly complete duplicate set of plats from all parts of Michigan. Essential information for the nomination includes a discussion of the platting history of the business district: What area was encompassed by each of the plats that together covered the district area? When was each plat made or filed, and who were the property owners for each? What are the lot sizes (frontages and depths) and are they uniform throughout the plat? Are street widths uniform or are some wider than others? The nomination's significance statement for a business district will always need to provide information about the platting history and the impact of the early platting on the subsequent physical development of the business district.
- Old maps are a key tool in documenting your business district. Older county atlases, particularly the early ones from the 1850s-70s period, may show building footprints in the business district. This may be useful in helping to document some of the earlier standing buildings and will provide information on the district's state of development at the time that can be used in the significance statement.
- The Sanborn fire insurance maps are a key tool that should always be utilized when they are available. The maps for each community were originally published in book form beginning in the mid-1880s for most Michigan communities and updated periodically. The book versions are hard to find today, but microfilm versions of Sanborn maps for Michigan towns are available at the Library of Michigan and other university and local libraries. Typically what is available for a town are a series of maps from every few years down to about 1930 plus one or two later updates – for Iron Mountain, for example, Sanborns are available for 1884, 1888, 1891, 1897, 1904, 1911, 1923, and 1930, plus an update of the 1930 series with changes down to 1949. The Sanborns

show building and property outlines, street addresses, construction (frame, solid brick or brick veneer, and stone), number of stories, and building uses. Occasionally, for more important buildings, the date of construction is listed. These maps are extremely useful in documenting the period during which a specific building was constructed. **Every nomination project should make use of the Sanborn maps when they are available.**

- Old (and not so old) photographs and postcard views are also highly useful tools that should always be used. They can help document when particular buildings were constructed, provide documentation of buildings' uses at various times (this can be especially useful for those towns with only sporadically published city directories), and can provide important records of how building facades and storefronts evolved over the years, showing now missing features of existing buildings. Later (1950s, 60s, and 70s) views can sometimes be as useful as the older ones in showing the major changes to old buildings often made in those days and helping to explain why today's building fronts look like they do.
- Nineteenth-century birdseye views of entire communities usually give prominence to the business district and show what buildings were present at the time the view was made. They can be highly useful tools in understanding the extent of development at the time the view was made and documenting the history of particular parcels and buildings in the business district for the nomination.
- **Newspapers:** The newspapers can be a key source of information about the business district's history. They provide three useful categories of information: (1) about the construction and renovation of buildings and about changes in ownership and use; (2) about specific events – such as fires, road widening projects, or urban renewal – that affected the business district; and (3) about broader historical patterns that, affecting the entire community, had a major impact on development in the business district. In Iron Mountain, for example, the establishment of the huge Ford sawmill and factory complex just south of the city in the early 1920s brought about the "Ford boom" for the area, resulting in a period of extensive building in the downtown.

The older generation of newspapers down to the early twentieth century tend to relegate the kind of building-specific details you seek to columns of local news (often labeled with names like "Local Brevities"). In these local news columns the building information you seek will typically form tidbits – often only a few lines long – interspersed with notes about people visiting friends in other towns and the same short advertisements for local businesses repeated three or four times. The kinds of information these tidbits can provide is illustrated by the following: "Fred Jones has begun work on John Smith's new brick block next to Osbert's drug store. Smith expects to move his grocery in by July 1st." This gives us the owner's name, the name of the builder, the time when the building was constructed, the planned occupant, and a (sometimes needed) clue to the building's location. During the early years of the twentieth century (sometimes earlier), fortunately, actual articles, with headlines, about new buildings, renovations, and new stores tended to replace the references in "Local Brevities" columns, making it easier to spot the information you want (or to see that there was no coverage).

Newspaper research can be time-consuming in the extreme. Ideally, research should include reading the local newspaper from the beginning to the present. But – unless your project includes people who can devote their lives to this work – the project needs to focus on specific time frames. Key landmark buildings including public buildings such as city hall and the library, churches and fraternal buildings, and leading commercial buildings such as banks, hotels, and large store buildings – the kinds of buildings whose dates of construction are generally known up front – are also the most likely buildings in the business district to have received newspaper coverage when they were built or underwent major expansions and renovations. **The newspapers should always be used to seek documentation for these key buildings.** Searching for information on these will likely result in finding pieces of information about other business district buildings as well. Make use of whatever you find.

Newspaper research should also focus on the period or periods during which the information you have available to you suggests the greatest number of the standing buildings in the district were constructed. For Iron Mountain, for example, the boom period of the early 1920s coinciding with the

establishment of the Ford plant would seem to be a fruitful period for newspaper research to locate information on building construction. Another example: in researching Portland's business district, I began with a statement in the 1880 county history that during 1879 ten brick buildings were constructed in the business district. Starting with the newspaper the first week of March 1880 to catch the beginning of the construction season, I soon found evidence of building plans for sites in the "burnt district"; this set me to looking backwards as well as forward and proved most fruitful both in providing information about a fire that destroyed a large section of the business district and documenting the still-standing buildings that were constructed in the wake of the fire.

How Much Research Must We Do?

The short answer is: Enough to make the case for the district being eligible for the national register. The value of detailed research is that it provides solid documentation of many, even most of the district's buildings. This will be useful in the future for tax credit projects, for promoting local tourism efforts, for any future local historic district effort, and, generally, for making reliable historical information about the business district available for the future. But – knowing all there is to know about the history of your business district is not essential to successfully nominating the district to the register.

How Do We Use the Results of Historical Research in the Nomination?

The building-specific information is incorporated into Inventory Entries that follow the Overview Description in the nomination's Description statement. The general background historical information for the community and business district, along with pieces of building-specific historical information, are used to compile the nomination's Significance statement.

PREPARING THE NOMINATION

The first part of this guide has described the field work – the photographing buildings and other features – and the general and building-specific historic research that needs to be done to provide the information necessary for nominating your business district to the national register. The rest of this guide will explain how you use the results of the field work and research to prepare the national register nomination. It will also set forth several additional tasks that need to be carried out to complete the nomination.

The National Register of Historic Places Registration Form (Form 10-900) is available as a downloadable Word template at the register's website, www.nps.gov/nr. Always check the website to make sure you are using the most recent form rather than some outdated version. At the same site, under Publications, Technical Assistance for Preparing Nominations, you will also find the nomination instruction manual, *How to Complete the National Register Registration Form* and the *National Register Photo Policy Factsheet*.

DESCRIPTION STATEMENT

For your business district, the nomination's Description statement will be comprised of two sections, an overview description of the district and inventory entries for all of the buildings and other features.

Overview Description

The overview description for the district will generally be no more than two pages of single-spaced text in length. It should provide general descriptive information on the district – **avoid discussing history here**. Picture yourself trying to describe the district to a new acquaintance you've encountered on a trip who has never been there – how would you explain to them in an organized fashion what the district looks like and what's visually distinctive about it? That's what needs to be done in the descriptive overview. The overview should describe the following general characteristics of the district in the approximate order in which they are listed:

- General character of district: Is it exclusively commercial or does it include other types of development as well, such as residential or industrial?
- How big is it and what general form: acreage, approximate maximum dimensions, general shape or form, orientation direction (north-south, east-west, etc.).
- Location: Where is it located in relation to the broader community?

- Setting: What is the district’s environment like – is it flanked by older residential neighborhoods, factory district, highways, or what?
- Topography and physical features: What is the character of the topography throughout the district, and how do rivers, hills, or other physical features within or adjacent to the district affect its physical form?
- Street plan and public spaces: What is the street plan within the district, what is the character of the streets in general, are there boulevards or other special streetscapes, and are there squares or other public spaces? Do the street plan and public spaces result in vistas and visual focal points within the district?
- Street trees and plantings, pavements, and street furniture: Do shade trees or other plantings along the streets form a significant part of the district’s character? Are unusual historic street or sidewalk paving, retaining walls, ornamental fencing, fountains, outdoor public sculpture, old horse blocks or hitching posts, street lighting, or other historic street furniture present?
- Building stock: What is the general character of the district’s building stock in terms of property types (such as stores, banks, hotels, public buildings, fraternal halls, and churches), ages, architectural styles and building forms, exterior cladding materials, and scale? What are the most important landmark buildings or other features from a visual standpoint?

The National Register requires that the description statement begin with a single brief paragraph that provides a summary, stand-alone description that, when combined with a similar summary significance paragraph, could stand alone in providing a brief summary statement of the district’s character and historic importance. The following are a sample description summary paragraph and then the overview description from the Niles Downtown Historic District nomination:

Sample Description Summary Paragraph

The Niles Downtown Historic District encompasses the city’s historic downtown located along a four-block long section of East Main Street together with the first block of the side streets to either side. It contains eighty-six buildings dating from the 1850s to the 1960s that range from one to four stories in height, with two and three-story buildings predominating, and from Greek Revival and Italianate to 1950s and 60s modern in design.

Sample Overview Description

The downtown district is located nearby to the east of the St. Joseph River, which runs in a south-to-north direction through Niles, cutting the city in half on its way to Lake Michigan twenty-five miles to the northwest. Main Street crosses the St. Joseph a half block west of the district and runs east-west through the district. Front Street, the street nearest the river, intersects Main only on the north side, a former southern extension having been erased in the early 1970s by an Urban Renewal project that cleared Main’s south side east from the river to the next cross street, 2nd. The buildings along Front’s west side north of Main form part of the district’s west edge. South of Main Street, 2nd Street, the east edge of the Urban Renewal area, forms the district’s west edge. Four blocks east of Front, 5th Street serves as the district’s east edge. The district also includes buildings along the cross streets’ first block north and south of Main, but parking lot development in the 1950s and 60s and later has substantially eroded the building stock along parts of some of these streets – thus the irregularity of the north and south boundaries.

East of the district Main Street passes Niles’ city all, which occupies the city’s most opulent Queen Anne house, with its ample shady grounds; the present public library, built in the early 1960s; a few remnants of the fine homes that once lined the street east of the business district; and modern commercial development that has replaced older housing. Older residential neighborhoods stand to the district’s northeast and south, with a mixture of commercial development, vacant lots, and parking lots on the streets behind Main in both directions forming a buffer between the neighborhoods and downtown.

The topography, level as far east as 2nd Street, rises rapidly from that point east for two blocks, up to 4th Street, where it levels off again to the relatively higher ground on which most of the city’s east side stands. From the high ground near the Main/4th intersection, a broad vista opens

west along Main and across the St. Joseph to the tree-shaded old residential area on the hillside beyond.

The district's oldest buildings – dating mostly, it appears, from the 1850s and early 60s – are of brick construction and stand along Main between Front and 3rd and along Front and 2nd. The most intact form rows along the west half of the block of Main between Front and 2nd and the west half of the block between 2nd and 3rd on Main's north side, and on the east side in the south half of the block of 2nd north of Main. The early buildings along Main itself are three stories in height. The virtually identical buildings at 105, 107, and 109 exhibit styling in what seems a vernacular version of the Greek Revival, with square-head window openings with low and simple pedimental caps made of iron. Others among these buildings display round-arch windows and other Italianate detailing. The building at 101 East Main must be considered the outstanding example of Italianate among these early buildings because of its surviving storefront ironwork and its upper façade that, faced in light buff sandstone, displays elaborate corbel and keystone-trimmed molded window caps and vermiculated quoins. These early Greek Revival and Italianate buildings, along with the Neoclassical former Newman & Snell's Bank (now Niles Corner) Building at the northwest corner of 2nd, visually dominate the district's west end despite the presence there of several large early twentieth-century buildings. Another (Late Victorian) Italianate building, the massive three-story, three-storefront Gitchell Block or Masonic Temple Building, visually dominates the east end of the north side of the 200 block.

In addition to its Italianate buildings, East Main's 200 and 300 blocks contain an architecturally diverse mix of one, two, and three-story buildings presenting mostly early and mid-twentieth-century facades to the street although a number actually date from the nineteenth century. Commercial Brick buildings are present, the largest being the three-story yellow brick White Block, 219 E. Main, with its Sullivanesque terra-cotta trim blocks. A Sullivanesque decorative vocabulary is also displayed in the terra-cotta roofline ornament on the upper part of the narrow Thayer's façade at 224 E. main. The Burns-Kerr (Van Riper) Building at 313 presents to the street a sunny cream-colored terra-cotta façade containing twisted-column and Gothic effects. One façade and two storefronts on Main (and a third façade around the corner on 2nd) exemplify the porcelain enameled metal architecture of the later 1930s to early 1950s, and several other storefronts the crisp design and bare aluminum look current in the later 1940s and 50s. Niles' commercial facades are a museum of storefront design of the early and mid-twentieth centuries.

The solid rows of side-by-side commercial buildings standing on the sidewalk line end west of 4th Street. A cluster of larger-scale civic and commercial buildings dominates the high ground at the district's east end. Fronted by areas of lawn behind low retaining walls, the Neoclassical former post office and Carnegie Library buildings, the library's front actually facing 4th, stand opposite one another across Main at the northwest and southwest corners of 4th, respectively. To the east, the four-story Spanish Colonial-style Four Flags Hotel occupies the southeast corner of Main and 4th, with its broad front facing Main and a large wing extending down 4th. Just to its east, the Commercial Brick block of the Ready Theater fills the remaining Main Street frontage east to 5th, the district's east edge. Formerly vacant land opposite the hotel and theater on Main's north side between 4th and 5th (not within the district) that most recently contained gas stations has recently been developed with a large bank building.

The north half of that block, bounded by 4th on the west, 5th on the east, and Sycamore Street on the north, stands within the district. Within the half block are the two-story Star Building, a half block long office/commercial building constructed in the 1920s and refaced in modern style in the 1950s, fronting west on 4th a little north of the former library, and a Prairie School one-time house, now attached to the Star Building and housing office space. The Niles newspaper's large printing plant, another large Commercial Brick building, extends eastward behind the Star Building mid-block to 5th Street.

The first blocks of the side streets reflect the same architectural diversity that is seen along Main, with Italianate, Commercial Brick, 1950s modern, and more present there, including the one previously noted enameled metal panel façade building from the late 1930s. Several 1920s car dealership/garage buildings survive along Front, 3rd, and Sycamore. The broad, gable-fronted former General Garage at 109 N. 3rd, with its side-to-side second-story window band and artful

Commercial Brick façade, is the city's landmark among such buildings. Another landmark is the 1920s Ready (Montgomery Ward) Building at the southwest corner of 2nd and Sycamore. This massive building displays a Commercial Brick side façade with piers capped with cast concrete ornaments and a double entry storefront with arched central display window. The upper part of its elaborate low stepped-parapet façade is still covered in metal sheeting installed in the late 1960s, as is the façade of another large-scale Commercial Brick building, formerly Troost Brothers Furniture, next door to the south at 214 N. 2nd. In both cases the sheathing begs to be removed.

Seven buildings constructed as houses stand within the district as remnants of the residential area that once closely ringed the then smaller downtown. Three of the four nineteenth-century ones are Greek Revival in style. Three others date from the early twentieth century. All but two of the houses have housed commercial or office uses for well over fifty years.

Inventory Entries

The inventory entries include the descriptive information resulting from the survey plus the building-specific historical information. There will be a separate inventory entry for each building, structure, and other feature. They should be organized by streets, listed alphabetically (without regard to compass directions), with each side listed separately so that all odd-numbered and all even-numbered are together rather than interspersed. List East before West, North before South. (This will make finding a specific address and locating information about the properties to either side of it a straightforward procedure for people in the future; other systems such as listing the streets from north to south tend to complicate what should be a simple operation in locating information on the property.)

For the inventory entry, use a four-part format, including a first identification section, followed by a description paragraph, then a paragraph containing the available historical background on the property, and finally any bibliography specific to the property.

1. Identification:
 - Historic name/other important names property has had
 - Street address
 - Date(s) of construction and substantial expansion and/or renovation
 - Architect, builder/contractor, artisans if known

2. Description: Include
 - Property type (i.e. house, commercial building)
 - Number of stories
 - Width (a single storefront wide, 25-35 feet, like a typical downtown commercial building, or two or more wide – this is a handy way to characterize a building's overall size in comparison to other buildings in the business district)
 - Style
 - Form, if applicable (gable-front, hip-roof, etc.)
 - General footprint, if not otherwise obvious (T-shaped, etc.)
 - Exterior materials:
 - Walls. Identify all by type and color (i.e. red brick with orange sandstone trim); for stone, list specific stone if known (Portage Entry or Waverly sandstone, Indiana limestone, etc.). For masonry walls, indicate bond (such as coursed or random ashlar) and finish (such as smooth or rockface). If side and rear walls are different from the front, provide same information for them.
 - Foundation. If visible, list material, color, and finish.
 - Roof. List special materials such as slate or metal shingles if roof is visible. For standard rear-slanting flat-roof downtown commercial buildings, notes on roofing material are not important.
 - Cornices, cresting, other non-stone trim. Indicate whether wood or metal.
 - Ground-floor shop or storefronts
 - General form (such as "3 bays with slant-sided recessed central entry, 2nd-story entry to right")

Finishes (such as "Aluminum-trim single-light shop windows above modern red brick bulkheads; vertical T-111 siding in transom location; ceramic tile floor in entry containing name 'Fowler.'")

- Building interior: Generally, information about interiors is not required. However, for public buildings with significant interior spaces and features, some description is appropriate. It is also appropriate to provide description of unusual historic interior features such as a historic backbar, old pressed metal ceilings, or old store furnishings/fittings.

The description part of the entry should ALWAYS begin with the general information such as the number of stories, width, style, and exterior materials before moving into the details.

3. History: Types of information to include when available:
 - Original owner and who they were
 - Circumstances related to the building's construction (for example, the present building replaced the same owner's recently burned previous building at the same site).
 - What the building initially housed (such as Smith & Jones hardware downstairs, IOOF hall upstairs), with a summary of any available background history of those businesses, organizations, etc., and time frames for use of the building.
 - Subsequent important uses (especially unusual ones or ones that lasted long periods of time), with date frames.
4. Bibliography: List historical information sources specific to the particular building, such as newspaper notices related to the building's construction. If the documentation includes unique items, such as original plans or historic photos, list the location where the information is housed or the person who provided it. Include owners or others who provided oral history information about the building and briefly cite the type of information provided. **The work of documenting the histories of specific buildings in a business district is time-consuming. Once you have come up with documentation, there is no excuse for not carefully listing the specific sources of the information so that people years in the future can easily verify it. No one in the future should have to start from scratch to locate the same information.**

Format for inventory entries for commercial district nominations (first number is address, under a street name heading):

128. Smith & Dellenbaugh Block (1880); Ayers & Axtell, Lansing, contractors.

Two-story seven-bay two-storefront red brick Italianate commercial building; symmetrical upper façade with window bays framed by projecting one brick deep piers running up to corbelled brick frieze with four and two step corbelling in the alternating downward projections and recesses (as in 108 and 118) except for the center bay, which is capped below the frieze by raised brickwork forming an arch; 2nd-story windows display chocolate brown Marquette sandstone caps; window caps and main bracketed iron cornice are of the same design as in 108-118; present pent roof and half-timbered Old English storefront for the bar/restaurant that occupies the entire first story dates from between 1973 and 1977.

Dr. Charles C. Dellenbaugh originally owned the building's south section and L. A. Smith the north. Willis M. Elder's drugstore was the initial occupant of the Dellenbaugh section of the building. From the late 1890s or very early 1900s until 1922 the Dellenbaugh's first floor housed Mr. and Mrs. Alphonso Sulpizio's fruit and candy and ice cream store. In 1922 the Sulpizios sold the fruit and confectionary business to Santino Guidi. Under Guidi's ownership, the store acquired the name "Candyland." Jean's Tavern occupied the space during the 1950s and expanded to occupy both storefronts by 1967. Steve and Cindy Fabiano's Fabiano's Restaurant and bar replaced Jean's in 1979, and Amy's, the current restaurant/bar, opened in 1994.

Obs. [Observer newspaper], 5/26 and 6/2/1880; 3/9 and 4/13/1922; *History of Portland*, 22; Historical photographs, Amy's Restaurant; Historical Scrapbooks, "Streets - Paving - Etc." [full citations in general bibliography].

Inventory Entries for Non-Contributing Resources (New and Old)

Inventory entries too often give scant attention to non-contributing resources, whether they are considered non-contributing because less than fifty years old or are older properties viewed as having lost adequate integrity because of extensive alterations. Inventory entries need to provide enough data on non-contributing resources to make clear what they are and why they are non-contributing. This is important both for those properties viewed as non-contributing just because they are not quite fifty years old and for older properties that could be re-evaluated as contributing if appropriate rehabilitation work is done to them.

Properties under fifty years old can become contributing resources once they reach the magic fifty-year age. For that to be possible, the nomination would have to be revised to move the end of the period of significance forward to fifty years ago – and that expansion of the period of significance justified in a revised significance statement. That done, the inventory entries for resources previously listed as non-contributing because not quite fifty years old can then be revised to list them as contributing.

Other types of resources.

These need to be included in the inventory, using the same general format:

- Squares or parks: a general entry for any square or park that provides descriptive and historical overviews followed by bullets for each resource (such as a monument or fountain). Old trees and plantings may be significant features of such public places and may merit a single or multiple bullets.
- Historic pavements such as old brick streets. Standard modern asphalt or concrete pavements should be noted in the district's descriptive overview but not given separate inventory entries.
- Historic street light fixtures – a single entry that describes, explains where they are located, and provides any historical background. Note the general character of modern fixtures in the district's descriptive overview only.

What is a Building (for Inventory purposes)?

Old commercial districts often contain some or all of the following kinds of properties:

- Buildings that when constructed in the nineteenth century shared a common façade design and were together known by a single name, such as Union or Exchange Block, but which were actually separate, though side-by-side, buildings with different owners and, perhaps, no interior connections.
- Buildings – whether of similar or not very similar design – that were originally separate in ownership and function but were long ago combined into what has since been considered a single building.
- Buildings that were originally separate in ownership and use but which now or in recent past times have contained a single store that occupied the street level of both or all buildings.

Should the inventory include a single entry for each combined building or separate entries for each of the individual buildings that form the “combined” building? There is no one answer that fits all circumstances for combined buildings. Use the following as a general guide:

Groupings of buildings that from the first had a single name, such as Union Block or Exchange Block, because of shared façade design should be given a single inventory entry that includes the information common to the block – the inclusive street addresses, historic name, date of construction, and names of architect and contractor if available. Following the description of the block as a whole, the inventory entry should summarize what is known of the history the same as for individual buildings – especially the original owners and uses and subsequent important uses of the various parts. If there is substantial information about the various parts of the building over the years, such as owners and occupants and/or significant renovations affecting parts but not the whole building, create a separate entry for each part below the general description and history of the whole building.

Buildings that were originally separate in ownership and function but were long ago combined into a single building should be listed the same way as the Union Block types of buildings noted above, with a single entry that provides historical information relating to their being combined and a separate entry beneath for each component building that provides descriptive and historical information for the period when the building functioned separately.

Buildings that were originally separate in ownership and use but which now or in the recent past contained a single store that occupied the street level of both or all buildings should be listed the same way as buildings that were long ago combined. In many cases where a single store came to occupy several buildings, it may have initially occupied only one – an individual entry for each building beneath the primary one should include information on when the store occupied or expanded into the building (as closely as this can be determined).

SIGNIFICANCE STATEMENT

What the Significance Statement Should Be

The significance statement is like a legal brief or a term paper: it argues a specific case for how the district being nominated meets the criteria for listing in the national register, marshalling the facts to make the case. It begins with a brief summary of the case for the district being significant – i.e. meeting the criteria – then provides historical background necessary for making the case, and then makes the case for each applicable criterion. Rather than a narrative chronological history of the town, it should focus on the district. It should be organized by historic theme and, for each, provide background relevant to the district and its buildings relating to that theme and explanations of how the buildings contribute to the district's significance under the theme.

Downtown commercial districts can be historically significant under criteria A, B, and C, and in terms of various historical themes – most typically Commerce, Politics/Government, Social History, Entertainment/Recreation, and Architecture.

Most old downtowns possess historic significance under the **Commerce** theme in the following ways:

- The district's buildings will generally possess a collective significance under Commerce for together housing much of the community's commercial activity from the date of the oldest surviving building to the standard cutoff date for the period of significance under the register's criteria, fifty years ago, or down to some other more recent date marking the end of an important period of downtown development that the nomination can justify.
- Individual buildings within the downtown may possess significance under Commerce as well for:
 1. Housing stores, banks, or other businesses that were leading downtown commercial institutions in their day.
 2. Reflecting continuity of uses over long periods of time – a building housing a single store or business or a succession of businesses of the same type (such as drugstores) over a long period of time.

Under **Politics/Government**, downtowns typically possess historic significance for containing buildings in long use by government – such as a village or city hall, the county courthouse, post office, or armory. The significance relates to the long-term use, but may also relate to important events that took place at or involved the buildings.

Downtowns also possess historical significance under the related themes of **Social History** and **Entertainment/Recreation**. A downtown district typically possesses several or even many buildings that contribute to its significance under the themes.

- Under Social History, most downtowns retain buildings built for or long occupied by fraternal organizations such as the Masons, Elks, Odd Fellows (IOOF), Knights of Pythias, or Woodmen of the World or by clubs or other social or cultural organizations. In addition, some downtown buildings also typically contained at one time halls or other spaces used for a broad variety of meetings and social events such as political or labor meetings and church socials.
- Under Entertainment/Recreation, downtowns typically contain old buildings once used as opera houses, theaters, or movie theaters or that housed bowling alleys, dance halls, or other spaces used for events that fit better under Entertainment/Recreation than Social History.

Most districts possess significance in terms of **Architecture**. Again, the significance is in part a collective one – the buildings together reflecting broad trends in American and Midwestern commercial (and perhaps other) architecture of the nineteenth and twentieth centuries. Individual buildings may also possess importance as outstanding examples (in the local or perhaps in a broader context) of particular architectural styles, building forms, works of their architects, or for other reasons.

Under each of the applicable themes, the narrative must provide background history on the theme as it relates to the specific district properties to make clear why the district properties are historically significant under the theme.

As in the Description Statement, the Significance Statement must begin with a single paragraph that provides a summary of the case to be made in the subsequent narrative for the district being eligible for the national register.

Below are a sample summary paragraph and significance narrative for the Greenville Downtown Historic District.

Sample Significance Summary Paragraph

The Greenville Downtown Historic District meets national register criterion A for comprising an area that has served as Greenville’s central business district and community focal point since its establishment during Greenville’s founding years in the early 1850s. The district contains commercial buildings dating back as far as 1869 and from the later nineteenth and early twentieth centuries that reflect that long history and that collectively have housed much of the city’s commercial activity and many of the city’s leading commercial institutions over the years. The downtown’s business blocks, housing various meeting spaces in their upper stories during past years, hosted much of the city’s social, cultural, and entertainment activity. Many commercial buildings and, especially, the city’s Danish Brotherhood Hall, possess historical associations with a Danish community that has existed in the city since the 1860s. Downtown Greenville’s commercial buildings meet criterion C for collectively representing a broad range of later nineteenth and early and mid-twentieth-century commercial architecture forms and styles, and several of the Italianate and Late Victorian buildings possess significance in the local context of their architectural styles as outstanding examples. Two nineteenth-century church buildings and one early twentieth-century house meet criterion C individually for their architectural distinction. The district also possesses significance under criterion B for containing at least two buildings, the Rutan Block and the Ranney House, that possess direct historical associations with Manning Rutan and Frederick E. Ranney, persons of special significance in the early history of the downtown and city in general.

Sample Significance Statement

[Beginning: A brief historical overview of the community as a whole that provides the background necessary for understanding the downtown’s historical development. It discusses early settlement, establishment of government, key factors in early and later 19th-C. development (lumbering, railroad development, and agriculture in this case), and an ethnic pattern significant in the area’s and downtown’s historical development. This is a sample, and the overall length needed will vary.]

Greenville began in 1844 with the arrival of the first settler, John Green, and his family from Fulton County, New York. The site was described as being at the time of settlement “an unbroken plain dotted here and there with clumps of underbrush, while north of the bridge [i.e. Flat River] only a dense forest met the eye” (“Greenville – By Gone Days”). That year Green and Samuel Demorest built the first of a number of sawmills at what became known as Green’s Mills along the Flat River at the north edge of the new settlement. A year later a second sawmill was built at the settlement’s south end. That year, 1845, the location became part of Montcalm Township, which then encompassed the whole of Montcalm County. The county was created as a geographical unit in 1831, when the territory was still an unbroken wilderness, but was not established as a political unit until 1850. Before that Montcalm Township was attached to Ionia County, its neighbor to the south. Eureka Township, which contained the new settlement, was

one of several townships separated from Montcalm at the same time the county became a legal entity.

In 1850 newly established Eureka Township had a population of 461. In 1853 John Green and Manning Rutan platted adjacent areas in what is now Greenville centered on Lafayette Street. As of 1860 the settlement contained about 400 persons out of the township's population of nearly 1000. The 1850 act incorporating Montcalm County established Greenville as the temporary county seat until 1860. In 1860 the county voters approved moving the county seat to a location more central in the county that subsequently became the village of Stanton, the present county seat.

Lumbering and wood products manufacturing soon became Greenville's economic mainstays. In the community's earliest days the mills cut mostly for the local market, with the surplus being rafted down the Flat and Grand rivers to where it could be sold, but soon the local lumbermen were looking for a larger market. An 1869 *Greenville Independent* article on "The Lumbering Region of Flat River" stated that the white pine region along the Flat and its tributaries extended twenty-one miles north and seven east from Greenville and that logging activities thus far had barely begun to tap this resource. Cutting the pine north of town along the Flat River and tributaries began in earnest in the winter of 1865-66, with a first log drive on the Flat River in 1866 bringing 35,000,000 feet of logs successfully down that and the Grand River to Grand Haven (Schenk, p. 374). The lumber boom peaked in 1881, when 165 million feet of logs were shipped downriver, and ended by about 1890.

In October 1870 the community's first railroad, the Lansing & Ionia (it soon became the Detroit, Lansing & Lake Michigan), was completed as far northwest as Greenville from Ionia, making it possible to ship forest products to market by rail. Service to Greenville began September 6, 1870, and the 9/13 *Independent* noted that the first cargo brought for shipment south on the 7th was a load of shingles. The railroad (the line was extended northwest to connect with the Grand Rapids & Indiana line at Howard City during the coming year) resulted in a rapid expansion of lumbering activities and rapid development of Greenville itself. A sketch of "Greenville in 1872," prepared by local druggist W. H. Conover for the *Michigan State Gazetteer and Business Directory*, noted that, while 75,000,000 feet of logs were being floated annually down the Flat and Grand rivers to sawmills, nearly as many more were being sawn by mills along the Flat and its tributaries and the products shipped out by rail. Local mills turned out lumber, shingles, lath, window sash, and other building products. The 1881 county history states that the local mills had markets in Michigan, Indiana, Ohio, Connecticut, New York, and elsewhere (Schenk, p. 381). By 1875 ten lumber, lath, and shingle mills lined the Flat in Greenville, with more upstream to the north. The 1884 Sanborn maps, the first for Greenville, show, in addition to sawmills, planing and shingle mills, a sash, door and blind factory, and a barrel factory.

The Flat River logging boom and the opening of the railroad connection in September 1870 were key factors in Greenville's rapid growth and development. Greenville was incorporated as a village in March 1867, and the 1870 census recorded a population of 1807. City government was established in 1871, and the population rose to 3144 in 1880. A second railroad line, the Toledo, Saginaw & Muskegon, reached Greenville in 1887. By then, with the depletion of the supply of pine, the lumber boom was near its end.

Farming began to assume a substantial importance even before the railroad's opening facilitated shipping agricultural products to market. In addition to Manning Rutan's load of shingles, the first freight shipped from Greenville on September 7, 1870, included locally milled flour bound for New York (*Independent*, 9/13/1870). Conover's "Greenville in 1872" states that three flour mills and a woolen mill were then operating in the city. Grist and flour mills, present since the community's early years, along with cider and wool carding mills, assumed greater prominence along the Flat as the sawmills disappeared.

Potatoes became a key crop in the 1880s, and beginning in the 1890s Greenville was a leading potato shipping point in Michigan. Long-time potato buyer and shipper George C. Bower stated that the first shipments of potatoes from Greenville were made in the 1870s and that by the early 1900s seven to ten local dealers were shipping quantities of "potatoes, apples, onions, beans,

hay, wheat, rye, etc.," with potato shipments growing the fastest. In the 1900-01 season, he reported, 3000 cars of potatoes were shipped, in 1903-04 about 5000 cars, and, in the six seasons from August 1900 to August 1906, 25-30,000 carloads of potatoes were shipped. The crop came to Greenville dealers from an area from Cedar Springs on the west to Sheridan on the east and from Big Rapids on the north to Ionia on the south ("Potato Business in Greenville"). In 1910, when Michigan ranked second only to New York among the states in acreage planted in potatoes and in production, Greenville and nearby Stanton were the state's leading shipping points. Shipping warehouses for potatoes, beans, hay, and other agricultural produce formed a substantial presence near the railroad tracks north of downtown across the river.

A foundry/machine shop and a wagon and a furniture shop all existed in Greenville as early as the mid-1850s and other industries came and went, but potatoes led indirectly to what became the city's leading industry in the twentieth century. A plan in the early 1890s to establish a potato starch factory proved unsuccessful and left the city with an unfinished and unneeded factory building. In 1892 local businessmen approached Frederick E. Ranney (1853-1922), a businessman from nearby Belding, about using the building as a refrigerator factory that would manufacture wooden iceboxes utilizing the area's still abundant hardwoods. At the time Ranney was manager of a refrigerator plant at nearby Belding that was one of the enterprises of Belding Brothers, whose silk mills formed that community's industrial base. Greenville businessmen and residents were to subscribe to at least \$10,000 worth of stock. The factory went into operation early in 1893 (*Independent*, 10/6/1892, 1/12/1893). By 1896 Ranney's company was offering three lines of wooden refrigerators, the Lapland, Monitor, and Mascot, and reportedly doing \$500,000 worth of business a year (*Headlight Flashes*). By 1900 the company was operating two factories in Greenville.

A second firm, the Gibson Refrigerator Company, was founded in 1908 by Greenville men's clothier and banker, Frank S. Gibson. The 1918 Sanborn map shows Gibson's as by far the largest factory complex in town. Switching over to metal by the 1930s, the company became one of the nation's largest manufacturers of refrigerators and Greenville's largest employer during the rest of the twentieth century. A third firm, the Consolidated Soda Fountain Corporation, manufactured ice boxes for soda fountains beginning in the 1910s. The Gibson Refrigerator Company's closing in the early 2000s ended over a century of refrigerator manufacturing in Greenville.

In the early twentieth century important industries in Greenville also included the Greenville Implement Company and the Moore Plow and Implement Company, manufacturers of agricultural implements, and the R. J. Tower foundry and machine shop. The Federal-Mogul Corporation, manufacturers of marine parts, opened its substantial plant during the 1930s.

Greenville forms a part of a substantial Danish settlement that occupies much of Montcalm and adjacent counties. Danish migration to the United States, virtually nonexistent before the 1840s, grew rapidly in subsequent decades due to urban growth and unemployment and rural impoverishment and lack of land. The loss of the southern province of Holstein to the Prussians in the mid-nineteenth century and the additional loss of south Schleswig, north of Holstein, in the wake of the 1864 Danish defeat by the Prussians and Austrians resulted in increased migration of ethnic Danes from those areas. The Montcalm County Danish settlement began with the arrival of a few Danes in the Gowen area, north-northwest of Greenville, in 1853. It expanded rapidly by word of mouth. By 1857 forty Danes were living at the "Big Dane Settlement" around Gowen. In the late 1850s a "Little Dane Settlement" began to coalesce just north of Greenville. Colonies as well as individuals continued to settle in the 1880s and 90s, and Greenville itself contained a substantial Danish population by the end of the nineteenth century. In Greenville Danish Lutherans established a predecessor to the present St. Paul's Lutheran Church in the 1870s and founded Danish Brotherhood Lodge No. 70 in 1893.

Greenville calls itself Michigan's Danish Festival City today. The city has held an annual Danish Festival since 1965.

[Then comes the discussion of the physical development of the business district. The sample begins with platting/the early street plan. It then discusses the beginnings of development of the business

district, sets forth important factors that influenced the future development (here the new availability of brick, imposition of fire laws, and additional railroad development). It sets forth the further development that took place in the district during its prime building years (corresponding with the district's period of significance). Finally, it explains what the business district has experienced in terms of development pressures and economic uncertainties since the end of the period of significance.]

The Greenville Business District

Lafayette Street, Greenville's main street, and Washington, Cass, and the other streets that cross it at right angles were among the original streets platted by John Green and Manning Rutan in 1853. Prior to Greenville's incorporation as a village in 1867, Eureka Township built the first Lafayette Street bridge across the Flat River at the north edge of the village in 1856-57. Another wooden bridge replaced this first one in 1868 and an iron bridge replaced that one in 1885.

A business district began to develop along Lafayette in the 1850s and 60s, with stores concentrated in the block between Washington and Cass streets and intermixed with houses farther north and south. Lots along Lafayette varied in width from block to block as different owners subdivided larger lots, but averaged twenty to twenty-four feet in street frontage. As originally platted, a public square twelve rods (198 feet) square marked the Lafayette/Washington intersection, with the streets crossing in the center, thus leaving a four-rod square space at each corner. Public squares of this configuration are common in some other states, including Indiana, but in Michigan they are rare – Marshall, Coldwater, and Vermontville are examples – and the other Michigan examples noted all have substantially larger dimensions. If Greenville's, platted when the town was the county seat, was intended as a courthouse square, it is difficult to see how it could have served that purpose. In any event, this very small square came to be viewed as serving no purpose – the *Independent* said it was called a public square only "by way of compliment" (3/9/1869). In March 1869 the village vacated it, turning the property back to private ownership.

The oldest surviving photograph of downtown Greenville, a c. 1867 photo looking across the square, shows wooden gable and falsefront stores, primarily of two-story height. Other old photographs and post card views show a variety of one and two-story wooden buildings standing cheek by jowl with the later brick ones. The last two intact examples of the early wood buildings survived side-by-side until the early 1960s along Lafayette's east side at nos. 118-20.

The growing logging boom, rapid settlement and agricultural development of the country, and, especially, it seems, the anticipated completion of the railroad into Greenville set off a building boom in the late 1860s. The Lafayette Street business district, previously a patchwork of one and two-story wooden buildings, was radically transformed in character beginning about the time of the village's incorporation in 1867. Three developments helped spur this redevelopment.

The first was the opening of a local brickyard in July 1867. Before this brick had to be hauled to Greenville by wagon from Ionia, the location of the nearest brickyard and railroad connection. The *Independent* (7/30/1867) reported that brick from the local Westover & Clement yard cost little more than the cost of transporting brick from elsewhere.

The second was the village's establishment in November 1868 of a fire district along Lafayette between Benton Street (south of the district) and the Flat River (to its north) and including the first block of the side streets to either side that prohibited the construction, enlarging, or moving in of wooden buildings without prior approval by the village trustees (*Independent*, 12/1/1868). Unlike many other communities of sizes ranging from Chicago down to Portland, Michigan, which adopted fire districts following catastrophic fires, Greenville had suffered no such disaster. No mention is made in the local newspaper of the circumstances that led to enactment of Greenville's ordinance. In the wake of the new ordinance the local brickyard, by now owned by Clement & George and R. H. Thompson, planned improvements for the coming year so that they could make 8,000 brick per day (*Independent*, 12/29/1867).

A third was the opening of the railroad line to Greenville late in 1870. This development would have greatly reduced the cost of shipping brick and other building materials to the city from Ionia and other places in west Michigan.

The post Civil War logging – and population – boom resulted in a construction boom in the business district, and the developments noted above ensured that the new buildings would be of brick. The downtown's first brick commercial building, the three-story single-storefront Fargo & Belknap Block at 332 S. Lafayette, was built in 1869 by Hiram B. Fargo and James W. Belknap, whose grocery and dry goods store occupied the first floor. Standing at the northeast corner of Lafayette and Washington, it occupied a prime location in one of the four vacated sections of the former public square. In 1871-72 the two store buildings of the same exterior design next door to the north at 328 and 330 S. Lafayette were built, the three together forming what was soon being called the Post Office Block because the post office occupied one of the storefronts (the middle, no. 330).

Another of the earliest brick blocks is the 1870-71 Rider & Potter Block at 301 S. Lafayette (southwest corner of Cass) built for Myron Rider and Thomas J. Potter. The building has a commanding presence because of its large footprint, fifty-foot height that makes it still the tallest building along Lafayette in the business district, and special features that include oculus windows above the regular third-story windows (a unique feature among downtown buildings) and a large wooden main cornice.

By 1875 about twenty substantial brick "blocks," often of three-story height and two storefronts in frontage width, stood along Lafayette in the core commercial area between Washington on the south and Montcalm on the north. The largest, the 1872-73 Eureka Block, extended for five storefronts, or 110 feet, along Lafayette's west side north of Washington, and another three-story three-storefront block, built in 1875, stood at Lafayette and Montcalm's northwest corner. These buildings have not survived, but fifteen of the brick blocks built in those years do still stand, including the Post Office and Rider & Potter blocks mentioned above and the three-story two-storefront Walker & Clough (1873), Norton & Ecker (1874), and Rutan (1875) blocks at 102-104, 225-27, and 400-404 S. Lafayette, respectively.

The national economic downturn that began in 1873 caught Greenville in the middle of the building boom. Two large buildings were constructed in 1874 and one single-storefront block in 1875. Thereafter no new downtown building seems to have taken place until the mid-1880s.

A new era of building took place in the downtown from the mid-1880s into the early 1890s. During this time period at least a dozen buildings were constructed, including the 1887 two-storefront Slawson Block at 300-302 S. Lafayette and the Edwards, Anderson, and Harris Blocks at 216-224 S. Lafayette, built in the 1890-93 period.

The Grabill Block at 226 S. Lafayette seems to have been the first built of this new Late Victorian generation of downtown brick blocks. Elliott F. Grabill, editor and proprietor of the *Greenville Independent*, had this building constructed shortly after his appointment as the Greenville postmaster to house the post office, a bank, his newspaper plant, and rental office space. The post office occupied the building in November 1884. A postmaster's salary was based on the business volume of the office, and the postmaster was expected to defray all office costs, for space, equipment, and personnel, out of the salary. Thus there was every incentive for the postmaster to use his own building rather than rent quarters.

Grabill's building is important through the association with the man and because of its interesting early history. E. F. Grabill did several years' service in the Civil War, ending the war as a major. He fought at Gettysburg, Wilmington, North Carolina, and in other key battles. Marrying a Greenville woman in 1865, he settled there after the war and took charge of the *Independent* in 1866. He was an outspokenly partisan Republican who used the paper to regale his readers with a steady diet of party politics and news of soldiers' reunions and other events dominated by the Republican faithful. Grabill was appointed postmaster in March 1883 under the Republicans, but in 1885 Grover Cleveland, a Democrat, came into office as President. A victim of the political "spoils system" – to the victor belong the spoils – Grabill was removed from office in November

1885, and a Democrat appointed in his place. During 1886 the post office moved out of his building. The 1889 election returned the Republicans to power. In April 1890, following an advisory election by Greenville's Republican voters that selected him over another Republican candidate, C. L. Rardon, by a vote of 269 to 224, Grabill was reappointed postmaster. Moved back into the Grabill Block, the post office remained there until it outgrew the space in 1907. E. F. Grabill ran the *Independent* from this building into the twentieth century (*Independent*, 11/6, 11/13, and 11/20/1884; 11/4/1885; 7/8/1886; 3/13, 3/27, and 4/17/1890; 1/30, 7/17, and 7/31/1907).

Part of the impetus for the 1880s-90s new wave of building begun with Grabill's block was a series of fires. Large-scale fires along Lafayette in 1884, 1887, and 1888 destroyed substantial segments of the older wooden commercial building stock (the 1884 fire burned five buildings and the 1887 eight).

The largest of these fires took place on the evening of March 31, 1887, and destroyed the seven or eight frame buildings on Lafayette's east side where 310-324 S. Lafayette are located along with the Exchange Hotel located across the street. Only two weeks after the fire the *Independent* was reporting that all but two of the property owners had already made plans to rebuild. Excavation work began early in June and the local brickyard burned its first kiln of 100,000 bricks later in the month. The owners worked together to provide a uniform façade to what was really a row of seven separately owned buildings. A contract to erect the block was awarded to H. G. Wright & Co. early in July and the buildings completed at about the end of the year.

The gradual process of more intensive development along Lafayette, replacing wooden buildings one by one with masonry ones, was ongoing in the 1890s and into the twentieth century, but seemingly without the construction spurts that took place during the 1870s to early 1890s. The Callaghan, Smith Hardware, and Church Blocks at 113-15, 117, and 305 S. Lafayette were all built in the 1892-1900 period; the Winter Inn in 1901-03 (replacing the previous hotel on the site, which burned in 1900); the Winter Block, 100 S. Lafayette, in 1903; the Kemp-Gilmour Block, 212-14 S. Lafayette, in 1906; the Backus Block, 129 S. Lafayette, c. 1907; Gleason Building, 110 S. Lafayette, in 1913; Hansen Building, 131-35 S. Lafayette, in 1917; Hopkins Building, 112 S. Lafayette, in 1922; and Greenville National Bank, 127 S. Lafayette, in 1930. The early twentieth-century development included a number of garage and car dealership buildings, most of them located along Lafayette at the district's north and south edges. A major exception is the 1917 Rasmussen Building. Located in the heart of the downtown at 128-32 S. Lafayette, it housed a large rental commercial space in addition to a garage and Ford dealership. The Greenville National Bank seems to have been the last downtown commercial building constructed before the 1930s depression brought further building activities to a halt.

Although there was considerable new development in the years after World War II, that development seemed to continue the early twentieth-century pattern. There was no single large-scale new development downtown, but rather a slow, spotty process of replacing older buildings here and there, especially the remaining old wooden buildings, and filling the few previously vacant sites. By the early 1960s nine new commercial and office buildings had been built along Lafayette and West Cass streets and many additional buildings modernized.

Since the early 1960s few new buildings have gone up along Lafayette within the old core area of the downtown. In 1982 the former Phelps Hotel, one of the buildings constructed following the March 1887 fire, also burned. The ruins remained standing until 1988 when, with state assistance, they along with the early 1870s five-storefront long Eureka Block to its south, at the northwest corner of Lafayette and Washington, and the nearby Silvers Theater were all torn down, leaving a large open space at the south end of the business district on Lafayette's west side that has remained a parking lot since then. The downtown has suffered from the development of a shopping center area out Washington Street at the city's west edge. New development in the 1980s and 90s has tended to involve renovation – most of it unsympathetic to the underlying historic character. The rehabilitation of the former Greenville State Bank complex a few years ago represented the first use of the federal historic preservation tax credits in Greenville. It will hopefully lead to additional future projects that will result in economic development along with protection of the downtown's historic character.

[Next should come the discussion of important historic themes (or “areas of significance”) as reflected in the district’s standing buildings. For a downtown district whose reason for being was commerce, the theme of Commerce will always be a key one – one that should be presented first. Significance under Commerce is reflected in the overall pattern of the business district being the commercial center for the community for a long time, in specific businesses being leaders in their field or being in business for long periods of time, and in specific buildings housing the same business or type of business (such as a succession of drugstores) for long periods of time. It is CRITICAL to the success of the nomination to relate the history presented in this and all the thematic discussions to the buildings standing within the district that housed these activities.]

Commerce

By the late 1860s Greenville’s commercial district supported a broad variety of businesses, including groceries and dry-goods stores; bakeries; hardwares and agricultural implements dealers; clothing, millinery, and boot and shoe stores; watch and jewelry shops; harness shops; and book and stationary stores. There was at least one restaurant separate from those in the hotels and a number of saloons, most of them apparently located around the fringes of the business district to the north and south of the historic district area. A few barber and tailor shops and other small businesses, including at least one photographic studio, were present. Blacksmith shops, livery stables, and at least one monument works were also located mostly around the business district’s edges. The core area of Greenville’s downtown along Lafayette between Montcalm on the north and Washington on the south contained the largest part of the city’s commercial activity and most of the early city’s leading businesses. The ongoing redevelopment of the business district, with larger brick buildings placed side by side replacing mostly smaller wooden ones, supported a growing number and variety of stores in the 1880s, 90s, and later, but the core business district area remained largely within the boundaries encompassed by the historic district until well into the twentieth century. The following is a sampling of businesses housed in the surviving nineteenth-century commercial buildings in their early years:

Chapin Bros. grocery, 102-104 S. Lafayette (1873)
Connell & Hansen furniture store, 106-108 S. Lafayette (1875)
Lars Hansen grocery and flour and feed store, 210 S. Lafayette (1874)
John Avery & Son drug store, 216 S. Lafayette (1890)
L. H. Wright meat market/Anderson Meat Packing Co., 218-20 S. Lafayette (1890)
Harris Bazar (home furnishings, furniture, bazaar goods), 222 S. Lafayette (1892)
J. H. Edsall restaurant, 224 S. Lafayette (1893)
G. R. Slawson Co. drug store, 300 S. Lafayette (1887)
D. S. Seaman grocery, 302 S. Lafayette (1887)
S. R. Stephens, boots and shoes, 304 S. Lafayette (1873)
Cole & Taylor drug store, 328 S. Lafayette (1872)
Fargo & Belknap grocery, dry goods and books and stationary, 332 S. Lafayette (1869)
E. Rutan & Co., hardware and stoves, 400 S. Lafayette (1874)
Stevens Hardware, 117 S. Lafayette (1890s)
James Miller clothing, 225 S. Lafayette (1874)
George Faber, boots, shoes, and rubber goods, 307 S. Lafayette (1885)

One of Greenville’s leading early commercial institutions was the Jacobson’s dry-goods establishment founded by David Jacobson in 1873. Jacobson, a Polish Jew born in 1850, came to the United States in 1866 and made his way to Detroit and then to Greenville (*Headlight Flashes*). A brief notice in the 9/11/1884 *Independent* stated that Jacobson had been in business in Greenville over thirteen years; thus he must have moved here by at least 1871. The store gave its founding date as August 1873 (*Greater Greenville*). Advertisements in 1877 list a Jacobson & Clegman dry-goods, fancy goods, and millinery store, but in 1879 Jacobson and Jacob Netzorg established Jacobson & Netzorg, the “New York Store” (*Independent*, 5/17/1877 and 4/17/1879). Prior to the fire of March 31, 1887, that destroyed the row of buildings where 310-20 S. Lafayette now stand, the J & N store occupied the Potter Block, 301 S. Lafayette, for a time, but in the wake of the fire they occupied a double storefront building at 312-16 S. Lafayette in January 1888. In 1893 Jacobson & Netzorg dissolved their partnership. Jacobson kept the old store, while Netzorg

moved back into the Potter Block (*Independent*, 10/11/1893; 1/17 and 3/21/1894). By the early 1900s Jacobson's, calling itself "The Big Store," expanded into the adjoining buildings, ultimately occupying 310-18 S. Lafayette. By 1912 David Jacobson had dropped out and Joseph J. and Henry S. Jacobson, probably David's son and grandson, ran the business. Henry Jacobson closed the store in April 1921 and moved to Detroit (*Independent*, 3/30 and 3/31/1921). The former Jacobson Block at 312-16 and the other buildings that also housed the business still stand, but were re-faced c. 1960-61 so that nothing of their historic appearance is now visible.

Another building that housed several commercial enterprises of special historic significance to Greenville is the Rutan Block at 400-404 S. Lafayette. It was built for Manning Rutan, who arrived in Greenville in 1851 the owner of lands that included much of the site of the future town. Rutan platted the area that included the part of the business district on the east side of Lafayette Street in 1853 and, establishing one of the first stores, became a successful merchant. Rutan had this building constructed in 1873-74 on a part of the former public square deeded back to him when the city abandoned it. It initially housed the E. Rutan & Co. hardware and stove business in which his son, Eugene, was a partner.

For a period in the early twentieth century the building housed Francis O. Lindquist's Canada Mills Company. The company, established by Lindquist about 1906, sold suits, coats, and other clothing by mail order under the "The Man from Michigan" label, the building serving as the company's original headquarters, factory, and shipping point for merchandise and also containing a large retail store (*Greater Greenville*). Lindquist, who reportedly began his career in clothing as a clerk at the Star Clothing Company in Grand Rapids, parlayed his success into a term in the U. S. Congress in 1913-14 (*Independent*, 4/16/1913). In 1915 the growing business moved to Grand Rapids, but the Rutan Block continued to house a store. Two other clothing manufacturers followed Canada Mills in using the building during the 1920s. From 1927 until 1990 the building housed another long-term and large-scale business, the Greenville Furniture Company (Elsie McNeil notes).

The business district continued to expand in the number and variety of stores in the early years of the twentieth century as the city itself grew with the city and area's industrial and agricultural development. In addition to a growing number of stores of the standard types already present for decades such as groceries and drug, dry-goods, clothing and millinery, shoe, furniture, and jewelry stores, the downtown area also attracted new businesses such as music stores and fruit and candy stores. Restaurants, smoke shops, and billiard parlors also assumed more of a presence in the central part of the business district in the early twentieth century than previously.

In addition to locally owned stores, the early twentieth century saw the coming of the first chain stores. The grocery chains seem to have been the first, with an A & P store in operation in the 1920s at 202 S. Lafayette and at 135 S. Lafayette between 1930 (*Daily News*, 11/25/1939) and 1937. A & P opened one of the community's first two super markets in 1937 at 101-103 S. Lafayette (a Meijer super market on N. Lafayette north of the district opened a few days before A & P). Kroger's had their store at 318 S. Lafayette from the late 1920s to about 1936 and then occupied 135 S. Lafayette until moving to the then new Carter Building at 309-11 in 1947. In the late 1920s Fidelity Stores ran a short-lived department store at 332 S. Lafayette, perhaps the first non-grocery chain store in Greenville. In 1930 McLellan's Variety and the J. C. Penney Co. opened side-by-side large stores at 310-12 and 314-16 S. Lafayette, respectively, that served as mainstays of the business district until the late twentieth century. The Gambles department store, Western Auto, and Ben Franklin Stores also opened stores on Lafayette in the 1930s or early 1940s.

[Banks form one aspect of Commerce, but providing a separate discussion makes sense for business districts that contain several historic bank buildings.]

Banks

Banks formed a part of Greenville's commercial life beginning in the 1860s. The first bank established was the Charles J. Church & Co. private bank, founded in 1861. Greenville's banks, like banks everywhere, took up highly visible quarters in some of the city's most substantial buildings, generally sited overlooking key intersections in the business district. M. H. Norton &

Co., another of these early private banks, is one example. The Norton & Ecker Block, at the northwest corner of Lafayette and Cass, was built with the bank's requirements in mind, and M. H. Norton occupied the corner storefront when that building was constructed in 1874.

The First National Bank, organized in 1872, occupied quarters in the Eureka Block when that building, Greenville's largest, with five storefronts extending northward from Washington on Lafayette's west side, was completed in 1873. In 1884 the bank moved into quarters designed for them in the new Grabill Block at Lafayette and Cass's northeast corner, opposite the old M. H. Norton & Co. location in the Norton & Ecker Block. The same Grabill Block quarters were later occupied by the C. J. Church & Co. Bank and its successor, the Greenville State Bank, until 1914. Established around 1895, the State Bank (renamed the First State Bank of Greenville in 1914) bought the Rider & Potter Block, 301 S. Lafayette, in 1913 and occupied it as their quarters – in more recent years under the Old Kent and then Fifth/Third names – from 1914 until 2002, expanding into 303-305 S. Lafayette in 1951 and into 307 S. Lafayette in 1974.

The small terra-cotta-clad building at 127 S. Lafayette is another old bank, constructed in 1930 to house the Greenville National Bank, and the present large Huntington Banks building at 203-209 S. Lafayette, constructed in 1984, incorporates another, the former Backus Block, built in 1902 to house the then newly established Commercial State Savings Bank (*Independent*, 2/23, 5/7, and 9/10/1902).

[The offices of various types that tended to occupy upstairs spaces in business buildings formed a historically significant aspect of most business districts' activity that merits discussion as part of the district's significance. The discussion of offices seems to fit best under the general category of Commerce despite the fact that the offices often housed a broad variety of professionals, including medical practitioners.]

Offices

The professional directories published in the weekly newspaper and occasional newspaper notices show that various attorneys, real estate and insurance agents, doctors and dentists, and other professionals had their offices in downtown Greenville in the later nineteenth and early twentieth centuries and generally occupied the upper stories of commercial buildings. The few who paid for listings and who received mention in the paper were likely among the leading firms and may represent the tip of a much larger "iceberg" of professionals. For example, Ellsworth & Lewis, attorneys, and Crane Bros., insurance agents, occupied office space in the second story of the Rider & Potter (Potter) Block at 301 S. Lafayette early in 1871 when that building was completed. This must have been some of the most exclusive office space in the city then. Less than four years later, when the Norton & Ecker Block was built directly across Cass Street from their current quarters, Ellsworth & Lewis with another attorney, Dexter T. Sapp, moved into new quarters in that building's second story designed especially for them (*Independent*, 1/24/1871; 8/12, and 11/4/1874). In May 1873 the E. H. Jones & Co. real estate and abstract office was about to move into the nearly finished Eureka Block (*Independent*, 5/7/1873). In late 1884 the newly completed Grabill Block contained second-floor offices for Dr. C. M. Martin and Hall & Gracey, insurance agents, and in late 1906 the newly finished Kemp & Gilmour Block contained offices for C. L. and C. B. Rarden, attorneys, and Dr. M. G. Hillman, dentist, and Dr. F. J. Fralich (*Independent*, 11/13/1884, 12/5/1906).

Unlike most of the city's professional people at the time, realtor and insurance agent F. A. Gleason built his own building. In 1913, following a fire, Gleason built the one-story building at 110 S. Lafayette that now forms the north end of the Huckleberry's restaurant and bar. Gleason, most atypically, had a ground-floor office (*Independent*, 3/5, 5/28, and 9/10/1913).

"Professional Row"

The early 1950s saw the development of the block of West Cass Street between Lafayette and Franklin as "Professional Row." The *Daily News* of June 10, 1950, coined that term in response to the growing concentration of doctors and dentists establishing offices there. In an earlier day most doctors and dentists may have practiced out of their homes. At least there is little evidence

that any of them had downtown offices.

In the early twentieth century the house at 118 West Cass served as the residence of dentist Dr. W. L. Rarden and attorney C. L. Rarden. Dr. Rarden built the small concrete block building next door east of the house at 116 West Cass to serve as his dentist office in 1913 and was still in practice there into the 1930s. Dr. Harold B. Juhlin, an osteopathic physician, had his office in the former house at 120 West Cass by 1949.

During 1950 the street underwent the building boom that led to the *Daily News'* "Professional Row" sobriquet. First to build was Dr. D. O. Ostrander, a dentist, who occupied his small building at 124 West Cass – minus the thatched "Danish" roof added later – in August 1950. Dr. Karl Smith's plans for building next door to the east at 122 were announced in April 1950 at the same time as Dr. Ostrander's. His building housed his and dentist Dr. Earl H. Faber's offices. Construction of Dr. N. P. Sorensen's large building across the street at 117 West Cass also began in the spring of 1950. Above first-floor commercial space, the new building housed his suite along with two other offices (*Daily News*, 4/29, 5/13, 6/10, and 8/12/1950).

[Hotels were key features of the commercial life of business districts. Discussions of hotels should focus on buildings still standing, but need to provide some basic historical background on earlier hotel buildings to make clear how the ones now standing relate in their functions and locations to older ones.]

Hotels

Hotels were an important institution in a growing community such as Greenville. Visitors and other transients, prospective and new residents, and salesmen and other businesspeople constantly arriving in town needed places to stay. The hotels contained dining rooms that served visitors and locals as well. In addition, some of the hotels had meeting rooms or ballrooms that served as gathering places for dances and other entertainments and meetings. Greenville's first hotel, built by Morton Shearer shortly after his arrival in 1848, was Shearer's Hotel, later known as the Exchange Hotel and then as Keith's Exchange. This three-story wooden Greek Revival building, with its gable-front and side-gable sections, was located on Lafayette's west side in mid-block between Washington and Cass. Destroyed by fire in 1887, it was replaced on the same site with a large brick building known as the Phelps Hotel that, in turn, burned in 1982. Another hotel, the Sanders (later the Central) Hotel, stood on Lafayette's east side on the site of the Rasmussen Building by 1869.

The lone survivor of downtown Greenville's hotels is the Winter Inn. Located at the northeast corner of Lafayette and Montcalm, the hotel stands on the site of older hotels dating back to 1850 that included two successive Rossman House hotels, the especially short-lived Merritt House, built in 1868-69 and burned in 1870 (*Independent*, 9/15/1868, 5/11/1869, 3/15/1870), and the Webster House (renamed the Northern Hotel, presumably for its location on the north side of the business district, in its last days). The Northern suffered a devastating fire in March 1900. Thomas B. Winter had the Winter Inn built on the site in 1901-02 and expanded it with a rear wing – containing "sample rooms" for salesmen and a hall for meetings and dances – in 1902-03. Damaged by fire in the late 1970s, the building was restored to something close to its original appearance and continues in business today.

[Most business districts have some auto-related commercial buildings, sometimes including gas stations as well, dating from the district's period of significance.]

Garages/Car Dealerships

The August 28, 1901, *Independent*, in noticing R. J. Tower's new automobile, stated that it was the first "owned in Greenville." By the 1910s autos were becoming common sights on Greenville's streets, and substantial service garages and auto dealership buildings, mostly located at the edges of the downtown, were becoming a part of the downtown scene in Greenville as they were across the country. Of the six garage/dealership buildings in the district, Kemp's Garage, 406-08 S. Lafayette, is the oldest, having been built in 1912. The garage did repair work and

also housed E. A. Kemp & Son, dealers as of 1913 for Ford, Cadillac, Buick, Studebaker, and Oakland (*Independent*, 4/2/1913). By 1922 the building became Sharpe's Garage, a service/repair garage (advertisement, *Independent*, 11/1/1922). Like most of these buildings that have been so modernized over the years that only the basic roof form and remnants of concrete block side or rear facades remain visible, Kemp's was much renovated in 1961 to become the Greenville Furniture Company's Warehouse Furniture Outlet and nothing original can now be seen from the front (*Daily News*, 5/25/1961).

Most of these buildings were located at the downtown's north and south edges, but Oscar A. Rasmussen, a long-time, highly successful Ford and later Chevrolet dealer, built his building in a highly visible location in the very center of town. Replacing the old Central Hotel in 1917, his broad-fronted Rasmussen Building, 128-32 S. Lafayette, housed his garage, office, and showroom in the ground story's north end until the early 1930s (there was a smaller commercial space at the building's south end).

Rasmussen remained in business as a new and used car dealer longer than anyone else among the early dealers. In the early 1940s his dealership operated out of a garage at 410 S. Lafayette that he may have had built during the 1930s. In 1945 he built a new garage/dealership building at 105-107 S. Lafayette. It housed his O. A. Rasmussen Chevrolet-Cadillac Sales and Service until about 1954 and later was occupied by Bill Berger Chevrolet.

[For many if not most business districts the post World War II era was an important period of developmental activity following the wartime hiatus. This sample discusses the continuity of old businesses within the district down into and through the post-war period, the continuation and expansion of chain businesses in the business district in the early years after the war, and the beginnings of fundamental changes in retailing that affected the business district.]

The Post-World War II Years

The end of the war years brought new prosperity to Greenville. Locally owned businesses continued to form a major component of the downtown business scene. Many of the downtown commercial buildings during the late 1940s, 50s, 60s, and 70s housed long-established Greenville stores or successions of businesses of the same types, such as hardwares or drug stores. The following are buildings within the district that housed a single business or a succession of businesses of the same type for at least fifty years:

- 100 S. Lafayette: Drug stores, beginning with Van Deirse's in 1903, occupied the building until 1970.
- 106-08 S. Lafayette: Grocery stores from 1884 until the early 1940s.
- 124 S. Lafayette: Hardware stores from at least 1908 to c. 1990.
- 218 S. Lafayette: Clothing from before 1900 to the 1990s.
- 226 S. Lafayette: *Greenville Independent* newspaper, 1884 to 1949.
- 300 S. Lafayette: Slawson & Co., Zank's Pharmacy, and other drug stores from completion of building down to 1980s (drug stores at this site almost all the time between 1852 and 1887).
- 328 S. Lafayette: Paint stores from early 1930s to 1990s.
- 400-404 S. Lafayette: Greenville Furniture from 1927 to 1990.
- 117 S. Lafayette: Hardware stores from 1890s to 1974.
- 131 S. Lafayette: Barber shop probably beginning before 1884 to present.
- 201 S. Lafayette: Reno's Bar since 1957.
- 221 S. Lafayette: Drug stores, 1870-1960s.
- 225 S. Lafayette: Drug stores, late 1880s to 1974.
- 301 S. Lafayette: First State Bank, 1914-2002.

The late 1940s saw a building boom in the downtown similar to those experienced in many Michigan towns and elsewhere across the nation as wartime controls on the economy and building materials were lifted and peacetime production resumed. The 1945 Rasmussen Building, 105-07 S. Lafayette, 1947-48 Carter Building, 309-11 S. Lafayette, and the 1948-49 Jimos Brothers Building at 123-25 S. Lafayette were the first post-war commercial buildings constructed. Owned

and built by local building contractor Harold Carter, the Carter Building initially had as its primary tenant the Kroger grocery formerly located in a much smaller store at 318 S. Lafayette. Greenville restaurant proprietors Gust and George Jimos had the Jimos Brothers Building built to house Gambles Department Store, which, like Kroger's, was looking for more space.

Most of the downtown's new building seems to have been done at the behest of the non-local chain stores, which began mounting aggressive expansion programs in the late 1940s and 50s. During the early post-war period national chains often continued their early twentieth-century practice of locating new stores along major streets in downtown areas. The building of the new Gambles store in 1949 and the 1954-55 W. T. Grant department store at 322-26 S. Lafayette reflect that pattern. McLellan's and J. C. Penney had been fixtures of the downtown since 1930, located side by side at 310-12 and 314-16 S. Lafayette. In 1950 both companies invested heavily in completely remodeling their stores at these locations, McLellan's expanding following a fire that destroyed their previous quarters at the same location.

In March 1951 a fire in the Carter Building, built only a few years earlier, destroyed the Kroger's grocery. Carter began reconstruction of his building almost immediately, but, rather than reopen with a conventional downtown store at that location, Kroger located a larger site off Lafayette Street at the corner of Grove and Franklin and built a "super-market" with adjacent large parking lot for customers. Offering features that would soon become standard in supermarket planning such as "automatic opening electronic doors," shopping carts with seats for children, a drug counter, and "Speedy Check-Out Stands," the new store opened in January 1953 (*Daily News*, 1/23 and 1/26/1953). (Meijer, the hometown grocery chain, founded in Greenville, smugly took out a full-page advertisement offering "Our Sincere Congratulations" to the Kroger Company "of Cincinnati, Ohio" (*Daily News*, 1/26/1953)).

The Commercial District Today

Even in the early post-World War II period when Kroger's built its new store, much of the new commercial development was taking place around the city's edges, particularly along West Washington. This evolution took place slowly, but new commercial construction in the downtown since the 1960s has been confined to bank buildings – the First Savings & Loan of Saginaw (now Comerica) Bank office at 101 N. Lafayette in 1972 and the Huntington Banks building, a combination of remodeled old building and new construction, at 203-09 S. Lafayette built in 1984. Today's business climate is very different from what it was in the 1970s, when most of the community's leading stores were still located downtown. The downtown today seems to be the home mostly of single-storefront locally owned businesses.

[In addition to historic themes such as Commerce that all historic business districts reflect, some districts will also have buildings that illustrate distinctive, locally important historic themes – for Greenville its Danish ethnic heritage that is reflected in a number of the downtown buildings.]

Ethnic Heritage – Danish

During the 1970s downtown Greenville buildings began to sprout stucco and half-timber "Danish" affectations made of cheap materials. What was done to these buildings in the name of Danishness should be an embarrassment to all true Danes and all who value the Danish heritage. Downtown Greenville wears its true Danish heritage in the many buildings that were built by members of the Danish community or that housed businesses owned by them and in the Danish Brotherhood Hall that stands a block off Lafayette Street within the district.

Downtown Greenville's first businessman of Danish heritage may have been Lars Hansen, who in partnership with D. S. Moore ran Hansen & Co., a dry-goods, groceries, and provisions store, in 1867. Late in 1867 Moore took over the business when Hansen went back to Denmark. He returned in May 1868 with a large party of immigrants and soon resumed running the store (*Independent*, 12/3/1867, 5/12 and 6/2/1868). A few months later Hansen sold a half-interest in the business to N. E. Stoughton, and it became Hansen & Stoughton. The store was located in a no longer standing building owned by Hansen along with Myron Ryder. An 1870 "Sketch of Greenville" by C. C. Ellsworth then listed the store as one of the leading dry-goods shops out of

the ten or twelve in Greenville and termed Hansen a “young man, but a few years from Denmark” (*Independent*, 4/5/1870). The still standing Partlow Block, 210 S. Lafayette, housed Lars Hansen’s grocery and flour and feed store when it was completed in late 1874. The newspaper referred to the business as Hansen & Partlow, “family groceries,” a few months later (*Independent*, 11/4/1874, 2/4/1875).

Two large landmark commercial buildings built by members of the Danish community in downtown Greenville are the Hansen and Rasmussen Buildings that face one another across Lafayette Street. Both were built in 1917. The Hansen Block, 131-35 S. Lafayette, was built for Dr. John R. Hansen, whose residence and doctor’s office was upstairs. Dr. Hansen reportedly officiated at the births of a great many Greenville babies over several decades. The building contained income-producing commercial space downstairs.

The Rasmussen Block, 128-32 S. Lafayette, was the property of Oscar A. Rasmussen. A newcomer to Greenville itself when the building went up, O. A. Rasmussen had the strongest of connections to the area’s Danish settlement, being one of six sons of August Rasmussen, who, one of the founders of the settlement, arrived in 1856. Reportedly a “natural salesman” with a knack for closing the deal, Rasmussen was highly successful both in real estate and as a new and used automobile dealer (Flat River Historical Society, p. 123). His new building in downtown Greenville housed his Ford agency and showroom and garage as well as a furniture and undertaking establishment that leased the first floor’s south end. Rasmussen initially sold Ford products but switched to Dodge and Oakland and then to Buick by 1926. This building housed his business until the early 1930s.

Three other buildings in downtown Greenville are also associated with Oscar Rasmussen. By 1940 Rasmussen was a Chevrolet dealer, and the garage building at 410 S. Lafayette housed his dealership during the early 1940s. He built the building at 105-107 S. Lafayette in 1945 to replace it. His Oscar A Rasmussen Chevrolet-Cadillac Sales remained in business there until about 1954. Rasmussen had previously built the building next door to the north at 101-103 S. Lafayette in 1937 as income property. In part it initially housed the A & P supermarket.

Another long-term Greenville “Danish” commercial institution was Christiansen’s Reliable Hardware at 124-26 S. Lafayette. The hardware store was established as the W. J. Fowler & Co. Hardware around 1900 in no. 124 and expanded into 126 by 1932. Harry and Anna Christiansen purchased the business in 1939 and ran it until 1984 (Flat River Historical Society, pp. 52-53; Elsie McNeil notes).

Other buildings in the district that housed businesses owned by members of the Danish community for significant periods of time include:

- 104 S. Lafayette: H. Peter Hansen’s Copenhagen or Hansen’s Grocery, 1910s to 1930s.
- 106 S. Lafayette: D. P. Madsen and H. J. Rasmussen groceries, early 1900s and later 1920s.
- 116 S. Lafayette: Frank Hansen restaurant, 1940s; Hansen’s Music House, late 1940s to present.
- 111 S. Lafayette: H. C. Hansen barber shop, 1910s to c. 1936.
- 115 S. Lafayette: Clifford Carlsen’s Carlsen’s Wallpaper & Paint, early 1940s to c. 1966.
- 129 S. Lafayette: Senius Neilsen, tailor and cleaners (and residence), early 1920s to later 1940s.

Greenville Lodge No. 70 of the Danish Brotherhood (Det Dankse Brodersomfund) was established in 1893. Founded in 1882, the Danish Brotherhood in America had as its goal the unification of all Danes in America to perpetuate the memory of the homeland. Like similar organizations representing other nationalities, the Brotherhood also provided a program of insurance against death, sickness, and disability administered through its lodges. By 1889 the Brotherhood comprised thirty-four lodges, and by 1907 there were 255 lodges with 17,173 members. A Danish Sisterhood in America, which Nielsen describes as largely an auxiliary, was founded in 1893 (Nielsen, 173-75).

Greenville’s Danish Brotherhood lodge held dances – they seemed to specialize in masquerade dances – often at the Coliseum, located where the present Danish Brotherhood Hall is located.

The building was owned by the local Grange after 1908, but in 1917, when the Grange built a new building, the Danish Brotherhood bought it (10/25/1916, 2/14/1917).

The Danish Brotherhood held their meetings there, but also continued to rent the building out for entertainments, most often dances. One special occasion was a showing of two "moving pictures," "A Trip to Denmark and Schleswig" and "A Nation in Celebration," to celebrate the reunion of south Schleswig – taken from Denmark by the Prussians in 1864 – with Denmark the previous year (the 1921 calendar of the national Danish Brotherhood featured "1864-1920, Denmark and Slesvig Reunited," illustrated with a photograph showing King Christian X crossing the border between Denmark and Schleswig July 10, 1920). The Coliseum burned down in the late 1920s and the Danish Brotherhood replaced it on the same site with the present hall in 1930 (*Daily News*, 7/9/1930). The building, as it has been since its construction, is used by both the Danish Brotherhood and Danish Sisterhood.

Since 1965 the city of Greenville has hosted an annual Danish Festival. Perhaps because of its growing awareness of the historical importance of the area's Danish community, the city soon began to encourage businesses to build and modernize using a "Danish" theme. The result was an infestation during the 1970s of renovations in mostly cheap materials that cheat residents and visitors alike of the full experience of Greenville's outstanding downtown architecture with its Danish historical associations.

In resounding contrast to the visual poverty of most of the "Danish" renovations is the c. 1990 transformation of two small and very ordinary 1950 medical office buildings into a visually stunning expression of Danishness. When Dr. Kirkwood Faber, D.D.S., after long years' service on the Danish Festival Committee, decided to renovate his combined building, he felt constrained to follow the Danish theme. Instead of the usual stucco-and-half-timber-look plywood storefront job, however, Dr. Kirkwood redesigned his building with roofs modeled after what he saw in picture books, a red tile roof over one part modeled after the ubiquitous red tile roofs of Copenhagen and other large and small Danish towns and the thatched roofs still evident in the countryside. His extraordinary building stands on a busy side street directly across the street from the post office. One such building may be enough for Greenville, but Dr. Faber's is a worthy homage to the city's and region's Danish heritage.

[An important part of a business district's historic significance is the social and entertainment-recreation activity its buildings housed during the period of significance. The sample discusses the many meeting halls various buildings contained in their upper stories and their uses by fraternal and social organizations and for social, musical, and other events – focusing on the still-standing buildings that housed these organizations and activities. It also discusses the local movie theater history enough to place the surviving local representations of that history in context.]

Social History/Entertainment and Recreation

The pages of the *Greenville Independent* make it clear that Greenville's brick blocks contained numerous meeting halls in their upper stories and that these spaces housed a surprisingly rich variety of social, cultural, entertainment, and other activities and events throughout the later nineteenth and early twentieth-century years. Most of the three-story blocks had meeting halls in their third stories and a few of the two-story ones, as well, had upstairs halls. Building owners included these halls in their buildings as income-producing investments.

Some of the halls were rented out to fraternal or other organizations and became the exclusive meeting places of those organizations for the duration of their leases. Fraternal and social organizations formed an important component of the community's early social life. Greenville's earliest fraternal organization was its Masonic lodge, organized in 1857. The Odd Fellows (IOOF) established a lodge in 1865, the Knights of Pythias (K of P) about 1873, the Grange in 1874, the Grand Army of the Republic (GAR) and Woman's Relief Corps (WRC) by the early 1880s, and the Danish Brotherhood in 1893.

Other halls were built with the expectation of using them for events. In the latter case the building owner or a lessee would hold events that would generate revenue from the admissions.

Eureka Hall, in the third floor of the now-demolished Eureka Block, for example, was a leading event venue in the first years after its completion in early July 1873. Among the many events held there was Civil War general Judson Kilpatrick's program on "Sherman's March to the Sea" in March 1874; a performance of the Peak Family, "vocalists, harpists, and Swiss bell ringers," a few weeks later; a Free Love lecture by Victoria Woodhull in February 1875; and a band concert in May 1879 (*Independent*, 6/11/1873, 3/18 and 4/1/1874, 2/18/1875, and 5/1/1879). The Eureka Block's public hall seems to have had a longer life as a place for events and entertainment than most of these halls, serving as the community's leading events place until the opening of the Phelps Opera House on West Cass in the mid-1880s superseded it. Others, as public event and meeting places, seem to have had remarkably short lives before being converted to other uses or becoming lodge halls.

The district's brick blocks contained at least the following meeting halls:

- Hall, 3rd floor, Fargo & Belknap Block, 332 S. Lafayette. Served as Masonic temple from early 1870 probably until 1890 (*Independent*, 1/11/1870, 5/1/1890).
- Hall, 3rd floor, Shearer Block, probably 204 S. Lafayette. Used as Knights of Pythias lodge hall c. 1873-75 before moving to the Potter Block (*Independent*, 4/1/1875).
- Rider's Hall (soon renamed Potter's Hall), 3rd floor, Rider & Potter Block, 301 S. Lafayette. Described as having dimensions of 100 x 33 feet, with a 17 foot ceiling, and with a platform and 500 seats available. Frederick Douglas spoke there in January 1872, and various "hops" are noted. Soon superseded by Eureka Hall, it served as the Knights of Pythias hall from 1875 to 1890 and then became the Masonic temple (*Independent*, 8/2/1871, 1/3/1872, 12/31/1873, 12/9/1874, 4/1/1875, 2/6 and 5/1/1890).
- Grange Hall, 3rd floor, Rutan Block's south half, 404 S. Lafayette. The Montcalm and Eureka Grange occupied this hall upon the building's completion in 1874. By 1884 they had moved to 330 (*Independent*, 5/6/1874).
- Hall, 2nd floor, Partlow Block, 210 S. Lafayette. This hall was being used for services by the Christian Church shortly after the building's 1874 completion (*Independent*, 12/9/1874). The 1884 Sanborn lists the hall as vacant.
- Norton Hall, 3rd floor, Norton & Ecker Block, 225-27 S. Lafayette. Rented by the Good Templars upon the building's completion early in 1875 (*Independent*, 3/18/1875).
- Grange Hall, 3rd floor, Fargo & Belknap Block, 330 S. Lafayette. The 1884 Sanborn indicates the third floor at 330 was being used as the Grange Hall, with the third floor of 332 serving as the Masonic temple.
- GAR Hall, 2nd floor, Fargo & Belknap Block, 330-32 S. Lafayette. The GAR and WRC occupied rooms in the building's 2nd story, with a lodge hall across the front, beginning in 1890 (*Independent*, 2/6, 2/27, and 3/6/1890).

The local Grange seems to have been the first Greenville lodge to own its hall. In 1908 they bought a building, located where the Danish Brotherhood Hall is now, and made it into the Coliseum, a meeting place also used for dances and other entertainments. In 1916-17 the Grange built a new hall building that still stands at 117 E. Montcalm. The Coliseum then became the first hall owned by the Danish Brotherhood.

The Knights of Pythias also looked toward moving out of rented quarters into a building of their own during the 1910s. In 1913 the *Independent* reported apparently firmed-up plans for a new building, with the temple on the third floor and stores and offices beneath. The site seems to have been then vacant ground between 117 and 127 S. Lafayette. Funds were to be raised through the sale of stock, with much of the money supposedly in-hand. Despite this rosy report, this plan came to naught (*Independent*, 6/11/1913). In 1927 the Knights were able to purchase the Walker & Clough Block, 102-04 S. Lafayette, and converted the building's second and third stories into their lodge quarters.

The Masons established their lodge hall in the upstairs of the Callaghan (Church/Callaghan & Miller) Block, 113-15 S. Lafayette, during the middle or late 1910s. In 1920, during a period of rapid growth, the Masons bought the building (*Independent*, 12/8/1920). It still serves as their meeting place.

In addition to the halls in the various commercial blocks, several of Greenville's downtown hotels also offered ballrooms that saw use for dances, dinners, parties, and other events. The one surviving historic hotel, the 1901-02 Winter Inn, had a hall in its rear wing, added in 1902-03. It opened with a dance February 20, 1903 (*Independent*, 9/17/1902, 2/18/1903).

The leading venue for events in late nineteenth and early twentieth-century Greenville was Phelps Opera House, located on the south side of West Cass Street just west of the Potter Block. Established by T. I. Phelps, whose livery stable had previously occupied the same site, the large frame building opened in the mid-1880s and hosted serious and comic musical and dramatic performances and other events into the 1910s.

Roller skating was another popular form of entertainment – if not a craze – across the nation in the 1880s. In Greenville the Princess Skating Rink was built during the period between 1884 and 1887 at the northeast corner of Montcalm and Franklin. Newspaper advertisements for events suggest that it was designed to function both as a skating rink and as a performance space. The same building seems to have gone through a rapid evolution in the coming years, serving both as a recreational place and for other purposes. The 1892 Sanborn map shows it as a “fruit evaporator (closed)” while in late 1894 a new lessee, Percy D. Edsall, made it into the “Academy of Music” (*Independent*, 10/24/1894). The 1900 Sanborn map shows it as housing the Greenville Planter Company, but in 1908 the local Grange bought it to use for their meetings and for events. The name it acquired, the Coliseum, stuck with it when the Danish Brotherhood bought the building from the Grange in 1917 when they built their new Grange Hall on East Montcalm Street (*Independent*, 2/14/1917). During the Grange and Danish Brotherhood eras the building saw continued recreational use, for dances, roller skating (including masquerade skating parties), and other events until the large building burned in 1928. They built the present Danish Brotherhood Hall on the site in 1930.

A new form of entertainment, motion pictures, came on the scene at the beginning of the twentieth century. Greenville's first “vaudettes,” small movie theaters, appeared about 1907. The Marguerite (soon renamed the Lyric) was in operation in the Potter Block in 1907, and another, the Ideal, in the Slawson Block by the next year (*Independent*, 5/1/1907; 2/12 and 3/4/1908). The old Phelps Opera House also became a movie house, the Silver Family Theatre, by 1916. In 1920 and again probably in the late 1930s the old building with its iron-sheathed wood exterior was modernized (*Independent*, 3/3 and 5/19/1920). By the 1940s it was encased in a concrete block Art Deco facade. While the Silver Theater has been demolished, the Potter and Slawson Blocks that contained Greenville's first movie theaters still stand.

In addition to musical and theatrical shows that were an ongoing feature of the cultural/entertainment life of towns like Greenville that were located along railroad lines and were large enough to drum up a paying audience, exhibits of curiosities hawked from town to town sometimes found their way to Greenville's main street. One such was the “Cardiff Giant,” a reputed petrified human of larger-than-life dimensions “found” buried on a farm near Cardiff, New York, in 1869. Although the true facts regarding its surreptitious carving and burial emerged before 1869 was over, the figure went on tour for years afterwards. A famous hoax, it survives and is now on permanent display at the New York State Historical Association in Cooperstown, New York. Previously on display in Ionia and Grand Rapids, the Cardiff Giant was brought to Greenville in mid-December 1875. “The Cardiff Giant is on exhibition in the Brothers building, and many people visit it daily, finding it a curiosity well worthy of their attention. School children will be admitted on Saturday for 5 cents each” (*Independent*, 12/9 and 12/16/1875). Presumably the figure was displayed in a vacant storefront on the ground floor of the building, located at 306-08 S. Lafayette.

Churches

The outer edges of the business district became the sites of most of Greenville's churches in the nineteenth century. By the 1870s and 80s central Greenville contained Congregational, Methodist, Baptist, Episcopal, Adventist, and Catholic churches. Greenville's churches tended to locate one block off Lafayette to either side, and the city's three oldest church buildings stand within the district.

The oldest standing church building was constructed in 1855-56 by the Congregationalists and originally stood on the site of the present First Congregational Church building at the northwest corner of Cass and Clay streets one block east of Lafayette. Early in 1874, when the Congregationalists were planning a new church, they sold this building to the Episcopalians, who occupied it as their church from February until August. Whatever the reasons – the suddenly harsh economic times probably played a role – the Congregationalists had to drop their building plans, and the Episcopalians turned the building back to them. In 1879, when the Congregationalists were finally able to build, they moved their old church – the present St. Paul’s – across the street to the current site. When the present 1879-80 Congregational church was built, the older building became St. Paul’s Episcopal Church a second time. With renovations to give it a more “churchly” interior, it remains in use today.

Another standing church building located two blocks west, at W. Cass and Franklin’s northeast corner, also once served as St. Paul’s. Following the August 1874 abandonment of the former Congregational church building, the Episcopalians raised funds and, in the fall of 1874, built this small and simple chapel, opened probably in January 1875. Like the former Congregational church, this building also served only a short time as an Episcopal church. The building was sold and the parish for a time became dormant. From around 1880 until the late 1980s the building served as the Seventh Day Adventist church.

[Architecture will be a key historic theme for most historic business districts, and the architectural significance has to be defined separate from any discussion of the buildings’ importance under Commerce or other themes for the nomination to be able to justify checking national register Criterion C. The sample begins with its own short summary paragraph that informs the reader what the section is going to discuss. It begins with the churches and post office to both give them their due and also to clear the decks for discussing the commercial buildings: while the churches and post office are important in architectural terms, they are not the main story – the commercial buildings are! The Architecture theme should be a narrative that builds a case for architectural significance by discussing the buildings in groups for the most part chronologically and based on styles. It should discuss individual buildings to the degree necessary to explain significance in terms of the broader architectural patterns of the district.]

Architecture

The Greenville Downtown Historic District is notable in architectural terms for its commercial buildings, churches, the post office building, and one house. The district contains commercial buildings that, dating from 1869 to the 1950s and early 1960s, exhibit a stylishness and diversity in design and materials that seem unusual for what was still a small city.

Greenville’s three surviving nineteenth-century church buildings all stand within the district. The present First Congregational Church is a highly polished and intact auditorium church in the Gothic Revival designed by an important Michigan architect, Elijah E. Myers, who planned five state capitols, numerous Midwestern county courthouses, and fine churches and other buildings in Michigan. The former Congregational church building, serving as St. Paul’s Episcopal Church for all but about twenty-five years of its 150 years, dates back to Greenville’s pioneer years. Combining vestigial Greek Revival features, such as the square belfry and square piers supporting the tower, with pointed-arch windows and a steeply sloping roof suggestive of the Gothic Revival, it reflects a pragmatic, non-doctrinaire approach to church design that, characteristic of the times for non-liturgical Protestant churches, adopted Gothic as a “Christian” style but within a budget. The 1874 Episcopal/Adventist church was originally similar to the present St. Paul’s, but without the tower and belfry. It is clad in synthetic siding and the Gothic side windows now have square heads. Something better should be done.

The Greenville Post Office building, constructed in 1938-39, is a fine example of the solid and substantial post office buildings the government was building in great numbers across the nation during the 1930s. The building follows one of a number of standard designs the post office was using at the time for new buildings in smaller cities such as Greenville. Its reserved exterior exemplifies a simplified Art Deco-influenced classicism that in relation to post offices of this period

has been called "Starved-Classicism," in which ornament is eliminated or reduced to a minimum to reduce costs and speed construction. Notwithstanding the less than flattering term, Greenville's building, like most others of its type, is an ornament to its street.

Greenville's commercial architecture exemplifies a broad variety of architectural styles and features characteristic of the later nineteenth and early and mid-twentieth centuries in Michigan's small-city commercial districts. The downtown's oldest buildings are brick Italianate blocks built in the 1869-75 period.

Italianate as an architectural style for commercial buildings harkens back to the city palazzos of Renaissance Italy built in the fifteenth to seventeenth centuries with their connotations of power, security, and prosperity. Tastemakers in Britain and the Continent began to see Italianate as an alternative to the prevalent architectural vocabularies of Roman and Greek classicism and the Gothic Revival and as a particularly appropriate style for certain types of buildings, including banks and commercial buildings that represented capital and sought to look solid and substantial. The first of these Italianate commercial buildings began to appear in the United States in the 1840s.

Greenville's Italianate commercial buildings, broadly speaking, are similar to Italianate commercial buildings throughout southern Michigan and beyond. They are narrow-fronted along Lafayette, usually a single storefront – generally twenty to twenty-four feet – in width, although there are a number of double-storefront buildings, and deep. They have load-bearing brick exterior walls and timber structural systems, although there may be some use of iron interior support columns.

The exteriors display typically Italianate decorative features such as bracketed cornices, corbelled brickwork detailing below the frieze, and round-arch, segmental-arch, and rounded-corner windows with boldly projecting caps. By the time Greenville's Italianate commercial buildings were being built in the 1869-75 period, iron was becoming an increasingly popular material for cornices in place of wood, presumably because of fire concerns, and almost all of the downtown Greenville Italianate buildings' cornices appear to be of that material. The upper facades' decorative window caps are also of fire-resistant materials, brick, iron, and, less commonly, cut stone. Many if not most of these buildings had iron storefront columns supporting the upper facades, but of them all only the ones in 400-404 S. Lafayette have survived successive modernizations.

The Greenville district contains fifteen Italianate commercial buildings, six of them double storefronts and one a triple-storefront building. They are:

102-04 S. Lafayette. Walker & Clough Block, 1873
106-08 S. Lafayette. Edwards Block, 1875
124 S. Lafayette. Rich Block, 1870
200-02 S. Lafayette. Shearer Block, 1869-70
204 S. Lafayette. Shearer Block, 1870-71
210 S. Lafayette. Partlow Block, 1874
304 S. Lafayette. Stevens Block, 1873
306-08 S. Lafayette. Brothers Block, 1869-70
328-32 S. Lafayette. Post Office Block, 1869, 1871-72
400-04 S. Lafayette. Rutan Block, 1873-74
213 S. Lafayette. Pre-1884
215-17 S. Lafayette. Cole & Bennett/Briggs & Gibbs Block, 1872-73
223 S. Lafayette. Lawton Block, 1873
225-27 S. Lafayette. Norton & Ecker Block, 1874
301 S. Lafayette. Rider & Potter Block, 1870

These buildings possess a collective importance in illustrating Italianate commercial architecture, in all its broad variety of materials and decorative features, in one west Michigan town. Six of the buildings retain original cornices (some buildings had brickwork detailing along the roofline and no wood or iron cornices), with only two of the surviving cornices alike. The Rider & Potter Block,

one of the first of the brick Italianate blocks to be built, is the only one having a wooden cornice. It displays large paired brackets, detailed with sawn appliqué on the sides of the brackets, and smaller modillion-like brackets between the widely separated pairs and below the broadly overhanging eaves. The same variety is present in the buildings' window cap designs. Several buildings have brick caps in rows that conform to the arch of the window heads. In the Post Office Block, Rider & Potter Block, and a few other buildings, the caps are formed of two or three rows of slightly raised headers placed upright within the rows, with "triangles" or rectangles of corbelled brick forming the impost on either side of the window from which the arched cap springs.

The 1884 Grabill and 1886 Gault Block at 226 and 126 S. Lafayette form parts of the next, Late Victorian generation of commercial blocks in downtown Greenville dating from the 1880s to the very early 1900s. By the mid-1880s Italianate was passing out of favor in the face of other more recent design influences across the nation, and, while decorative iron cornices and window caps were still commonly used, new buildings were less likely to display specifically Italianate features. In these newer buildings the boldly projecting, elaborately decorative cornices tended to be much reduced in depth and, often, simplified in detail, often with fewer brackets and those more widely spaced. The windows tended to be square-headed in form rather than round or segmental-arch-headed. The Gault Block façade harkens back to Italianate in its segmental-arch windows and bracketed cornice but the façade playfully turns the tables aesthetically with a rock-face rather than "finished" facade treatment and smooth-slab window caps rather than the typical boldly projecting ones found in Italianate buildings. The Grabill Block's front window caps and the Gault Block's modillion-like cornice brackets display incised detailing of plant forms that seem to be derived from English Aesthetic Movement sources such as Christopher Dresser designs.

The Grabill Block's owner, Elliott C. Grabill, retained Ionia contractors Allen & Van Tassel to build his new building (*Independent*, 5/22/1884). Van Tassel was previously associated with G. W. Badger in another Ionia building firm, Badger & Van Tassel. The March 9, 1882, *Ionia Sentinel* reported that Badger "has completed the drawings of a handsome new front" for the building at 340 W. Main in Ionia. Badger & Van Tassel soon received the contract for renovation of the building, which included the new front (*Sentinel*, 3/23/1882).

Allen was Claire Allen, practicing as an architect in Jackson by about 1890 and later a leading figure in the profession in southern Michigan. Allen & Van Tassel were the contractors for the Ionia County Courthouse in Ionia, built in 1883-85, and for the Lenawee County Courthouse, begun in April 1884 (the firm withdrew from this project in October 1884, reportedly leaving \$7000 in unpaid debts – *Adrian Times & Expositor*, 10/21/1884, 9/30/1885). Could Allen & Van Tassel have designed Grabill's building? Unfortunately little research (beyond that on 340 W. Main) has been done on building activities at the time in Ionia's business district, where Allen & Van Tassel might have done substantial work, and nothing else is known about their careers prior to 1883.

The Harris Block, 222 S. Lafayette, exemplifies another architectural mode of the 1880s sometimes called "Panel Brick." This is characterized by the extensive use of raised and corbelled brickwork and panels of decorative brickwork such as the sawtooth brickwork between the second and third-story windows. With its intricate brickwork, highly sculptural pedestals crowning the projecting upper ends of the piers, paneled frieze, and rock-face stone window trim, the Harris is a particularly fine example of the Panel Brick mode. The Callaghan Building, 113-15 S. Lafayette, displays some of the same Panel Brick features.

From the later 1880s into the very early twentieth century buildings often reflected the influence of what came to be called Richardsonian Romanesque. This was a stylistic vocabulary inspired by the work of architect H. H. Richardson during the 1870s and early 80s. Richardson's trademark massive masonry buildings inspired a generation of American buildings displaying large, broad, round-arch "Romanesque" windows, rock-face stonework, and decorative work such as clusters of diminutive Romanesque colonettes and pine cone finials atop piers and the ends of cornices. No. 224 S. Lafayette, with its triple round-arch windows, gabled treatment, tall colonettes, finials, and "checkerboard" parapet – the district's foremost example – is a remarkable architectural achievement for a single-storefront wide façade in a town the size of Greenville. The Winter Inn

and no. 305 S. Lafayette also both show the influence of Richardsonian Romanesque in the rock-face stone beltcourses that form such visually important components of their facades.

Perhaps the most innovative Late Victorian facades along Greenville's main street are those of the 1887 Slawson Block and 1890 E. B. Edwards Block, 300-302 and 216 S. Lafayette, respectively. These buildings' upper facades display wonderfully intricate detailing in beltcourses at window sill, meeting rail, and head level; the window caps (and arches over the Slawson's middle windows above the two storefronts); and in the piers that frame the facades. What is especially noteworthy about these upper facades is that they are faced in what was called at the time "artificial stone" – *i.e.* concrete block. Concrete block as a building material was beginning to come into greater use for ornamental details such as window caps by the 1880s, but its use for entire facades at this early date was all but unknown.

The Slawson Block was the first of a number of downtown Greenville buildings constructed during 1887 that used artificial stone in their facades. Its upper façade on the Lafayette side was faced in it, and the artificial stone treatment extended a short distance around the corner facing East Cass, the rest of the Cass façade being finished in locally made brick. In addition to the Slawson Block, the row of new buildings at 210-224 S. Lafayette built in the wake of the March 31, 1887, fire was also faced in artificial stone, and the brick façade of the Phelps Hotel, replacing another building burned at the same time, also used artificial stone trim pieces. The *Independent* on June 9, 1887, reported that, "Mr. Stevens of Lansing will move his plant here for the manufacture of the sills, belts, caps, flints [plinths?], coping and front pieces for the new hotel." A month later, the July 14 edition noted that, "The artificial stone in Phelps' new hotel and in the wall of Geo. Slawson's new building are made in Greenville" – presumably by Stevens.

The row or block of stores at 210-24 S. Lafayette was by far Greenville's largest artificial stone project. Although separately owned, the buildings were given a uniform façade. The newspaper reported that excavation for the new block began about the beginning of June and that a contract to build the stores was let to H. G. Wright & Co. early in July (*Independent*, 6/2 and 7/7/1887). In the completed block, each building's facade was capped by a low metal pent roof and had a slightly projecting center section capped by a finial-topped metal gable treatment. The third store from the north, Jacobson & Netzorg's double store, displayed a broader projecting center section with taller gable than the rest, two buildings to the north and four to the south. This block with its picturesque gabled roofline must have been a prominent landmark in the business district. The two buildings at the south end of the row have been demolished and replaced with a lower building and the rest of the row was refaced c. 1960-61, so that all that remains visible today are the vermiculated piers at ground level flanking the second-story entry between 312 and 314.

The 210-224 facades are gone except for the one detail, but the single-storefront building at 216 S. Lafayette, built in 1890, is virtually identical in overall design and detailing to the row's single-storefront buildings. It and the Slawson Block are highly important architectural landmarks both for their Late Victorian design and their construction with "artificial stone" facades at this early date.

No. 129 S. Lafayette, built probably c.1907, is one of the most fanciful of these Late Victorian blocks. Unlike the more typical turn-of-the-century commercial buildings that present simplified classical detailing to the street, this is light-heartedly Gothic, with a pointed arch of bi-chromatic stonework – whitish limestone voussoirs alternating with brown sandstone ones – over the storefront entry and stylized Tudor hoods atop the square-head second-story windows. Corbelled brickwork in the frieze and bracketed metal storefront and façade cornices, the latter with pinecone finials at the ends, add to the decorative interest.

One of downtown Greenville's largest early twentieth-century buildings, the broad-fronted Hansen Building at 135 S. Lafayette, and a few smaller ones, including the single-storefront building at 122 S. Lafayette, are fine examples of a characteristic architectural "style" of the early twentieth-century in Michigan's downtowns known as "Commercial Brick." Commercial Brick seems to be an outgrowth of the Arts-and-Crafts movement. It is an architecture in which the patterns formed by the brickwork provide the styling, with few or no references to historic architectural

styles such as Georgian, Neoclassical, or Gothic. Horizontal bands or rectangular panels formed by bricks placed on edge and bands of bricks on edge outlining window areas – all of these often accented with blocks of stone, terra cotta, or concrete placed at the corners or other prominent locations – are fundamental features. The Hansen Building’s façade is typically Commercial Brick in its banks of upright stretcher bricks punctuated by decorative blocks, and displays a modicum of historicism in the classical swag-decorated plaque below its stepped parapet.

Built at the same time as the Hansen Block, the 1917 Rasmussen Building, 128-32 S. Lafayette, contrasts strongly with that building in its no-nonsense lack of detailing. It seems a precursor to the district’s post World War II commercial architecture in the austere simplicity of its broad paving brick front with its large windows forming an almost continuous band across the facade. This building is one of the prime landmarks of Greenville’s Danish heritage, but the plaque that bore the Rasmussen name has been replaced or covered over. The building’s appearance would be much improved by restoring both the Rasmussen name plaque and the building’s cornice.

The district contains nine commercial buildings dating from the early post World War II era from 1945 to the early 1960s, and many additional older buildings were also renovated with new storefronts then. In addition, the rebuilding of the upper facades of the row of buildings at 310-20 S. Lafayette, dramatically changing those buildings’ appearance from elaborately detailed Late Victorian to a single broad, streamlined façade similar to that seen at suburban malls, also took place in this time period, c. 1960-61. Thus these years appear to represent an important era in the downtown’s development.

Five of the nine buildings built in the 1945-62 period have subsequently had their facades so significantly renovated that they no longer can be viewed as contributing to the district’s historic character, and some of the buildings modernized during those years have also been renovated again since then leaving little or nothing behind of the 1945-62 work. The most visually interesting and best preserved commercial buildings of the period in downtown Greenville are the 1948-49 Jimos Bros. Building, 123-25 S. Lafayette, with its orange brick upper façade that pays only understated deference to modernism, and the 1950 Sorenson Building, 117 W. Cass, a straightforward two-story example of the International Style with bare white cinder block walls and black and white structural glass tile accents in the first-floor storefront.

TEXTNOTES/FOOTNOTES/ENDNOTES

The Significance statement will likely require citing information sources. Textnotes (in parentheses at the end of a sentence or paragraph), footnotes at the bottom of each page, or endnotes at the end of the section are all acceptable formats if used consistently throughout.

When to use notes to cite sources:

- Direct quotes – these always require notes.
- General historical background on the community that comes from widely available published sources such as local and county histories – a note is generally not necessary since such sources of information will be cited in the general bibliography.
- General historical background that comes from a source not readily available such as a manuscript local history only available in a local repository – a note is appropriate.
- Historical information on specific buildings or other features of the district included in the Significance statement – notes are essential, except for information from general sources such as old maps and city directories that were used to provide information for all buildings.

BIBLIOGRAPHY

The bibliography lists the sources used in preparing the nomination. Bibliographic entries must be:

- Complete – including the name(s) of authors, the full title of the source (including the part following the colon!), volume number, and publication information, including publisher’s name, place of publication, and date.
- In a consistent standard format such as the *Chicago Manual of Style*.

For newspapers, cite the articles/tidbits relating to specific buildings in the inventory entries (see the sample inventory entries) – these need not appear in the general bibliography as well. The general bibliography should cite all the articles used in preparing the nomination’s significance statement. Where the subject matter is not made clear by the headline, it is appropriate to add a brief explanation (see the third to fifth items). Listing a newspaper with only a broad date range (*Iron Mountain News*, 1930-65) is **Not Acceptable!**

Sample:

Iron Mountain News, Iron Mountain, MI

1/12/1933: “County Relief Problem Reaches Severe Stage.”
5/14/1948: “Widening of New Highway in Progress.”
6/7/1948: “Building a New Town,” editorial.
1/28/1949: “Well-Known Architect Died in Menominee,” about Derrick Hubert.
8/16/1949: “City to Join in Protest to Railroad,” proposed passenger service abandonment.
7/1/1950: “County Lost 11 Per Cent of Population in Last Ten Years.”

For a photographic collection, list who has it or where housed.
For one-of-a-kind materials, always list the location where found.

BOUNDARY DESCRIPTION

The national register requires a written description of the district boundaries. The boundary description must carefully and fully define the boundaries of the nominated area. Descriptions may reference tax parcel numbers or properties identified by street addresses. The sample language below uses abbreviations typically seen in tax assessor records: cr for corner, pt for point, sd for said, and th for thence.

Sample:

For the Niles Downtown Historic District:

Beginning at center pt of intersection of 2nd and Main Sts; th S in center of 2nd to pt in line with S line of 111 N 2nd; th E along S line of sd 111 N 2nd to W line of 209 E Cedar; th S on W line of sd 209 E Cedar to center of E Cedar St; th E in center line of Cedar to center of N 3rd St; th N in center of sd N 3rd to pt in line with S line of 109 N 3rd; th E along S line and N along E line of sd 109 N 3rd to center of alley; th E in center line of alley behind (S of) 322 E Main to center of N 4th St; th S in center line of S 4th to pt in line with S line of 103-105 N 4th/403 E Cedar; th E along sd S line to SE cr of sd 103-105 N 4th/40s E. Cedar; th N along sd E line and E line of 111 N 4th to center of alley S of Four Flags Hotel property; th E along center line of sd alley to center of N 5th; th N along center line of N 5th to center line of E Main St; th W along center line of E Main to center of N 4th; th N along center line of N 4th to S line of 217-29 N 4th/214 N 5th; th E along S line of 217-29 N 4th/214 N 5th to center of N 5th St; th N along center line of N 5th to center of Sycamore St; th W along center line of Sycamore to pt in line with E line of 305 N 3rd; th N and W along E and N lines of 305 N 3rd to center of N 3rd St; th S along center line of N 3rd to center of alley between Main and Sycamore Sts; th W along center line of alley W to center of N 2nd; th N along center line of N 2nd to center of Sycamore St; th W along center line of Sycamore W to E line of 35 Sycamore; th N, W and S along E, N and W lines of 35 Sycamore and in same S’y direction across Sycamore and along W line of 34 Sycamore to SW cr of 34 Sycamore property; th E along S line of 34 Sycamore and 220-222 Front to center of Front St; th S along center of Front to center of E Main St; th E along center line of E Main; th E along center line of E Main to center of N 2nd St, the POB.

BOUNDARY JUSTIFICATIONS

The boundaries selected for national register districts must be appropriate in terms of the national register criteria. SHPO staff will work with your community at the outset of the project to ensure that the boundaries selected for the district meet national register standards. The nomination must

contain a clear-cut written justification for the precise boundaries selected that explains why adjoining areas were not included. Below is a sample boundary justification for a business district:

Niles Downtown Historic District

Boundaries have been drawn to include the contiguous historic core of the downtown while omitting parking lots, vacant land where buildings once stood, and areas containing modern buildings that surround the historic core area. To the district's immediate north along and north of Sycamore Street are several city parking lots, vacant land north of Sycamore to the west of N. 2nd Street, and a much remodeled 1940s building north of Sycamore between N. 4th and 5th. East of 5th Street lies vacant land, a small modern strip shopping center, and, south of Main, the Chapin House (Niles City Hall) – individually listed in the national register – which marks the east edge of the historic downtown area. To the district's immediate south are parking lots and vacant land where buildings once stood. South of Cedar Street stands the remnant of old residential areas containing a church building and houses along with some modern commercial development. To the district's immediate southwest and west stand the shopping center resulting from the 1970s urban renewal project [this was discussed in the nomination's significance statement], city parking lots, and a small modern park area.

NOMINATION PHOTOGRAPHS AND CD-Rs

The building-by-building inventory images do not become part of the formal nomination materials sent on to the National Register. They will serve as a permanent record in your community and at SHPO of the properties in the district at the time the nomination was done. The register does require a set of photographic prints for views that together illustrate the character and historical and architectural high points of the district. These views will be primarily streetscape views – such as the sample ones below – but may include some building-specific views of buildings the nomination identifies as key in terms of historic and/or architectural significance. Generally two-thirds to three-quarters of the views should be streetscapes. The streetscapes must provide coverage from all parts of the district and depict as much as possible the broad range of historic resources present in the district in terms of historic functions (stores, banks, etc.), scale (large and small buildings), exterior materials, and architectural styles. Consult with the SHPO's national register coordinator concerning the total number of views needed to adequately illustrate your district.





The *National Register Photo Policy Factsheet* lists the specific standards that must be met for photographs and CDs submitted to the register. The register requires one set of prints and a CD-R containing color images in TIF format. Follow the TIF file naming protocol set forth in the *Photo Policy Factsheet*.

In addition to these register requirements, the SHPO requires the following:

- A second set of prints for our copy of the nomination. The SHPO prefers the nomination photographs be in 5 X 7" format.
- A second CD containing a PowerPoint slide show of the images (for use in the presentation to the State Historic Preservation Review Board). If you are using the 2010 version of PowerPoint, there is an option, when you insert a "photo album," to size the photos to fit the slide. If you do that, it doesn't matter what size the photos are. If you are going to insert the images into the presentation individually, the size of a PowerPoint slide is 10" x 7.5". As long as those are the dimensions, the dpi doesn't matter. Avoid using anything higher than 300 dpi as the final PowerPoint file size will become excessive.

The nomination must include a list of the nomination photos that states the photographer(s) name(s) and date(s) when photos were shot and identifies the views by photo numbers and by image file name from the CD-R that forms a part of the formal nomination submission. This information can be entered on the prints themselves, as set forth in the *Photo Policy Factsheet*, but the Word template of

the registration form also provides a place for this information near the end of the form. The photograph list should follow the format in the sample below:

Name of Property: Niles Downtown Historic District
City or Vicinity: Niles
County: Berrien **State:** MI
Photographer: R. O. Christensen
Date Photographed: June 2005
Description of Photograph(s) and number:

- 1 of 16: West end of 100 Block of Main looking NW (101 at left)
MI_Berrien_Niles Downtown HD_0001.tif
- 2 of 16: 100 Block of Main N side looking NW (Newman Building at right)
MI_Berrien_Niles Downtown HD_0002.tif
- 3 of 16: 200 Block of Main N side looking NE (201 at left)
MI_Berrien_Niles Downtown HD_0003.tif
- 4 of 16: 200 Block of Main N side looking NW (Masonic Temple at right)
MI_Berrien_Niles Downtown HD_0004.tif
- 5 of 16: West end 300 Block of Main N side looking NE (Blackmond's, 301, at left, Burns-Kerr Building at right)
MI_Berrien_Niles Downtown HD_0005.tif
- 6 of 16: 305-307 E. Main looking N (1945 Morris Ketchum, Jr., storefront on left)
MI_Berrien_Niles Downtown HD_0006.tif
- 7 of 16: Carnegie Library, Main and 4th, from SE
MI_Berrien_Niles Downtown HD_0007.tif
- 8 of 16: 200 Block of Main S side looking SW (226-28 at left)
MI_Berrien_Niles Downtown HD_0008.tif
- 9 of 16: Former Post Office, 322 Main, from N
MI_Berrien_Niles Downtown HD_0009.tif
- 10 of 16: Four Flags Hotel, W façade on 4th, from SW
MI_Berrien_Niles Downtown HD_0010.tif
- 11 of 16: Four Flags Hotel (right) and Ready Theater (left)
MI_Berrien_Niles Downtown HD_0011.tif
- 12 of 16: Plym House (center), 416 E. Sycamore, and side of Star Building from NE
MI_Berrien_Niles Downtown HD_0012.tif
- 13 of 16: 200 Block of Front W side from NE
MI_Berrien_Niles Downtown HD_0013.tif
- 14 of 16: 200 Block of 2nd E side from NW
MI_Berrien_Niles Downtown HD_0014.tif
- 15 of 16: General Garage (center), 109 N. 3rd, and 113 and 115 (to left) from SW
MI_Berrien_Niles Downtown HD_0015.tif
- 16 of 16: Star Building, 217-25 N. 4th, from SW
MI_Berrien_Niles Downtown HD_0016.tif

Dates embedded in images and prints: Neither the national register nor the SHPO will accept images or prints with dates embedded in them.

MAPS

Two forms of maps are required.

USGS Maps

All nominations submitted to the national register must include an original United States Geological Survey (USGS) topographical map indicating the location of the nominated property and listing its UTM coordinates. It is the applicant's responsibility to provide **one full-size original paper map, 1:24000 scale, for the quadrangle or quadrangles containing the property included in the**

district. USGS maps can be ordered directly from the U. S. Geological Survey through their USGS Store at <http://store.usgs.gov/> or through a number of stores and agencies throughout Michigan. For Michigan locations, visit the USGS Store site listed above and access the USGS Business Partner website. The State Historic Preservation Office will label the map if you prefer. **All labeling must be done in pencil.**

District Maps

National register nominations for historic districts require a district map or set of maps as part of the nomination materials. The map(s) must show the locations of all historic and non-historic features of the district. If more than one map is required to cover the entire district, a key map should illustrate the entire district and its boundaries.

Maps must clearly show all features listed in the description statement's inventory list plus other important features described in the nomination, but not listed in the inventory, such as roads and natural features such as rivers and ponds. All features must be identified. If space is limited, features should be numbered or lettered and keyed to an identification list in the margin of the map or on an attached sheet.

Information District Maps Must Provide

- District name
- Name of community, county, and state
- Date of the map
- Significant natural features such as lakes and rivers, with names
- All streets, railroad lines, old railroad grades, and any other transportation rights of way, labeled in bold print with their names
- Lot or property lines
- Outlines or representations for all surveyed properties. The district map should show both the lot lines and the outlines of the buildings. For business districts containing buildings that occupy most of their lots, the maps must show the building outlines. Monuments and other objects may be represented by circles or dots.
- Patterned or shaded coding of footprints or representations of all buildings to indicate whether they are contributing or non-contributing to the district's historic character and significance. The outlines or representations of contributing resources should read darker than for non-contributing resources.
- For districts, street addresses for all properties listed in the description's inventory section; if the properties have numbered street addresses, no other form of identification may appear on the map.
- Boundary of the territory encompassed by the district.
- Key identifying any symbols used, including a representation for the boundary
- North directional arrow
- Scale bar (in case map is copied in larger or smaller format)

Map Standards

Do not use color coding. Photocopying in black and white will render color coding unreadable.

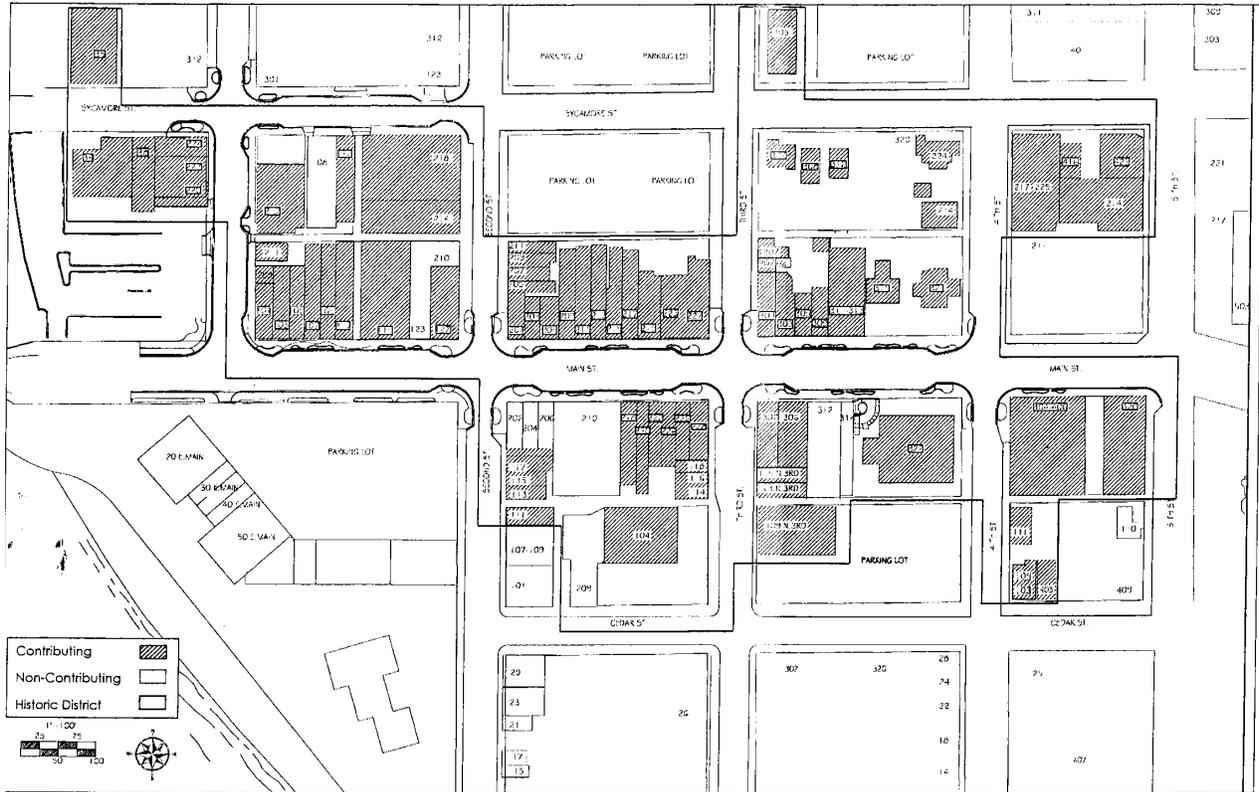
The final copies of maps must be printed on white paper meeting the national register's standards for archival stability – 20 pound acid-free paper with a two percent alkaline reserve. Two **original** copies must be provided of all maps. Tape, staples, and adhesive labels may not be used. Maps should be in 8 1/2" X 11" format, if possible. Map sheets larger than 11" X 17" are not acceptable.

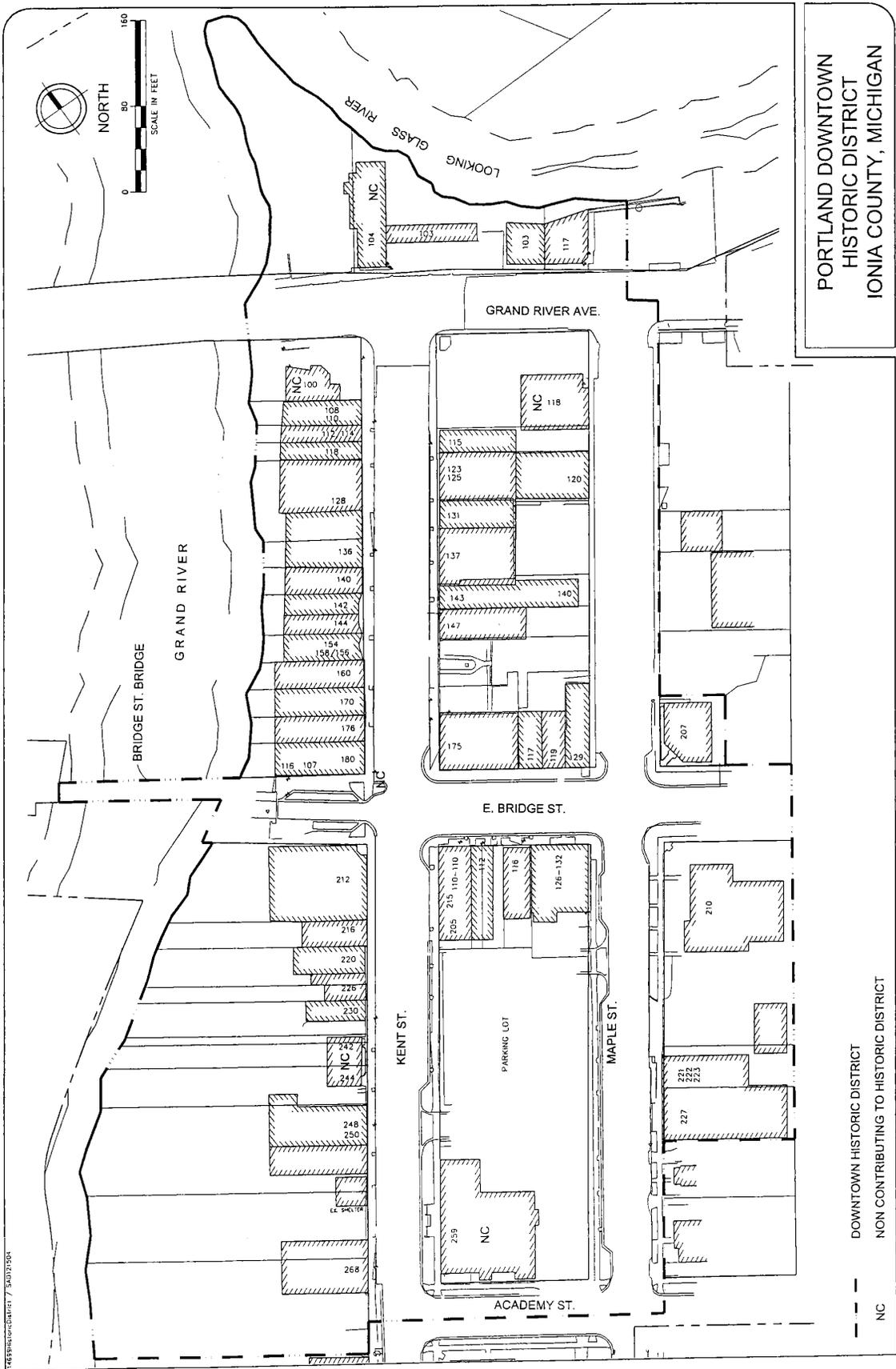
Aerial maps are **NOT ACCEPTABLE** as base maps for district maps because the clutter of detail makes the required information very hard to read and because the edges of natural features such as rivers and ponds do not show clearly.

Sample District Maps

The Niles and Portland maps are two of the best examples of sample downtown district maps. Both come close to, but do not fully meet, the above specs. The Niles map does not show property lines and omits a representation of the boundary line in the key. The Portland map lacks a date. Its use of "NC" for non-contributing buildings works fine in this district, where the few non-contributing buildings are large enough for the NC to fit within the building outlines, but this would not work well for a district with narrow-width non-contributing buildings.

Niles Downtown Historic District
City of Niles, Berrien County, Michigan – March 1, 2007





PORTLAND DOWNTOWN
HISTORIC DISTRICT
IONIA COUNTY, MICHIGAN

— DOWNTOWN HISTORIC DISTRICT
- - - NON CONTRIBUTING TO HISTORIC DISTRICT

34312789

NOTIFICATION LIST

As part of the formal national register nomination process, the SHPO will need to provide written notice to the owners of all private and public property within the district boundary, including vacant lots and parking lots. The letters are prepared and sent out one to two months prior to the review board meeting at which the nomination is presented. **As part of the nomination project, you will need to provide a list of all properties with their owners and mailing addresses for SHPO to use in preparing the notification letters.**

The list will include all properties and parcels organized in street and house number, with each address followed by the name and mailing address of the owner. Provide the list in Microsoft Excel (so we can generate the letters efficiently) using the following categories: First Name, Last Name, Professional Title, Company or Organization, Address 1, Address 2, City, State, Zip Code. For public, institutional, or company/corporate-owned properties, list the name and title of the appropriate official to be notified. The list should be prepared just before it is needed by SHPO to ensure that owner information is as up-to-date as possible.

A FINAL POINT: STORING THE RESULTS FOR THE FUTURE

In reviewing this instruction manual, you will see that a lot of work is required. By the time the project is completed you will have made an enormous effort in terms of time and perhaps money. You will have uncovered a mass of historical information about the business district that was probably not known beforehand. You will have developed substantial data in the form of written material, maps, and photographs and color images. Following the instructions in this guide will provide you with a historical resource that should be useful for years to come. At the most basic level, it will provide historical background information for property owners, public officials, or members of the public who are interested in history. But the information can also be used to provide historical background on buildings for property owners to use in seeking federal income tax credits in connection with the rehabilitation of National Register of Historic Places-listed income-producing properties. In the future there may again be some form of state tax credit program for historic properties for which this information will be useful. Even if the property owners and community are not interested now in creating a local historic district for the business district, they may become interested in the future for one reason or another. Carrying out the nomination project will provide both historical background and detailed photographs of buildings as they existed at a specific time that will greatly reduce the time and costs involved in completing the documentation necessary for establishing the district under state law. The historical data may also be useful for highlighting the business district's history or the history of individual historic buildings for heritage tourism promotional activities including such things as walking tour brochure and website development and historical markers. Who knows what other uses for the information may come along?

My point is that you will have created a valuable resource of historical information about the business district that should be carefully housed in local repositories so it is still available in the future. The planning for the project should include planning for what will be done with the results – for keeping them in the public domain rather than in someone's house or a back corner of city hall where new people who know nothing about the project and the investment of time and money it represents will decide what happens to them! The State Historic Preservation Office will require a full set of the products to enable it to review and comment on the work as it is done and to forward the nomination to the national register. But having a full copy of the project's products as part of a permanent library – if there is such a thing – in the local government's office that has charge of planning and/or economic development activities seems a good idea. Housing a copy there **and** in the reference or local history section of the local library is also good. Having full sets in both of those places **and** in some regional repository such as a nearby university library or archives is even better. Develop a plan for housing the results as part of the work plan for the project.

GRANT MANUAL APPENDIX K

Civil Rights Manual For The Historic Preservation Fund Program In Michigan

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This publication has been financed with federal funds from the National Park Service, Department of the Interior. However, the contents and opinions do not necessarily reflect the views and policies of the Department of the Interior. This program receives federal financial assistance for identification and protection of historic properties. Under Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973 and the Age Discrimination Act of 1975, as amended, the U.S. Department of the Interior prohibits discrimination on the basis of race, color, national origin, age or handicap in its federally assisted programs. If you believe you have been discriminated against in any program, activity, or facility as described above, or if you desire further information, please write to:

Office for Equal Opportunity
National Park Service
P.O. Box 37127
Washington, D.C. 20013-7127

CIVIL RIGHTS REQUIREMENTS

Introduction

These procedures are issued under the authority of Title VI of the 1964 federal Civil Rights Act, and the State of Michigan Executive Directive 1979-4. It is the policy of the State of Michigan to afford all Michigan citizens full and equal employment benefits provided by federal- and state-supported programs and services, without discrimination based upon race, color, creed, religion, national origin, age, sex or handicap.

It is appropriate that the State of Michigan, in fulfilling that policy, assure compliance with the non-discrimination provisions of state and federal laws whenever grant funds are awarded and used. It is further appropriate that the state not enter into any contract or agreement, not fund or serve as a conduit for funding, for programs which may have the effect of creating or perpetuating patterns of discriminatory practice.

All recipients of state grants and federal grants passing through the Michigan State Housing Development Authority are therefore required to file a statement pledging that there is a reasonable representation of minority group individuals and women in all levels of their work forces and that there exists equal opportunity to participate in and enjoy the benefits of all programs and activities without regard to race, color, religion, national origin, age, sex or handicap.

Subgrantees receiving sums of \$25,000 or more or employing twenty-five persons or more will also be required to complete a written Equal Employment Opportunity Plan.

Enclosed are instructions for completion of the Civil Rights forms that must accompany an application for a Historic Preservation grant.

If it is determined at any time that an applicant is not in compliance with the equal opportunity standards established by law, the application will be rejected or the grant agreement terminated.

Definitions (As used in this document:)

| | |
|--------------------------------------|--|
| Subgrantee: | Any public or private agency, organization or contractor, to whom state or federal funding is extended through the Michigan State Housing Development Authority. |
| Contractor: | All contractors, vendors, subcontractor, and suppliers providing goods or services directly or indirectly to a subgrantee. |
| Minority persons: | American Indians or Alaskan Natives: Persons having origins in any of the original peoples of North America, and who maintain cultural identification through tribal affiliation or community recognition; Asian or Pacific Islanders: Persons having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands, and Samoa; Blacks: Persons having origin in any of the black racial groups of Africa; Hispanics: Persons of Mexican, Puerto Rican, Cuban, Central or South American or other Spanish culture or origin, regardless of race. |
| White persons: | Persons having origins in any of the original peoples of Europe, North Africa, or the Middle East. |
| Program, activity or service: | Any function conducted by any unit of the subgrantee or contractor receiving funds through the Michigan State Housing Development Authority. |
| Population base: | The relevant population for the area from which the work force is drawn (e.g., county, municipality, or geographic area). |

Handicap:

A determinable physical or mental characteristic of an individual or the history of the characteristic which may result from disease, injury, congenital condition of birth or functional disorder which characteristically is unrelated to the individual's ability to perform the duties of a particular job or position, or is unrelated to the individual's qualifications for employment or promotion, or is unrelated to the individual's ability to utilize and benefit from a program. Qualified handicap includes a handicapped person who, with reasonable accommodation, can perform the essential functions of the job in question.

What Must Be Submitted With The Application

- 1. Recipients employing fewer than twenty-five (25) employees and receiving less than \$25,000 are required to submit the following reports to the Michigan State Housing Development Authority with the application:**
 - The Work Force Status Report (Appendix II)
 - The Affirmation of Equal Opportunity (Appendix III)
- 2. Recipients employing twenty-five (25) or more persons or receiving \$25,000 or more are required to submit the following reports with the application:**
 - The Work Force Status Report (Appendix II)
 - The Affirmation of Equal Opportunity (Appendix III)
 - Work Force Analysis (Appendix IV)
 - An Equal Employment Opportunity Plan (Appendix V)
- 3. Additional Responsibilities**

A subgrantee's responsibilities include requiring its contractors to file a Work Force Status Report and an affirmation of Equal Opportunity.
- 4. Alternative Compliance**

A subgrantee who has obtained a current Certificate of Awardability from the Michigan Department of Civil Rights (MDCR) may fulfill the minority and female reporting requirements of these procedures by submitting a copy of the Certificate to the SHPO, Michigan State Housing Development Authority.
- 5. Preservation of Records**

Each subgrantee/contractor is required to keep employment and other records used in preparation of the above reports for not less than six months beyond the end date of the grant agreement and to permit access to records by the SHPO of the Michigan State Housing Development Authority, MDCR, or the Office of Equal Opportunity to ascertain compliance with Executive Directive 1979-4 and Title VI of the Civil Rights Act.
- 6. Reporting Requirements**

Failure to file timely, complete and accurate documents as described above constitutes presumptive noncompliance with the obligations of recipients under Executive Order 1979-4 and Title VI of the 1964 Civil Rights Act and may be a basis for the imposition of sanctions authorized under Executive Directive 1979-4 and Title VI of the 1964 Rights Act.

Equal Opportunity In The Provision Of Services, Activities And Programs**1. Prohibited Discriminatory Actions**

No person in the State of Michigan shall, on the grounds of race, color, religion, national origin, age, sex or handicap, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any contract, program or activity funded in whole or in part with funds made available through any state agency. Prohibited discriminatory actions include, but are not limited to, the following:

- Deny any service or other benefit provided.
- Provide any service or other benefit to a minority, female or handicapped person that is different, or is provided in a different form, from that provided to the majority, unless

such action is necessary to provide qualified handicapped persons with benefits or services provided to others.

- Treat a minority, female or handicapped individual differently from others in determining whether the person satisfies any admission, enrollment, eligibility, membership, or other requirement that persons must meet in order to provide any service or other benefit.
- Deny any person an equal opportunity to participate as an appointed member of a planning or advisory body involved in administering state or federal funds.

2. Site Selection

Each subgrantee/contractor shall, make selections of site and location of facilities that are available to all individuals without regard to race, color, religion, national origin, age, sex or handicap.

3. Imbalance in Services

Each subgrantee/contractor shall take action to improve any imbalance in services or facilities provided to any geographic area or specific group in order to overcome the effects of prior discriminatory practice.

Equal Opportunity In Employment

1. General

In any program or activity funded in whole or in part with public funds, each subgrantee/contractor shall not directly or indirectly subject any individual to unlawful discrimination on the basis of race, religion, color, national origin, age, sex or handicap in its employment practices. These practices include recruitment, recruitment advertising, hiring, lay-off, termination, up-grading, demotion, transfer, rates of pay or other forms of compensation, use of facilities, and all other terms and conditions of employment.

2. Employment Selection Procedures

MDCR, in carrying out its responsibilities under the Michigan Constitution and Act No. 453 of the Public Acts of 1976, has adopted and promulgated the Guidelines on Employee Selection Procedures as published by the U.S. Equal Employment Opportunity Commission (EEOC), to assist in establishing and maintaining equal employment opportunities. Among other things, these guidelines forbid the use of employee selection practices (e.g., tests, minimum educational levels, experience) which disqualify a disproportionate number of minorities or women for employment and which are not related to job performance.

3. Sex Discrimination

MDCR has adopted and promulgated guidelines on sex discrimination as published by EEOC. Among special requirements relating to equal opportunity for women are:

- There shall be no distinction based upon sex in employment opportunities, wages, hours, the granting of fringe benefits, leave, mandatory or optional retirement age, and other terms and conditions of employment.
- Medically verifiable disabilities caused or contributed to by pregnancy, miscarriage, therapeutic abortion, childbirth, and recovery shall be treated as temporary disabilities under any health or temporary disability insurance policy or sick leave plan. Written and unwritten employment policies and practices involving matters such as the commencement and duration of leave, the availability of extensions, the accrual of seniority and other benefits, reinstatement, and payment under any health or temporary disability insurance policies or sick leave plans, shall be applied to pregnancy disability or childbirth in the same way as they are applied to other temporary disabilities.
- Advertisements for employment in newspapers and other media must not express a sex preference. The placement of an advertisement in columns "male" or "female" is considered to be a discriminatory limitation.
- Nothing in these procedures shall prohibit the hiring of employees of one sex, provided sex is an established bona fide occupational qualification, as provided under section 208 of Act No. 453 of 1976. A bona fide occupational qualification will be interpreted narrowly. The assumption that women are not aggressive or that co-workers or

customers prefer one sex or the other does not establish a bona fide occupational qualification.

4. Religious Discrimination

MDCR has adopted and promulgated guidelines on religious discrimination, requiring in part that employers make "reasonable" accommodations to the religious needs of employees and applicants for employment. These procedures shall not apply to a religious corporation, association or society with respect to the employment of an individual of the same religion to perform work connected with carrying on its religious activities.

5. National Origin

MDCR has adopted and promulgated guidelines on national origin discrimination. In addition to the protection guaranteed to all minorities, requiring proficiency in the English language where it is not a requirement for satisfactory performance on the job is prohibited.

6. Age

A subgrantee or contractor shall not refuse to hire, and shall not otherwise discriminate against, a person with respect to employment because of the age of that person, except as otherwise provided by law.

7. Handicap

With regard to handicapped persons:

- Under the obligations imposed by Executive Directive 1979-4, each subgrantee is required to take specific action to employ and advance in employment qualified handicapped individuals at all levels of employment, including the executive level. Specific action shall apply to all employment practices, including but not limited to: hiring, upgrading, demotion or transfer; recruitment or termination; rates of pay or other forms of compensation; and selection for training including apprenticeship.
- Each subgrantee shall evaluate its total selection process, including training and promotion, to ensure freedom from stereotyping handicapped persons in a manner that limits their access to all jobs for which they are qualified.
- If a physical or mental job qualification requirement is used in the selection of applicants for employment or changes in employment status such as promotion, demotion or training and to the extent that the requirement tends to screen out qualified handicapped individuals, the requirement shall be related to the specific job for which the individual is being considered. The subgrantee shall bear the burden of demonstrating that it has complied with the requirements of this paragraph.
- Each subgrantee must make reasonable accommodations for the physical and mental limitations of an employee or applicant, unless the contractor can demonstrate that such accommodations would impose an undue hardship. In determining the extent of these accommodation obligations, business necessity and financial cost among other factors may be considered.

Funding Approval

1. Condition of Approval of EEO

The execution or renewal of any contract awarding a grant covered under Executive Directive 1979-4, shall be conditioned upon written approval of the subgrantee's EEO Affirmation or the Equal Opportunity Plan.

2. Review of Reports and Program Proposals

The SHPO of the Michigan State Housing Development Authority has primary responsibility to review and accept or reject the reports and program proposals submitted by each subgrantee.

3. Review of Remedial Action

When the subgrantee/contractor who employs more than 25 employees or receiving grants of \$25,000 or more has areas of underutilization that require a written plan, the SHPO will

review any remedial action which the recipient proposes to take to determine whether the requirements of Executive Directive 1979-4 have been met.

- When the requirements appear to have been met, the recipient will be notified of acceptance on the condition that the proposed corrective action will be taken.
- When the recipient fails to submit a required plan or submits a plan that does not meet the requirements of Executive Directive 1979-4, the SHPO will notify the recipient that the plan (or lack thereof) is not acceptable, specifying each area of deficiency. If necessary, assistance shall be provided to the recipients in revising the plan to meet the Executive Directive.

4. Review On-site

On-site compliance reviews of a subgrantee/contractor's program may be scheduled by the SHPO pending or following acceptance of a plan. Priority shall be given to any subgrantee that excludes handicapped persons or that has a significant disparity between the percentage of minorities and women in the population area and the percentage in the recipient's work force.

5. Alternative in Event of Noncompliance

When the SHPO and the subgrantee/contractor cannot agree on a mutually acceptable plan, the SHPO may:

- Declare the subgrantee/contractor unawardable and proceed as in any determination of nonperformance under the contract.
- Notify MDCR that the SHPO and the subgrantee are unable to resolve their differences. Written notice to that effect will be served on the subgrantee by the SHPO.
- Staff from MDCR will review the file, consider any additional information either party cares to submit, and offer assistance in resolving the differences in a final effort to secure voluntary compliance. Whenever an amicable resolution cannot be achieved, MDCR will issue a written determination to the SHPO that the subgrantee/contractor is or is not in compliance. Thereafter, either party may petition MDCR for a Hearing as provided for in the rules of the Michigan Civil Rights Commission.

CIVIL RIGHTS MANUAL APPENDIX II

Instructions For Work Force Status Report

1. Every subgrantee shall submit a report on the status of the present work force to the SHPO (see next page). The report shall include the following information:
 - Current total number of employees, and the numbers of minority, female and handicapped employees in all levels of employment.
 - The percentage of minority and the percentage of female employees in all levels of employment.
 - The total number of employees, and the numbers of minority, female and handicapped employees hired and/or terminated for any reason within the preceding 12 months.
 - A calculation of the percentage of minorities in the population and women in the work force for the geographic area from which employees are drawn, based on figures obtained from the Michigan Employment Security Commission or an equally reliable source. The basis for establishing the geographic area must be included.
 - A comparison of the available percentage of minorities and females (above) and the percentage of minorities and women among the total employees. Reasonable representation for minorities and females means employing a work force that reflects the percentage of minorities and females in the population base at all job levels and in all areas. A subgrantee or contractor whose work force does not meet this standard is required to take remedial action, described in Appendices IV or V.
 - Provide the date of the payroll used to obtain the workforce breakdown.
 - Fill in minority population figures for your area by using the Minority Population percentages found in this manual.
 - Circle each percentage that is less than the minority availability for your area in the "Minority %" column.
 - Circle each percentage that is less than 51 percent, which is the statewide percentages of females in the labor force, in the "Female %" column.
 - Is residence required for employees in the above classification?
2. The subgrantee shall submit the Work Force Status Report to:

**Joelle Letts, Grants Manager/Budget Analyst
State Historic Preservation Office
Michigan State Housing Development Authority
PO Box 30740
702 West Kalamazoo Street
Lansing, Michigan 48909-8240**

Work Force Status Report

Payroll Date Used _____
 Minority Population Base _____

| Job Category | Total | Black | | Hispanic | | American Indian | | Asian | | Female | | Other Minority | | Handicapped | |
|-----------------------------------|-----------------------|----------------------|---|----------|---|--------------------|---|-------|---|--------|---|-------------------------|---|----------------------------|---|
| | | M | F | M | F | M | F | M | F | Total | % | Total | % | Total | % |
| | | Administrative | | | | | | | | | | | | | |
| Professionals | | | | | | | | | | | | | | | |
| Technicians | | | | | | | | | | | | | | | |
| Office/Clerical | | | | | | | | | | | | | | | |
| Service/Maintenance | | | | | | | | | | | | | | | |
| Total | | | | | | | | | | | | | | | |
| New Hires | | | | | | | | | | | | | | | |
| New Hires Within Last Year | | | | | | | | | | | | | | | |
| Terminated | | | | | | | | | | | | | | | |
| Wage Range | | | | | | | | | | | | | | | |
| Annual Salary | Administrative | Professionals | | | | Technicians | | | | | | Office/Clericals | | Service/Maintenance | |
| Minimum | | | | | | | | | | | | | | | |
| Maximum | | | | | | | | | | | | | | | |

1. Provide date of the payroll used to obtain the workforce breakdown.
2. Fill-in Minority Population figure for your area.
3. Use the Minority Population percentages on the following pages.
4. Circle each percentage, which is less than minority availability for your area in the Percentage Minority Column.
5. Circle each percentage, which is less than 51%, which is the statewide percent of females in the labor force, in the Female column.
6. Is residence required for employees in the above classification?

| | |
|--------------|------|
| Name | Date |
| Organization | |

Michigan Population Statistics – By County

Source: 2010 U.S. Census

| COUNTY | % TOTAL MINORITY | % BLACK | % HISPANIC | % AMERICAN INDIAN | % ASIAN AMERICAN | % OTHER MINORITY |
|----------------|------------------|---------|------------|-------------------|------------------|------------------|
| Alcona | 2.2 | 0.1 | 1.1 | 0.6 | 0.2 | 0.2 |
| Alger | 12.1 | 6.4 | 1.2 | 4.1 | 0.3 | 0.1 |
| Allegan | 11.9 | 1.2 | 6.7 | 0.6 | 0.6 | 2.8 |
| Alpena | 2.4 | 0.3 | 1 | 0.5 | 0.5 | 0.1 |
| Antrim | 3.5 | 0.2 | 1.7 | 1 | 0.2 | 0.4 |
| Arenac | 3.4 | 0.2 | 1.4 | 1.2 | 0.2 | 0.4 |
| Baraga | 21.6 | 7.2 | 1 | 13.1 | 0.1 | 0.2 |
| Barry | 4.2 | 0.4 | 2.3 | 0.5 | 0.4 | 0.6 |
| Bay | 8.3 | 1.6 | 4.7 | 0.5 | 0.5 | 1 |
| Benzie | 4.3 | 0.4 | 1.7 | 1.4 | 0.3 | 0.5 |
| Berrien | 23.8 | 15.3 | 4.5 | 0.5 | 1.6 | 1.9 |
| Branch | 9.6 | 3.1 | 4 | 0.4 | 0.5 | 1.6 |
| Calhoun | 19.1 | 10.9 | 4.5 | 0.6 | 1.6 | 1.5 |
| Cass | 11.1 | 5.4 | 3 | 1 | 0.6 | 1.1 |
| Charlevoix | 4.0 | 0.3 | 1.4 | 1.5 | 0.4 | 0.4 |
| Cheboygan | 4.7 | 0.5 | 0.8 | 3 | 0.3 | 0.1 |
| Chippewa | 24.4 | 6.5 | 1.2 | 15.8 | 0.6 | 0.3 |
| Clare | 3.2 | 0.5 | 1.5 | 0.7 | 0.3 | 0.2 |
| Clinton | 9.1 | 2.1 | 3.9 | 0.4 | 1.5 | 1.2 |
| Crawford | 2.7 | 0.4 | 1.3 | 0.5 | 0.4 | 0.1 |
| Delta | 4.1 | 0.2 | 0.9 | 2.4 | 0.4 | 0.2 |
| Dickinson | 2.6 | 0.3 | 1 | 0.6 | 0.5 | 0.2 |
| Eaton | 14.3 | 6.3 | 4.7 | 0.4 | 1.7 | 1.2 |
| Emmet | 6.2 | 0.5 | 1.3 | 3.7 | 0.5 | 0.2 |
| Genesee | 25.8 | 20.7 | 3 | 0.5 | 0.9 | 0.7 |
| Gladwin | 2.5 | 0.2 | 1.2 | 0.5 | 0.3 | 0.3 |
| Gogebic | 7.8 | 4.1 | 0.9 | 2.4 | 0.2 | 0.2 |
| Grand Traverse | 5.9 | 1.2 | 2.2 | 1.2 | 0.7 | 0.6 |
| Gratiot | 13.4 | 5.5 | 5.4 | 0.5 | 0.3 | 1.7 |
| Hillsdale | 3.5 | 0.5 | 1.8 | 0.4 | 0.4 | 0.4 |
| Houghton | 5.3 | 0.5 | 1.1 | 0.6 | 2.9 | 0.2 |
| Huron | 3.5 | 0.4 | 2 | 0.3 | 0.4 | 0.4 |
| Ingham | 27.2 | 11.8 | 7.3 | 0.6 | 5.2 | 2.3 |
| Ionia | 11.3 | 4.7 | 4.4 | 0.5 | 0.4 | 1.3 |
| Iosco | 3.8 | 0.5 | 1.6 | 0.7 | 0.5 | 0.5 |
| Iron | 2.9 | 0.1 | 1.4 | 0.9 | 0.3 | 0.2 |

| COUNTY | % TOTAL MINORITY | % BLACK | % HISPANIC | % AMERICAN INDIAN | % ASIAN AMERICAN | % OTHER MINORITY |
|---------------|---------------------------------|--------------------|-----------------------|----------------------------------|---------------------------------|---------------------------------|
| Isabella | 11.1 | 2.4 | 3.1 | 3.4 | 1.6 | 0.6 |
| Jackson | 12.8 | 7.9 | 3 | 0.4 | 0.7 | 0.8 |
| Kalamazoo | 18.9 | 10.9 | 4 | 0.4 | 2.1 | 1.5 |
| Kalkaska | 2.8 | 0.3 | 1.2 | 0.9 | 0.2 | 0.2 |
| Kent | 26.7 | 9.7 | 9.7 | 0.5 | 2.3 | 4.5 |
| Keweenaw | 0.9 | 0.1 | 0.7 | 0.1 | 0 | 0 |
| Lake | 12.5 | 9.2 | 2.1 | 0.8 | 0.1 | 0.3 |
| Lapeer | 7.1 | 1 | 4.1 | 0.5 | 0.3 | 1.2 |
| Leelanau | 8.9 | 0.3 | 3.7 | 3.5 | 0.4 | 1 |
| Lenawee | 13.1 | 2.5 | 7.6 | 0.5 | 0.5 | 2 |
| Livingston | 3.9 | 0.4 | 1.9 | 0.4 | 0.8 | 0.4 |
| Luce | 17.6 | 11.1 | 1.2 | 5 | 0.3 | 0 |
| Mackinac | 19.3 | 0.5 | 1.1 | 17.3 | 0.2 | 0.2 |
| Macomb | 14.8 | 8.6 | 2.3 | 0.3 | 3 | 0.6 |
| Manistee | 8.6 | 2.9 | 2.6 | 2.1 | 0.3 | 0.7 |
| Marquette | 5.3 | 1.7 | 1.1 | 1.7 | 0.6 | 0.2 |
| Mason | 7.3 | 0.6 | 4 | 1 | 0.5 | 1.2 |
| Mecosta | 5.9 | 2.5 | 1.7 | 0.6 | 0.7 | 0.4 |
| Menominee | 4.7 | 0.3 | 1.2 | 2.7 | 0.3 | 0.2 |
| Midland | 6.0 | 1.2 | 2 | 0.4 | 1.9 | 0.5 |
| Missaukee | 3.8 | 0.3 | 2.1 | 0.6 | 0.3 | 0.5 |
| Monroe | 6.9 | 2.1 | 3.1 | 0.3 | 0.6 | 0.8 |
| Montcalm | 7.2 | 2.3 | 3.1 | 0.5 | 0.4 | 0.9 |
| Montmorency | 1.9 | 0.2 | 1 | 0.4 | 0.2 | 0.1 |
| Muskegon | 22.0 | 14.5 | 4.8 | 0.8 | 0.5 | 1.4 |
| Newaygo | 9.6 | 1 | 5.5 | 0.8 | 0.4 | 1.9 |
| Oakland | 24.0 | 13.6 | 3.5 | 0.3 | 5.6 | 1 |
| Oceana | 21.5 | 0.4 | 13.7 | 1.1 | 0.2 | 6.1 |
| Ogemaw | 2.9 | 0.2 | 1.4 | 0.7 | 0.4 | 0.2 |
| Ontonagon | 2.4 | 0.1 | 0.9 | 1.1 | 0.2 | 0.1 |
| Osceola | 3.0 | 0.6 | 1.5 | 0.5 | 0.2 | 0.2 |
| Oscoda | 2.0 | 0.2 | 0.9 | 0.6 | 0.1 | 0.2 |
| Otsego | 2.8 | 0.3 | 1.2 | 0.7 | 0.4 | 0.2 |
| Ottawa | 16.5 | 1.5 | 8.6 | 0.4 | 2.6 | 3.4 |
| Presque Isle | 2.4 | 0.4 | 0.9 | 0.7 | 0.3 | 0.1 |
| Roscommon | 2.6 | 0.4 | 1.1 | 0.6 | 0.3 | 0.2 |
| Saginaw | 30.7 | 19 | 7.8 | 0.4 | 1.1 | 2.4 |
| St. Clair | 6.9 | 2.4 | 2.9 | 0.4 | 0.5 | 0.7 |

| COUNTY | % TOTAL MINORITY | % BLACK | % HISPANIC | % AMERICAN INDIAN | % ASIAN AMERICAN | % OTHER MINORITY |
|---------------|---------------------------------|--------------------|-----------------------|----------------------------------|---------------------------------|---------------------------------|
| St. Joseph | 13.9 | 2.6 | 6.6 | 0.5 | 0.7 | 3.5 |
| Sanilac | 5.5 | 0.3 | 3.3 | 0.5 | 0.3 | 1.1 |
| Schoolcraft | 10.0 | 0.1 | 0.8 | 8.8 | 0.2 | 0.1 |
| Shiawassee | 4.3 | 0.5 | 2.4 | 0.5 | 0.4 | 0.5 |
| Tuscola | 5.4 | 1.1 | 2.8 | 0.5 | 0.3 | 0.7 |
| Van Buren | 20.8 | 4.1 | 10.2 | 0.9 | 0.4 | 5.2 |
| Washtenaw | 26.1 | 12.7 | 4 | 0.3 | 7.9 | 1.2 |
| Wayne | 50.4 | 40.5 | 5.2 | 0.4 | 2.5 | 1.8 |
| Wexford | 3.6 | 0.4 | 1.6 | 0.6 | 0.6 | 0.4 |

CIVIL RIGHTS MANUAL APPENDIX III

Affirmation Of Equal Opportunity

1. The subgrantee/contractor hereby affirms a policy of equal opportunity in employment and participation in and benefit from all programs, activities, and services without regard to race, color, religion, national origin, age, sex, or handicap.
2. The subgrantee/contractor hereby agrees to:
 - Take all remedial steps necessary to correct any under-representation of minorities or women reported on the Work Force Status Report.
 - To achieve a reasonably representative work force at all levels of employment.
 - State in all promotional, and advertising materials that all programs, services, and activities are performed without regard to race, color, religion, national origin, age, sex, or handicap and that in employment practices all applicants shall receive equal consideration.
 - Post, in conspicuous, place, notices setting forth the law on equal opportunity in employment and services. (Posters are available from the SHPO, Michigan State Housing Development Authority or the Michigan Department of Civil Rights.)

| | |
|---------------|-------|
| Typed Name: | Date: |
| Signature: | |
| Title: | |
| Organization: | |

3. The subgrantee shall submit the Affirmation of Equal Opportunity form to:

**Joelle Letts, Grants Manager/Budget Analyst
State Historic Preservation Office
Michigan State Housing Development Authority
PO Box 30740
702 West Kalamazoo Street
Lansing, Michigan 48909-8240**

CIVIL RIGHTS MANUAL APPENDIX IV

Work Force Analysis

In addition to completing Appendix II and III, a subgrantee/contractor with a contract in excess of \$25,000, or employing 25 or more persons is required to prepare the following analysis:

1. The first step in analyzing the present representation of minority and female persons accomplished by completing the Work Force Status Report. If the minority and female work force in all job categories is equal to or exceeds the standard at all levels, no further analysis is required for minorities and women.
2. The first step in providing equal opportunity for handicapped persons shall be a self-evaluation that shall identify any selection, promotion or training programs that exclude or tend to exclude handicapped persons who are otherwise qualified to perform a particular job.
3. Each subgrantee/contractor is required to conduct a continuing program of self-evaluation to ascertain whether any recruitment, selection, or promotional policy directly or indirectly has the effect of denying equal opportunities to minority individuals, women, or handicapped persons.
4. In making the evaluation of employment opportunities, the subgrantee/contractor shall conduct a separate analysis for minorities, women, and handicapped persons. However, all racial and ethnic data collected should be cross-classified by sex to ascertain the extent to which minority women and minority men may be under-utilized.
5. Whenever under-utilization of minorities and women occurs or whenever conditions have resulted in the limited participation of handicapped persons, it will be necessary to identify those policies and procedures which operate to the disadvantage of minorities, women, or handicapped persons. The analysis should include:
 - A review of the employment selection procedures for the preceding fiscal year, including application forms, recruitment methods, interview procedures, test validity, experience/education requirements, and final selection methods to insure that unnecessary barriers do not disadvantage minorities, women, and handicapped persons. The number of individuals by race, sex, national origin, and handicap applying for employment within the preceding fiscal year should be compared with the number of applicants who were offered employment and those who were actually hired. Attention should be paid to the reasons for rejection and the effects on minorities, women, and handicapped persons. If such data is unavailable, the subgrantee should institute a system for the collection of such data.
 - A review of promotion procedures and training programs during the preceding year in order to insure that equal opportunity. The race, sex, age, national origin, and handicap of applicants who made application for promotion or training should be compared with the number who were actually promoted or trained.
 - For handicapped persons, the subgrantee shall invite applicants and employees who believe themselves covered by the Executive Directive and who wish to benefit under the affirmative action program to identify themselves as handicapped. The invitation shall state that the information is voluntary, and will be used only in accordance with the Executive Directive. Refusal to provide the information will not result in adverse treatment. If a handicapped person is identified the subgrantee should seek suggestions from the applicant or employee regarding proper placement and appropriate accommodation.

CIVIL RIGHTS MANUAL APPENDIX V

Equal Employment Opportunity Plan

This section applies to those plan/contractors employing 25 or more or contracts in excess of \$25,000 and who have an under-utilization of minorities and females or limited participation of handicapped persons in one or more areas. A written Equal Opportunity Plan shall specifically address the areas of under-utilization for minorities, women or handicapped persons and should include:

1. A plan for the recruitment of minorities women, and handicapped persons based on what is necessary to attract applicants including but not necessarily limited to use of advertising media patronized by women, minorities, and handicapped persons.
2. A statement of the plan's existing employment policies and practices, e.g., testing, experience and education requirements, with particular emphasis on steps which have been taken or will be taken to assure that each is job-related.
3. An evaluation of the effect the policies and practices have on minorities, women, and handicapped persons. Specific attention should be given to transfer and promotion policies and procedures, including credit for departmental seniority that may disadvantage women, minorities, and handicapped persons. Where improvement is necessary, the plan shall set forth the steps that will be taken to assure equal opportunity.
4. The equal opportunity goal is the employment of minorities and women in each job category so that the work force reflects the percentage of minorities and women found in the population base. In establishing goals and timetables for the employment of minorities and women during the life of the contract, the availability for specific job categories may be determined by the following factors:
 - The minority and female population of the labor area surrounding the facility;
 - The availability of minorities and females having requisite skills in an area in which the plan can reasonable recruit;
 - The availability of minorities and females within the work force who may be transferred or promoted.
 - The existence of training institutions capable of preparing minority persons and females in the requisite skills.
 - These goals should be significant, measurable, and attainable. In establishing timetables to meet the goals, the plan or contractor will consider the anticipated expansion, contraction or turnover of the work force. In no case are the goals to be viewed as rigid quotas. The purpose of setting a projected goal is to permit the plan to measure the success of the steps taken to implement equal employment opportunity. Failure to meet a goal should alert the plan that the plan is not working and that additional action is required.
 - Provision for dissemination of the Equal Employment Opportunity Plan to all personnel, applicants, and the general public.



www.michigan.gov/shpo