

UDOT GUIDELINES FOR IDENTIFYING, RECORDING AND EVALUATING ARCHITECTURAL RESOURCES

INTRODUCTION

The purpose of the UDOT Architectural Guidelines is to assist consultants, UDOT staff, and others in the UDOT cultural resource compliance process. The guidelines specifically address UDOT and Utah Division of State History (UDSH) architectural survey requirements and apply to projects funded, permitted or sponsored by FHWA and UDOT. Section 106 of the National Historic Preservation Act of 1966 (NHPA), Section 404 of the State Antiquities Act (U.C.A. 9-8-404), and Section 4(f) of the Department of Transportation Act of 1966 are the applicable laws that may require UDOT to undertake an architectural survey. UDOT must adhere to the requirements of Section 106 and Section 4(f) when the agency relies on federal funding or needs federal approval for a transportation project. Section 404 is the counterpart to Section 106 when the agency uses state funding to undertake its projects. All three laws require UDOT to consider its actions on cultural resources defined as “eligible” for listing on the National Register of Historic Places.

The Federal Highway Administration (FHWA) implements the Federal-aid Highway Program (FAHP) of Utah by funding and approving state and locally sponsored transportation projects that UDOT administers. FHWA assigned responsibility for ensuring compliance with the National Environmental Policy Act (NEPA), including Section 106 of NHPA and with Section 4(f) of the DOT Act of 1966, through a Memorandum of Understanding. This assignment authorizes UDOT to act as a lead federal agency for FAHP projects. A Programmatic Agreement among FHWA, UDOT, SHPO and the Advisory Council of Historic Preservation (ACHP) established this authorization and procedure.

Section 106 requires agencies to consult with the Utah State Historic Preservation Office (SHPO) and other appropriate parties and provide the Advisory Council on Historic Preservation (ACHP) an opportunity to comment if an agency’s project adversely affects a property that is eligible for or listed on the National Register. The involvement of the ACHP is unnecessary when only state (or other non-federal) funding is used for UDOT projects. Like Section 106, Section 4(f) only applies to federally-funded projects. Section 4(f) is considered to be the cultural resources law with the sharpest “teeth,” as agencies must analyze alternatives to prove that they chose the alternative causing the least harm to eligible properties, as opposed to the mere consultation required under Sections 106 and 404. The determinations of eligibility and the findings of a project’s effect on eligible properties established through the Section 106 process are used in the Section 4(f) analyses.

Generally speaking, buildings, bridges, and culverts are considered architectural resources and the architectural guidelines apply to their documentation and evaluation. Other architectural resources can include, but are not limited to, walls and fences, monuments, statues, farmsteads and outbuildings such as loafing sheds, silos, or hay derricks. To record and evaluate linear resources such as irrigation features and rail lines consultants and UDOT staff should refer to the

[UDOT Guidelines for Identifying, Recording, and Evaluating Archaeological and Paleontological Resources](#), because they are considered archaeological sites.

UDOT is divided into four regions, with a UDOT archaeologist assigned to each region. In addition, there are two cultural resources specialists located in the UDOT Complex in Salt Lake City: a Cultural Resource Program Manager and an architectural historian. If the project includes historic buildings or structures (bridges or culverts), consultants should work directly with the architectural historian. For all other cultural resources consultants should work directly with the region archaeologist.

The Utah SHPO functions within the Utah Division of State History (UDSH) and is responsible for carrying out the state's duties defined by the NHPA. Although the SHPO handles NHPA responsibilities, including Section 106 requirements, SHPO is not a separate or defined section within the UDSH. The SHPO staff includes employees of both the Antiquities (archaeology) and Preservation (buildings). In this document, "UDSH" will be the term most commonly used; however, in some instances the term "SHPO" will be used, as when these guidelines refer to forms and policies clearly marked as "SHPO" or to functions associated with Section 106.

In addition to using these guidelines for architectural resources, cultural resource specialists should also refer to the [UDOT Environmental Process Manual of Instruction](#) (Chapter 5.3 (M)), and the UDSH website for the most recent *Standard Operating Procedures* for reconnaissance-level and intensive-level surveys, as well as the SHPO's suggestions for navigating compliance requirements.

This manual is intended to instruct both consultants and others working on UDOT projects in the UDOT cultural resource compliance process. These guidelines apply to all projects regardless of sponsor, funding instrument, or permitting agency. Consultants are an important part of the cultural resources compliance program of UDOT. These guidelines contain procedures and methods considered essential to completing surveys and reports. Unique situations, however, may occur and UDOT cultural resource professionals are open to appropriate and creative solutions that may not be presented in the following text. Thus flexibility and open communication with the UDOT Project Manager, the region archaeologist, and architectural historian are key elements to the successful completion of any UDOT project.

DETERMINATION OF SCOPE AND LEVEL OF IDENTIFICATION EFFORTS

Determining the scope of identification efforts requires considering the possible effects of the project on architectural resources and how the resources should be identified. According to CFR 36 § 800.4 *Identification of historic properties*, scoping requires determining the area of potential effect (APE), reviewing existing information on historic properties, and seeking information from parties, individuals or organizations who may have knowledge or concerns about the potential effects of the undertaking on historic resources. It is the agency's responsibility to determine the APE. The second task, reviewing existing information, is usually tied to identifying and evaluating historic resources, and the third task addresses documentation and public involvement.

Establishing the Area of Potential Effect (APE)

The APE is defined as “the geographical area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.” (36 CFR § 800.16.d *Definitions*). The APE is defined before the identification of any historic properties and may differ or correspond to the survey area or the project footprint. UDOT must consider both potential direct and indirect impacts to historic properties. Direct impacts include acquisition or demolition. Indirect impacts can include those that intrude on viewsheds, create noise and vibration as well as alter traffic patterns that may disrupt historic development patterns.

Stipulation IV.B.7 of the programmatic agreement dated August 23, 2017 between FHWA, SHPO, and UDOT addresses APE consultation. Briefly stated, UDOT is not required to consult on the APE with SHPO on routine projects, including projects that the UDOT Environmental Division processes as delegated Categorical Exclusions (CE). UDOT is required to consult with SHPO on the APE for undertakings that are non-routine or those with the potential for substantial direct, indirect and/or cumulative effects as addressed in documented CEs, EAs or EISs. In these instances, the discussion between UDOT and SHPO regarding the APE are ongoing parts of consultation as a project’s alternatives evolve and change. APE consultation may require UDOT to establish several APEs in order to address different types of impacts. Although APE discussions between UDOT and SHPO are an important component in Section 106 consultation for complex projects, it is ultimately UDOT’s responsibility to determine the APE.

In cases in which the project team anticipates that the project will not adversely impact historic resources, the consultant can describe the APE in the Fieldwork Authorization Request (FAR) submitted to the region archaeologist. On complex projects with several alternatives or those with anticipated adverse effects, consultants should discuss APE determination with both the region archaeologist and the UDOT architectural historian prior to submitting the Fieldwork Authorization Request.

Review Existing Information on Historic Properties

At a minimum, anyone undertaking an architectural survey should check the UDSH database and the National Register database to determine what properties have already been surveyed, how they were evaluated, and if they are listed on the National Register. Because many of the dates in the UDSH database are estimates and eligibility evaluations in the SHPO database may be outdated, consultants should check other sources to determine dates of construction or establish significance. These sources include the following:

- County tax assessment records (not all counties provide construction dates)
- Certified Local Government (CLG) surveys
- Subdivision plats
- U.S. Department of Agriculture (USDA) aerial maps
- Utah Geological Survey (UGS) aerial maps <https://geodata.geology.utah.gov/imagery/>

Submitting a Fieldwork Authorization Request (FAR)

The FAR describes the archaeological and architectural identification that a consultant will undertake for a project. Prior to undertaking fieldwork, the consultant should complete the FAR and submit it to the region archaeologist who then forwards it to the UDOT architectural historian. The region archaeologist is the point of contact for a project regarding cultural resources and keeps the architectural historian aware of projects that may involve the documentation and evaluation of architectural resources. The UDOT cultural staff encourages consultants to discuss any questions regarding field methods, sources of information, formatting issues, and final delivery products with the UDOT architectural historian.

Because of NEPA assignment, it is very important to indicate the type of environmental document the survey is associated with on the FAR.

UDOT reserves the right to take one week to sign the FAR and return it to the consultant. The FAR form can be accessed on the UDOT Environmental website under the Cultural Resources heading: *2013 UDOT Fieldwork Form*.

IDENTIFYING HISTORIC PROPERTIES

Identifying the architectural resources that a transportation project may impact includes the following steps:

- Determining whether a survey is necessary
- Determining the level of survey that should be conducted
- Evaluating properties for National Register eligibility
- Preparing the survey record or documentation

Is a Survey Necessary?

The UDOT architectural historian determines whether a survey is necessary. This determination is based on several factors, including how recently properties in the project area have been evaluated and the likelihood of impacts to properties that may be deemed eligible. Surveys are typically not necessary if no architectural resources are located within the UDOT right-of-way and all work remains in the UDOT right-of-way or if in-period buildings are absent in the project area. The consultant or UDOT staff can check Google Earth and local county assessor records to determine if a survey is needed and inform the UDOT architectural historian whether historic properties are located within the project area.

Determining the Level of Survey

Consultants can undertake three primary levels of survey: windshield-level, reconnaissance-level survey (“RLS”), and intensive-level survey (“ILS”). As its name implies, a **windshield** survey consists of driving throughout an area or neighborhood, quickly noting what architectural properties are present and observing the locations or concentrations of potentially eligible properties. It can also consist of “driving” a project area on Google Earth. The windshield survey does not result in a report. Windshield surveys are a “first cut” of evaluating the

responses in a project area and are also used for scoping-level screening of potential project alternatives. They are rarely, if ever, sufficient for completing the Section 106 or U.C.A. 9-8-404 processes.

A **standard** reconnaissance-level survey results in the documentation, including photographs and maps, of every primary building in the survey area regardless of age. Very few standard reconnaissance-level surveys are conducted for UDOT; instead, **selective** reconnaissance-level surveys are the most common approach to documenting architectural resources for the agency. Selective surveys require documenting only those resources constructed during the historic time period.

Intensive-level surveys are usually undertaken to document the history and appearance of architectural resources and require in-depth research and documentation. ILS surveys focus on individual buildings rather than the identification and evaluation of the large groups of buildings associated with RLS surveys. Surveying individual buildings at the ILS level is generally undertaken for mitigation or to assist with re-evaluation of eligibility after a RLS survey has been submitted to SHPO.

Evaluation of National Register Eligibility

Surveyors must evaluate architectural resources for eligibility for the National Register of Historic Places (NRHP) by considering the age of the property, its integrity and the criteria of significance, as outlined in 36 CFR § 60.4.

- Age – 36 CFR § 60 does not state that a property must be 50 years old to be eligible but the National Park Service, the federal agency charged with administering the NRHP, has determined that this benchmark ensures an adequate perspective as to what is truly “historic.” In order to accommodate the length of time needed to complete environmental studies and secure funding for construction, UDOT generally uses a 45-year time period for evaluation especially if funding is not secured for design or construction. If the UDOT project team believes that construction will begin within five years the UDOT architectural historian can instruct the consultant to extend the 45-year time frame; however, the UDOT architectural historian must approve this extension.
- Integrity – Evaluating integrity requires determining whether the property retains the features that have made it significant. Has the property undergone a sufficient amount of alterations that its original or historic appearance can no longer be discerned?
 - Seven criteria are used to determine integrity: location, setting, design, materials, workmanship, feeling and association. Not all integrity criteria apply in all situations; some integrity criteria carry more weight than others, and can be used in many combinations. The National Park Service bulletin entitled *How to Apply the National Register Criteria for Evaluation* (often referred to as “Bulletin 15”) is invaluable in explaining how to evaluate the integrity of a property.

- Significance – Architectural properties are significant when evaluated within a historic context because they:
 - A. Are associated with events that have made a significant contribution to the broad patterns of our history; or
 - B. Are associated with the lives of persons significant in our past; or
 - C. Embody the distinctive characteristics of a type, period or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction; or
 - D. Yield, or may be likely to yield, information important in prehistory or history.

Again, Bulletin 15 is helpful in describing when to apply the various criteria of significance. For UDOT purposes, few properties will be eligible under Criteria B and D. Criteria C should be used for properties distinctive for their design, including those with an exceptionally high level of integrity and represent a rare or outstanding example of a building type or design. Most eligible buildings evaluated for UDOT purposes will be significant under Criteria A for their contribution at the local level. More than one significance criteria can be applied to properties.

Utah Division of State History – Historic Preservation Section Criteria

In addition to the NRHP criteria, the UDSH has developed a rating system to evaluate the integrity of buildings. Its rating system considers the physical integrity of buildings and excludes historical associations. For compliance purposes, agencies use the UDSH rating system and the age of the property to evaluate properties without developing extensive historic contexts. This is beneficial for transportation projects that tend to be linear and do not require the evaluation of properties beyond the potentially affected roadway. If needed, UDOT will submit re-evaluations to SHPO based on in-depth research to establish if a property has individual significance or if a clear and direct association to a historic or architectural theme exists.

Consultants and UDOT staff should use the following four rating options as the guide to determining whether a property retains physical integrity.

1. ES -- Eligible/Significant: built within the historic period and retains integrity; excellent example of a style or type; unaltered or only minor alterations or additions; individually eligible for National Register under criterion “C;” also, buildings of known historical significance.
2. EC -- Eligible/Contributing: built within the historic period and retains integrity; good example of a style or type, but not as well-preserved or well-executed as “ES;” more substantial alterations or additions than “ES” buildings, though overall integrity

is retained; eligible for National Register as part of a potential historic district or primarily for historical, rather than architectural, reasons.

3. NC -- Non-contributing: built during the historic period but non-contributing in a potential historic district; has had major alterations and displays minimal, if any, clues as to its historical appearance; no longer retains integrity.
4. OP Out-of-period: constructed outside of the historic period as defined for the specific survey.

When considering integrity, consultants should consider the frequency of occurrence and the extent of modifications on architectural properties. The important question to ask is whether the primary historical building retains sufficient integrity to represent the era in which it was constructed. Consultants should pay attention to what features define the character for a given time period or architectural type or style. Changes to rooflines, the application of non-historic material, enclosing porches and carports, the presence of out-of-scale additions, and modification of fenestration altering the size and shape of door and window openings are examples of modifications likely to impair historic integrity and render a building ineligible. Furthermore, consultants should also consider how well a resource type or style is represented in the survey area and surrounding area. Stricter standards apply in defining historic integrity for common building types, such as post-war residences, than for pre-war dwellings, which are not as prevalent in UDOT's project areas. Structure types and styles that are common in an area are held to a higher-than-average standard of integrity to be considered eligible while more leniency may be used when evaluating rare and unique structure types.

Preparing the Survey Report

The goal of an architectural resource survey is to provide UDOT staff with enough information to evaluate the physical characteristics and integrity of a resource and to determine the eligibility of the resource to the National Register for effective consultation with SHPO. When the project effects are known, the UDOT staff relies on the survey to assess how impacts will affect the integrity of the resource. The findings of the survey are gathered into a report, which includes the following:

- A summary of the project data.
- A table providing a brief description of the resource.
- Maps providing the general project location, the survey location, and the results indicating the location, the eligibility and the street number of the resource.
- Individual E106 forms for surveys of nine or fewer properties or individual photo files for surveys of ten or more properties.

For every project requiring both architectural and archaeological surveys, the consultant or UDOT staff prepares a report for each discipline. Submitting separate reports enables UDSH to file them in the appropriate location and to ensure that sensitive archaeological information is not available to the public in the Historic Preservation Section. One report is primary and the other is secondary. The primary report addresses greatest number of resources, either archaeological

or architectural. If the primary report is archaeological, the report must include all the information outlined in the UDOT *Guidelines for Identifying, Recording, and Evaluating Archaeological and Paleontological Resources* (2018). Whether the primary report is architectural or archaeological, both must reference the submittal of the other and both should adhere to UDSH requirements.

Preliminary Survey Submittal

For surveys of large number of buildings, consultants may submit the table that will be used in the survey report and properly labeled digital photographs prior to completing a draft of the report. This allows the UDOT architectural historian to review the consultant's eligibility determinations before the consultant has refined the rest of the report. This is not a requirement but it saves time for both the consultant and the architectural historian. Consultants should communicate with the architectural historian that s/he will be submitting a preliminary survey.

Utah SHPO Electronic Submittal System: "E106"

In 2017, the Utah SHPO implemented an electronic submittal system for Section 106 projects, known as "E106." This program allows agency staff to track the status projects submitted for consultation. The agency submits the relevant correspondence for SHPO staff to review, as well as a report, forms, photographs, and maps in a single package. The format of individual property documentation depends on whether **nine or fewer** resources are surveyed, or if **ten or more** resources are surveyed. Submittal requirements for regarding E106 forms and photographs are described below under "Components of an Architectural Resource Survey Report" (no. 13).

Components of an Architectural Resource Survey Report

Consultants should refer to the attached checklist (Attachment B). **The checklist is only for convenience. It is unnecessary to submit the checklist with the survey report.**

For a complete survey report, consultants must submit the following items:

1. A UDSH Survey Cover Sheet. This cover sheet is specifically for E106 and is used for Section 106 projects that address both archaeological and architectural properties.
2. A title page that includes the following:
 - UDOT project name and project number
 - UDOT PIN (project identification number)
 - Name of the firm or individual who prepared the survey
 - Name of the local government associated with the project, if applicable
 - Date of submittal
 - Version of survey (number of draft or final)
 - For federally funded Documented CE, EA, or EIS projects, the following text must be included on the title sheet:

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out

by UDOT pursuant to 23 USC 327 and a Memorandum of Understanding dated January 17, 2017, and executed by FHWA and UDOT.

3. An abstract including the following:

- Short summary of the project
- Description of the study area
- Description of the APE
- Type of survey that was conducted (standard or selective)
- Results of the survey
 - Number of properties surveyed
 - Number of properties eligible for the National Register

4. Table of contents, including a list of tables and figures

5. Introduction:

- A description of the UDOT project and a description of the project area
- The purpose of the project and type of environmental document for which the survey was prepared
- Whether an archaeology report will be submitted to UDOT separately
- Name of the environmental consultant

6. Previous Research

- When was the search of previously-recorded buildings or other relevant information conducted? Is a new survey being conducted because a previous survey is obsolete and needs re-evaluation?
- Are any buildings in the survey area listed on the National Register either individually or in a district? Are National Register properties or locally-designed historic districts located within the vicinity of or overlap the APE or project area?
- Have the properties in the survey area been recorded as part of other surveys? What was the purpose of the surveys (transportation related, CLG, etc.)? This information can be included in a table.
- Previously recorded buildings should be included in a table that includes the address, the UDSH rating and NRHP eligibility determination of previous documentation, and the current status of the building (present or demolished).

7. Methodology

- The survey should state whether the consultant followed the UDSH *Standard Operating Procedures* or used an alternative method that was cleared with the UDOT architectural historian.

- What was the cut-off date to include or exclude the evaluation of properties based on age? Generally, UDOT gives itself a five-year margin to accommodate the length of project development or construction, so properties can be evaluated as eligible after 45 years, rather than 50. UDOT will, however, make exceptions if construction is imminent once the agency has issued an environmental clearance.
 - What sources were used to determine the age of the resources?
 - Was survey data entered into the UDSH database?

8. **Historic Boundaries.** Determining the historic boundaries of a property is an essential step in the evaluation of impacts to architectural resources. The boundaries should include the area and resources that contribute to the property’s significance. For the majority of properties evaluated for UDOT undertakings, the historic boundary will be the current legal parcel. If this is the case for all properties the surveyors can simply state this in the methodology section.

Determining the historic boundaries of unusual architectural properties requires that cultural resource professionals consider the significance of a property. For example, agricultural outbuildings, such as silos or granaries, or small sheds once associated with an industrial use, are often within a project area but are obviously remnants of a historical development. In such cases, the consultant or UDOT staff must determine if the remaining buildings provide sufficient information to convey the history and significance of the property with which the remaining building is associated.

9. **Documented Buildings.** Obviously, the documented buildings are the most essential part of a survey report. This section should consist of a table including the following information:

- An address
- Date of construction
- A very brief building description, including style or type, and modifications that have occurred
- A mention of outbuildings; the SHPO rating and NRHP eligibility recommendations
- The historic boundary if different from the legal parcel
- The text should be in a font size not smaller than 10.

The table in Attachment A is a preferred format but surveyors can arrange this information in a variety of ways. Consultants should present the information clearly so that the UDOT architectural historian and SHPO staff can efficiently review the consultant’s findings. Consultants should include a photograph of the surveyed building in the table. **Datasheets with coding will not be accepted.**

If it is obvious what the primary building or structure is on a site and if the outbuildings are unexceptional (a garage or shed, for example), only the primary structure needs to be recorded and the outbuildings and their contributing or non-contributing status mentioned.

If a property has a substantial outbuilding or a collection of noteworthy outbuildings, consultants should document them as a separate entry in both the table and the UDSH database but note their association with another property, if applicable (such as an Intermountain style barn associated with a farmhouse). When outbuildings are the only architectural resource present, they should be documented as stand-alone entries (silos, granaries, etc.). If they appear to be clustered together (a few sheds, fences, corrals, but no residence or structure that is clearly the primary building), they should be evaluated as one property and entered into the SHPO online data base as such.

10. Summary of Findings. The summary section should state the number of properties recorded, the number of those that are eligible for the National Register, and a break-down of buildings that fall into the SHPO integrity categories. The summary should also note the number of buildings already listed on the NRHP either individually or as part of NRHP historic districts. This is also the section in which the consultant can mention other observations or categorize the documented properties, such as the historical periods considered, uses, or any information that may shed light on the historical development of a project area or community.

11. References. Include sources used and cited.

12. Maps. At a minimum, the following types of maps should be included in the survey report:

- A map of the APE
- A map of the study area (if different from the APE), preferably with an aerial background showing surrounding roads and other landmarks.
- A USGS map of the study area
- Maps denoting the locations, addresses and eligibility evaluations of the surveyed properties. Maps showing this information superimposed on a photographic aerial are the most effective presentation method. The maps do not have to be to a specific scale but must be large enough to indicate clearly every primary building, structure or site included in the survey and its address number. The maps must be clear enough that copies can be made. The map should include individual street names. If the survey includes properties in more than one city or county the boundary of the municipality should be noted on the map.

Denote the eligibility evaluation of each building using a square or a circle:

- A square or circle should be drawn for each building, indicating its eligibility.
- For “ES” and “EC” buildings, the square or circle should be filled in; “NC” buildings are cross-hatched or halfway filled in; and the square should remain open for “OP” buildings.
- Indicate addresses. Indicate estimated street numbers with a question mark. **Do not use site numbers to reference properties with addresses.**

The UDOT and UDSH architectural historians realize that reconnaissance-level surveys consisting of large numbers of buildings for UDOT projects are usually sited in long, linear patterns and are thus cumbersome to describe graphically. Survey areas are thus often recorded on several maps. When this is the case, the surveyor should include a small illustration in the legend indicating the order of the maps and where the subject map is located within the overall survey area (i.e., an index map).

13. E-106 Forms and Photographs. For surveys of **nine or fewer** architectural resources, the E106 form must be used. This form accommodates two photographs. If consultants desire to include more than two photographs, the SHPO staff or the UDOT architectural historian can provide an extra photograph page. Each form should be submitted separately (i.e., no merging of forms for different properties into a single file) and the file name should take the following format: 1234E_BeautifulStreet_Ogden. The E106 form must be submitted in a PDF/A format.

E-106 forms are not required for surveys of **ten or more** architectural resources. Instead, consultants must provide UDOT with properly labeled individual photos files in an image format (preferably .jpg or .tiff) in addition to the photograph submitted for each property included in the survey table. Consultants can submit photographs via an online file transfer site or a USB thumb drive. Photographs must be organized by street, with the address of each property labeled in the following format:
1234E_BeautifulStreet_Ogden.

It is no longer necessary to submit photographs on a CD, gold or otherwise, for reconnaissance surveys.

All work must be submitted in a PDF/A format.

All photographs must be submitted in a digital format meeting UDSH resolution standards.

14. Entering data into the SHPO database. It is the consultant's responsibility to enter the survey report findings into the SHPO database.

15. Submittal of the report. The architectural report should be submitted to the region archaeologist, who will then forward it to the architectural historian.

16. Inclusion of bridges and culverts in reports. In 2011, UDOT completed a historic bridge survey, which documented and evaluated the National Register eligibility of bridges and culverts in the UDOT structures inventory. The historic bridge survey includes the earliest remaining bridges in Utah through 1965. The survey, entitled [Utah's Historic Bridge Inventory](#), can be accessed on the UDOT Environmental Section website.

The eligibility determinations of the bridges from the study period were based on the development of an extensive context and the establishment of character-defining features of the bridge types found in Utah. Although the SHPO considers linear features to be archaeological sites (canals, highways, and rail lines), resources related to linear sites

bridges and culverts) are considered architectural resources. UDOT cultural resource staff and consultants should thus refer to the bridge survey for eligibility determinations.

If a bridge is part of a survey that consists of 10 or more properties, it should be recorded as one of the resources included in the entire report. If the bridge is part of an architectural survey evaluating nine or fewer resources, the consultant should complete an E106 form for the bridge. If an adverse effect of an eligible bridge is anticipated, the consultant should complete an ILS form for the bridge.




SUMMARY

The documentation and determination of eligibility of architectural resources is an important part of the Section 106 process, and is handled separately but concurrently with the review of archaeological resources. The UDOT architectural historian should be considered not only as a resource for the Sections 106 and 404 processes, but also included on project teams in order to assist with evaluating impacts to architectural resources. The sooner the architectural historian is consulted in the project development process, the smoother the cultural resource process will be.

The preparers of all reports for submittal to SHPO should remember that the report is an important document that *enables any reviewing party to understand its basis* (Section 800.11 *Documentation Standards* of 36 CFR 800) and enables the UDOT cultural resources staff to lead the agency through the consultation process. It is a professional report consisting of the compilation of research in a variety of formats: text, photographs and maps that may influence the outcome of a transportation project. The consultation process proceeds more smoothly when consultants understand the purpose of identification of architectural resources for UDOT projects.

ATTACHMENT A

BUILDING DESCRIPTIONS AND EVALUATIONS

Address	Approx. Date Built	Description	SHPO Rating	Photo
572 S. 2000 W. Syracuse 120350029	1965	1.5-story Split-Level single-family dwelling exhibiting Split-Level plan and style. Primary materials include regular brick and aluminum siding. Alterations include in-fill of aluminum siding over the primary entrance and window replacement. Outbuildings include a shed behind the house that is not visible from the street.	EC-rating/Eligible	
522 S. 2000 W. Syracuse 120350074	1961	1-story Ranch style and plan house. The primary material is regular brick, with synthetic siding in the gable end. Low-pitch roof; essentially a side-gable with a front-gable over a narrow porch and the front door. The minor alterations include window updates. No outbuildings are visible from the street.	EC-rating/Eligible	
488 S. 2000 W. Syracuse 12030025	1965	1.5 story Split-Entry plan and style house. Appears to be single-family. Side-gable with one-car carport. Primary material is brick. Alterations are minimal, and include window replacements and filling in the substantial transom.	EC-rating/Eligible	

APPENDIX B

CHECKLIST FOR COMPLETING UDOT HISTORIC RESOURCE SURVEYS (The checklist is meant for convenience and does not have to be submitted to UDOT)

- ___ Was a Fieldwork Authorization Form submitted to the UDOT region archaeologist?
- ___ What is the APE? Did you and the UDOT Cultural Resource staff need consult with SHPO in making the determination of the APE? Have you provided a map of the APE?
- ___ Did you check the UDSH database for previously recorded sites? Are any sites listed on the National Register either individually or within a district?
- ___ Did you include a SHPO survey cover sheet with the report?
- ___ Did you include the PIN and the UDOT project name and number in the report?
- ___ Did you include the name of the firm or individual who prepared the report?
- ___ What version (draft, final) of the report is being submitted and what is the date of submittal?
- ___ Is the transportation project state or federally funded?
- ___ If the transportation project is associated with an EIS, EA, or Documented Catex, did you include the following language on the cover of the report: *The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by UDOT pursuant to 23 USC 327 and a Memorandum of Understanding dated January 17, 2017, and executed by FHWA and UDOT?*
- ___ Is the transportation project a local government project? If yes, which local government?
- ___ Did you include a table of contents?
- ___ Did you describe the transportation project?
- ___ Did you follow UDSH survey procedures?
- ___ What kind of survey has been undertaken? (Selective vs. standard)
- ___ Did you describe the area of the survey?

- ___ What methodology did you use to undertake the survey?
- ___ What other sources other than the UDSH database did you use (subdivision plats, Sanborn maps, Dept. of Agriculture maps, etc.?)
- ___ Did you include a table indicating which properties in the survey area have been previously surveyed, their previous eligibility determinations (both NRHP and UDSH ratings), what surveys they were associated with, the date of previous surveys, and the current status of the resources (demolished, extant, etc.)? When was the search of previously surveyed buildings undertaken?
- ___ Is a separate archaeology report being submitted to SHPO?
- ___ Did you indicate the cut-off date for evaluation of properties based on age?
- ___ What are the historic boundaries of the properties surveyed?
- ___ Did you include a bibliography?
- ___ Did you include a summary of findings?
- ___ For all surveys, did you prepare a table including the address, eligibility determination, date, style, brief description, alterations, and a photograph? Did you limit the number of buildings per page on this table to no more than three?
- ___ For surveys documenting nine or fewer resources, did you complete the E106 forms?
- ___ For surveys of more than ten resources, did you upload photographs in a file organized into individual streets with photographs properly labeled?
- ___ Did you include maps of the APE, the project area, and the survey area?
- ___ Did you include a USGS map at 1:24,000 scale?
- ___ Did you include an aerial map of the survey area with the resources marked by address and whether or not the resources are eligible or ineligible?
- ___ Did you enter the data into the UDSH database?
- ___ Did you submit all work in a PDF/A format?