

PART II
CHAPTER 6
Historic Property Identification and Evaluation:
Above-Ground

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6-1.0 Overview

Section 106 requires a “reasonable and good faith effort” to identify historic properties within a project’s area of potential effects (APE). For the purposes of Section 106, historic properties are defined as those properties listed in or eligible for listing in the [National Register of Historic Places](#) (NRHP). As a general guideline, in order to be considered for listing in the NRHP, a resource should be at least 50-years old. Historic properties include both above-ground and archaeological resources. The identification phase of Section 106 consists of locating properties previously listed or determined eligible for the NRHP and evaluating properties to determine if they are eligible for NRHP listing.

FHWA and INDOT rely on qualified professional consultants to provide clear, detailed and honest information when identifying historic properties in order to ensure a reasonable and good faith effort. Without a proper identification effort, FHWA/INDOT is unable to make an assessment of “adverse effect.” Therefore, this chapter provides guidance for completing the identification of historic above-ground resources, including survey, evaluation and reporting for projects funded by FHWA. Chapter 7 details the steps for completing archaeological identification and evaluation.

Identification of above-ground resources is conveyed through the production of a historic property report (HPR). The HPR provides the results of the above-ground identification efforts, including field survey and NRHP eligibility evaluations. An HPR must be produced by a qualified professional who has been approved to conduct historic/architectural investigations. INDOT-CRO will only accept an HPR that has been prepared by qualified professionals who meet the Secretary of Interior's Professional Qualification Standards and who are listed on the [Indiana Division of Historic Preservation and Archaeology's Qualified Professionals Roster](#). Once a completed HPR has been submitted to/approved by INDOT-CRO, that HPR will be provided to SHPO and consulting parties for review and comment.

6-2.0 How to Complete a Historic Property Report

The following subchapters describe the procedures for identifying and evaluating historic properties. These procedures will be described through the preparation of the HPR. A full or short HPR will be prepared for every Section 106 project that does not fall under the Minor Projects PA. Specific HPR content guidelines are provided in Chapter 6-3.0.

6-2.1 Literature Review/Previous Investigations

A Literature Review includes the collection of sufficient data to characterize or predict the type and location of previously identified cultural resources that might be present in the APE. A background literature search is the review of all pertinent cultural resources data, a summary of known resources, and a determination if cultural resources may exist in the study area. The thorough literature review should be completed early in the investigation. The literature search area must be broad enough to develop the historic context for the area, but most importantly, it

should provide a base that can support the cultural resource evaluations that follow. Without a quality literature review, it is virtually impossible to formulate an accurate and useful historic context.

Some expected resources to include in a literature review include:

Indiana Historic Sites and Structures Inventory (a.k.a. county interim reports)

Likely the most-used resource when completing a literature review is the Indiana Historic Sites and Structures Inventory (IHSSI). All of Indiana’s 92 counties (and, separately, some municipalities or townships in large urban areas) have been surveyed. The majority of the counties that have been surveyed have published reports called “interim reports.” The term “interim report” recognizes that a “final” inventory of a county can never be accomplished due to the ever-changing nature of the built-environment. Properties are demolished, altered, and/or restored on a daily basis. Further, as each year passes, properties previously omitted because they were less than 40 years old attain sufficient age to be considered for survey.

All survey records are filed at the DHPA for public access. Additionally, survey data is continually being made available through the Indiana State Historic Architectural and Archaeological Research Database (SHAARD) and SHAARD GIS.¹ By the end of 2013, roughly half of the counties in the state have county survey data entered into SHAARD. With the development of SHAARD, new survey data will be made available online, but not in published interim reports. For counties where survey data appears in SHAARD and in a published interim report, SHAARD should be checked first. SHAARD will take precedence over published interim report data.

For a map of the surveyed counties and to ascertain whether an interim report has been published, visit the DHPA website at <http://www.in.gov/dnr/historic/>. The DHPA has a complete set of interim reports that is available to the public. Other repositories that maintain copies of interim reports include the Indiana State Library, federal and state agencies, regional planning agencies, city governments, as well as libraries throughout the state².

SHAARD

SHAARD, the [Indiana State Historic Architectural and Archaeological Research Database \(SHAARD\)](#) and SHAARD [GIS](#), is an online database of known historic resources in Indiana. SHAARD includes data on the Inventory of Historic Sites and Structures surveys (county interim reports), properties listed in the State and National Register of Historic Places, historic bridges, historic theaters, and archaeology sites (for registered qualified professional archaeologists). SHAARD GIS is the mapping component of SHAARD. Data are continually being added to the database.

¹ SHAARD and SHAARD GIS is available online at: <http://www.shaard.dnr.in.gov> and <https://gis.in.gov/apps/dnr/SHAARDGIS>

² Contact the Indiana Landmarks at 317-639-4534 or <http://www.indianalandmarks.org/Resources/ArchitecturalSurveys/Pages/SurveyReports.aspx> to check the availability of a specific Interim Report. Some Interim Reports have been digitized as part of the digital library collections of the IUPUI University Library and can be found online (<http://www.ulib.iupui.edu/digitalcollections/home.html>).

Indiana Landmarks has partnered with the Indiana University/Purdue University at Indianapolis (IUPUI) University Library to digitize and make certain interim reports available online at <http://www.ulib.iupui.edu/digitalscholarship/collections/IHSSI>. To be included in the IHSSI, a property must be at least 40 years old and retain its historic integrity. Severe alterations to the fabric of a building, such as the addition of synthetic siding material, removal of decorative features, replacement/resizing of windows, and construction of large or incongruent additions affect integrity and often disqualify a property from inclusion in the survey.

The IHSSI uses the following rating system³:

Outstanding (O)—These properties possess a high level of historic or architectural significance. They are either already listed in the National Register or may be eligible for listing in the National Register. These properties can be of local, state, or national significance;

Notable (N)—These properties do not quite merit an Outstanding rating, but possess enough historic or architectural significance to be considered above-average. Further research may reveal these properties to be eligible for listing in the National Register;

Contributing (C)—These properties meet the basic inventory criteria, but do not possess any noteworthy historic or architectural significance. These properties are an important contribution to an area’s historic fabric. They can be eligible for or listed in the National Register as part of a historic district, but do not have enough merit to stand alone;

Non-Contributing (NC)—These properties are included in the survey only as part of a historic district. These properties are fewer than fifty-years old or possess little historic integrity due to alterations. They are not eligible for the National Register.

While these surveys and companion interim reports are valuable tools in understanding the local built environment and identifying potential historic properties, they are not the final authority on NRHP eligibility. Survey ratings do not always translate to NRHP eligibility. Moreover, since the surveys were completed, significant changes may have occurred to the properties and environment. Information found in the interim reports should always be field-checked.

Indiana Register of Historic Sites and Structures (the State Register) and National Register of Historic Places

Properties previously listed on the State and National Registers should be checked during the literature review. For a listing of National Register listed properties in Indiana please refer to the [National Register Database](#). Additionally a listing of National and State Register properties can be found on [SHAARD](#).

³ IHSSI Survey Manual for Architectural and Historical Resources. Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology.2011.

Historic Bridge Inventory

Bridges built through 1965 have been surveyed and evaluated through the Indiana Historic Bridge Inventory. More information about the bridge inventory can be found in Part IV of the CRM. A listing of surveyed bridges can be found on the [Historic Bridges Inventory Summary & Results](#) webpage. Historic bridge locations also appear on SHAARD. Keep in mind that there may be location discrepancies between the Historic Bridge Inventory and SHAARD. Keep in the mind that the Historic Bridge Inventory data takes precedence over SHAARD if there is a discrepancy.

Historic maps

Reference to historic maps will also provide valuable insight in predicting the likely presence of historic properties in the APE. Historic maps can be accessed in a variety of locations including online, Indiana State Library, Indiana Historical Society, and libraries across the state.

6-2.2 Historic Context

The results of the Literature Survey will aid in the development of the historic context, a critical element in evaluating properties for National Register eligibility. The [National Park Service's National Register Bulletin 15](#) states that historic contexts are "...found at a variety of geographical levels or scales. The geographic scale selected may relate to a pattern of historical development, a political division, or a cultural area. Regardless of the scale, the historic context establishes the framework from which decisions about the significance of related properties can be made..."⁴

A historic context is information about historic properties grouped by an important theme in the prehistory or a history of a community, state, or the nation during a particular period of time. The development of historic contexts is a foundation for decisions about the planning, identification, evaluation registration, and treatment of historic properties, based upon comparative significance.

Because historic contexts are organized by theme, place, and time, they link historic properties to important historic trends. In this way they provide a framework for determining the significance of a property and its eligibility for National Register listing. Knowledge of historic contexts allows applicants to understand a historic property as a product of its time and as an illustration of aspects of heritage that may be unique, representative, or pivotal.

Themes often relate to the historic development of a community, such as commercial or industrial activities. They may relate to the occupation of a prehistoric group, the rise of an architectural movement, the work of a master architect, specific events or activities, or a pattern of physical development that influenced the character of a place at a particular time in history. It is within the larger picture of a community's history that local significance becomes clear and

⁴ National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation*, See <http://www.cr.nps.gov/nr/publications/bulletins/nrb15/nrb15.pdf>.

the property is seen in relationship to trends and patterns of prehistory or history statewide or nationally.

The historic context for a project should be integrated into all summaries and discussions of significance. Previously recorded properties and previous decisions regarding National Register eligibility should be evaluated against the context. Recommendations should be justified in narrative text by referring to all available data. Thematic groupings should be identified within and relative to the historic context developed for the project.

Specific content that should be provided in the historic context is listed in Chapter 3.0. Additional guidance for the definition and the preparation of a historic context can be found in [National Register Bulletin's 16A](#) *How to Complete the National Register Form*; [National Register Bulletin 15](#) *How to Apply the National Register Criteria for Evaluation*; and [National Register Bulletin 16B](#) *How to Complete the National Register Multiple Property Documentation Form*.

6-2.3 Methodology

The methods used to address cultural resources investigations vary depending on the scope and type of projects. The goal for the above-ground survey is to identify properties 50-years or older, or that will be 50 years old at the proposed project letting, that have been listed or may be eligible for listing in the National Register. Buildings, structures, and objects 50 years or more in age, including resources previously identified, are documented according to location, historic context, use, type, age, condition, integrity, and relevant [National Register Criteria](#).

Fieldwork is a key step at this stage in identifying and documenting the actual properties in the APE, gauging the potential for historic districts, and assessing retention of integrity. Based on fieldwork and historic context development, the qualified professional preparing the HPR must summarize the qualities and characteristics of the identified properties and make appropriate NRHP eligibility recommendations. It is expected that the investigator will follow all applicable INDOT-CRO, DHPA, and NRHP guidelines and requirements when evaluating properties. The investigator must always focus on collecting the necessary data to address integrity and eligibility, as INDOT-CRO is **only** interested in information that is needed to determine the eligibility of a property. Extraneous information in such evaluations is distracting.

Repetitiously occurring property-types and their context should be summarized collectively in the survey report. INDOT-CRO (in consultation with SHPO, if necessary) will make the final determination about which architectural properties require further investigation, such as property deed research and interior access and documentation.

For most typical projects, the methodology will include full identification and evaluation of properties 50 years or older in the APE, which is therein conveyed through a single HPR. As a means to ensure that identification remains current up to construction, the 50 year age threshold should be determined based on the date of the proposed project letting. The methodology should clearly state the beginning date used for identification. For projects where actual construction may not begin for many years after the completion of Section 106, it is recommended to increase

the scope of survey to include properties 45 years and older to ensure proper coverage between Section 106 and project implementation.

6-2.4 National Register Eligibility Evaluations

The National Register Criteria for Evaluation (Section 800.4[1]) (National Register Criteria), is used to determine the significance of historic properties.⁵ Cultural resource evaluation is effectively made by following the five-step approach outlined in the National Register Bulletin-How to Apply the National Register Criteria for Evaluation (Please note that the information contained in Chapter 6-2.4 concerning eligibility evaluations is from this aforementioned National Register Bulletin.) These steps are:

- 1) Categorizing the cultural resource as site, building, structure, object, or district;
- 2) Determining the historic context or contexts within which the cultural resource is associated;
- 3) Determining whether the cultural resource is significant under one or more of the four National Register Criteria.
- 4) Determining whether the cultural resource meets any of the criteria of considerations; and
- 5) Determining whether the cultural resource retains the integrity to convey its historic significance.

Cultural resources that meet one or more of the four National Register criteria, or any of the criteria considerations, and retain sufficient integrity to convey their historic significance are considered eligible for listing in the NRHP. The National Register Criteria, criteria considerations, and integrity are discussed below.

6-2.4.1 Criteria of Eligibility

Historic significance is defined as the importance of a property to the history, architecture, archaeology, engineering, or culture of a community⁶. Significance is determined by applying the criteria of eligibility within the framework of a historic context. The four NRHP criteria used to assess whether or not cultural resources are, in fact, **significant** and therefore eligible for the NRHP are:

- A. Cultural resources that are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Cultural resources that are associated with the lives of persons significant in our past; or
- C. Cultural resources that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess

⁵ Consult the various National Register Bulletins that are available online at the following website: <http://www.cr.nps.gov/nr/publications/#bulletins>.

⁶ Ibid

high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

- D. Cultural resources that have yielded or may be likely to yield, information important in prehistory or history.

6-2.4.2 Criteria Considerations

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories⁷:

(a) **A religious property** deriving primary significance from architectural or artistic distinction or historical importance; or

(b) **A building or structure removed from its original location** but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

(c) **A birthplace or grave** of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life.

(d) **A cemetery** which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

(e) **A reconstructed building** when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

(f) **A property primarily commemorative** in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or

(g) **A property achieving significance within the past 50 years** if it is of exceptional importance

6-2.4.3 Historic Integrity

The concept of historic integrity is central to resource eligibility. Integrity is defined as the authenticity of a property's historic identity, evidenced by the survival of physical characteristics

⁷ National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation*, See <http://www.cr.nps.gov/nr/publications/bulletins/nrb15/nrb15.pdf>, 25.

that existed during the resource's historic or prehistoric period. In other words, integrity is the ability of a resource to convey its significance.

There are seven aspects of integrity⁸:

1. **Location:** Quality of integrity retained by a historic property existing in the same place as it did during the period of significance;
2. **Design:** Quality of integrity applying to the elements that create the physical form, plan, space, structure, style of a resource;
3. **Setting:** Quality of integrity applying to the physical environment criteria in one or more areas of significance.;
4. **Materials:** Quality of integrity applying to the physical elements that were combined or deposited in a particular pattern or configuration to form a historic property;
5. **Workmanship:** Quality of integrity applying to the physical evidence of the crafts of a particular culture, people, or artisan;
6. **Feeling:** Quality of integrity through which a historic resource evokes the aesthetic or historic sense of past time and place;
7. **Association:** Quality of integrity through which a historic property is linked to a particular past time and place.

How much integrity is required for eligibility is a somewhat subjective question, but generally several, if not most, of the seven aspects must be met. A resource can be significant, but unless it has a certain amount of integrity, it cannot be eligible. In simple terms, Significance + Integrity = Eligibility. Because integrity is based on the identity for which a property is significant, the NPS emphasizes the need to assess integrity only *after* significance has been determined.

6-2.4.4 Making National Register Eligibility Recommendations

National Register evaluations should clearly show that the NRHP criteria were applied and that integrity was appropriately considered. Once again, it is critical to frame evaluations in these terms: *Significance + Integrity = Eligibility*. When assessing integrity, it is vital to understand how a property is significant and what aspects of integrity are critical for that property to convey its significance. Fully supporting these aspects will help ensure that upon its review, the SHPO concurs to the HPR's findings and recommendations.

Keep in mind that the HPR only conveys recommendations of eligibility. Through the evaluations in the HPR, properties are recommended either eligible or not eligible for the NRHP. Only after SHPO has reviewed the HPR and concurred to its findings, is a property formally determined eligible or not eligible for listing in the NRHP.

⁸ Ibid, 44-45.

6-2.4.5 Disagreements of National Register of Historic Places Eligibility

During the Section 106 process, if FHWA and the SHPO do not agree on the eligibility of a property, or if the ACHP or the Secretary of the Interior so request, FHWA shall obtain a determination of eligibility pursuant from the Keeper of the National Register of Historic Places (Keeper), who is housed in the Department of the Interior.⁹

If a Native American tribe that attaches religious and cultural significance to a property off tribal lands does not agree, it may ask the ACHP to request FHWA to obtain a determination of eligibility. FHWA can also choose to submit a request to the Keeper for a determination of eligibility for a property on which FHWA and SHPO agree upon eligibility status, but a consulting party disagrees.

The procedures outlined in 36 CFR Part 63 will be followed with regard to the determination. INDOT-CRO should be contacted for further guidance in such a situation.

6-2.5 Report Review and Distribution

Before distribution to consulting parties and the SHPO, one electronic copy of the HPR should be forwarded to the INDOT-CRO for review. If the HPR is too large to send via email, a CD or access to a FTP site is acceptable. A copy of the Early Coordination Letter (ECL), if not already distributed, or transmittal letter that will accompany the HPR should be sent to INDOT-CRO at the same time. INDOT-CRO will be able to complete a more thorough review with all relevant information provided.

Remember:

The SHPO must always receive a hard copy of the entire report. Not providing the report in hard copy format to the SHPO could result in delays in the review process.

After any comments from INDOT are satisfactorily addressed, the HPR may be distributed to the consulting parties and SHPO for review and comment as part of the Section 106 process. The transmittal letter should indicate that the INDOT Cultural Resources Office has reviewed the document. CRO should be electronically copied on the transmittal letter and should receive an electronic copy of the final report for INDOT's files.

When the project area warrants preparation of a large HPR (generally over ¼" thick when double-sided) or the number of consulting parties is greater than 10, it is not necessary to provide each consulting party with a complete hard copy of the report. The SHPO must always receive a hard copy of the report, but the other consulting parties could receive a CD of the report instead.

⁹ 36 CFR Part 63.

6-3.0 Full Historic Property Report Guidelines¹⁰

The guidelines are meant to drive the content of the reports. Format and structure of the reports can vary based on what the authoring historian feels is appropriate, as long as the pertinent information is present.

Cover Sheet/Title Page

A cover sheet must be attached to all project reports and should include the following information:

- Report Title/Brief description of the project (i.e., Historic Property Report for the SR 45 Bridge Replacement Project over the White River, Johnson Township, Clark County)
- Principal Investigator, author, and organization including address, telephone number, and e-mail address
- Date
- INDOT Des. No.
- DHPA No. (if already known)

Table of Contents

Arranged in accordance with the sequence of topical headings. Page numbers for each section or appendix must be provided.

Lists of Figures, Photos, and Tables

Management Summary or Abstract

This section should include a brief description of the undertaking and project area, the scope of the work of the report, and a summary of the recommendations concerning National Register eligibility for properties located within the Area of Potential Effects (APE).

Many of the readers of the HPRs submitted to INDOT are not historians: they are project managers, project engineers, and environmental specialists. The Management Summary is included in all INDOT HPRs so that these readers can quickly ascertain if historic properties are within the project area.

Introduction/Project Description

- Summary of the undertaking---identification of the project location, identification of the approximate project termini, and enough project scope information to support the APE delineation. Please focus the HPR on the identification and evaluation of properties, and

¹⁰ These guidelines were largely influenced by those created by the Kentucky State Historic Preservation Office/Kentucky Heritage Council, *Specifications for Conducting Fieldwork and Preparing Cultural Resource Assessment Reports*:
<http://heritage.ky.gov/NR/ronlyres/5757C6A1-E8E0-4B5E-BE0F-7AF5B78C6BF1/0/2006FieldworkCRspecs.pdf>

not project details and effects related discussions. Details concerning plan sheets should all be contained within the transmittal letter instead of the HPR itself. Later changes in the project or effect findings may cause procedural confusion if a HPR contains different or contradictory information than that of the eventual finding/800.11 documentation.

- Description of the project area---include a brief summary of the setting (urban, suburban, rural), a discussion of present land use (commercial, agricultural, etc.), a brief discussion of the physical environment (topography, physiography, soils, vegetation, drainage), and a summary of the transportation facilities that bisect/have bisected the project.
- Define the APE and explain how it was determined.
- Acknowledge survey/research personnel. Indicate project personnel meeting Secretary of the Interior's Professional Qualifications Standards, and what tasks these persons performed during the project.¹¹

Literature Review/Previous Investigations

- Describe and assess research materials consulted including both primary and secondary sources.
- Names of investigators or institutions that have previously conducted historic architectural surveys in the project area, dates of research; purpose of the surveys; survey methodologies; and the results of the surveys, including sites or districts, or multiple resource areas identified.
- Include previously recorded sites/structures (from the National Register or State Register lists, county Interim Reports, etc.) in a list or table (whichever is appropriate given the number of resources listed) within the text. The author should employ information for analysis and development of a context. State the date of record and the responsible agency/organization. If a property has been recorded in the Indiana Historic Sites and Structures Inventory, please include full 11-digit site number when referencing said property. Also, please provide the IHSSI-issued rating for the property for reference. If IHSSI properties are part of a historic district, this fact should be noted as well.
- Discuss and include copies of pertinent cartographic resources when available (county atlases, plat maps, Sanborn maps, topographic maps, etc.). These complement the discussion of the original land subdivision and its impact on the cultural landscape and should include a reasonable interpretation.
- If interurban lines, railroad lines, brick pavers or other transportation elements are identified through the literature review these should be identified in the HPR.

Historic Context

¹¹ http://www.cr.nps.gov/local-law/Prof_Qual_83.htm

- Describe the natural setting. Include natural resources that impacted the historical development of the community. Examples include rivers, harbors, fords, passes, minerals, timber, etc.
- Include a brief overview of Native American habitation during the historic period and how it informed historic settlement patterns and the built environment.
- Relate important events and persons that have shaped the course of community development. When appropriate, mention or list architects, engineers, builders, craftsmen, or other designers who had an impact on the area.
- Address past economic trends and the resulting fluctuations in population and impacts upon cultural resources.
- Mention important sites or structures that played pivotal roles in community life such as public buildings, parks, industrial sites, etc.
- Discuss how transportation routes affected past and present settlement and land use patterns.
- Be sure to remember key 20th century events. Discussion would likely include building booms, the Depression, impact of wars, post-war growth, etc.
- Provide an analysis of the important themes from the historic context that would inform above-ground property significance under the National Register criteria.
- Themes included in the historic context should vary somewhat by project area depending on the setting and the resources. For example, a historic context for a rural setting with farm properties and a school house should include information about the agricultural and educational history of that area. As another example, if the only properties surveyed are mid-twentieth century houses, the historic context should focus on post-World War II suburban development and architectural styles of that period.

Methods/Methodology

Field techniques shall be described in such a way that reviewers and future researchers may reconstruct what was done and why. The methods used to address cultural resources investigations vary depending on the scope and type of projects. It is expected that the investigator will follow all applicable INDOT, DNR-DHPA, and NRHP guidelines and requirements.

NRHP Eligibility and Evaluations

First, this section shall provide a general summary of all above-ground resources fifty years old or older in the APE. Unless it is part of an identified National Register eligible or listed historic

district, each previously or newly recorded property fifty years old or older that warrants a rating of Contributing or higher (in the Indiana Historic Sites and Structures Inventory system) shall be described and evaluated either in the narrative or a table as outlined below. Properties currently listed in the NRHP or previously determined eligible for listing in the NRHP shall also be described.¹²

Properties that are over fifty years old, but do not warrant a rating of Contributing or higher (in other words, the property would warrant a Non-Contributing rating in the Indiana Historic Sites and Structures Inventory system) should be mentioned, but do not require an evaluation. A summary of the general type and number of these properties is adequate. The report author should maintain a level of documentation on these properties that is sufficient to address questions if they should arise during the Section 106 process.

Remember:

Identification and evaluation should include those properties 50 years or older, or that will be 50 years old, at the time of the proposed project letting.

Properties less than fifty years of age should be mentioned, but do not require full documentation unless there is a question about their age. A brief summary of the general type and number of these properties is adequate.

For properties that have not been previously recorded as part of the Indiana Historic Sites and Structures Inventory and do not have an IHSSI number, it is suggested that a numbering system specific to the project be employed for these properties for easier reference (ie, “INDOT-1, INDOT-2,” etc. or “House 1, House 2, Church 1,” etc.).

Please note that some properties less than fifty years old may be eligible or listed in the NRHP under National Register Criteria Consideration G (properties that have achieved significance within the last fifty years). Due consideration and analysis must be given to these properties.

Precede the NRHP evaluations by listing the NRHP criteria and explain the aspects of integrity to set forth the framework for the NRHP evaluations. Explanation of the NRHP criteria and aspects of integrity can be included in the Methodology section of the report instead of this section, if preferred.

Remember:

Significance + Integrity = NRHP Eligibility.

Unless it is part of an identified NRHP eligible or listed historic district, each previously or newly recorded property fifty years old or older that warrants a rating of Contributing or higher shall be evaluated for NRHP eligibility within the framework of the historic established context. Properties currently listed in the NRHP or previously determined eligible for listing in the NRHP shall be reevaluated.

¹² When properties previously listed in the NRHP or determined NRHP eligible are present within the APE, please consult with INDOT CRO staff to determine the appropriate level of documentation for the current undertaking.

If the APE contains ten (10) or fewer properties over fifty years old that warrant a rating of Contributing or higher, the NRHP analysis for all of them must be provided fully in paragraph form in the text of the report as outlined below.

If the APE contains eleven (11) or more properties over fifty years old that warrant a rating of Contributing or higher, a table can be used to summarize the NRHP evaluations. Only those properties warranting a Notable or Outstanding rating (that are not located within a historic district) must have their NRHP analysis fully described in the text of the report (as outlined below). If the APE contains eleven (11) or more properties over fifty years old that warrant a rating of Contributing or higher, but none of them warrant a Notable or Outstanding rating, a representative sampling of Contributing properties shall have their NRHP analysis included in the text with a full description (as outlined below).

When the NRHP evaluation for an individual property is described fully in the text of the report, the following information should be included:

- A detailed description of each property shall be provided highlighting the character-defining features of the properties. Properties previously listed in the NRHP or properties previously determined eligible shall be included and their historic boundaries delineated on project maps contained within the report.
- Each resource shall be mapped and illustrated with at least two photographs. In some cases, additional views may be needed to support recommendations, such as illustrating the resource's defining characteristics or showing its alterations. The photographs must clearly show the property. A final evaluation may be delayed if the property is obscured in the photographs by weeds, brush, or trees or if photographs are taken from too far away. Photographs shall be in the text immediately adjacent to the property description so the reader may easily compare the text to the photograph. All photographs shall be clearly labeled. If several photographs of each property have been taken, one or two only need to be included in the body of the report, and the rest may be included in appendix, if preferred.
- The information provided on individual properties must be sufficient to support a NRHP eligibility evaluation. Alterations in material integrity should be shown as clearly as possible in photographs, especially if integrity issues are the main reason for not recommending a property NRHP eligible. Additionally, alternations should be clearly described in the text as they are not always easy to ascertain through photographs.
- The property must be evaluated individually against the NRHP Criteria A, B, C, and D. Writing off properties only with statements such as "the property is not eligible because there are better examples of this style elsewhere" or "the property is a vernacular example of ... (x) style and is therefore not eligible for the NRHP" are not acceptable since they fail to specifically address *all* of the NRHP criteria and aspects of integrity.

- The National Park Service’s NRHP Categories for Areas of Significance are inherently applicable when evaluating properties for eligibility: http://www.cr.nps.gov/nr/publications/bulletins/nrb16a/nrb16a_III.htm#statement.
- Previously listed or previously determined eligible NRHP properties should be reevaluated. Further, the report shall address whether the original boundary descriptions of these properties are still appropriate. In some cases, a project survey may determine that these properties no longer qualify for the NRHP or that changes to part of the property justify a recommendation for boundary reduction. In such cases, written and photographic documentation shall be provided to support the recommendation.
- For previously listed properties, the date of listing and the NRHP criteria under which the property is listed should be included.
- Previously recorded properties documented in the Indiana Historic Sites and Structures Inventory (Interim Report) but not listed in the NRHP should be evaluated properly against the NRHP Criteria. Writing off properties only with statements such as “the property is not eligible because it was listed as ‘contributing’ in the Interim Report” or recommending a property as NRHP eligible only with statements such as “the property is NRHP eligible because it was rated ‘Outstanding’ in the Interim Report” are not acceptable since they fail to specifically address the NRHP criteria and aspects of integrity.
- Provide a property boundary map and a verbal boundary description with justification for each building or structure recommended eligible for the NRHP. The description and maps should include outbuildings and other features of interest, and distinguish between contributing and non-contributing elements of the property.

Conclusions

Provide a summary of the survey efforts and the National Register eligibility recommendations. Describe how many properties were evaluated and a summary of why the surveyed properties were found eligible or ineligible. For example:

Eighteen (18) properties were inventoried as part of this study (Table 1; Figures 10-24; 36). Most of the buildings inventoried dated from the period 1870-1950. None of the buildings in the APE were recommended as eligible for the National Register for historic or architectural significance. The following residential properties are ineligible due to severe alterations resulting in a lack of integrity: 131-20114-25004, 131-20114-25005, 131-20114-25007, 131-20114-250010, 131-20114-25014, 131-20114-25015, and 131-20114-25017. While other residential properties in the corridor have retained a good level of material integrity, they are ineligible due to a lack of architectural distinction. These properties are: 131-20114-25006, 131-20114-25008, 131-20114-25009, 131-20114-25011, 131-20114-25012, 131-20114-25013, 131-20114-25016, 131-20114-25018, 131-20114-25019, 131-20114-25020, 131-20114-25021.

References Cited

All works cited, either directly or indirectly, must be included in this section. Proper footnotes, endnotes, or parenthetical notes should be used throughout the report to accurately give credit to cited and referenced sources. INDOT does not require a specific citation style for historic property reports. Any established convention may be used. However, uniformity must be maintained throughout the report.

Appendices

Photos, tables, and maps can be integrated into the text of the report for ease of reference. If these items are not integrated into the text of the report they should be included as appendices. The appropriate place for these items is left to the author's discretion provided they are presented in a clear and understandable format.

Photos

- The photos must be clearly labeled and keyed to maps and tables.
- Photographs of excellent quality are a requirement.
- Include panoramic or streetscape shots when appropriate to characterize a project area or historic district, whether it is an urban or rural setting.
- Photos should be of sufficient size to ascertain property details. When thumbnail photos are provided in tables and no other image of the properties is provided in the report, it is advisable to also submit a CD with the jpeg files of the images to INDOT and the SHPO to aid in their review.

Maps

- A map showing the location of the project within the state and county must be included.
- A 7.5' USGS map (with map title) of the project area must be included.
- An aerial photograph of the project area must be included. A map of the APE must be included (the APE can be indicated on the USGS map or aerial photograph).
- A master map indicating all inventoried sites recorded as a result of the survey must accompany the report.
- Include any other maps that are of value in understanding results of the survey project or illustrate points raised in the report.
- Copies of historical maps illustrating the location of the project area should be included in the report when pertinent/available.
- In the event that a NRHP- listed or recommended eligible property is located in the APE, the boundary of the property must be indicated on at least one of the maps or as a separate graphic.
- Please note that maps from Google or other commercial web sites cannot be used in reports fully or partially funded by INDOT unless a commercial license has been purchased by the consultant.

Tables

- A survey results table is optional for projects with ten properties or less to investigate. The table has its greatest utility as an organizational tool for projects with large numbers of properties within the APE.
- The tables are tools to identify patterns and organize data. They are NOT meant to substitute for a detailed analysis of individual properties. As outlined above, the author must discuss properties, results, and conclusions in the report text, based on the context, photos, and data on the tables.
- An example table is shown below:

Table 6.1: Example Survey Results Table

Photo	INDOT No. & Rating / IHSSI No. & Rating	Property Name	Address	Date/Style	National Register recommendation/ Integrity Issues
	INDOT 1 (C)/ NA	Hobart Apartment Building	418 W. JACKSON ST.	c. 1895/ Vernacular	Not National Register eligible; lacks significance & integrity; vinyl siding & additions
	INDOT 2 (N)/ 035-442-45153 (C)	House	400 W. JACKSON ST.	c.1880/Italianate	Not National Register eligible; lacks significance & integrity; see discussion in text
	INDOT 3/ 035-442-36001 through 035-442- 36127 (Varies from NC to O)	Walnut Street Historic District	Roughly Walnut St. from Washington St. to Victor St.	Mid-19 th to mid- 20 th century; Varies: Italianate & Revival styles are prevalent	Listed in the National Register in 1989 under Criteria A & C; see discussion in text
	INDOT 4 (C)/ NA	House	401 W. JACKSON ST.	c.1890/Vernacular	Not National Register eligible; lacks significance & integrity; vinyl siding, some replacement windows & doors on front facade
	INDOT 5 (C)/ NA	Commercial Building- Muncie Music Center	225 W. JACKSON ST.	c.1960/Modern	Not National Register eligible; lacks significance; not a noteworthy example, does not possess high artistic value
	INDOT 6 (O)/ 035-442-45197 (O)	Muncie Public Library	301 E. JACKSON ST.	c.1903/Neoclassical	Listed in the National Register in 1976 under Criterion C; see discussion in text

6-4.0 Short Historic Property Report Guidelines

An abbreviated historic property report may be prepared under the following circumstances:

- No above-ground resources are present in the APE.
- Above-ground resources are present within the APE, but none are fifty years old or older.
- Above-ground resources fifty years old or older are present within the APE, but none exhibit enough integrity to warrant at least a Contributing rating in the Indiana Historic Sites and Structures Inventory system (in other words, the properties warrant a Non-Contributing rating).
- The only above-ground resource fifty years old or older present within the APE that warrants at least a Contributing rating in the Indiana Historic Sites and Structures Inventory system is a bridge that has been evaluated in the latest historic bridge inventory or *is exempt from individual review pursuant to the Program Comment for Post-1945 Bridges*.¹³ (If resources other than the bridge warrant at least a Contributing rating, or if a property is less than 50 years old but meets National Register Criteria Consideration G [properties that have achieved significance within the last fifty years], a full report must be prepared in order to properly evaluate those resources).
- The only above-ground resource fifty years old or older present within the APE that warrants at least a Contributing rating in the Indiana Historic Sites and Structures Inventory system is a property that is listed in the NRHP or was recently previously determined eligible for listing in the NRHP¹⁴ (If resources other than the National Register listed property warrant at least a Contributing rating, or if a property is less than 50 years old but meets National Register Criteria Consideration G [properties that have achieved significance within the last fifty years], a full report must be prepared in order to properly evaluate those resources).

Remember:

Identification should include those properties 50 years or older, or that will be 50 years old, at the time of the proposed project letting.

Please note that some properties less than fifty years old may be eligible or listed in the NRHP under National Register Criteria Consideration G (properties that have achieved significance within the last fifty years).

Include the specified information for the following components from the Full Historic Property Report format guidance, unless otherwise specified below:

- Cover Sheet/Title Page
- Table of Contents
- Lists of Figures, Photos, and/or Tables
- Management Summary or Abstract
- Introduction/Project Description

¹³ http://environment.fhwa.dot.gov/histpres/program_comment.asp

¹⁴ When properties previously determined NRHP eligible are present within the APE, please consult with INDOT CRO staff to determine the appropriate level of documentation for the current undertaking.

- Literature Review/Previous Investigations: Describe any primary and secondary sources (such as Interim Reports, historic maps, National Register list, etc.) used to determine that a Full Historic Property Report is not warranted. Also, describe any previously conducted surveys in the project area that came to this conclusion.
- Methods/Methodology
- Recommendations: Provide an analysis explaining why, in your professional opinion, no further history/architecture work (i.e., a Full Historic Property Report) is required for the APE. Justification for no further work could be based on one or more of the following factors:
 - No above-ground structures are located in the APE;
 - All above-ground resources in the APE are less than fifty years old
 - None of the above-ground resources over fifty years old in the APE warrant a rating of Contributing in the Indiana Historic Sites and Structures Inventory system;
 - The only above-ground resource fifty years old or older present within the APE that warrants at least a Contributing rating in the Indiana Historic Sites and Structures Inventory system is a bridge that has been evaluated in the latest historic bridge inventory or *is exempt from individual review pursuant to the Program Comment for Post-1945 Bridges*¹⁵;
 - The only above-ground resource fifty years old or older present within the APE that warrants at least a Contributing rating in the Indiana Historic Sites and Structures Inventory system is a property that is listed in the NRHP or was recently previously determined eligible for listing in the NRHP.
- Conclusions
- References Cited
- Appendices

The following guidance should be taken into consideration when preparing the Recommendations section:

Alterations in material integrity should be shown as clearly as possible in photographs, especially if integrity issues are the main reason for not recommending a Contributing rating for a property. Additionally, alternations should be clearly described in the text as they are not always easy to ascertain through photographs.

For bridges evaluated in the latest historic bridge inventory, provide appropriate references to the inventory and the recommendations made in the inventory.

For properties listed in the NRHP or recently previously determined eligible for listing in the NRHP, provide appropriate references to when the property was listed or determined eligible for listing and under what criterion. Provide a brief analysis of whether the National Register listing or eligibility determination is still valid and appropriate.

¹⁵ http://environment.fhwa.dot.gov/histpres/program_comment.asp

References

- 2011 *Survey Manual for Architectural and Historical Resources*. Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology. Document on file at IDNR, DHPA.

APPENDIX- Guidance for Specific Property Types

Based on consultation with SHPO and consulting parties, this Appendix includes special guidance for completing identification and evaluation for resources that require special consideration or where consultation has resulted in specific procedures. This Appendix will be enhanced and added to as new procedures or guidance is developed.

Bridges-Historic Bridge Inventory

Bridges built through 1965 have been surveyed and evaluated through the Indiana Historic Bridge Inventory. More information about the bridge inventory can be found in Part IV of the CRM. A listing of surveyed bridges can be found on the INDOT website here: <http://www.in.gov/indot/2531.htm>.

Understanding the eligibility determination for any bridges within the APE will greatly determine the Section 106 course. For projects involving historic bridges, please refer to Part IV for specific information on processing a project through the Historic Bridge Programmatic Agreement.

Program Comment for Common Post-1945 Concrete and Steel Bridges

For bridges built after 1965 there is another resource for assessing bridges for NRHP eligibility. On November 2, 2012, the Advisory Council on Historic Preservation (ACHP) issued the [Program Comment for Streamlining Section 106 Review for Actions Affecting Post-1945 Concrete and Steel Bridges](#). As a summary, the Program Comment relieves federal agencies from the Section 106 requirement to consider the effects of undertakings on most concrete and steel bridges built after 1945. On March 19th 2013, federal agencies were approved to use the Program Comment for Indiana projects.

When considering the Program Comment for your project the following considerations should be evaluated before the Program Comment can apply:

The Program Comment does NOT apply to bridges that are already listed in or eligible for the National Register of Historic Places or to those located in or adjacent to a historic district (Section IV.A). Please note that per the Indiana Historic Bridge Inventory, bridges built between 1945 and 1965 have already been evaluated for National Register eligibility. Therefore, it is important to reference the Historic Bridge Inventory.

The Program Comment does NOT apply to these bridges.

- The Program Comment does NOT apply to arch bridges, truss bridges, bridges with movable spans, suspension bridges, cable-stayed bridges, or covered bridges (Section IV.B).
- The Program Comment does NOT apply to bridges identified as having exceptional significance for association with a person or event, being a very early or particularly

important example of its type in a State or the nation, having distinctive engineering or architectural features that depart from standard designs, or displaying other elements that were engineered to respond to a unique environmental context and included in a list to be developed by each state Division of FHWA (Section IV.C). Based on consultation between FHWA, INDOT, SHPO and interested parties, no bridges with exceptional significance were identified.

Please keep in mind that the Program Comment is not a waiver of the Section 106 review. It does relieve federal agencies from the need to individually evaluate and consider the effects of undertakings on bridges where the Program Comment applies. When submitting Section 106 materials where the Program Comment applies to a bridge, provide clear documentation that the criteria considerations were evaluated. In addition to providing some basic information and photographs of the subject bridge, below is an example of how application of the Program Comment might be explained in a historic property report:

On November 2, 2012, the Advisory Council on Historic Preservation (ACHP) issued the Program Comment for Streamlining Section 106 Review for Actions Affecting Post-1945 Concrete and Steel Bridges (Program Comment). The Program Comment relieves federal agencies from the Section 106 requirement to consider the effects of undertakings on most concrete and steel bridges built after 1945. On March 19, 2013, federal agencies were approved to use the Program Comment for Indiana projects. The Program Comment applies for Bridge No. 041-42-02351 ANBL because it has not been previously listed in or determined eligible for listing in the National Register of Historic Places and it is not located in or adjacent to a historic district (Section IV.A of the Program Comment). As an example of a steel beam structure built in 1967, this bridge is also not one of the types to which the Program Comment does not apply (arch bridges, truss bridges, bridges with movable spans, suspension bridges, cable-stayed bridges, or covered bridges [Section IV.B]). Additionally, this bridge has not been identified as having exceptional significance for association with a person or event, being a very early or particularly important example of its type in the state or the nation, having distinctive engineering or architectural features that depart from standard designs, or displaying other elements that were engineered to respond to a unique environmental context (Section IV.C). This bridge also has not been identified as having some exceptional quality. Based on consultation between FHWA, INDOT, SHPO and interested parties, no bridges with exceptional significance were identified in Indiana (Section IV.C). Because the above criteria from the Program Comment have been met, no individual consideration under Section 106 is required for Bridge No. 041-42-02351 ANBL.

For additional reference, please visit the FHWA website for a further description of the Program Comment and a Q&A: <http://www.environment.fhwa.dot.gov/histpres/bridges.asp>.

Historic Districts

It is incumbent upon the project historian to be observant for unidentified historic districts within the APE, including rural historic districts. In some instances, a potentially NRHP eligible historic district may lay both within and outside of a project's APE. When assessing such districts it is most important to define the boundary within the APE and to define the number and type of resources located therein. Because some effect from the project is possible within the APE, it is important to fully assess this portion of the district.

In order to fully determine the district's eligibility, a rough estimate of the boundary outside the APE is needed. Also, a rough estimate of the number and type of resources located outside the APE is needed. In difficult situations, such as a large district where large portions extend beyond the APE, it is possible to provide general boundaries, such as a road or physical feature where the district may end, and general descriptions of resources for those portions beyond the APE.

Previously identified historic districts (as identified through the Interim Reports, previous projects, or National Register listing) and newly identified historic districts should be described fully in the text of the report. Each district must be evaluated against the National Register Criteria A, B, C, and D. Provide a district boundary map and a verbal boundary description with justification for each district. The report shall address whether the original boundary descriptions of NRHP listed districts are appropriate.

Previously or newly recorded properties fifty years old or older that warrant a rating of Contributing or higher that are located within an identified historic district do not need to be individually described or evaluated. Because it is known they are part of a historic district, it is not necessary to come to consensus on their individual eligibility.

Mid-20th Century Resources:

When documenting mid-20th century resources, it is especially important to provide enough information to support your recommendation. In many cases, these resources are not old enough to have been included in the Indiana Historic Sites and Structures Inventory. Thus, no previous information is available for them (i.e., survey cards and photographs). For individual properties, it is important to provide two to three clear photographs and a good description of the material integrity and any alterations observed.

When there is a collection or strip of mid-20th century resources, as is common, consideration of a potential historic district should be provided. For potential historic districts, it is important to provide streetscape photographs of representative building types. For potential historic districts, more information than is normally required about properties outside the APE will aid in INDOT and/or SHPO's review. For example, when a potential historic district is located both within and outside the APE, photographs of the properties outside the APE are usually not included in the HPR. However, more detailed photographs of individual properties or streetscapes that include several properties may need to be included for mid-20th century areas in order to better ascertain the character and feeling of the potential historic district.

With regard to assessing mid-20th century houses for National Register eligibility, consultation with the SHPO has indicated that given the ubiquity of such residences constructed throughout

Indiana at the time, a property must have other associations with broad trends in American history in order to be significant enough to be recommended as individually eligible for listing in the National Register under Criterion A. With regard to Criterion C, such houses need to retain nearly all of their original features in order to be considered National Register eligible and they should have experienced few alterations. In other words, a high level of overall material integrity is needed. Additionally, a significant house of this era might be architect-designed, a “high-style” example, and/or exhibit a high level of workmanship.

An analysis of historic mapping, aerial photographs, and neighborhood plats is helpful in determining what areas of mid-20th century resources might constitute a historic district. When looking for potential historic districts of mid-20th century resources, there would likely be a uniformity of design and a feeling of continuity within the area. The buildings should retain a high level of integrity and represent a particular era of development and/or a particular popular housing stock of the era. To be eligible under Criterion A, historic districts of the mid-20th century would need to exhibit an important association with the planned suburban development of the area. Under Criterion C, historic districts of the mid-20th century would need to exhibit a noteworthy collection of intact architecture.

A useful resource is [A Model for Identifying and Evaluating the Historic Significance of Post-World War II Housing](#). However, when evaluating a mid-century resource, it is recommended to contact INDOT-CRO for specific guidance. In some situations, INDOT-CRO will confer with SHPO during the evaluation for guidance.