Chapter 5:

IDENTIFICATION OF HISTORIC PROPERTIES:

PHASE I HISTORY/ARCHITECTURE SURVEY

Cultural Resource Review During The Preliminary Engineering Phase

As a project moves forward from the PDP Planning Phase into the PDP Preliminary Engineering Phase, more project engineering details will be developed for any feasible alternatives and initial environmental field studies may then begin to be performed on the identified alternative(s). The regulations implementing Section 106 require a "reasonable and good faith effort" to identify historic properties in the Area of Potential Effects (APE) in enough detail to permit evaluation of NRHP eligibility and to begin evaluation of the nature and extent of potential effects on historic properties.

Guidance on meeting the "reasonable and good faith identification standard" has been provided by the ACHP. The regulations note that a reasonable and good faith effort may consist of or include "background research, consultation, oral history interviews, sample field investigations, and field survey."

Based on the level of potential environmental impacts, as documented in the PIP prepared during the Planning Phase, and following delivery of the Section 106 Scoping Request Form (Section 106 SRF) to ODOT-OES, a decision will be made by the ODOT-OES cultural resources staff regarding the level of cultural resource analysis needed on a project (see Chapter 4 for more on the Section 106 SRF). The strategy and scope of work for Phase I field survey is based on the information from the secondary source review and the conditions observed during Planning Phase field review. ODOT-OES will use the secondary source review information provided as part of the Section 106 SRF to develop the Phase I survey scope of work. ODOT-OES may conduct research to enhance that information after receiving the Section 106 SRF from an ODOT District office.

The results of the secondary source records check, the observed field conditions, and the Section 106 SRF are all used to develop the historic context for a project’s APE. The field survey strategy provides expectations for the identification of new cultural resources within the project’s APE and the means for evaluating the identified resources for NRHP eligibility.

The Phase I survey reports must present sufficient and pertinent contextual information to apply the National Register Criteria to the identified cultural resources. Since the historic context is the foundation on which all understanding of historic properties is based and on which all NRHP eligibility evaluations are made, the information must be concise, succinct, focused and appropriate.

Secondary Source Review For Phase I Survey Reports

During the Identification of Historic Properties step in the Section 106 process, the purpose of the secondary source review (records check) is twofold:

1. to compile information on previously studied resources; and
2. to collect sufficient data to characterize the types and locations of resources which may be present in the APE of the project.

The secondary source review information is used to develop a historic context against which history/architecture resources will be evaluated using the National Register Criteria. The secondary source review completed in the PDP Planning Phase and the PDP Preliminary Engineering Phase brings all pertinent resource data, a summary of known resources, and a determination if resources
exist in the APE into this step of the Section 106 process. All of that information will be incorporated into the Phase I report.

The secondary source review for a Phase I report must focus on the APE but it must also cover a broad enough area to develop and support the historic context. Development of the historic context for the APE will initiate at this time and will be carried forward for further refinement in the Phase I survey report. The historic context provides the base that supports the cultural resource survey, documentation, and evaluations that follow.

Without an accurate and pertinent historic context, it is impossible to make informed decisions regarding resources in and adjacent to the APE. A quality historic context will also make an unusual or difficult-to-categorize resource easier to understand and evaluate. When finalized, this section of a Phase I report should embody the secondary source review data, including any additional secondary source review data, and the historic context for the APE.

The secondary source review information will be documented on a History/Architecture Secondary Source Review Table that is keyed to the Secondary Source Review Map (Figure 3, Appendix K). This table is a summary of known information for understanding property types and for development of research questions. It should be completed for projects having five or more identified resources in the APE/study area. For more information on the history/architecture tables, see Appendix D.

Conducting the secondary source review for the Phase I survey will satisfy the requirement in 36 CFR Section 800.4(a)(2) of reviewing existing information to help identify historic properties (i.e., those included in or eligible for inclusion in the NRHP) in the project’s APE. This review for Phase I survey (in combining the records check data and the historic context) is critical in the development of the survey research design. It will help determine the level of effort needed in the Phase I field survey to identify historic properties in the APE.

**Developing Historic Context and Assessing Potential For Effects On History/Architecture Resources**

In the NRHP program, historic context studies include three elements:

- Historical themes, trends, and patterns of history.
- Physical context (the setting, landscape, geography, land use, topography, etc.).
- Chronological periods or historical time frames.

Researchers should identify the significant themes, events, subjects, or patterns in history associated with the project APE. The physical context should address the current built environment by discussing the history of modern land use in the APE, the nature of current land use patterns, and the types of disturbances or intrusions that may negatively impact historic properties found in the APE. The historic context should be clear on the chronological periods or time frames within which the identified themes, trends and patterns of history are significant in an APE.

Historic contexts should be concise summaries and be clear on why the context is relevant to the project APE. The historic context defines the types of resources that may be found in the APE or identifies the range of resources on any physiographic feature or region that may be present.

Multiple historic contexts can apply to each project’s APE. In many cases, historic contexts applicable to a project’s APE already exist in the literature and should be referenced or adapted to the specific project APE. Historic contexts range from general to specific patterns, themes, or trends in history, as well as range in applicability from national to local levels. Refer to the ODOT-OES Cultural Resource Section 106 Toolkit for [regional and statewide context studies](#).
The NRHP emphasizes the importance of the development of historic contexts for planning, identification, evaluation, registration, and treatment of historic properties. The NRHP directs that contexts must identify the specific physical characteristics that each property type in an APE must possess (and the integrity that must be present) in order to be considered eligible for the NRHP. The historic context should address the National Register Criteria that apply to the historical themes, trends and patterns of history associated with property types in an APE.

Investigators should integrate the historic context for a project into all summaries and discussions of significance. Previously recorded properties and previous decisions regarding eligibility should be evaluated against the context, and recommendations should be justified in narrative text by referring to all available data. To organize discussions, properties may be addressed by placing them within a particular (and valid) theme or themes. These thematic groupings should be identified within and relative to the historic context developed for the project. Then properties may be appropriately evaluated within their contextual theme.

Development of historic context will be based on the secondary source review information compiled for a project and must be appropriate for the project’s scope and APE. ODOT-OES is not requiring a historic context to be developed on every project. It will be required on all projects being scoped for Phase I history/architecture surveys in the PDP Preliminary Engineering and Environmental Engineering Phases. Development of historic contexts is not required for projects during the PDP Planning phase.

Considerable information on how to develop historic contexts is available in the various NRHP publications that are available online at http://www.nps.gov/nr/publications/index.htm. However, the following statement from the NRHP very clearly states ODOT’s position on the necessity of historic context development:

“The significance of a historic property can be judged and explained only when it is evaluated within its historic context. Historic contexts are those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear” (National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation).

Also refer to the NRHP White Paper “The Components of a Historic Context”, for guidelines on the organization and components of a historic context summary.

Phase I History/Architecture Survey

The purpose of the history/architecture survey is:

- to locate both previously identified and unidentified history/architecture properties in the APE associated with the historic context;
- to identify the characteristics which the properties must possess to be eligible based on the historic context;
- to identify whether the properties retain sufficient integrity to be representative of the historic context;
- to determine if any properties require additional evaluation to determine historic significance; and
- to determine if any properties are affected by the project.

For projects in PDP Paths 2 and 3, Phase I History/Architecture Survey is usually conducted during the PDP Preliminary Engineering Phase within the APE of the preferred alternative. For projects in PDP Paths 4 and 5, this survey is generally conducted during the PDP Preliminary Engineering Phase within the APE of the feasible alternatives. The area surveyed, survey methods, and
deliverables may vary depending on the scope of the project. In the PDP Process, it is a project management decision on the timing of the need for the results of Phase I survey.

Whenever questions arise over whether specific cultural resources need to be identified and recorded, or what information is appropriate for evaluating specific cultural resources, the Project Manager should request that the District Environmental Coordinator submit a Section 106 Scoping Request to ODOT-OES for scoping guidance (refer to Chapter 4). ODOT-OES may informally consult with the OHPO and the cultural resources consultant (if appropriate) in order to address questions and concerns about the resources.

Prior to conducting the Phase I field survey, the historic context, results of secondary source review, and data from historic maps should be considered and incorporated into the Phase I survey report. The survey report should include a physical description of each property fifty years of age or older identified during the Phase I survey, locational information, background information on each property if available (i.e., historic atlas, 15' USGS map, fire insurance maps, aerial map, county histories, etc.), and discuss the level of integrity of the properties relative to the historic context.

During the Phase I History/Architecture Survey, the properties within the APE are subject to visual inspection and documentation by completion of a Phase I History/Architecture Resource Table. Buildings, structures and objects more than 50 years in age, including resources previously documented on OHI forms are documented on the table according to location, type, age, material, integrity, and relevant National Register Criteria guidance. The information presented on a Phase I History/Architecture Resource Table is keyed to the Phase I History/Architecture Map (Figure 8, Appendix K). All data recorded on tables must be discussed in the report text as it relates to the historic context and NRHP significance of the identified history/architectural resources. For more information on the history/architecture tables, see Appendix D.

Use of a Phase I History/Architecture Resource Table is optional for projects with five properties or less to investigate. This table has its greatest utility as an organizational tool for projects with large numbers of properties in the APE. It may be used on any project, but it should be used on all projects that have quantities of data to organize. Contact ODOT-OES if there are questions/concerns about using the table.

The tables in this manual are tools to identify patterns and organize data. They are NOT meant to stand alone in a report; the investigator must discuss properties, results and conclusions in the report text, based on the context, photographs and data on the tables. The tables may be modified as needed to accommodate a project and the data being collected and analyzed.

Bridges 50 years of age or older within the APE will be documented on a Phase I History/Architecture Resource Table. In the address/location column include the structure file number and/or OHI number. Identify structures included in the NRHP or that are eligible for inclusion in the NRHP as a result of previous inventories and evaluations. Refer to ODOT’s 2010 Historic Bridge Update (www.buckeyeassets.org).

Repetitiously occurring property types and their context should be summarized collectively in the survey report. Ohio Historic Inventory (OHI) designations must be included in the Phase I report as identifiers for properties that will factor in the project decision making process; i.e., for properties considered eligible for the NRHP and properties being recommended for further work to establish NRHP eligibility. OHI designations must also be included in the report for any properties that already have OHI numbers, regardless of their eligibility.

Investigators preparing Phase I survey reports must summarize the available information regarding the qualities and characteristics of the identified history/architecture properties relative to the secondary source review and the historic context. The Phase I survey should evaluate each resource using the NRHP criteria of eligibility to determine whether the identified properties can be considered eligible for the NRHP. If a property is recommended eligible for the NRHP, the survey
report must identify the contributing characteristics of the property, recommend the appropriate historic boundary based on the property’s significance, and discuss any contributing and non-contributing components within the boundaries. The reports should be concluded with appropriate NRHP eligibility recommendations and/or justification for the need for additional Phase II investigation to determine NRHP eligibility. It is expected that the investigator will follow all applicable ODOT, OHPO, and NRHP guidelines and requirements when evaluating properties.

ODOT-OES and the OHPO will comment on the NRHP boundary recommendation and revisions will be requested if needed. ODOT needs historic boundaries for determination of effect and in the evaluation of use under Section 4(f). It should not be assumed that boundary determination is always a Phase II survey task.

If recommendations are made for further work on specific properties (i.e., Phase II survey), the recommendations must clearly state what information is needed to fully evaluate the properties. The recommendations should include scoping information in the form of survey strategy to acquire the necessary field data, as well as an estimate of the cost and time needed. ODOT-OES, in consultation with OHPO, will make the final determination on which history/architectural properties require further investigation to establish eligibility.

Resources recommended for Phase II investigation and those not considered eligible must all be discussed in the text of the Phase I Survey report. Further work cannot be recommended if that work should have been included in the Phase I as a standard component of Phase I surveys.

Since determination of a project’s effect on historic properties is an agency responsibility under 36 CFR Part 800, no Phase I survey report should ever discuss effect in any manner. ODOT-OES, on behalf of FHWA and in consultation with OHPO, will make the effect determination on all projects. This will be documented in an Inter-Office Communication (IOC) addressed to the ODOT District office or in a formal consultation letter between ODOT and OHPO.

Depending entirely on project conditions, ODOT-OES and OHPO may at times agree to advance a project directly to Phase II survey or may decide to combine Phase I and Phase II level work. ODOT-OES and OHPO may consider situations where additional Phase I work may be done in order to advance a project without going to Phase II level work.

In addition, a Phase I history/architecture survey and a Phase I archaeological survey may be combined into a Phase I Cultural Resources Survey report on certain projects. That is a project management decision which will be based on a project’s schedule and other issues. As such, and because the Phase I surveys typically occur at different times under the PDP, this decision to combine into a single Phase I survey report should be made early in the Planning Phase (and in consultation with the ODOT-OES cultural resource staff) so that the work can be scoped and scheduled properly.

If, during a Phase I survey, a cultural resource consultant thinks they can determine NRHP eligibility (or non-eligibility) by performing some extra work on a property or properties, they should always first confer with the ODOT District and the prime consultant. After that, the cultural resource consultant should consult with ODOT-OES, which will bring OHPO into the conversation. Any such decisions will be made in consultation with project sponsors and the project management team before implementation in the field due to the possible impact to the project schedule, budget, and contract(s). ODOT-OES encourages this approach whenever appropriate if approved as a result of these consultations.

ODOT-OES is available for consultation if there is a question about a history/architecture property, survey methodology, preliminary findings, etc. ODOT-OES can also bring in OHPO at any time for consultation.

An individual that has been prequalified by ODOT to conduct history/architecture surveys must direct the Phase I History/Architecture Survey.
Refer to Appendix D for history/architecture report guidelines.

Phase I History/Architecture Survey Overview:

Level of Work:
- Phase I History/Architecture Survey (36 CFR Section 800.4(b) Identification of Historic Properties)

Area of Work:
- For PDP Path 2 & 3 Projects: Generally, area within the preferred alternative/APE
- For PDP Path 4 & 5 Projects: Generally, area(s) within the feasible alternatives/APE

Survey Objectives:
- Account for all properties in APE previously listed or found eligible for the NRHP.
- Account for previously surveyed areas.
- Identification of other cultural resources for avoidance consideration such as cemeteries.
- Collect sufficient data to enhance development of historic context.
- Identify history/architecture resources 50 years of age and older within the APE.
- Existing OHI forms will indicate if a previous survey and/or determination of eligibility has been done; investigators may have to go to OHPO to look at history/architecture reports on file in order to refine historic context and/or survey strategy.
- Determine eligibility of each history/architecture resource for the NRHP.
- Discuss eligibility/non-eligibility of all properties.
- Discuss eligibility/non-eligibility repetitiously occurring properties as a group.
- Recommend history/architecture resources that require additional investigation in a Phase II survey to evaluate their NRHP eligibility with supporting explanation and expected results.
- Summarize and refine the historic context developed during the secondary source review.

Survey Methods:
- Conduct a visual inspection of the APE.
- Photograph resources 50 years of age and older and key to appropriate mapping (Refer to Appendix C and Appendix D.)
- Photographs should provide sufficient information about resources being investigated.
- Identify property locations primarily by addresses available via on-line resources (e.g., Google Earth, the OHPO GIS on-line system, etc.). Field confirmation of addresses can then be made.
- If no address is available, such as for an object, provide UTM coordinates to establish the location of the property.
- Obtain UTM coordinates via on-line resources or by using a handheld Global Positioning Systems (GPS) device meeting ODOT’s accuracy requirements. (NOTE: ODOT requires a GPS unit with GIS data collection capability that is accurate to within 1 meter).
- Consult with ODOT-OES prior to changing field methodology due to field observation/conditions.

Deliverables:
- Phase I History/Architecture Survey Report that meets ODOT and OHPO guidelines (which includes secondary source review/historic context) with recommendations for or against NRHP eligibility and/or further work as appropriate; (project manager and DEC should reference the abstract and the summary and conclusions sections of this report for the history/architecture property information in project APE); refer to Appendix D for report guidelines.
**ODOT/Project Sponsor Responsibilities:**

- ODOT District or the project sponsor will send property owner notification letters (and copy head of history/architecture survey) at least 48 hours before survey work is conducted.
- ODOT District or the project sponsor will provide project maps (e.g., electronic files, GIS shapefiles, etc.) for recording history/architecture property locations and photograph key.
- ODOT-OES will provide comments on the NRHP eligibility of resources if needed prior to report submission.
- ODOT-OES and District will review report submittals.
- ODOT-OES and District will provide recommendation/scope for next phase of cultural resource work.
- ODOT-OES will conduct all agency coordination and make all determinations of effect in consultation materials.

**When to Prepare OHI Forms**

History/Architecture resources are electronically recorded through the OHPO’s on-line website on an Ohio Historic Inventory form. These forms constitute the searchable database used during the cultural resources records check for early decision making in the PDP Planning Phase. OHI forms should be prepared for all properties recommended as NRHP eligible and for any properties recommended for Phase II survey.

Once the Phase I field survey is complete, the history/architecture specialist must determine if any of the identified resources warrant documentation on an OHI form.

OHI forms are not required on every property identified in an APE. For example, if a minor widening project, such as an intersection improvement, adding new turn lanes, adding a bikeway, etc., is proposed and there is no involvement of any kind with a property fifty years of age or older in the survey area, then there would be no need to inventory any such property.

Inventory forms are subject to change and revisions are expected with the generation of new information about inventoried resources. ODOT expects completion of and submission of new or revised forms to OHPO via the online IForm application when the final survey reports are submitted to ODOT. Completed forms are not to be appended to the reports submitted to ODOT.

Both ODOT-OES and OHPO staff will jointly monitor OHI forms in the IForm system as part of the report review process. Inventory forms will have to be submitted to OHPO via the IForm application when survey reports are submitted to ODOT.

Since these forms are used during project development to help make informed decisions, their timely completion or revision is imperative in order to provide the most up-to-date and accurate preliminary information on known cultural resources in a project’s APE and for use in historic context development.

**References:**
