

Reporting on the Eligibility of Archaeological Sites, Historical Buildings, and Structures

A presentation by the Arizona State Historic Preservation Office Compliance Staff

October 19, 2022 (modified November 2022)



WELCOME




STATE HISTORIC PRESERVATION OFFICE



Section 106 / SHPA Compliance Review

The SHPO Compliance Review Program staff provide technical assistance to federal, state, local, and Tribal agencies through the following processes:

- 1) reviewing federal, state, county, and city projects to assist in determining possible impacts from proposed projects on historic properties;
 - 2) explaining state and federal compliance procedures;
 - 3) ensuring application of state and federal professional standards and qualifications; and,
 - 4) providing opinions on cultural resources eligibility to the Arizona/National Register of Historic Places
- 



NATIONAL REGISTER OF HISTORIC PLACES BASICS



- Dr. Bill Collins, SHPO Historic Properties Manager: I have only a few minutes to go over the basics of what is the National Register and in keeping with the theme of this workshop, I want to emphasize the role of historic contexts as crucial to an evaluation of eligibility. Much of this you may already know because it is “Basics” so I’ve made sure to include a little reward at the end, something practical that you can take away into your field work. No one wants a survey report returned by SHPO for revisions so I’m going to show you how to meet our expectations the first time, at least on one point.

In the name
of
"Progress"
...



Urban Renewal: Boston City Hall



Pruitt-Igoe Public Housing Project, St. Louis, MO



Interstate Highways: Los Angeles

National Historic Preservation Act of 1966

Section 101(a)(1)(A)

The Secretary of the Interior is authorized to expand and maintain a National Register of Historic Places composed of districts, sites, buildings, structures, and objects significant in American history, architecture, archeology, engineering, and culture.

Section 101(a)(2)

The Secretary... shall establish or revise criteria for properties to be included on the National Register.

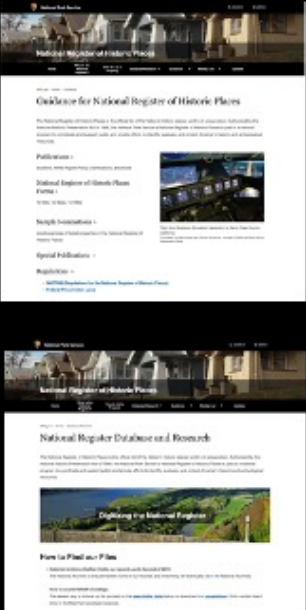


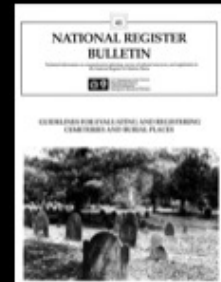
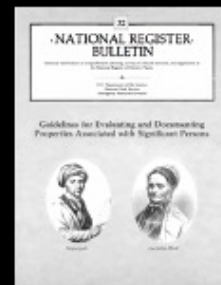
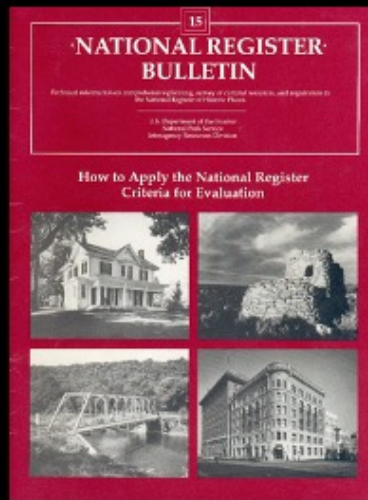
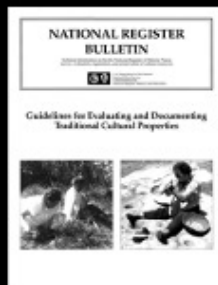
President Johnson signs the National Historic Preservation Act





National Register Website





National Park Service Guidance National Register Bulletins



Tombstone Courthouse



Harrenstein House, Tucson



San Pedro Chapel, Tucson



Navajo Nation Council Chambers



Wigwam Motel, Holbrook



Executive Towers, Phoenix

Property Types: Buildings



Burgess Lateral Historic
District, Phoenix



Ed Riggs Trail
Chiricahua National
Monument
Designed Landscape



Roald Amundsen Pullman Railroad Car,
Scottsdale



Falcon Field WWII Hangars, Mesa



Kingman Army Airfield Tower



Arizona Canal

Property Types: Structures



Camp Horn Monument



Berger Memorial Fountain, Univ of AZ



Titan II Missile, Green Valley



Blaisdell Slow Sand Filter Washing Machine, Yuma



Hi Jolly Monument, Quartzite



Initial Point Gila and Salt River Baseline

Property Types: Objects



1956 Grand Canyon TWA - United
Airlines Aviation Accident Site
National Historic Landmark



Camp Grant Massacre Site



Murray Springs Clovis Site, Sierra Vista vic.



Tempe Butte

Property Types: Sites



Pierson Place, Phoenix



Winslow Municipal Airport



Casitas de Castilian, Tucson



OK Ranch, Sedona



Hunt Farmstead, Pine

Property Types: Districts

National Register of Historic Places Criteria



Pascua Cultural Plaza, Tucson
Criterion A: Event



L. Ron Hubbard House, Phoenix
Criterion B: Person



Dome House, Cave Creek
Criterion C: Design/Construction



Lyman Lake Rock Art Site, St. Johns vic.
Criterion D: Information Potential

National Contexts



State Contexts



Local Contexts



“Corral”

Justification: This type of structure is ubiquitous across the Arizona landscape and does not hold any particular historical significance. There is no association with an historic event (Criterion A), and there is no evidence that the road has a connection with the lives of historically significant individuals (Criterion B) nor that it embodies a distinctive artistic style or represents the work of a master artist (Criterion C).

Design Review for A/NRHP Listed/Eligible Resources:

The SHPO can provide technical assistance, if requested:

1) Courtesy project review to assist in determining possible impacts from proposed actions on properties listed in, or eligible for the A/NRHP;

2) Assisting with evaluations of building integrity; and

3) Assisting with interpretation of the Secretary of the Interior's Standards for Rehabilitation.



PRESERVE
AZ

Susan Lawson, SHPO Architect

Integrity Evaluations

Properties must have a high degree of historic integrity in order to be listed in the A/NRHP. The Seven Aspects of Integrity are:



1. **Location**
2. **Design**
3. **Setting**
4. **Materials**
5. **Workmanship**
6. **Feeling**
7. **Association**



Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a building/structure property for the National Register. Not all seven aspects need be present, as long as the overall sense of time and place are evident.

On this slide we have here the Steinegger Lodging House, formerly at 27 E Monroe Street in Downtown Phoenix. Without exception, wholesale demolition means there is no integrity left. Without integrity, a building can be delisted from the NRHP.

I'm going to show you all some case studies where we can collectively do some integrity evaluations and then I can let you know what SHPO's recommendation was.

Aspects of Integrity: Location



1. Has the Property Been Moved?
2. Does that Affect its Ability to Convey its Significance?



Preservation "in place" is the preferred strategy for the long-term management of historic properties, when this is not possible, relocation is a recommended alternative to preserve the historic characteristics of the property.

-----Tucson project – potential relocation of 5 contributing properties within the West University National Register Historic District. A decision had to be made as to whether their relocation caused a loss of integrity sufficient enough to remove them from the NRHP. This was reviewed by the City of Tucson Historic Preservation Officer, and the AZ Historic Sites Review Committee. Buildings were allowed to remain. Why?

Aspects of Integrity: **Location**

1. **Has the Property Been Moved?**
2. **Does that Affect its Ability to Convey its Significance?**



Before



After

The NR listed Smurthwaite House used to be at 602 N 7th St. but is now in Downtown Phoenix at 1317 W. Jefferson next to the Pioneer Cemetery.

It was relisted in the NR at its new

location (Criterion C eligibility -
architecture)

Aspects of Integrity: Design

1. Has the original appearance of the resource been altered?
2. Do the alterations impact the original design intent?



Before



After

This is a modest residence in Phoenix's Willo HD, which had some porch work done. We see lots of this type work – making the house a bit larger, fresher, nicer.

- As I said earlier, things can get confusing. This is a case in point. The one in Willo went to HSRC and they sided with the owner. In part, this was because of Jim Garrison's argument, which was not that the owners had messed it up but that the error was in the original nomination 30+ years ago. Basically, the preparer missed that the front porch had been enclosed so it should have never been a

contributor in the first place. So it is still a contributor.

Aspects of Integrity: Design

1. Has the original appearance of the resource been altered?
2. Do the alterations impact the original design intent?



Before



After

- On the left we have is a non-contributing ranch house in Encanto Manor HD in Phoenix that was non-contributing because of the classical columns. The owners protested and went before HSRC, who agreed to let it become a contributor. They later changed the columns into something more appropriate, which is the photo on the right.

Aspects of Integrity: Setting



1. Has the setting of the property changed?
2. Does this affect its ability to convey its significance?



This is the contributor to the Sam Hughes HD, Benedictine Monastery, Tucson--now the Benedictine Apts. On the left is a photo from the first half of the 20th century in its original open site. To the right is a modern view. The building is surrounded by modern apartments and City growth.

Aspects of Integrity: **Materials**

1. **Have inappropriate materials been added to the resource?**



Before



After



This is a 1948 residence within the NRHP listed Pierson Place District in Phoenix. It recently came to our attention that work was completed at the building, so our office, and the HSRC, reviewed the changes to determine if they were consistent with the Secretary of the Interior's Standards, or if the alterations were inappropriate, and the building should be taken off the NRHP.

- Historic block exterior obscured with stucco sheathing
- Complete replacement of historic steel

casement windows

- Glass block window at east elevation eliminated

It was SHPO's opinion that the residence no longer retained sufficient integrity of workmanship, materials, feeling, or design to qualify as a contributing property to the Pierson Place National Register Historic District.

For the first time in recent memory, the Keeper of the NRHP disagreed with our recommendation. She had the following comments: The alterations to this property—namely, exterior stuccoing, replaced windows, and one infilled window—do not appear to adversely affect the building's ability to convey its significance and contribute to the Pierson Place Historic District. I recommend re-evaluating the property pursuant to the guidance regarding integrity found in Bulletin 15: How to Apply the National Register Criteria for Evaluation. For example, if historic exterior building material is covered by non-historic material (such as stucco), the property can still be eligible if the significant form, features, and detailing are not obscured. (Bulletin 15, p. 47.) And even if a property has lost

some historic materials or details, it can still be eligible under Criterion C if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, etc. (Bulletin 15, p. 46.)

Aspects of Integrity: Workmanship

Have alterations, additions, or repairs matched the historic fabric in terms of craftsmanship?



Sandra Day O'Connor House. Her c.1959 residence is a relocated property and now serves as the ASU Center for Civic Discourse at ASU. But in this case we are going to look at it through the eyes of Workmanship. From the O'Connor Institute Website (where all the photos were obtained)

In 2006, Justice O'Connor learned that her family home, which the O'Connors no longer owned, was scheduled to be demolished. Friends in high places decided to find a way to save this historic home by locating a new setting for the O'Connor House.

The owners donated the house to the Rio Salado Foundation, but it needed to be moved to a new location. Even though the experts said it was impossible to move an old adobe structure, the Friends of O'Connor House committee worked with Janie Ellis, whose father, George Ellis, made the original adobe bricks for the home from the mud of the Salt River in the 1950s. Through their combined efforts, the founding committee began raising the money for the move and establishing a vision for use of the home.

Under Janie's direction, the home was disassembled, brick by adobe brick, and with the help of John McCullough and Sundt Construction, and painstakingly moved to its new home in 2009. Today, the historic O'Connor House is situated close to the Salt River, the source of the original mud from which the adobe bricks and the home was constructed.

Workmanship retained and, through the willpower of Sandra Day O'Connor, the Keeper listed it!

Aspects of Integrity: [Feeling](#)

1. Has the property's expression of an aesthetic, or expression of a sense of a particular period of time, changed?
2. Do the other aspects of integrity, taken together, convey the property's historic character?



Before



After

- Here's a commercial one. If it's unclear, the white building is the latest photo. This was delisted last year and is in Armory Park in Tucson.
- It simply does not FEEL the same.
- Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register. What else here is wrong?

Aspects of Integrity: Association

1. Has the property's association with its historic context been compromised?



Before



After



- The “property” is a chimney remnant of F.L. Wright’s Pauson House, built 1940-42. Its association with its context – the house itself - has been lost. It now serves as the entrance to the Alta Vista Park Estate Subdivision in Phoenix.
- Association can also be applied at more of a macro level. For example an outhouse that has lost its residence. A storage warehouse that has lost its factory.

Aspects of Integrity: Q&A

What Resource Integrity Challenges are you facing?

Reach out!

Susan Lawson

SHPO Historical Architect

slawson@azstateparks.gov



For more info:

Download National Register Bulletin 15,

How to Apply the National Register Criteria of Evaluation:

https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf



ARCHAEOLOGY

The SHPO archaeologist is the primary contact for **all** reviews, even if the report includes the built environment

The SHPO architect and/or historian review built environment portions of reports and sign off on eligibility determinations although official signatures on letters may be by the archaeological compliance specialist

SHPO staff do not possess the knowledge and expertise of tribes; as such, we need to be informed of tribal concerns as early as possible in consultation

We strongly encourage federal and state agencies to include tribal perspectives in all scopes of work for the identification and evaluation of historic properties

Mary-Ellen Walsh, Cultural Resources Compliance Manager

Erin Davis, Kasey Miller, Caroline Klebacha, Archaeological Compliance Specialists

General Expectations for Report Submittals

- Use of current SHPO, ASM, and/or agency guidance
- Correct identification of applicable regulations
- Use of correct terminology - federal language where applicable
- Respectful terminology – no site names
- Legible, detailed site maps
- Complete site descriptions per guidance documents
- QA / QC

The current reporting guidance is found on our website, and it relies heavily on what is required for review under Section 106 of the National Historic Preservation Act. Conversations among the SHPO archaeologists have noted several key items that are missing or inconsistent in reports we review:

Bullet 1 - SHPO's survey report guidance was developed in collaboration with ASM, and it's available on our website and on ASM's website. Make sure you only cite the guidance you are using. If you are using ASM site criteria, write it out. Don't say you conducted research at SHPO when we generally don't have anything - if you contact us, use personal communication and the date. Some of it is agency specific (like for FCC pole installations). Always indicate if you are following land-managing agency guidance: this supersedes SHPO guidance if there are conflicts.

Bullet 2 - Don't include regulations that are not applicable to the project. Think carefully about what the nexus for each project is (State, Federal, private) and what the land ownership is.

Bullet 3 - If you have a project that has both a federal and state nexus, use the federal language such as "undertaking" and "area of potential effects" instead of "project" and "project area"

Bullet 4 - In coordination with some Tribes, ASM has a guidance document for respectful terminology for discussion of Human Remains. SHPO requests that reports adhere to this list.

Bullet 5 - Before tablets, we'd get site maps in which you could see the outline of a feature, not an "X" marking the spot. We think technology is sufficiently advanced that digital maps should once again depict the feature to scale. Please check your report

maps to make sure figure compression has not altered the quality of the map—it should not have blurry areas.

Bullet 6 - We'll get into some of this in the following slides

Bullet 7 - the QA / QC of a report is the consultant's job. Although agencies are looking at the reports, the level of detail in their review is probably less than 100 percent. SHPO's job is to focus on what we need to see in the report that demonstrates high professional standards, and gives us the information necessary for our concurrence with or determination of site eligibility. We will not hold up a project if we have sufficient information to concur with a finding of effect, but we will ask for report revisions when necessary.

Over the years, we've developed procedures or documents for streamlining - such as the survey report summary form (SRSF) and historic in-use structure form. The forms must be filled out in their entirety. The SRSF must be used for negative survey unless your contract specifies otherwise. By negative survey we mean no sites. It's ok to have IOs, as well as built environment features - as long as they will not be affected by the project. And if there are built environment features, you should prepare the appropriate history property inventory form for buildings or the historic in-use structure form.

Site Descriptions – Common things to look for during QA-QC

- ☐ **Artifact Counts**
 - Estimate number/range of artifacts for the entire site and each artifact concentration; 1000-1500, not “thousands” or “a few”
 - Provide exact count if artifacts appear to be under 100
 - If you use the terms “high density,” “low density,” etc., define in terms of artifacts per square meter
- ☐ **Feature Identification and Descriptions**
 - Include a summary table if there are 3 features or more
 - Include metrics, materials, associated artifacts
 - Feature photos are necessary
- ☐ **Previously Recorded Sites**
 - Original recording summary with citations and current description
 - Changes in condition, description, boundaries—if none, explicitly state so
 - Assessing sites previously determined ineligible—don't go crazy on the recording unless you disagree!
 - Site Maps—no need to make a new site map if nothing has changed, but insert the previous site map for reference
- ☐ **Built Environment**
 - Summarize all findings in report, even when using historic in-use structure forms or historic inventory property forms

Site Maps – Common things to look for during QA-QC

- At least one contour with elevation
- Datum where UTM's were recorded
- All artifact concentrations / features called out in text
- Disturbance and natural features discussed in text should be on map
- Check final pdf to make sure map is not blurry

“Multi-Component Site”

“Multicomponent” is not a site type!

It refers to a physical manifestation of at least two temporally or culturally distinct occupations or uses that cover the same space on the landscape, with each component meeting the definition of a site.

Prehistoric / Historic - the most recognizable multiple uses observed during survey

Each component is evaluated individually; do not state that one component contributes or not to the eligibility of the other

ASM's position differs in that it is all one site, meaning the combined assemblage equals a site. SHPO will address this in eligibility recommendations regardless.

In those cases where you are assigning feature numbers in consecutive order for the site area, we recommend starting with prehistoric and moving to historic. Or P-1, P-2, H-1, H-2.

Cultural Affiliation and Temporal Affiliations

DO NOT LEAVE THE INFORMATION BLANK in your site description or on the SRSF!

Cultural Affiliation

- Use archaeological or ancestral affiliations*
 - e.g., Hohokam or ancestral Huhugam;
- Paleo-Indian, Paleoamerican, Paleoarchaic, Archaic
- Protohistoric
- Prehistoric/Pre-contact, Unknown
- Euro-American—characterizes the artifacts (usually mass-produced) as associated with American culture, does NOT imply a particular ethnicity or cultural affiliation

Temporal Affiliation

Must use a date range and relevant phase/period, or Unknown

*Make inferences based on background research and geographic area, especially if you are recommending a site Register eligible; use “possible” or “likely” (culture)

MORE ABOUT CULTURAL AFFILIATION

Prehistoric/Historic, Unknown is not useful for evaluating significance and eligibility of sites. Think about where your project is located and what cultural groups are affiliated prehistorically and historically.

Use background research results.

Use the Government-to-Government Consultation Toolkit tribal maps

For Historic Period Sites,

Add a statement that a Euroamerican cultural assignment for historic resources should not be taken to diminish the cultural diverse nature of groups of people who have moved through this area during historic times. Identification of resources as Euro-American should not be meant to characterize *users* of the items are being of particular ethnicity of cultural affiliation. (following Moore and Langan 2022).

G2G maps identify ancestral lands for each tribe

Submittals to SHPO

- Electronic submittals only (unless otherwise requested by SHPO)
- Mandated 30 day review period
- Concurrent reviews with Tribes, ASM, and Others
- Do not submit reports labeled as FINAL before consultation has occurred; use a revised date for each submittal
- SHPO MUST receive the final report once all reviewer comments are addressed.

Archaeology and the National Historic Preservation Act

Archaeological site is a national register property defined as the place or places where the remnants of a past culture survive in the a physical context that allows for the interpretation of these remains
NPS Bulletin 36

Places of traditional ecological knowledge (TEK), traditional cultural properties, sacred sites, should be concurrently identified by descendant communities as part of the identification of historic properties – the first step in the S106 process
SHPO opinion

Most archaeological investigations occur because of requirements that trigger Section 106 of the National Historic Preservation Act. Approximately 70% of SHPO review is Section 106.

Typically this includes federal land, funding, permitting such as the Army Corps of Engineers Clean Water Act permit.

In AZ, we rely on ASM's definition of archaeological site as well as specific land managing agency definitions. That agency specific criteria, as mentioned early, should be specified in your report. Use ASM definition for sites on private land.

Identification of places of traditional ecological knowledge, TCPs, and sacred sites should be done as part of the Identification of Historic properties process, not just in consultation. This onus is on the agency to make sure these identification methods are scoped.

Section 106 Process – Step 2

IDENTIFY HISTORIC PROPERTIES

- Use of background research and historical maps
- Archaeological field survey
- Ethnographic Survey
- TEK survey
- Traditional Cultural Properties

We recommend that the agency coordinate with Tribes and the Archaeological Consultant to have tribal members in the field at the same time as the archaeological survey.

We cannot stress enough that ethnographic and TEK surveys should be part of the identification process, not a mitigation to resolve adverse effects.

Agencies should inform SHPO of these efforts as part of the consultation processes.

Historic Contexts...

Historic contexts are those patterns, themes, or trends in history (or prehistory) by which a specific occurrence, property, or site is understood and its meaning (or significance) within history is made clear.

Contexts provide the background necessary to understand why a resource may be significant.

A historic context document identifies and explains in detail those patterns, themes, or trends that apply within the resource's state.

Historic contexts may be applied at the local, state, or national level of significance



This is not the same as identifying general themes such as chronology or subsistence, and we're not asking for a research design (unless it is required by the land manager).

Historic Context Studies

Examples of context studies are available on the SHPO website

- Basques in Arizona
- Cattle Ranching in Arizona (2 studies)
- Gold & Silver Mining in Arizona
- Historic Trails
- Prehistoric Water Utilization and Technology
- The Prehistoric to Historic Transition
- Paleoindian and Archaic Sites in Arizona

These are some examples of the contexts on file. Granted, these are old and we have new information for some of them, like prehistoric water utilization and technology, but it's a starting point.

Remember that you must identify the period of significance to evaluate archaeological sites, so even if you have a site for which you don't have that specific temporal information, you are looking (under Criterion D) for a site's research *potential*. So you are taking these contexts and adapting them to the types of sites in your study area.

Step 2 cont'd

DETERMINE NATIONAL REGISTER ELIGIBILITY

A - Event

B - People

C- Design, Construction

Archaeological sites should not be evaluated only under Criterion D; we seem to forget to think about other criteria. It will be much easier when you start evaluating significance under relevant contexts. It might require additional research and maybe you'll end up stating additional research is required to evaluate the site's significance under Criteria A, B, or C, and--of course--you have to consider the aspects of integrity. Some obvious examples that could fall under these criteria are homesteads and linear sites or structures representing early electrification of an area.

Criterion D-Eligibility

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

That **have yielded**, or may be likely to yield, information important in prehistory or history

(36 CFR 60.4 - Criteria for Evaluation (also see NPS Bulletins 15 and 36))

We're focusing on Criterion D because most archaeological sites are assessed for significance and recommended eligible (or not) under Criterion D. We recognize that we are providing a western science perspective. We recognize that tribes have the knowledge and expertise that we don't possess, and we otherwise rely on the results of government-to-government consultation between agencies and tribes to address indigenous perspectives.

A site can be eligible and recommend no further investigations necessary—sites that have been excavated, for instance, have yielded important

information. They are still eligible, but as that data potential has been realized, it generally would not require further work.

Aspects of Integrity

Location – the place where the historic property was constructed or the place where the historic event occurred

Design – the combination of elements that create the form, plan, space, structure and style of a property

Setting – the physical environment of a historic property; includes such elements as topographic features, open space, viewshed, landscape, vegetation, and artificial features

Materials – the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property

Workmanship – the physical evidence of the labor and skill of a particular culture or people during any given period in history

Feeling – a property's expression of the aesthetic or historic sense of a particular period of time

Association – the direct link between an important historic event or person or a historic property. UNDER CRITERION D, it is measured in the strength of the association between data and important research questions

Aspects of Integrity are not equally weighed. But for a site to be historically significant AND register eligible, at least one aspect of integrity must be identified and briefly discussed.

The evaluation of integrity is sometimes subjective, but must always be grounded in a property's physical features and how they related to significance.

Aspects of Integrity

Location


Has the property been moved? Example of loss of integrity could be a site where the artifacts have eroded down a slope.

Most archaeological sites retain integrity of location.

Aspects of Integrity

Design


A historic mining site that retains building foundations and equipment probably retains integrity of design. If the building foundations have been demolished, the integrity of design has been compromised.



Aspects of Integrity

Setting


Archaeological sites that are nominated under Criterion D often may not retain integrity of setting – it obviously depends if they are located in a rural or urban setting. Because they are being evaluated for their data potential, integrity of setting is not necessarily heavily weighed.



Aspects of Integrity

Materials

A site may retain integrity of materials if it has adobe or masonry walls, has original wood posts, etc. Integrity of materials may be otherwise difficult to discern at the survey level.



Aspects of Integrity


Workmanship

Under Criterion D, integrity of workmanship can be evaluated by the quality of artifacts or the skill that would be necessary to construct features.

Aspects of Integrity

Feeling

In order for an archaeological site to retain integrity of feeling, it must evoke the sense of the time the site was in use. This usually means an undisturbed environment as well as intact features. Archaeological sites rarely retain integrity of feeling.



Aspects of Integrity

Association

A site that has archaeological deposits that can help answer important research questions retains integrity of association.

Steps for evaluating a site under Criterion D (see NR Bulletin 36)

1. Identify the site's data set(s) or categories of archaeological, historical, or ecological information
2. Identify the historic context(s)
3. Identify the important research question(s) that the site's data can be expected to address
4. Consider the integrity of the site and evaluate the data in terms of their potential and known ability to answer the research question(s)
5. Identify the important information that an archaeological study has yielded or is likely to yield

Points 3 and 4 are required to be addressed in surveys that are 640 acres or more. In smaller surveys, this information is usually implicit in the discussion about historical significance. It circles back to overarching historical context

Summary - Evaluation Process (all Criteria)

1. **Categorize** the Property (district, site, building, structure, or object)
2. Determine the appropriate **historic context(s)** the property represents
3. Determine whether the property is **significant** under the National Register Criteria
4. Determine if the property represents a type usually excluded from the National Register Criteria - does it meet any **Criteria Considerations**? (NOT COMMON FOR ARCHAEOLOGICAL SITES)
5. Determine whether the property retains **integrity**

Review National Register Bulletin 15 & National Register Bulletin 36; note that you can have more than one context within which to evaluate the significance and eligibility of sites

Historic Context Statement - Example 1

Site Type: Artifact scatter with features

Cultural Affiliation: Hohokam

Temporal Affiliation: Classic Period (A.D. 1150-1300)

Background Research: 3 Classic Period Hohokam Sites consisting of canals and field houses

Location: Salt River Floodplain, Phoenix, AZ

Culture History: Phoenix Basin Hohokam

Historic Context Statement

Hohokam irrigation agriculture within Canal System 2, Phoenix Basin, ca. A.D. 1150-1450

Note the historic context statement identifies the culture (Hohokam), a place (Canal System 2, Phoenix Basin) and a time (AD 1150-1450). The theme is irrigation agriculture.

Historic Context Statement - Example 2

Site Type: Artifact scatter

Cultural Affiliation: Northern Sinagua

Temporal Affiliation: A.D. 825-1300

Background Research: Surrounding sites include artifacts scatters representing resource procurement sites and small one to two room habitations

Location: Flagstaff

Culture History: Northern Sinagua

Historic Context Statement

Resource procurement and processing among the Northern Sinagua between A.D. 825 and 1300 on the Colorado Plateau in the vicinity of present-day Flagstaff

You will use relevant portions of your culture history to discuss the sites evaluated under specific historic contexts.

Historic Context Statement - Example 3

Site Type: Ranch

Cultural Affiliation: Euro-American

Temporal Affiliation: AD 1940-1970

Background Research: Nearby sites include historic household refuse, tent platforms, automobile parts, a windmill, and a historic telephone line

Location: Tonto Basin

Culture History: Euro-American – Tonto Basin

Historic Context Statement

Arizona cattle ranching in Tonto Basin during the modern era, 1945-1970

Historic Context Statement - Example 4

Site Type: Artifact scatter with features

Cultural Affiliation: Euro-American

Temporal Affiliation: Middle to late Historic Period (A.D. 1870- 1960)

Background Research: Surrounding sites consist of adits, test pits, shafts, and waste piles

Location: Superior, AZ

Culture History: Euro-American - Superior

Historic Context Statement

Euro-American silver mining in the 1870s to 1900 in the foothills of the Superstition Mountains near modern day Superior

Summary and Recommendations Discussion

This section should:

- summarize the survey findings
- discuss the historic context(s) used to evaluate the sites
- discuss the sites as they relate to each other
- offer eligibility recommendations
- address the project's specific effects on the sites
- offer recommendations for avoidance or further work (e.g., archival work, eligibility testing, data recovery).

Use your existing culture histories and background research to discuss what was happening in the general area and how the sites may relate to this knowledge

Summary and Recommendations Example

Sites x, y, and z are evaluated for significance under the theme **Hohokam irrigation agriculture in the Phoenix Basin, A.D. 500- 900, and 1150-1300**. The adoption of irrigation agriculture paved the way for the rapid growth of Hohokam populations after A.D. 500. The first primary villages, distinguished initially by a central plaza surrounded by house clusters and later by other forms of public architecture (ballcourts, platform mounds) appears during the Vahki phase (A.D. 500-650). Each of villages was associated with at least one major canal system that brought river water onto the upper alluvial terraces. Examples in Phoenix include XXX located on the north side of the Salt River and YYY on the South side of the Salt River. The appearance of these ancestral villages was followed by a rapid expansion of small and large habitation centers and irrigation systems across the valley during the late Pioneer period and subsequent Colonial period. (continue discussion as appropriate). Sites x, y, and z retain integrity of association and are recommended eligible under Criterion D.

Summary and Recommendations Example (continued)

Sites x, y, and z should be avoided by the proposed project. Currently, the transmission line for the project will cross site x. It is recommended that all poles be placed outside of the site boundary. If any of the sites cannot be avoided, phased data recovery is recommended.

Recommended treatments, including avoidance, don't belong with the site description but should be in the summary and recommendations section of the report (and perhaps in a site summary table).

Cultural Landscapes

The National Park Service defines a cultural landscape as a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or exhibiting other cultural or aesthetic values

We are NOT looking for a full blown cultural landscape discussion

We are NOT asking for identification of a traditional cultural landscape

We ask that you simply consider the temporal and spatial distribution of the identified sites (and isolates), including from your Class I and write a brief summary...it's more of a wrap-up of the research results

Separate all prehistoric sites and IOs from Historic sites, structures, and IOs on maps and use that information for discussion.

Cultural Landscape Example Discussion

Survey resulted in the documentation of xx sites and xxx IOs.

Address site density.

Where are the sites and IOs located relative to landform/topographic features – if you have both prehistoric and historic sites, break it down and show the distribution on separate maps.

Are there temporal differences in site location?

What do the results suggest about intensity of land use over time.

NOTE: We are not evaluating the landscape itself



Example Report Outline (survey less than 640 acres)

Introduction
Environmental Setting
Previous Research
Field Methods
Survey Results
 Site Descriptions
 Historical In Use Structures
 Historical Buildings
 Isolated Occurrences
Site Summary – **Discuss sites under relevant historic contexts and include a site summary table**
Cultural Landscape Consideration
Recommendations

The historical context statement and discussion means no culture history section.

Example Report Outline (survey 640 acres or more)

- Introduction
- Environmental Setting
- Previous Research
- Research Design with Research Questions
- Field Methods
- Survey Results
 - Sites
 - Historic In-Use Structures
 - Historical Buildings
 - Isolated Occurrences

[Site Eligibility Summary – relative to historic contexts](#)

Research Results and Discussion – include consideration of cultural landscape in its broadest sense

Management Recommendations

Brand new newflash 11/18/22!

ASM no longer requires a culture history for surveys of 640 acres or more – the historical context information will provide the necessary background