

**From:** [Emily Gluckin \(she/her\)](#)  
**To:** [Emily Gluckin \(she/her\)](#)  
**Subject:** FW: Historic Resource -Change  
**Date:** Monday, December 15, 2025 9:20:04 AM  
**Attachments:** [image.png](#)

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**From:** David Gray <david@dvgarchitects.com>  
**Sent:** Friday, December 12, 2025 5:13 PM  
**To:** Emily Gluckin (she/her) <GluckinE@ci.missoula.mt.us>  
**Cc:** Cassie Tripard <TripardC@ci.missoula.mt.us>  
**Subject:** Re: Historic Resource -Change

I should have scrolled my NRHP form down a bit. I have amended the definition of Individually Listed.

**Individually Listed** Properties: Individually listed properties in the National Register of Historic Places (NRHP) are single buildings, sites, structures, or objects deemed historically significant, distinct from larger historic districts. The property will have a NRHP application with only the "**Building or Site or Structure or Object**" Category of Property checked in the application or will focus on only one significant property.

David V. Gray LEED Green Associate  
Principal Architect and President  
DVG Architecture and Planning P.C.  
[david@dvgarchitects.com](mailto:david@dvgarchitects.com)  
111 N. Higgins Ave #420  
Missoula MT 59802  
406-241-7707  
[www.dvgarchitects.com](http://www.dvgarchitects.com)  
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On Fri, Dec 12, 2025 at 5:05 PM David Gray <[david@dvgarchitects.com](mailto:david@dvgarchitects.com)> wrote:

Emily,

That is helpful but it should say "28. Historic Resources means any prehistoric or historic building, structure, object and site Individually listed in the National Register of Historic Places **and** listed in the Missoula inventory of Historic Resources or included in a historic Resource Overlay under Division 4.6.08" to maintain intent.

The **and** is in line with current regulations not the comma in the staff definition below if staff is truly not expanding the breath of the term from Title 20.

**28. Historic Resource** means any prehistoric or historic building, structure, object, or site (1) individually listed in the National Register of Historic Places, (2) listed in the Missoula Inventory of Historic Resources or (3) included in a Historic Resource Overlay under Division 4.6.08.

This is important for two reasons.

1. When a building is Individually listed it is automatically included in the local inventory.
2. If a comma is used to replace "and" then a building **not** individually listed could be added to the local inventory and it would be treated as if it was individually listed. This is relevant as a building or site that is individually listed in the NRHP must have the property owners approval by Federal Law, while a building that is Contributing to a Historic District does not have to be approved by the building owner to be listed in the District and the owner may not know that it is actually occurring nor the ramifications of that listing.

The underlined portion of the definition above is the new portion being added to expand the reach of the Historic Preservation Ordinance in Title 22. That is the only reason I underlined it, just for clarity.

I urge staff to include the definition of "Individually Listed", "Contributing" and "Non Contributing" to a Historic District to Title 22. This is causing confusion right now. The State SHPO office will not add a Contributing building to a Historic District as "Contributing" only if the owner of the property tells them **not** to and they **Assume** the owner agrees if they do not hear from them. Well that also assumes the owner even knows it is occurring. There are no Assumptions with Individually Listed Properties, the owner is told and must agree. That may not sound significant but it can have huge ramifications down the road for local control. Being on the NRHP does not provide any protections for the property, which is intentional of the legislation. The NRHP created two categories of being listed because the legislation allows for two forms of regulation to occur by municipalities but offers the same benefit for Tax incentives. Missoula decided because of significant public pushback, including from the MOR, that Individually Listed properties were more important than "Contributing" properties. So the Historic Preservation ordinance focuses on Individually Listed Properties. There are **56 Individually Listed** properties in the City. There are over **1200 Contributing** properties in Historic Districts so the breadth of including Contributing properties for additional protections is a much bigger deal to the public. The MOR was concerned the value of Historic Properties would be diminished if Contributing properties where regulated and issues of taking would arise.

Proposed Definitions:

**Individually Listed** Properties: Individually listed properties in the National Register of Historic Places (NRHP) are single buildings, sites, structures, or objects deemed historically significant, distinct from larger historic districts. The property will have a NRHP application with only the "**building**" Category of Property checked in the application or will focus on only one one significant property.

**Contributing:** Contributing properties in a National Historic District are buildings, sites, structures, or objects that add to the district's historic character, were present during its "period of significance," and retain their historic appearance (integrity) through design, setting, materials, and association. The property will have a NRHP application with only the "**District**" Category of Property checked in the application.

**Non Contributing:** Non Contributing properties are too new or significantly altered properties in a Historic District. These properties are not regulated under the Historic Preservation Section of this code.

By including these definitions and references of what to look for in the application, I think it will clear up some confusion for citizens and staff.

Sincerely,

David V. Gray LEED Green Associate

Principal Architect and President

DVG Architecture and Planning P.C.

[david@dvgarchitects.com](mailto:david@dvgarchitects.com)

111 N. Higgins Ave #420

Missoula MT 59802

406-241-7707

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