Section 106 Process FDOT Procedure

Step 1:

- Initiate the Section 106 Process
- Establish undertaking
- Identify appropriate SHPO/THPO or Tribal
- representative
- Plan to involve the public
 Identify other consulting parties

- Define the archaeological and historic APEs
- Initiate desktop analysis of previously recorded
- resources & potential for new historic resources

 Determine if the Post-WWII Survey & Evaluation
- Methodology applies to the project

 If the method is applicable, present initial
- conclusions and tentative survey methodology in a Research Design-style document for SHPO review*
- If not applicable, conduct standard pre-survey efforts

Step 2: Identify Historic Properties

- Determine scope of efforts
- Identify historic & archaeological resources
- Evaluate resource(s) historic significance
- Following consulting party input, if applicable, refine the APEs and scope of efforts for the CRAS
 - Conduct survey in accordance with the methodologies for Post-WWII residential structures
 - Conduct the remaining architectural survey in accordance with the standard methods
 - Complete FMSF forms for the appropriate resources per methods chosen

Step 3:

Assess Adverse Effects
• Apply Criteria of Adverse

Effect to historic properties

 Determine the need (or not) for additional FMSF forms based on methodology

• Evaluate resources recorded on FMSF forms

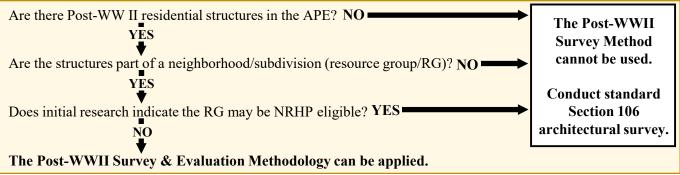
- Apply criteria of adverse effects to historic properties
- Present all findings in appropriate report type for SHPO/THPO review and concurrence

• Continue coordination with consulting parties

Step 4:

- Resolve Adverse Effects
 Continue consultation to
- Continue consultation to develop minimization and mitigation measures
- Document minimization and mitigation measures in an MOA

Can I Apply the Post-WWII Survey & Evaluation Methodology?



Post-WWII Survey & Evaluation Methodology

- 1. Categorize structures within a neighborhood/subdivision Resource Group according to style type.
- 2. Record the best example of each style on a FMSF Structure Form and evaluate for NRHP eligibility.

IF the best example of a style type is *Eligible* for NRHP listing, continued use of this method depends on whether additional structures or the resource group are affected by the single structure's basis for eligibility. If the significance is isolated to that one resource, the method is still applicable.

If significant under Criteria C, <u>ALL</u> structures of that style type within the APE will be recorded on individual FMSF forms and receive evaluations.

If significant under Criteria A or B, the remaining structures of that style

type within the APE are NOT individually recorded or evaluated.

type is *Ineligible* for NRHP listing, the remaining structures of that style type within the APE are <u>NOT</u> individually recorded nor evaluated on FMSF forms.

IF the best example of a style

- 3. Record the neighborhood/subdivision on a FMSF Resource Group form and evaluate for NRHP eligibility.
- 4. When initially determining the applicability of this method, the Resource Group will have been afforded sufficient background research to identify and/or eliminate the potential for NRHP eligibility; however, its significance should be further assessed based on additional research and the structure survey's results to ascertain if the initial NRHP eligibility evaluation has changed.

IF the Resource Group appears *Eligible* for NRHP listing, the standard Section 106 survey methods will be followed for this RG and its structures in the APE.

IF the Resource Group appears *Ineligible* for NRHP listing, the Post-WWII Survey & Evaluation Method still applies.

While it's understood that the RG will likely have *Insufficient Information* for a definitive NRHP determination, the above NRHP evaluations regarding the overall likelihood of the Resource Group's significance will be determined in good faith by an SOI qualified professional based on the available research.

^{*} SHPO will conduct an expedited review of these *Research Designs* within 15 days of receipt. This step is subject to alterations conditional on the successful implementation of this method.

Frequently Asked Question and Answers

Q: How may/will this affect the normal FDOT cultural resources process? A: Application of the Post-WWII Survey & Evaluation Methodology to a project, if

residential subdivisions, neighborhoods, and/or developments constructed post-1945

applicable, should result in no net increase in processing time, but may require a shift in cultural resource efforts. Successful application of the method may require increased background/archival research efforts and early coordination with SHPO but has the potential to reduce later-stage survey and deliverable production efforts.

Q: How many structures will this likely impact?A: This methodology only applies to a small subset of all structures within an APE;

according to the decision matrix criteria.

example for each style type.

Q: If a single structure within a subdivision/neighborhood/development is NRHP-eligible, can we still use the Post-WWII Survey & Evaluation Method?
A: It depends on the specific reason the structure is significant and whether there is any corresponding impact on the resource group or other structures. If a single structure's significance elevates the resource group's significance as a subdivision/neighborhood/development or if it affects similarly designed or constructed structures, the standard survey methods must be followed. If a structure's significance is isolated to just that

that meet the requirements discussed in the Post-WWII Decision Matrix.

Q: Are there any new requirements for Resource Group FMSF forms?

- A: Yes, the following must be documented on the RG form and/or continuation sheet:
 - Ensure an accurate boundary is provided for the whole resource group.
 - All structures within the project APE must be listed on the resource group continuation form:

one resource, the Post-WWII Survey & Evaluation Method may continue to be used

- Structure address, style type, and at least one representative photograph of each structure within the APE must be included.
 Indicate which structures were individually recorded and evaluated as the best
- NRHP evaluation justification must address Criteria A, B, and C

Q: Can I apply this methodology to any structure constructed after 1945?

section.

A: No. Structures that fall outside of a subdivision/neighborhood/development setting will be recorded and evaluated according to standard Section 106 survey methods.

Q: What are the benefits of the Post-WWI Survey & Evaluation Method over current practices?

A: Successful application of this method should streamline the survey and deliverable production for an individual Section 106 undertaking, but also provide more substantive data for the state's FMSF database.

Streamlined Survey & Deliverable Production: Currently, every structure requires a

FMSF form, NRHP-evaluation, and detailed write-up in the CRAS report. As more of these structures age into historic qualification, this recording effort will increase substantially, and the requisite report and deliverable production will increase at a directly proportional rate. Under this 'sampling' method, only the best representative example(s) of each style in a neighborhood would require an individual FMSF form, NRHP evaluation, and detailed write-up in the CRAS report – the remaining examples of each style in the APE would be listed in the Resource Group continuation form with their address, style type, and a representative photograph. Within the CRAS report, the structures that do not warrant individual documentation would not require individual discussion; they would be listed in the style type section and the Resource Group

Quality over Quantity Data Collection: Under current methods an abundance of ineligible homes that fall into this Post-WWII Survey & Method criteria are being recorded; this is flooding the FMSF database with volumes of structures, most of which are ineligible, but it provides little data of substance. Further, these ineligible structures which are so plentiful now, will likely not be considered again for Section 106 purposes during subsequent projects for a decade (10 years being the SHPO-stated age that an evaluation must be re-considered), if they are still extent by that time. Alternately, the application of this sampling method would result in most substantive data being collected at this time, while retaining the potential for assessment of non-previously recorded structures during each subsequent Section 106 undertaking.