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GUIDANCE FOR SHPO REVIEW OF HUD/ADOH PROJECTS REVISED NOVEMBER 17, 2022

General

Applicants consult with SHPO on behalf of HUD, and Section 106 consultation is required if the project involves more than routine maintenance or as otherwise required by HUD (see HUD Notice [CPD-16-02](#)).

Project descriptions should match proposed activities in HUD Appendix A, Part III, Historic Preservation.

Projects involving “in-kind” replacement must meet the Secretary of the Interior’s Standards for the Treatment of Historic Properties (see <https://www.nps.gov/tps/standards.htm>). Contact the SHPO Architect if you have questions or concerns.

A consultation letter on letterhead should be addressed to Kathryn Leonard, Historic Preservation Officer and submitted via email: azshpo@azstateparks.gov.

When to Consult with SHPO:

1. As required by HUD/ADOH, and;
2. An undertaking involves project modifications exceeding maintenance (i.e., involves rehabilitation, significant repairs, new construction, removals, or demolition) to an above-ground resource including buildings, sites, structures or objects over 50 years in age;
3. The building, site, structure or object (the resource) has been determined eligible for individual listing, or is listed on, a local historic register, or the Arizona/National Register of Historic Places (A/NRHP);
4. The resource is under 50 years of age but is located in or adjacent to an eligible or listed local historic district or an A/NRHP historic district;
5. Ground disturbing activities are greater than 2 feet in any direction;
6. The proposed project involves acquisition or refinancing associated with exterior alterations, regardless of building age; and
7. Your entity does not hold an individual Programmatic Agreement with SHPO providing alternate compliance instructions.

Note: Consultation with SHPO is not required for modifications to manufactured housing.

What to Include in the Consultation Letter:

- Reference to a currently-valid Programmatic Agreement, if applicable
- Address of building or parcel (and/or Assessor’s Parcel Number)
- Funding source for the project
- Year the building was constructed, if applicable
- Description of resource (including character-defining features)
- Scope of Work (description of the proposed project)
- Any previous modifications to the historic building materials
- Whether the building is in or near a historic district (if so, name the district)
- Whether the proposed modifications will meet the Secretary of the Interior’s Standards for the Treatment of Historic Properties

- Extent (depth, width, length) of any proposed ground disturbance
- Any archaeological work previously been conducted in the project area (reference resulting report)
- Request for concurrence with a finding “no historic properties affected” OR “no adverse effect” OR “adverse effect” (per the National Historic Preservation Act, 36 CFR Part 800)
- Email address of person who should receive SHPO’s response

ATTACHMENTS

All Submittals

- Exterior Photographs
- Interior photographs where work is proposed (if applicable and/or accessible)
- Location map(s) showing where the building or parcel is located, with street names

Historic Property Inventory Form

If work is being proposed on above-ground architectural resources over 50 years of age that have not been previously evaluated by SHPO for eligibility for listing on the Arizona/National Register of Historic Places, an Historic Property Inventory Form should be completed to the best of your ability, and included in all requests for consultation. AZ SHPO Historic Property Inventory Forms are available for download at: <https://azstateparks.com/shpo-forms-and-publications>

Architectural Drawings and Site Plans, if applicable:

If work involves any of the following activities, submit schematic or design development drawings, or a detailed written scope, for initial review:

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| • Significant Visible Exterior Alterations | • Full or Partial Demolition |
| • Hazardous Materials Abatement | • Adding New Wall Openings |
| • Constructing Permanent Ramps/Stairs | • Window Replacement |
| • Roof Replacement | • Exterior Door Replacement |
| • Masonry Rehabilitation | • Building Additions |
| • Hardscapes (driveways, walkways) | • Enclosing Carports |
| • Foundation Work | • Structural Alterations |
| • New/Relocated | • Building Relocations |
| • HVAC/Plumbing/Electrical Systems | • Adding Elevators |
| • Interior Floor/Wall/Ceiling alterations | |

Additional questions?

Please contact us at AZSHPO@azstateparks.gov