

## Standards for Inventory Documents Submitted for SHPO Review in Compliance with Historic Preservation Laws

The Arizona State Historic Preservation Office (SHPO) reviews a variety of documents related to compliance with Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. 306108 (formerly 16 U.S.C. 470), and the Arizona State Historic Preservation Act (SHPA), A.R.S. §41-861 *et seq.* In order to facilitate historic preservation compliance reviews, the SHPO has established this document, also known as “*SHPO Survey Report Standards*” for agency cover letters and survey reports. These survey report standards are based in part on guidance provided within the Secretary of the Interior’s Standards, the Advisory Council on Historic Preservation publications and policies, 36 C.F.R. §800.11, National Register Bulletins, SHPO guidance on implementing the SHPA, and Arizona State Museum (ASM) rules for implementing the Arizona Antiquities Act (AAA) or A.R.S. §41-841 *et seq.* The SHPO Survey Report Standards are provided as guidance for state and federal agencies, as well as for public agencies when consulting with our office. The SHPO encourages agencies to share these standards with consultants and project proponents who assist agencies in their compliance with historic preservation statutes.

The updated SHPO Survey Report Standards document fully replaces Part II, Subparts IV and V of the *Arizona Reporting Standards for Cultural Resources*, developed jointly by the SHPO, ASM, and the Arizona State Land Department (2001, revised 2008), and the 2012 *Standards for Documents Submitted for SHPO Review in Compliance with Historic Preservation Laws*. To maintain professional standards, we also recommend using the SHPO Report Standards for projects conducted on private land.

**NOTE:** Archaeologists should follow federal land-managing agency survey and reporting guidelines. For example, the Coconino National Forest (COF) requires a 200-300 m radius beyond the area of potential effects for background research, not a 1-mile radius. Also, COF does not want reports to include culture histories (although some cultural context may be necessary to support eligibility evaluations); follow COF guidelines.

### **A. AGENCY COVER LETTERS**

A cover letter from the responsible Agency official must be included with all consultations submitted to the SHPO; the letter must summarize all of the information that is critical to the consultation and review process. The federal or state agency must send the cover letter on agency letterhead, except in cases where specific regulations (at this time, only U.S. Dept. of Housing and Urban Development regulations) or Programmatic Agreements (e.g., Federal Communications Commission) authorize the agency to delegate its historic preservation compliance responsibilities (This does not apply to Government-to-Government consultation with Tribes). A cover letter should generally not be used in lieu of necessary project documentation, such as cultural resources reports, treatment/mitigation plans, Tribal consultation documentation, and other supplementary materials, as discussed below. It is important to note that, if the consultation documentation is insufficient, the SHPO response will be delayed until it is provided.

All Agency consultation letters must contain the following information, at a minimum:

1. A description of the project (including all planned actions), definition of the project area including the area of potential effects (APE), the nature and extent of the proposed impacts (i.e., type of disturbance, spatial extent, vertical depth), and the agency’s efforts to identify historic properties

and obtain and consider the view of affected local governments, Indian Tribes, the public, and other interested parties. Also identify all consulting parties. Note that surveys requiring AAA permits are also subject to review by ASM, and SHPO will coordinate with ASM, land managing agencies, and other consulting parties, as appropriate. For architectural properties, indicate whether the proposed action is an addition, replacement, repair, or demolition.

- a. If portions of the APE were previously surveyed, the letter should indicate whether those surveys meet current professional standards pursuant to SHPO Guidance Point No. 5, available at <http://azstateparks.com/SHPO/review.html>.
  - b. A separate map of the current APE must be included with the consultation letter if the APE differs from that depicted on the map in the survey report. For example, the APE as defined and consulted on by the Corps is sometimes different than that described and/or depicted in the technical report; the agency should include a map showing the current APE and explain the difference in the letter.
2. A description of the cultural resources that might be impacted directly, indirectly, or cumulatively by those actions. An evaluation of the eligibility of those resources for inclusion in the Arizona or National Register of Historic Places (ARHP or NRHP), including a determination of Register-eligibility by the responsible federal agency.
- a. Although consultants are usually asked by agencies to make recommendations regarding Register-eligibility, which can be helpful to the agency and the SHPO, it is the federal agency's responsibility to submit their formal determination of eligibility to the SHPO for concurrence.
  - b. 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, and/or projects on state or private lands, the determination of, and final authority on eligibility to the ARHP, is the State Historic Preservation Officer.
3. An evaluation of the potential for a federal undertaking or a state plan to directly, indirectly, or cumulatively affect Register-eligible properties. The potential for visual, auditory, and atmospheric effects of an undertaking on historic properties must be evaluated. Specifically indicate if the federal undertaking or state plan will or will not affect Register-eligible properties.
4. A finding of effect for the project by the responsible agency. Appropriate findings are: *No Historic Properties Affected*, *No Adverse Effect*, or *Adverse Effect*. There can be only one finding of effect for a given undertaking/plan.
5. A description of the alternatives evaluated and treatment or mitigation proposed. This should include alternatives identified during the National Environmental Policy Act (NEPA) process (for federal projects), as well as any alternatives specifically designed to avoid or reduce impacts to cultural resources. Some examples include: realigning a road to avoid demolishing a historic property, installation 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.

- a. The discussion of treatment or mitigation measures should include those that were considered but not chosen, and the reasons for selecting the preferred measure.
  - b. Alternative actions (including avoidance) considered, and the proposed treatment of any Register-eligible properties in order to reduce the potential adverse effects of the undertaking on those properties, should be discussed.
6. A summary of Tribal consultation efforts, including consultations on identifying Traditional Cultural Properties, sacred sites, traditional use areas, etc., should be provided; government-to-government consultations with tribes should be clearly articulated. Indicate which Tribes participated in consultation, and describe the process of government-to-government consultation (for example, phone calls, letters, meetings, field visits, e-mails, etc.).
  7. Requested action on the part of SHPO (e.g., concurrence with definition of the APE, concurrence on determination(s) of eligibility, concurrence with a finding of effect, etc.).

**Note:**

Agency-specific inventory forms (without additional information using the Survey Report Summary Form (SRSF, discussed below) or in a report format will only be accepted as adequate documentation as part of an existing formal agreement between the agency and the SHPO.

## **B. STANDARD INVENTORY REPORT INFORMATION**

The standards presented herein are supplemented by SHPO Guidance Point No. 10, *SHPO Guidance for Use and Submittal of the Survey Report Summary Form (SRSF)* (revised 2016). The SRSF may be substituted for surveys with negative results only (for reports less than 640 acres or 10 linear miles in size). Letter reports for negative findings will no longer be accepted for compliance purposes. The SHPO Abstract is a separate document.

Download the revised SRSF, SHPO Abstract, and SHPO Guidance Point No. 10 at <http://azstateparks.com/SHPO/review.html>.

For supplemental guidance, please refer to Appendix A, *SHPO Abstract and Instructions*; B, *Terminology and Definitions*; Appendix C, *SHPO Position on Isolated Occurrences*; Appendix D, *Eligibility Evaluations*; Appendix E, *FCC Cell Tower Projects*, and Appendix F, *Examples and Illustrations*.

Inventory reports must provide the following information:

1. SHPO Abstract. (revised, 2016 -- see Appendix A)
2. Project Description: The report must include a detailed description of the undertaking / plan, identify the lead agency and funding source, as well as permitting and land-managing agencies involved, define the area of potential effects (APE), and identify the types of potential surface and subsurface impacts, if known. A discussion of the relevant historic preservation statutes and regulations, including any Programmatic Agreements that may be pertinent, must also be provided.

- a. The APE should be sufficiently defined (ideally by the Agency, however consultants can often assist agencies in these evaluations) to address potential direct, indirect, and cumulative effects of the project to historic properties.
  - b. If known, be specific about the proposed ground disturbing activities, including extent of surface area to be disturbed (dimensions), depth of excavation, what is being installed, removed/replaced, etc., types of vehicles/machinery to be used, etc.
3. Project Location: Describe the project's location relative to the nearest town and county in which it is located, provide the legal description of the APE, and identify the UTM project locator (see 3.d, below). Identify the number of acres surveyed, by landowner, within the APE, and provide justification for areas not surveyed as part of the current project.
- a. Required maps include project location (state map), land jurisdiction, and research results. The APE and survey areas must be depicted on the land jurisdiction and research maps.
  - b. Illustrate the location of project elements within the APE (for example, a transmission line project might include the power line right-of-way, pole locations, access roads, and construction staging areas) on the land jurisdiction and topographic map(s).
  - c. Maps and photographs must be of professional quality and legible in a photocopied version. Final reports must be printed in color. Maps must include the appropriate key, scale, and north arrow. Township, Range, and Section must also be included on all location maps. USGS topographic maps must be at a scale of 1 inch = 2000 feet.
  - d. The UTM project locator (see *Appendix E*) is an arbitrary point to reference the project and therefore should be on the actual project boundary. Provide only a single UTM point, even for large or discontinuous project areas. However, this number cannot be changed and must be used consistently, much the same as for archaeological site designations. Note that the UTM project locator does not need to be placed on any figures.
4. Previous Research/Records Searches: This section must contain a summary of previous inventories conducted within the project area, and the results of literature reviews (archaeological, ethnographic, historic, etc.) and records searches, minimally including AZSITE, land-managing agency files, and historic General Land Office (GLO) maps. Also identify all properties listed to the National Register of Historic Places (NRHP) using AZSITE (for archaeological sites) and the Google Earth™ link to NRHP properties at [http://nrhp.focus.nps.gov/natreg/docs/Spatial\\_Data.html](http://nrhp.focus.nps.gov/natreg/docs/Spatial_Data.html).

When pertinent, we also recommend review of Sanborn Fire Insurance maps, historic road and topographic maps, title plats, etc., as part of the background research.

- a. For AZSITE data, we recommend all consultants formally request a records search to ensure all available information is gathered, including recent surveys and newly recorded sites. Data downloaded by the consultant may not otherwise be complete.
- b. Cultural resources and previous surveys identified within a one-mile buffer zone around the APE must be properly labeled and plotted on a 1:24,000 scaled 7.5' topographic map and summarized in tables (1 inch = 2000 feet). A half-mile buffer zone may be used if the project is

located in a highly urbanized area or for linear surveys; if you use a half-mile buffer zone, clearly articulate this in your report.

- c. Copies of relevant GLO maps must be included if they depict features within the APE; alternatively, the features can be added to the background research map. Any such features identified during the survey must be appropriately documented and evaluated. As appropriate, include a statement indicating that features depicted on the GLO do or do not exist in the survey area.
- d. When land jurisdiction beyond the APE (*i.e.*, but within the buffered study area) is federally owned, the appropriate land-managing agency's records must also be inventoried and summarized in the report. Shape files should be obtained and added to USGS maps.
- e. If a portion of the APE or study area includes Tribal land, contact the appropriate Tribe's archaeological records office and include the information about past projects and cultural resources in the report following Tribal policy. Clearly indicate the Tribe's policy and how it is reflected in the report documentation.
- f. Briefly discuss those surveys and cultural resources in the study area, emphasizing those that intersect the current APE or are of particular importance or relevance to the current study. If previous surveys within the APE are more than 10 years old, then there must also be a discussion on the adequacy of those surveys, including whether the previous surveys were conducted to current survey and site recording standards (following SHPO's Guidance Point No. 5 available at <http://azstateparks.com/SHPO/review.html>).
- g. If available from the Agency, include the Tribal perspective about the ethnohistory of the area and properties that may have traditional cultural significance to the Tribes.
- h. Tabular data used to summarize previous surveys must include an agency reference number (e.g., SHPO-2014-0001 or 2014-001.ASM), project name, report author, and year, if available. The results of all research should be summarized in tables, and graphically depicted. All references must be included and fully cited.
- i. The table of all cultural resources identified within the Class I study area must include the following information: site number or property, site type, and cultural/temporal affiliation, as well as the associated report reference (author/year). Identify/highlight those resources within the APE, and include eligibility status (including criterion/criteria and recommended or previously determined).

**NOTE:** Maps and tables containing background research results with site location information must be included in an Appendix to facilitate review and so that they can be easily redacted for Freedom of Information Act or state-level requests (Public Records Requests). Project plans, because they are not curated as part of the inventory report, should be the last document in the Appendix, or a separate attachment.

5. Physiographic Context: An environmental description of the general project area, including climate, biotic zone, surficial geology, soils, drainages, and landforms must be included in each report because geophysical aspects were critical to how the landscape was used. The detail required for this section will depend on the nature and extent of the undertaking, as well as the

cultural resources identified and their locations within the project area. Paleoenvironmental information should be included as appropriate. Cite all references/sources used.

6. Culture History: The length and detail of the prehistory and history presented in this section should be tailored to the project location, the nature and extent of the undertaking, and the cultural resources identified as a result of background research and field survey (as applicable). If relying on boiler-plated histories, utilize long or short versions, as appropriate, and make sure that they are up-to-date with current research in and around the project area. The culture history should reference the appropriate literature, and should reflect current research. All references associated with this section must be fully cited in the References/Bibliography section of the report. The information presented should provide the background for development of one or more historic contexts, which provides the basis for evaluation of significance and ARHP/NRHP eligibility.
7. Survey Methods: Reports must include comments on ground surface visibility, areas omitted from intensive survey and the rationale behind the decision to omit them, survey methods (including transect interval, GPS), date(s) of fieldwork, and project personnel (principal investigator, field supervisor, and crew). The site definition criteria used for identifying archaeological sites must be stated (e.g., ASM site designation criteria, Forest Service criteria, etc.), and artifact identification references should also be included, as appropriate.
8. Survey Findings: This section must include a thorough description of all cultural resources identified; the survey locations and all identified cultural resources must be plotted on USGS 7.5' topographic maps at a scale of 1:24,000. Include a site management summary table with all reports so it can be easily redacted, if necessary.
  - a. ASM site numbers and agency specific site numbers, as appropriate, should be obtained for all archaeological sites. We encourage you to obtain ASM site numbers for projects on private land, and submit courtesy copies of the agency/SHPO approved, FINAL report to the Arizona State Museum.
  - b. Reports must include a site map that clearly shows the relationship of cultural features within the site, site boundaries, roads (include milepost for ADOT projects), natural features (trees, streams, washes, cliffs, etc.), topography, areas of disturbance, and proposed impacts (for example, a proposed right-of-way), as well as land ownership and the APE, as applicable. Locations of diagnostic artifacts and/or artifact concentrations should also be depicted on the site map. Contour lines must also be depicted. Site maps plotted on aerial images should exhibit high quality resolution.
  - c. Archaeological site descriptions must include site dimensions, landform, elevation, details on possible temporal (phase, period/occupation date range) and cultural affiliations (as specific as possible, if known), all features observed, diagnostic artifacts observed, surface artifact density (see below) and diversity (artifact class, raw material, etc.), relevant photographs, as well as information of the integrity of each site (for example, amount of ground disturbance, potential for subsurface archaeological remains, potential to provide important information, and likelihood that human remains are present). The depositional environment of archaeological sites should also be characterized (e.g., residual, eluvial, colluvial, alluvial, aeolian, etc.), if possible.

- d. Artifact density should be characterized as estimated counts, or ranges, of artifacts observed on the site's surface and must be stated whether or not terms such as "low," "medium," or "high" density are provided. Ranges like "200 to 300 artifacts" or "one to five artifacts per square meter" are acceptable, but open-ended estimates, such as "200+" are not. If the terms such as "low," "medium," or "high" density are to be used, then these terms must be explicitly defined / quantified (in the report's Methods section) in relation to artifacts per square meter. Overly broad ranges, such as 0.01 to 0.99 artifacts per square meter, may need to be further subdivided (e.g., low-to-moderate, moderate-to-high) and quantified.
- e. For historic-period archaeological sites, in addition to the information above, important diagnostic artifact characteristics (makers' marks, technological aspects, embossing, etc.) should be referenced (with information source cited), described, and/or illustrated. A listing of these artifacts should be included with dates of production, information about the product, contents, function, etc.
- f. For standing architecture (i.e., buildings and structures), the **State of Arizona Historic Property Inventory Form** (available through SHPO or online at <http://azstateparks.com/SHPO/nationalregister.html>) must be completed and included in the documentation for each building and structure; instructions are included with the form. The property description must always include photographs, an assessment of the condition of the property, any architectural details that embody the distinctive characteristics of a type, period and method of construction, and, if applicable, the property's association with events or individuals that are pertinent to its significance.
- g. The extant and surrounding built environment within and surrounding the project area must be described in sufficient detail to insure 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, if possible.
- h. Other historical sites, structures, and objects should be thoroughly described, although the inventory form is not used. For additional guidance, see National Register Bulletins, "*Guidelines for Evaluating and Registering Historical Archaeological Sites and Districts*" and "*Guidelines for Local Surveys: a Basis for Preservation Planning*."
- i. For traditional cultural properties (TCPs), 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*."
- j. Arizona/National Register of Historic Places (ARHP/NRHP) Evaluations: Reports must contain evaluations of the Register eligibility of each cultural resource identified, and must present the property type (i.e., site, building, structure, object, or district) for each cultural resource evaluated. For multicomponent sites, each component must be separately addressed. Explanations supporting the recommendation of eligibility or ineligibility must be presented in detail and include assessments of historic significance and integrity. If it is not possible to evaluate the eligibility of a cultural resource, a thorough explanation for this evaluation must be provided. Refer to **Appendix D** for additional guidance.

- k. Isolated occurrences (IOs) must be depicted on the USGS topographic map and summarized in tabular format (when more than two recorded). Requisite information includes IO number, a brief description (material, quantity, areal extent), available cultural and temporal information, and UTM location. Refer to **Appendix C** for SHPO's revised policy on IOs.
- 9. Research Design: Reports for surveys of 640 acres or more than 10-linear miles of state-owned or controlled land, or private land, must include a research design with relevant questions and analysis of results.
- 10. Summary and Recommendations: Briefly recap the results of the survey with eligibility recommendations, assessment of impacts, and recommendations for the treatment of identified resources, as well as standard discovery clause(s), as appropriate. Include a site management summary table when more than 2 resources are identified. Do not include a finding of project effect; this information should be in the agency's consultation letter only.
- 11. References/Bibliography: Each report must contain a bibliography of all references cited using a standardized format (e.g., American Antiquity).

### SUMMARY

In order to facilitate our review of compliance documents associated with state and federal historic preservation laws, the SHPO needs specific information. These documentation standards provide requirements for the content of cultural resource survey reports and historic architectural/structural inventory documentation, as well as guidance for agency cover letter transmittals. Please be advised that, if consultation documents (including cover letters, reports, and supplementary materials) do not provide the information requested above, then the SHPO will request that information; failure to provide all pertinent information with the original submittal will delay SHPO review. The SHPO reviews and comments on several thousand projects annually, so adherence to these documentation standards will greatly facilitate our review of project submittals and, ultimately, our response time.

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## APPENDIX A: SHPO SURVEY REPORT ABSTRACT

**Report Title:** Full title; must match the title on the cover / title page(s). Include report submittal date, and indicate Revised, with revision date, if appropriate.

**Project Name:** Refers to the official project name, as provided by project sponsor or agency.

**Project Location:** Identify the nearest city or town, and county. For ADOT projects, include the roadway (highway, route), number, and milepost limits.

**Project Locator UTM:** Provide one UTM coordinate (N, E) for the project as a whole.

**Project Sponsor:** The project proponent.

**Sponsor Project Number(s):** The official project number provided by the sponsor or lead agency. For ADOT projects, include both the federal project number and the TRACS number.

**Lead Agency:** The agency responsible for consultation under the State or National Historic Preservation Acts.

**Other Involved Agencies:** List all agencies involved in the project, including land managers and permitting agencies, including Arizona State Museum if an Arizona Antiquities Act permit is involved. Do not include the SHPO.

**Applicable Regulations:** List all regulations that pertain to the current project/undertaking as it relates to review under the State or National Historic Preservation Acts.

**Funding Source:** Identify as federal, state, or private and list all sources.

**ASLD ROW Application Number:** Must be included on all reports involving State land administered by the Arizona State Land Department.

**Description of the Project/Undertaking:** Briefly describe the purpose of the project or undertaking (e.g., road widening, housing development, land transfer). If known, describe the nature and extent/limits of ground disturbing activities, including depth of disturbance, as well as the types of equipment that may be utilized. Include ancillary facilities such as utility easements, access roads, staging areas, etc.

**Project Area/Area of Potential Effects (APE):** Describe the extent of the project area (for state projects) or APE (for federal undertakings), including dimensions (length and width, if known).

**Legal Description:** Township, Range, Quarter Section (all involved); must be NAD 83. Reference the appropriate zone and baseline and meridian.

**Land Jurisdiction:** Identify the land owner(s)/land manager(s). If the land is an easement that is owned by a different entity, indicate the underlying landowner as well. All privately owned-land can be grouped together as "private".

**Total Acres:** Refers to the total number of acres in the survey area, all land jurisdictions combined.

**Acres Surveyed:** Total number of acres surveyed; list by land jurisdiction.

**Acres Not Surveyed:** Total number of acres not surveyed due to disturbances, vegetation, topography, etc.; list by land jurisdiction. State rationale for areas not surveyed.

**Consultant Firm/Organization:** Identify the organization or consultant firm conducting the survey and writing the report.

**Project Number:** The organization or consultant firm’s internal project or report number.

**Permit Number(s):** All associated permit numbers obtained by the organization or consultant firm that are necessary to conduct the survey.

**Date(s) of Fieldwork:** Inclusive dates of fieldwork.

**Number of IOs Recorded:** Total number recorded, whether isolated artifacts or features.

**Number of Sites Recorded:** The total number of sites recorded during field survey. Include any sites that were re-located and/or re-evaluated as well. Do not include previously recorded sites that were not re-located during the current survey, for whatever reason.

**Eligible Sites:** The total number of eligible sites.

**Ineligible Sites:** The total number of ineligible sites.

**Unevaluated Sites:** The total number of unevaluated sites.

**Sites Not Relocated:** The total number of previously recorded sites not relocated during the current survey. In the comment section, indicate whether the site was mis-plotted, destroyed, etc.

**Site Summary Table\***

Land Jurisdiction	Identification Status	Site Number/Property Address	Eligibility Status/Criterion/Criteria	Recommended Treatment

**\*Site Summary Table:**

**Land Jurisdiction:** Identify for each site; if private land, identify landowner if known.

**Identification Status:** For each site, identify as newly or previously recorded. Include sites not re-located as previously recorded.

**Site Number/Property Address:** Provide the official agency site number for archaeological sites, or the property address for historic buildings. If agency site number differs from ASM number, include both.

**Eligibility Status/Criterion:** Identify eligibility (eligible, ineligible, unevaluated) as recommended by recorder or determined by agency with SHPO concurrence; provide the concurrence date if available. Also include the appropriate criterion/criteria for eligible sites.

**Recommended Treatment:** Identify the proposed treatment for the current project, e.g., none, avoidance, monitoring, flagging, eligibility testing, data recovery, archival research, etc.

**Comments:** Include any other pertinent information/comments. Do not include a finding of project effect, as that is the agency's responsibility.

## APPENDIX B. Definitions/Terminology

**Historic properties** - cultural resources or cultural properties (prehistoric and historic archaeological sites, structures, building, districts, and objects) that are listed, or eligible for listing, in the National Register of Historic Places (NRHP) (36 CFR Part 800.16(l)(1)). SHPO applies the same term to cultural resources eligible or listed in the Arizona Register of Historic Places (ARHP). Use NRHP for federal undertakings and ARHP when consulting under the State Act. Note: Unevaluated resources must be included in assessments of effect.

**Area of potential effects (APE)** – "...the geographic area within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties..." (36 CFR § 800.16(d)). If the survey area is different from the project APE, clearly explain the reason for the difference (e.g., the remainder of the APE has been previously surveyed and no new survey is necessary). We recommend reports use "survey area" as consistently as possible, and distinguish it from the overall project APE on maps, as necessary. Please also see SHPO Guidance Point No. 6 for defining the APE for linear projects.

With the exception of FCC undertakings for cell towers (or unless otherwise defined in consultation with the SHPO, only a single APE should be identified. It is the agency's responsibility to define the APE, which should be of sufficient size to consider the direct, indirect, and (reasonably foreseeable) cumulative effects of the project to historic properties.

**Class I inventory** – background research consisting of a literature review and site files check that is sufficient to identify past survey coverage and generate expectations about the types and frequencies of cultural resources that might be expected during field survey. This research should include a one-mile buffer zone surrounding the survey area for block survey parcels (half-mile in highly urbanized areas), and a half-mile-buffer either side of a linear survey corridor (measured from the center line). Please do not use the term "Class I survey."

**Class II survey** – background research and a sample field survey; the sampling strategy must be agreed to by the lead agency in consultation with the SHPO prior to fieldwork, and discussed in the report.

**Class III survey** – background research (the Class I inventory) and an intensive field survey meeting current agency and/or ASM standards. Please do not use the term "Assessment Survey" as this generally refers to damage assessments, general overview, or survey not meeting these standards. Although titles should include pertinent information, extremely long titles are often problematic in databases.

**Reconnaissance:** a non-intensive exploration (less than ASM or other professional standards) of the **built** environment. Such reconnaissance may be conducted by vehicle (aka windshield reconnaissance) and/or using Google Earth™ or similar mapping application.

**Qualified archaeologist** – minimally meets the Secretary of the Interior's Standards for Professional Qualifications (36 C.F.R. Part 61). This office strongly recommends that all cultural resources investigations are completed under the supervision of an archaeologist who is also qualified under an Arizona Antiquities Act (AAA) permit as Principal Investigator. It is also our position that the field supervisor (directly in charge/in the field during the survey) should meet AAA permitting standards for a project director.

### APPENDIX C. SHPO Position on Isolated Occurrences (REVISED 2015)

The National Register currently identifies five property types: sites, buildings, structures, districts and objects. The Arizona State Museum and other permitting and land-managing agencies use specific criteria (quantity, artifact or material class, density, area or size) to define archaeological sites, and when identified resources (i.e., artifacts or features) do not meet the site criteria, they are generally classed as isolates or isolated occurrences (IOs). Our revised opinion is that IOs, by default, are generally not eligible for the Arizona/National Register of Historic Places, and no justification for this ineligibility is necessary. However, a certain amount of documentation (**see Section B.8.k**) is required to demonstrate the level of effort recording cultural resources during survey. Furthermore, in our reviews, we also find that IOs often include objects, a National Register property type that requires further discussion and an evaluation of eligibility.

The discussion of objects in National Register Bulletin 15 is limited and open to interpretation. Objects are generally small in scale and may be moveable. Although Bulletin 15 suggests that small objects not designed for a specific location are not Register eligible, there are certainly exceptions worthy of further evaluation. One example is the ceramic pipe found at the Barry M. Goldwater Range, which was recorded as an IO for lack of any context, but subsequently determined NRHP eligible under Criteria A after consultation with the Tribes. Another example might be an isolated pot break or projectile point (e.g., a Paleoindian or Clovis point). A series of isolated artifacts of any kind could be associated with a trail and, as such, might contribute to the eligibility of a known historic property. Isolated features should also be scrutinized; for example, an isolated rock pile might be a shrine.

We recommend (and ADOT requires) that roadside memorials and monuments, whether or not they are identified as IOs, should be located on maps (include milepost), documented, and photographed.

In conclusion, we recommend that due diligence during survey and reporting consider the importance and cultural value of individual artifacts or features (whether you call them isolates or objects), and include a consideration of their frequencies, types, and distributions as a component of the cultural landscape. Therefore, on a case-by-case basis, SHPO review may lead to requests for additional information, and possibly, for evaluation of one or more IOs in an appropriate historic context.

## APPENDIX D. Eligibility Evaluations

Evaluations of ARHP/NRHP eligibility must include the historic context(s) within which the significance of each identified cultural property has been evaluated. A historic context minimally consists of the place, time, and theme under which the cultural resource is significant.

1. 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, “The 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”).
2. In the absence of relevant published historic contexts (e.g., SHPO’s historic context studies or those generated by a land manager), the culture history of the area may be utilized to assist with eligibility assessments, but it must be specifically oriented toward evaluating the resources identified during survey, not simply a general or “boiler plate” summary of generalities on the prehistory and history of the region.
3. Register-eligibility evaluations must include the criterion or criteria under which a property is significant: Criterion A (association with events); Criterion B (association with significant person); Criterion C (distinctive design, construction, work of a master); Criterion D (may yield or has yielded important information). Always note whether this is the recorder’s recommendation, or SHPO/ Agency determination. When applying the ARHP/NRHP criteria, keep in mind that a property may be eligible under more than one criterion, and that an archaeological site may be eligible under criteria other than Criterion D.
  - a. AZSITE attribute data includes available information about the National Register status of identified cultural resources. If there are multiple SHPO/ Agency determinations for a single resource, especially linear properties, additional research may be necessary to address that particular segment or portion of property currently being investigated.
  - b. Assessing affects to Register-eligible properties requires that you address the character-defining elements of the resource and current aspects of integrity (see #4 below regarding aspects of integrity).
  - c. Address the eligibility of multicomponent sites separately, not as contributing and noncontributing elements of the same site, and not as a single entity.
  - d. Historic roads that are part of the Historic State Highway System (HSHS) are considered ARHP/NRHP eligible under Criterion D **only** (other than Route 66 and US 60/ Apache Trail), pursuant to the *Interim Procedures for the Treatment of Historic Roads* developed jointly by FHWA, ADOT, and SHPO (November 2002; for list of historic roads that are part of the HSHS see <https://www.azdot.gov/about/historic-roads>). Evaluate the segment of road within the APE as a contributing or noncontributing component. The individual road segment should have logical start and end points, even if they extend outside of the APE (only the segment of the road within the APE must be fully documented).

- e. See the Arizona Historic Bridge Inventory on ADOT's website for the eligibility of bridges associated with the HSHS (<http://azdot.gov/business/environmental-planning/environmental-guidance/technical-guidance>). All bridges have been evaluated for NRHP eligibility under Criteria A, B, and C; however, further evaluation may be necessary depending on the local significance of the structure.
  - f. Historic roads not part of the HSHS must also be documented and evaluated for ARHP/NRHP eligibility. The individual road segment should have logical start and end points, even if they extend outside of the APE.
  - g. SHPO is in the process of developing guidance for documenting and evaluating historic linear resources. In the meantime, we recommend that unevaluated linear resources (as a whole) be treated as ARHP/NRHP eligible under Criterion D. Then evaluate the segment of the resource within the APE as a contributing or noncontributing component of the overall eligibility, with justification. Again, the individual segment should have logical start and end points, even if they extend outside of the APE.
4. In addition to establishing its property type, significance, and historic context, the integrity of each cultural resource must be assessed when evaluating a property's ARHP or NRHP eligibility. "Integrity is the ability of a property to convey its significance (*National Register Bulletin 15*)."  
Aspects of integrity include: location, design, setting, materials, workmanship, feeling, and association.
  5. Additional archival research about historic-period sites may be recommended as a part of treatment, but the inventory report must include a discussion of the character-defining elements, type, period, method of construction, or high artistic merit already present that may make it eligible for inclusion in the ARHP/NRHP (under criterion/criteria A, B, and/or C).
  6. If archaeological testing is required in order to complete an eligibility evaluation, then the evaluation should specify why the significance assessment cannot be completed using available data. See SHPO Guidance Point No. 2 on the roles of archaeological testing for additional information.

#### Additional Guidance

1. *National Register Bulletin "Researching a Historic Property"*
2. The Historic Archaeological Advisory Committee's "Historical Archaeology Research Guide"; download at <http://azstateparks.com/publications/index.html>.
3. SHPO context studies; contact the SHPO.

## APPENDIX E. FCC CELL TOWER PROJECTS

- I. For surveys resulting in negative findings (following SHPO Guidance Point No. 10, *Survey Report Summary Form: Guidelines for Use and Submittal*; revised), submit either a technical report to current professional standards, or a Survey Report Summary Form (SRSF). Always address both the visual and direct APE in the requested information.
- II. If desired, submit only the FCC Form 620 (new construction) or 621 (collocation) without an SRSF or inventory report if the following conditions are met:

### A. New Tower Construction

1. Background Research indicates the Area of Potential Effects (APE) for direct effects was previously surveyed and no cultural resources were identified (negative findings). The previous survey must meet current ASM or land managing agency survey and site recording standards per SHPO Guidance Point No 5, *SHPO Position on Relying on Old Archaeological Survey Data* (April 20, 2004); **OR**
2. The APE for direct impacts was not previously surveyed, but it is paved or fully developed and there is no potential for intact subsurface cultural resources based on the environmental and historic settings and background research (include representative photographs in the Form 620 packet); **AND**
3. There are no historic properties eligible/listed in the NRHP under Criterion A, B or C within the APE for visual effects.

### B. Collocations

1. Absolutely no ground-disturbing activities will occur and the height of new antenna does not exceed FCC collocation standards; **AND**
2. The collocation does not occur within the boundaries of an historic property eligible under Criteria A, B, C; **OR**
3. The collocation does not involve an unevaluated building or structure that is 45 years or older.

If conditions for new tower construction or collocation are not met, submit an inventory report, SRSF, and/or Historic Property Inventory Form(s), as appropriate.

**NOTE:** The FCC packet must contain the relevant information and photographs. Modify forms as necessary to include the methods/results, condition of project area in the Historic Properties Identification section. Include USGS topographic map showing project location (aerial also recommended), and any research results (AZSITE screen shot is acceptable).

### Additional Notes

Submittals of FCC packets to SHPO ideally should occur after Tribal and local government consultation is completed (with responses in hand). Please send SHPO all comments even if they come in post SHPO review.

**PLEASE SUBMIT FCC PACKETS ELECTRONICALLY!**

Appendix E.1. Example of project location/vicinity maps.

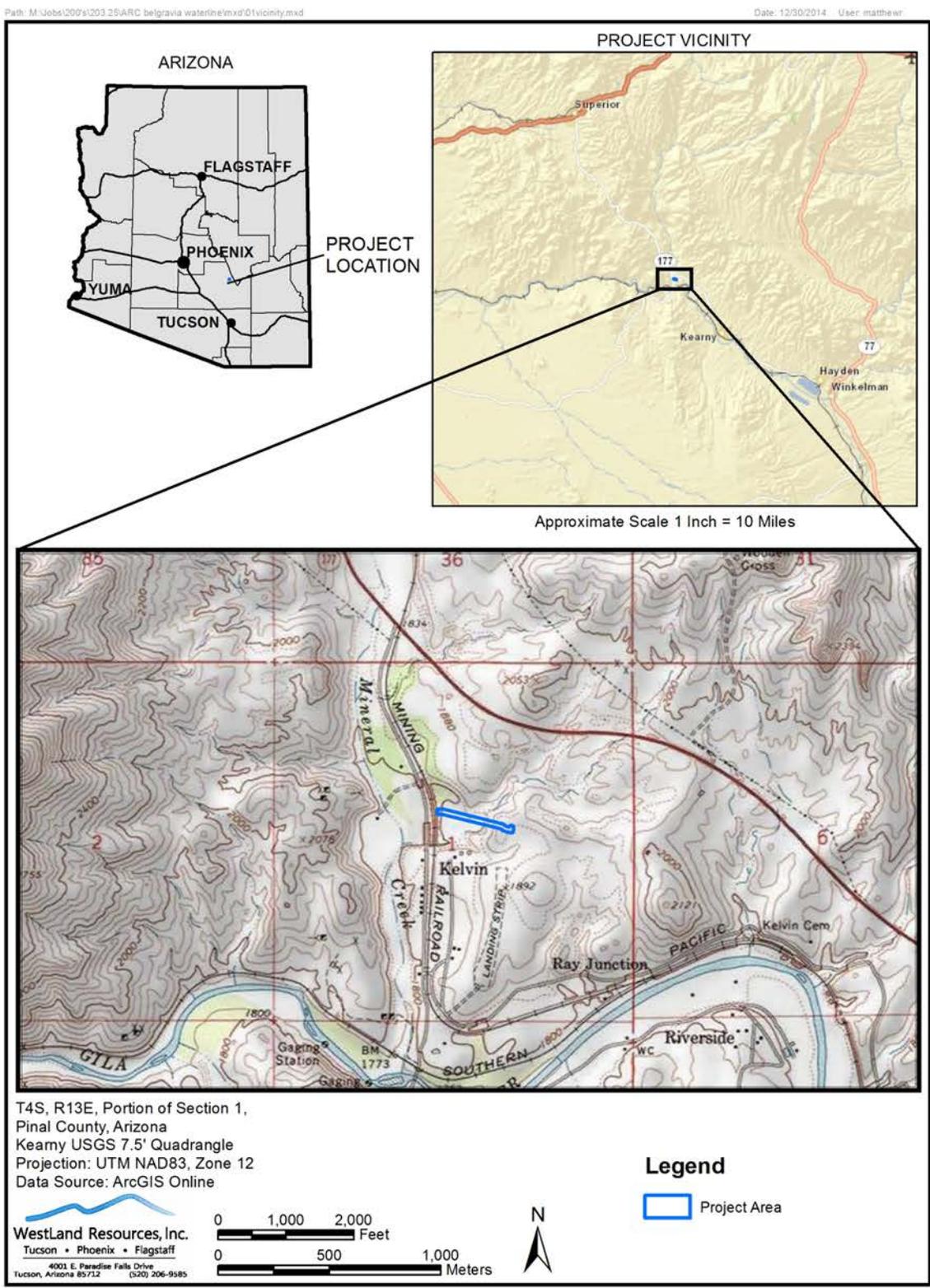
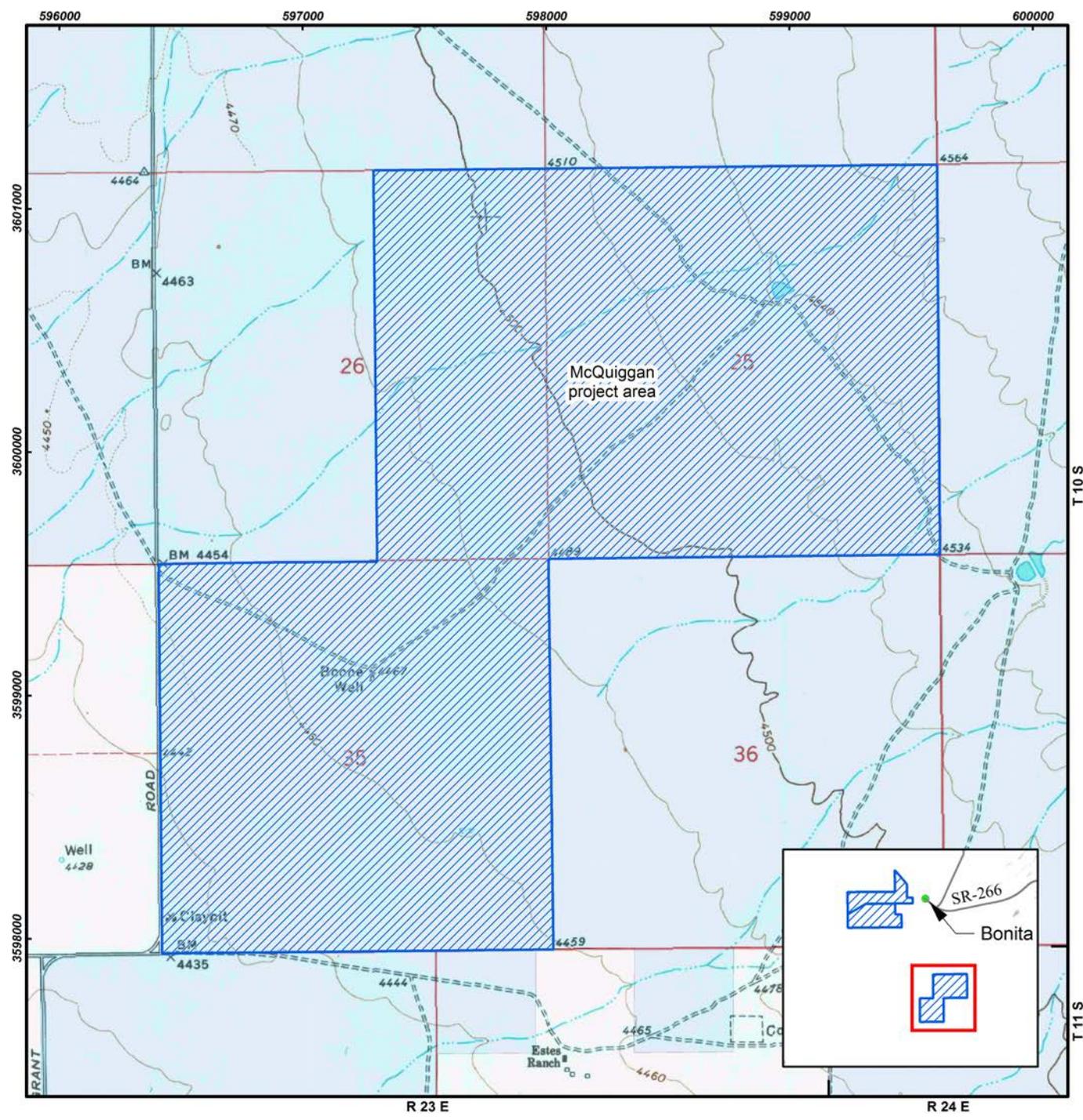


Figure 1. Vicinity map

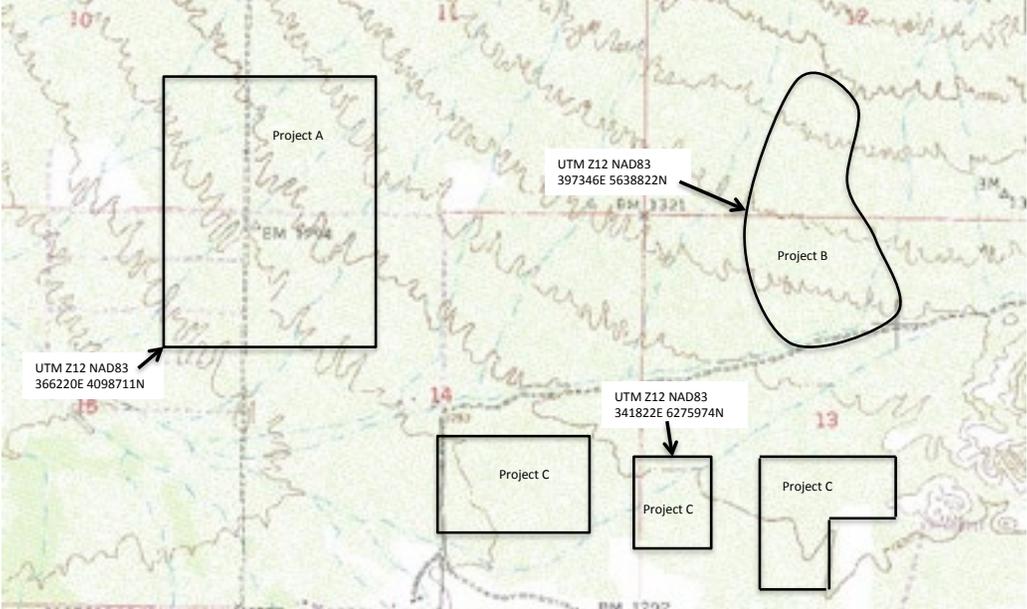
Appendix E.2. Example of land jurisdiction map.



Source: USGS 7.5' Quadrangles:  
 Fort Grant, Ariz. (1972);  
 Land Jurisdiction provided by Arizona  
 State Land Department (2013)  
 NAD 1983, UTM Zone 12

Key		Land Jurisdiction	
	Project area		Private Land
			State Trust Land

**Appendix E.3. UTM Project Locator.**



Note: You do not need to show the UTM Project Locator on the map.  
Also, you no longer need to show any UTM coordinates on map.