SHPO Administrative Procedure
Documentation Submitted for Review
in Compliance with Historic Preservation Laws

On February 5, 1988, the State Historic Preservation Office (SHPO) issued a memo to consulting archaeologists and federal and state agencies, which provided guidelines for preparing reports and writing abstracts. On January 2, 1992, those guidelines were reissued as a policy statement. That statement has been revised and expanded, as an Administrative Procedure, to provide updated guidance in response to recent changes in the compliance review process at the national and local levels. These changes including: increased participation of Native Americans in the federal process as a result of the 1992 amendments to the National Historic Preservation Act (NHPA); new computerized state inventory procedures; and increased voluntary participation by local governments through local planning and zoning actions, grading permits, or environmental ordinances. This Administrative Procedure is based in part on guidance provided in the Secretary of the Interior's Standards, Advisory Council on Historic Preservation publications and policy statements, National Register Bulletins, and Arizona State Museum rules implementing A.R.S. §41-841 *et seq.* While this Administrative Procedure is provided as guidance for state and federal agencies, the SHPO encourages agencies to share this guidance with consultants and proponents acting on behalf of the agency or under contract with the agency.

By formally issuing this Procedure, we are advising participants in the review process—including federal, state, and municipal government agencies, cultural resource managers, planners and developers, and archaeologists and other cultural resource consultants—of this office's current standards for reports submitted in compliance with the NHPA, the Arizona State Historic Preservation Act, and local government ordinances. We have also included some recommendations on the kinds of information we look for in cover letters. Please be advised that if consultation documents, including cover letters and reports, do not include the information necessary for this office to complete its review of an undertaking, the SHPO will request that information. Failure to provide all pertinent information with the original submittal will delay SHPO review.

The cover letter and report should provide the following information:

- ✓ A complete description of the undertaking/plan, including precise location, definition of the area of potential effect, land ownership, and detailed information about planned actions,
- ✓ A thorough identification and description of the cultural resources that might be impacted directly or indirectly by those actions (Area of Potential Effect for federal undertakings),
- ✓ An evaluation of the eligibility of those resources for inclusion in the Arizona or National Register of Historic Places (Register eligible), including a determination of Register eligibility by the responsible federal agency or recommendations of Register eligibility by the responsible state agency,
- ✓ The potential impacts of the undertaking on all Register eligible resources, including a determination of effect by the responsible agency,
- ✓ Alternative actions (including avoidance) considered, and

✓ The proposed treatment of any Register eligible properties in order to reduce the potential effects of the undertaking on them.

Some of these issues are appropriately addressed in the consultation letter from the agency to this office; others should form the bulk of the inventory report(s). The abstract, which should be included in every inventory report, is a concise summary of critical information that forms the basis for our review. Agency-specific inventory forms (without additional information) will only be accepted as adequate documentation with a formal agreement between the agency and the SHPO. Letter reports are not encouraged but may constitute adequate documentation if no cultural resources are identified in the project area.

We recognize that federal undertakings, plans of state agencies, and local-government actions vary considerably, as do the measures that should be taken to consider historic properties that they might affect; as a result, the cultural resource inventories, descriptions, and evaluations should also vary. For many projects, more than one inventory may be conducted by cultural resource professionals with different specialties (for example, geomorphology, history, architecture, ethnography, or archaeology). The identification and evaluation effort should be directed by individuals with particular skills and expertise in the appropriate disciplines (see Section 112 of the NHPA and the Secretary of the Interior's Standards for Professional Qualifications). Many project areas include both archaeological sites and standing architecture; in that case, the expertise of an archaeologist and an architectural historian or architect will be required. In some cases, tribes or their preservation offices may produce separate reports describing the tribe's traditional use of a project area and traditional cultural places that might be impacted by that project. In others, input from tribes, including community members and traditional cultural authorities, may be solicited at public meetings or site visits, and may be documented in meeting notes, letters, or consultants' reports. Although strategies for dealing with different resource types do require separate technical analyses, the process of identifying and evaluating cultural resources and considering the impacts of agency undertakings/plans on those properties is the same. All reports and other materials that document the agency's efforts to identify and evaluate cultural resources that might be affected by a federal agency undertaking or state agency plan should be submitted to SHPO, as SHPO cannot concur with determinations of eligibility and effect without reviewing all pertinent information.

REPORT ABSTRACT

AGENCY: Name of lead federal or state agency for project, or local government that requires the inventory. List all other agencies with jurisdiction over all or part of the undertaking, including land owner/manager, as well as funding and permitting entities.

PROJECT TITLE: Concise title that contains key identifying words. Use same title in subsequent correspondence.

PROJECT DESCRIPTION: Brief description of the project, including proposed construction, plans, need for ancillary facilities, etc.

LOCATION: Name of nearest city or topographic feature (if applicable), county, legal description (Township, Range, Section, and Quarter-Section), and USGS quad name.

NUMBER OF SURVEYED ACRES: Total number of surveyed acres, also any portion of project area not surveyed.

NUMBER OF SITES: Total number of sites found during the survey, as well as previously recorded sites in the project area.

LIST OF REGISTER ELIGIBLE PROPERTIES: List site numbers for archaeological sites, or property names and/or addresses for standing structures, buildings or objects and the Arizona/National Register criterion or criteria under which the site is considered eligible.

LIST OF INELIGIBLE SITES: List site numbers (or names/addresses) for all sites/properties that are not considered or recommended eligible for inclusion on the Arizona or National Register of Historic Places.

COMMENTS: Include assessment of the potential direct and indirect effects of the agency's undertaking/plan on Register eligible or potentially eligible resources and include recommendations for avoidance, mitigation, or other treatment.

STANDARD REPORT INFORMATION

Inventory reports should provide the following information:

1. A description of the undertaking/plan with photographs, maps, and drawings as necessary. Maps and photographs should be of professional quality and legible in a photocopied version. Describe the types of surface and subsurface impacts (direct and indirect) anticipated. Survey area and site locations must be plotted on **USGS** maps showing the boundaries of the area of potential effect and the locations of project elements (for example, a transmission line project might include the power line right-of-way, pole locations, access road, and construction staging areas). Show land ownership if multiple jurisdictions are involved. In order to digitize mapped information, each USGS map sheet submitted in the report must have four clearly identified points labeled with the corresponding UTM coordinates (**UTM registration points**). These UTM registration points should be inside the map corners.

2. A summary of previous research and results of literature or records search (AZSITE, other site files, GLO and Sanborn maps, land-use records available at ASLD for State Trust Land, SHPO records, etc.). See *National Register Bulletin* "Researching a Historic Property" for additional guidance.

3. A description of all efforts to identify cultural resources (such as literature or archival records search, tribal consultation, archaeological survey, ethnographic interviews). For archaeological surveys, include comments on the visibility of the ground surface, areas omitted from intensive survey and rationale behind the decision to omit them, survey methodology. For consultation with Native American tribes and groups, indicate what groups participated in consultation and describe the process (for example, phone calls, letters, meetings, and field visits).

4. A thorough description of the resources located. For prehistoric and historical period archaeological sites, such information should include a site map that clearly shows the relationship of cultural features within the site, site boundaries, areas of disturbance, and proposed impacts (for example, a proposed right-of-way). Site information should include details on features observed, photographs, artifact density and diversity, diagnostic artifacts noted, as well as information on the integrity of each site (for example, amount of ground disturbance, potential for subsurface remains, potential to provide important information and likelihood that human remains are present). Arizona State Museum (ASM) site numbers should be obtained for all archaeological sites and agency-specific site numbers may also be required on some federal or tribal lands.

   For historical archaeology sites, in addition to the information above, important diagnostic artifact characteristics (Maker Marks, technological aspects, embossing, etc.) should be referenced (information source), described, and/or illustrated. A listing of these artifacts should be included with dates of production, information about the product, contents, function, etc. Attribute data that are appropriate for artifacts from the historic period should be recorded.

   For standing architecture, the attached **State of Arizona Historic Property Inventory Form** (available through the SHPO) should be completed and included in the documentation. Instructions for completing the form are incorporated in the form. The site description should always include photographs, an assessment of the condition of the property, any architectural details that embody the distinctive characteristics of a type, period or method of construction, and, if applicable, the property's association with events or individuals that are pertinent to its significance. The surrounding built environment should be described in sufficient detail so that potential historic districts and cultural landscapes may be identified and considered. If modifications to the building or structure have been made, these should be described. Information on such sites should also identify the original owner(s) and dates of use based on archival research or oral interviews. Other historical sites, structures, and objects should be thoroughly described, although the inventory form is not used. For additional guidance see the National Register Bulletins, "Guidelines for Evaluating and Registering Historical Archaeological Sites and Districts" and "Guidelines for Local Surveys: A Basis for Preservation Planning."

   For traditional cultural places, the report should include sufficient information about the traditional use of the place and its role in the culture to support a determination of eligibility. For additional guidance on evaluating these properties, see *National Register Bulletin* 38, "Guidelines for Evaluating and Documenting Traditional Cultural Properties."

5. Historic context(s) within which the significance of identified cultural resources has been evaluated in order to assess the eligibility of those resources for inclusion in the Arizona or National Register of Historic Places. The SHPO has published numerous historic context studies that should be used to guide the evaluation of the property types defined in those documents; however, in many instances, "[t]he person documenting the site or property must define potential historic contexts and evaluate the significance of the resource in the perspective of each context.... Numerous historic contexts may need to be considered, and substantial documentation gathered, to place the property in an appropriate context" (*National Register Bulletin* 15, "How to Apply the National Register Criteria for Evaluation")

6. Assessment of and recommendations regarding the Register eligibility of each property recorded. When applying the Arizona/National Register criteria, keep in mind that a property may be eligible under more than one criterion and that archaeological site may be eligible under criteria other than "*d*". If archaeological testing is required in order to complete this evaluation, be specific about why the significance assessment cannot be completed using available data. Additional archival research about historical period sites may be recommended as a part of treatment, but the inventory report must include sufficient historical and archival information to support an evaluation of the significance of such properties. The evaluation of architectural properties should include a discussion of the character-defining elements, type, period and method of construction, or high artistic merit that make it eligible for inclusion on the register.

   Eligibility assessments for multiple sites may be presented in tabular form for ease of reference, but should not be presented simply as "yes" or "no" without supporting text. In addition to establishing its historic context, the integrity of a site should be assessed. Arguments supporting the determination of eligibility, or a recommendation that a particular property is not eligible, should be presented in detail. Although consultants are usually asked by agencies to make recommendations regarding eligibility, which can be helpful to the agency and the SHPO, it is the agency's responsibility to submit their formal recommendations of eligibility to the SHPO for concurrence. Should there be a disagreement between the federal agency and the SHPO on eligibility, the final authority is the Keeper of the National Register. For state agency projects, the final authority on eligibility is the State Historic Preservation Officer.

7. An evaluation of the potential for a federal undertaking or a state plan to directly and/or indirectly impact Register eligible properties. Specifically indicate if the federal undertaking or state plan will not affect Register eligible properties. If the undertaking/plan will affect a Register eligible property(ies), provide a discussion of mitigation/treatment alternatives (avoidance, data recovery, documentation, adaptive re-use, etc.) considered by the agency and the agency's recommendation for mitigation/treatment. The SHPO provides advice to agencies regarding mitigation measures but the final decision regarding mitigation rests with the responsible agency.

COVER LETTER

The cover letter should include or summarize all of the information critical to the consultation and review process. Based on this office's many years of experience in reviewing consultation letters, we have developed the following recommendations for issues to be addressed:

1. A description of the undertaking, definition of the area of potential effects (APE), and the agency's efforts to identify historic properties and obtain and consider the views of affected local governments, Indian tribes, and other interested parties. For architectural properties, indicate whether the proposed action is addition, replacement, repair, or demolition.

2. Federal agency's determinations or state agency's recommendations of Register eligibility for all cultural resources located within the area affected by the federal undertaking or state plan (Area of Potential Effect for federal projects).

3. A description of the undertaking's effects (both direct and indirect) on eligible properties and the basis for these statements.

4. A description and evaluation of alternatives evaluated and treatment or mitigation proposed. This should include alternatives identified during the NEPA process (*for federal projects*), as well as any alternatives specifically designed to avoid or reduce impacts to cultural resources. Some examples are: realigning a road to avoid demolishing a historic property, use of overhead rather than underground transmission lines in a given area to avoid physically impacting an archaeological site, or adaptive reuse rather than demolition of a historic building. The discussion of treatment or mitigation measures (for example, rehabilitation according to the Secretary's Standards, use of plantings as a screen to reduce visual impacts, donation of all or part of an archaeological site to the Archaeological Conservancy or other entity for long-term preservation in place, or archaeological data recovery) should include those that were considered but not chosen, and the reasons for selecting the preferred alternative.

5. Agency's determination of project effect (for federal projects).

6. Requested action on the part of SHPO.

NOTES

For several years, the SHPO has been a part of the AZSITE consortium, which is working toward the creation of a comprehensive, statewide cultural resource database; a pilot form of that database is now being tested. AZSITE will include management and limited research data on all types of resources including archaeological sites, standing architecture, and National Register districts. We anticipate that by the year 2000, site forms in electronic format will be a required part of survey documentation.

Finally, although SHPO has not issued Administrative Procedures regarding the form and content of archaeological testing and data recovery reports, we do request that such reports include a management summary, in a format similar to that used for the abstract in inventory reports, to concisely present basic project information.