

**PART II**  
**CHAPTER 6**  
**Historic Property Identification and Evaluation:**  
**Above-Ground**

**August 2019**

## **REVISIONS**

<b>August 2018</b>	<b>All sections</b>	<b>General revisions, including updated HPR guidelines</b>
<b>March 2019</b>	<b>6-2.5</b>	<b>Revised submission and distribution guidelines</b>
<b>August 2019</b>	<b>6-2.5.1</b>	<b>Updated shapefile requirement. Shapefiles now required for all HPR submissions to CRO</b>

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## 6-1.0 Overview

Section 106 requires a “reasonable and good faith effort” to identify historic properties within a project’s area of potential effects (APE). For the purposes of Section 106, historic properties are defined as those properties listed in or eligible for listing in the [National Register of Historic Places](#) (NRHP). As a general guideline, in order to be considered for listing in the NRHP, a resource should be at least 50-years old. Historic properties include both above-ground and archaeological resources. The identification phase of Section 106 consists of locating properties previously listed or determined eligible for the NRHP and evaluating properties to determine if they are eligible for NRHP listing.

FHWA and INDOT rely on qualified professional consultants to provide clear, detailed and honest information when identifying historic properties in order to ensure a reasonable and good faith effort. Without a proper identification effort, FHWA/INDOT is unable to make an assessment of “adverse effect.” Therefore, this chapter provides guidance for completing the identification of historic above-ground resources, including survey, evaluation and reporting for projects funded by FHWA *and that cannot meet the conditions of the* [Minor Projects PA](#). See Chapter 3 for information regarding the Minor Projects PA.

Chapter 7 details the steps for completing archaeological identification and evaluation.

Identification of above-ground resources is conveyed through the production of a historic property report (HPR). The HPR provides the results of the above-ground identification efforts, including field survey and NRHP eligibility evaluations. An HPR must be produced by a qualified professional who has been approved to conduct historic/architectural investigations. INDOT-CRO will only accept an HPR that has been prepared by qualified professionals who meet the Secretary of Interior's Professional Qualification Standards and who are listed on the [Indiana Division of Historic Preservation and Archaeology’s Qualified Professionals Roster](#). Once a completed HPR has been submitted to and approved by INDOT-CRO, it will be provided to SHPO and consulting parties for review and comment.

## 6-2.0 How to Complete a Historic Property Report

The following subchapters describe the procedures for identifying and evaluating historic properties. These procedures will be described through the preparation of the HPR. An HPR will be prepared for every Section 106 project that does not fall under the Minor Projects PA. Specific HPR content guidelines are provided in Chapter 6-3.0.

### 6-2.1 Literature Review/Previous Investigations

A Literature Review includes the collection of sufficient data to characterize or predict the type and location of previously identified cultural resources that might be present in the APE. A background literature search is the review of all pertinent cultural resources data, a summary of known resources, and a determination if cultural resources may exist in the study area. The

thorough literature review should be completed early in the investigation. The literature search area must be broad enough to develop an accurate and useful historic context for the area, but most importantly, it should provide a base that can support the cultural resource evaluations that follow.

**Some expected resources to include in a literature review include:**

*Indiana Historic Sites and Structures Inventory (a.k.a. county interim reports)*

Likely the most-used resource when completing a literature review is the Indiana Historic Sites and Structures Inventory (IHSSI). All of Indiana's 92 counties (and, separately, some municipalities or townships in large urban areas) have been surveyed. All survey records are filed at the DHPA for public access. Additionally, survey data is continually being made available through the [Indiana State Historic Architectural and Archaeological Research Database \(SHAARD\)](#) and the [Indiana Historic Buildings, Bridges, and Cemeteries Map \(IHBBM\)](#).<sup>1</sup>

Please note that as of June 2018, all county survey information has been entered into SHAARD. Marion County and Hendricks County are in process of being resurveyed and that information will be entered when complete.

Prior to the development of SHAARD, IHSSI survey information was published as "interim reports." The term "interim report" recognizes that a "final" inventory of a county can never be accomplished due to the ever-changing nature of the built-environment. Properties are demolished, altered, and/or restored on a daily basis. Further, as each year passes, properties previously omitted because they were less than 40 years old attain sufficient age to be considered for survey.

With the development of SHAARD, new survey data will be made available online, but not in published interim reports. For counties where survey data appears in SHAARD and in a published interim report, SHAARD should be checked first. SHAARD will take precedence over published interim report data.

While interim reports are no longer being published, they can be valuable resources. As of June 2018, surveyed historic districts (not already NRHP-listed) have not been entered into SHAARD

### SHAARD

SHAARD, the [Indiana State Historic Architectural and Archaeological Research Database](#) and the [IHBBM](#), is an online database of known historic resources in Indiana. SHAARD includes data on the Inventory of Historic Sites and Structures surveys (county interim reports), properties listed in the State and National Register of Historic Places, historic bridges, historic theaters, and archaeology sites (for registered qualified professional archaeologists). IHBBM is the mapping component of SHAARD. Data is continually being added to the database.

Any questions about SHAARD or IHBBM should be directed to **Jeannie Regan-Dinius at DNR-DHPA:**

[JRDinius@DNR.in.gov](mailto:JRDinius@DNR.in.gov) or 317-234-1268

<sup>1</sup> SHAARD and IHBBM are available online at <https://www.in.gov/dnr/historic/4505.htm>

or the IHBBM.<sup>2</sup> Until surveyed historic district information is available online interim reports should be referenced to ascertain the likely presence of a historic district.

The DHPA has a complete set of interim reports that is available to the public. Other repositories that maintain copies of interim reports include the Indiana State Library, federal and state agencies, regional planning agencies, city governments, as well as libraries throughout the state<sup>3</sup>. Indiana Landmarks has partnered with the Indiana University/Purdue University at Indianapolis (IUPUI) University Library to digitize and make certain interim reports available online at <http://www.ulib.iupui.edu/digitalscholarship/collections/IHSSI>. For a map of the surveyed counties and to ascertain whether an interim report has been published, visit the DHPA website at <http://www.in.gov/dnr/historic/>.

To be included in the IHSSI, a property must be at least 40 years old and retain its historic integrity. Severe alterations to the fabric of a building, such as the addition of synthetic siding material, removal of decorative features, replacement/resizing of windows, and construction of large or incongruent additions affect integrity and often disqualify a property from inclusion in the survey.

The IHSSI uses the following rating system<sup>4</sup>:

**Outstanding (O)**—These properties possess a high level of historic or architectural significance. They are either already listed in the National Register or may be eligible for listing in the National Register. These properties can be of local, state, or national significance;

**Notable (N)**—These properties do not quite merit an Outstanding rating, but possess enough historic or architectural significance to be considered above-average. Further research may reveal these properties to be eligible for listing in the National Register;

**Contributing (C)**—These properties meet the basic inventory criteria, but do not possess any noteworthy historic or architectural significance. These properties are an important contribution to an area's historic fabric. They can be eligible for or listed in the National Register as part of a historic district, but do not have enough merit to stand alone (*Please note that the Indiana DHPA is no longer including "contributing" resources in their IHSSI surveys unless they are part of an identified historic district*);

**Non-Contributing (NC)**—These properties are included in the survey only as part of a historic district. These properties are fewer than fifty-years old or possess little historic integrity due to alterations. They are not eligible for the National Register.

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<sup>2</sup> While non-listed historic districts do not have entries in SHAARD, it should be noted that the database usually indicates when individual resources are part of a historic district, including instances when the district has been surveyed but not listed. In most cases, however, it does not provide boundaries or any other information for non-listed districts. Therefore, the interim reports must always be consulted in addition to SHAARD.

<sup>3</sup> Contact the Indiana Landmarks at 317-639-4534 or <https://www.indianalandmarks.org/resources/architectural-surveys/> to check the availability of a specific Interim Report. Some Interim Reports have been digitized as part of the digital library collections of the IUPUI University Library and can be found online (<https://ulib.iupui.edu/collections/IHSSI>).

<sup>4</sup> IHSSI Survey Manual for Architectural and Historical Resources. Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology.2011.

While the IHSSI is a valuable tool in understanding the local built environment and identifying potential historic properties, it is not the final authority on NRHP eligibility. Survey ratings do not always translate to NRHP eligibility. Moreover, since the surveys were completed, significant changes may have occurred to the properties and environment. Information found in the IHSSI should always be field-checked.

### *Indiana Register of Historic Sites and Structures (the State Register) and National Register of Historic Places*

Properties previously listed in the State and National Registers should be checked during the literature review. For a listing of National Register-listed properties in Indiana please refer to the [National Register Database](#). Additionally a listing of National and State Register properties can be found on [SHAARD](#).

### *Historic Bridge Inventory*

Bridges built through 1965 have been surveyed and evaluated through the Indiana Historic Bridge Inventory. More information about the bridge inventory can be found in Part IV of the CRM. A listing of surveyed bridges can be found on the [Historic Bridges Inventory Summary & Results](#) webpage. Additionally, Annual Reports are prepared as part of the Indiana Historic Bridge Inventory to report actions that have occurred to historic bridges in the previous calendar year. These reports should be checked as appropriate to determine the current status of a bridge. The Annual Reports can be obtained on the [Historic Bridges Inventory Summary & Results](#) webpage. Historic bridge locations may be found on SHAARD. Keep in mind that there may be location discrepancies between the Historic Bridge Inventory and SHAARD, and SHAARD acts as an archive of information that includes many bridges that are no longer extant. The Historic Bridge Inventory data takes precedence over SHAARD if there is a discrepancy. Please consult with INDOT-CRO staff if any unusual situations or questions arise.

### *Historic maps*

Reference to historic maps will also provide valuable insight in predicting the likely presence of historic properties in the APE. Historic maps can be accessed in a variety of locations including online, Indiana State Library, Indiana Historical Society, and libraries across the state.

## **6-2.2 Historic Context**

The results of the Literature Survey will aid in the development of the historic context, a critical element in evaluating properties for National Register eligibility. The [National Park Service's National Register Bulletin 15](#) states that historic contexts are “found at a variety of geographical levels or scales. The geographic scale selected may relate to a pattern of historical development, a political division, or a cultural area. Regardless of the scale, the historic context establishes the framework from which decisions about the significance of related properties can be made.”<sup>5</sup>

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<sup>5</sup> National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation*, See <http://www.cr.nps.gov/nr/publications/bulletins/nrb15/nrb15.pdf>.

Specific content that should be provided in the historic context is listed in Section 6-3.0. Please note that a historic context section may not be necessary if there are no resources receiving a full, in-text evaluation in the HPR (see [6-2.3 Methodology](#) section below).

A historic context is information about historic properties grouped by an important theme in the prehistory or a history of a community, state, or the nation during a particular period of time. The development of historic contexts is a foundation for decisions about the planning, identification, evaluation registration, and treatment of historic properties, based upon comparative significance.

Because historic contexts are organized by theme, place, and time, they link historic properties to important historic trends. In this way they provide a framework for determining the significance of a property and its eligibility for National Register listing. Knowledge of historic contexts allows applicants to understand a historic property as a product of its time and as an illustration of aspects of heritage that may be unique, representative, or pivotal.

Themes often relate to the historic development of a community, such as commercial or industrial activities. They may relate to the occupation of a prehistoric group, the rise of an architectural movement, the work of a master architect, specific events or activities, or a pattern of physical development that influenced the character of a place at a particular time in history. It is within the larger picture of a community's history that local significance becomes clear and the property is seen in relationship to trends and patterns of prehistory or history statewide or nationally.

Additional guidance for the definition and the preparation of a historic context can be found in [National Register Bulletin's 16A](#) *How to Complete the National Register Form*; [National Register Bulletin 15](#) *How to Apply the National Register Criteria for Evaluation*; and [National Register Bulletin 16B](#) *How to Complete the National Register Multiple Property Documentation Form*.

### 6-2.3 Methodology

The methods used to address cultural resources investigations vary depending on the scope and type of projects. The goal for the above-ground survey is to identify properties that have been listed or may be eligible for listing in the NRHP.

Fieldwork is a key step in identifying and documenting the actual properties in the APE, gauging the potential for historic districts, and assessing retention of integrity. Based on fieldwork and historic context development, the qualified professional historian preparing the HPR must summarize the qualities and characteristics of the identified properties and make appropriate NRHP eligibility recommendations. It is expected that the investigator will follow all applicable INDOT-CRO, DHPA, and NRHP guidelines and requirements when evaluating properties. The investigator must always focus on collecting the necessary data to address integrity and eligibility, as INDOT-CRO is **only** interested in information that is needed to determine the eligibility of a property. Extraneous information in such evaluations is distracting and may delay INDOT-CRO and SHPO review.



Repetitiously occurring property-types and their context should be summarized collectively in the survey report. INDOT-CRO (in consultation with SHPO, if necessary) will make the final determination about which architectural properties require further investigation, such as property deed research and interior access and documentation, which is rare.

For most typical projects, the methodology will include identification of properties 50 years old or older in the APE, which is therein conveyed through a single HPR. As a means to ensure that identification remains current up to construction, the 50 year age threshold should be determined based on the date of the proposed project letting. The methodology should clearly state the proposed project letting date and beginning date used for identification.

All resources that will be at least 50 years of age by the time of project letting will be surveyed, and photographic documentation of “Contributing” resources and representative “Non Contributing” resources will be prepared.

However, only resources that meet the following conditions shall be evaluated for the NRHP through a full write-up in the body of the report:

1. individual properties that are not already NRHP-listed (either individually or as part of a historic district) and that the qualified professional historian has determined warrant an IHSSI rating of “Notable” or “Outstanding,” using the IHSSI criteria; and
2. districts that are potentially eligible for the NRHP and that are not already listed in the NRHP.

This methodology is consistent with the DHPA’s updated IHSSI survey standards.

While properties determined to have a “Contributing” rating will not be formally evaluated for NRHP eligibility through a full write-up in the body of the report, the qualified professional is still responsible for considering all properties in the APE for NRHP eligibility. All “Contributing” properties should be documented through photographs and/or a table that summarizes the information. For “Contributing” properties located within historic districts, streetscape photographs are sufficient. Photos of each property that contributes to a historic district are not necessary.

#### 6-2.4 National Register Eligibility Evaluations

[The National Register Criteria for Evaluation](#) (Section 800.4[1]) (National Register Criteria), is used to determine the significance of potentially historic properties.<sup>6</sup> Cultural resource evaluation is effectively made by following the five-step approach outlined in the National Register Bulletin- [How to Apply the National Register Criteria for Evaluation](#) (Please note that the information contained in Chapter 6-2.4 concerning eligibility evaluations is from this aforementioned National Register Bulletin.) These steps are:

- 1) Categorizing the cultural resource as site, building, structure, object, or district;

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<sup>6</sup> Consult the various National Register Bulletins that are available online at the following website: <http://www.cr.nps.gov/nr/publications/#bulletins>.

- 2) Determining the historic context or contexts within which the cultural resource is associated;
- 3) Determining whether the cultural resource is significant under one or more of the four National Register Criteria;
- 4) Determining whether the cultural resource meets any of the criteria of considerations; and
- 5) Determining whether the cultural resource retains the integrity to convey its historic significance.

Cultural resources that meet one or more of the four National Register Criteria, or any of the criteria considerations, and retain sufficient integrity to convey their historic significance are considered eligible for listing in the NRHP. The National Register Criteria, criteria considerations, and integrity are discussed below.

#### *6-2.4.1 Criteria of Eligibility*

Historic significance is defined as the importance of a property to the history, architecture, archaeology, engineering, or culture of a community.<sup>7</sup> Significance is determined by applying the criteria of eligibility within the framework of a historic context. The four NRHP criteria used to assess whether or not cultural resources are, in fact, **significant** and therefore eligible for the NRHP are:

- A. Cultural resources that are associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Cultural resources that are associated with the lives of persons significant in our past; or
- C. Cultural resources that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Cultural resources that have yielded or may be likely to yield, information important in prehistory or history.

#### *6-2.4.2 Criteria Considerations*

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria or if they fall within the following categories<sup>8</sup>:

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<sup>7</sup> Ibid

<sup>8</sup> National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation*, See <http://www.cr.nps.gov/nr/publications/bulletins/nrb15/nrb15.pdf>, 25.

**(a) A religious property** deriving primary significance from architectural or artistic distinction or historical importance; or

**(b) A building or structure removed from its original location** but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or

**(c) A birthplace or grave** of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life.

**(d) A cemetery** which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or

**(e) A reconstructed building** when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or

**(f) A property primarily commemorative** in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or

**(g) A property achieving significance within the past 50 years** if it is of exceptional importance

#### *6-2.4.3 Historic Integrity*

The concept of historic integrity is central to resource eligibility. Integrity is defined as the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the resource's historic or prehistoric period. In other words, integrity is the ability of a resource to convey its significance.

There are seven aspects of integrity<sup>9</sup>:

1. **Location:** Quality of integrity retained by a historic property existing in the same place as it did during the period of significance;
2. **Design:** Quality of integrity applying to the elements that create the physical form, plan, space, structure, style of a resource;
3. **Setting:** Quality of integrity applying to the physical environment criteria in one or more areas of significance.;
4. **Materials:** Quality of integrity applying to the physical elements that were combined or deposited in a particular pattern or configuration to form a historic property;

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<sup>9</sup> Ibid, 44-45.

5. **Workmanship:** Quality of integrity applying to the physical evidence of the crafts of a particular culture, people, or artisan;
6. **Feeling:** Quality of integrity through which a historic resource evokes the aesthetic or historic sense of past time and place;
7. **Association:** Quality of integrity through which a historic property is linked to a particular past time and place.

How much integrity is required for eligibility is a somewhat subjective question, but generally several, if not most, of the seven aspects must be met. A resource can be significant, but unless it has a certain amount of integrity, it cannot be eligible. In simple terms, Significance + Integrity = Eligibility. Because integrity is based on the identity for which a property is significant, the NPS emphasizes the need to assess integrity only *after* significance has been determined.

#### 6-2.4.4 Making National Register Eligibility Recommendations

National Register evaluations should clearly show that the NRHP criteria were applied and that integrity was appropriately considered. Once again, it is critical to frame evaluations in these terms: *Significance + Integrity = Eligibility*. When assessing integrity, it is vital to understand how a property is significant and what aspects of integrity are critical for that property to convey its significance. Fully supporting these aspects will help ensure that upon its review, the SHPO concurs to the HPR's findings and recommendations.

Keep in mind that the HPR only conveys recommendations of eligibility. Through the evaluations in the HPR, properties are recommended either eligible or not eligible for the NRHP. Only after SHPO has reviewed the HPR and concurred to its findings, is a property formally determined eligible or not eligible for listing in the NRHP.

#### 6-2.4.5 Disagreements of National Register of Historic Places Eligibility

During the Section 106 process, if FHWA and the SHPO do not agree on the eligibility of a property, or if the ACHP or the Secretary of the Interior so request, FHWA shall obtain a determination of eligibility pursuant from the Keeper of the National Register of Historic Places (Keeper), who is housed in the Department of the Interior.<sup>10</sup>

If a Native American tribe does not agree with FHWA regarding the eligibility of a property located off tribal lands, it may ask the ACHP to request FHWA to obtain a determination of eligibility.<sup>11</sup> FHWA can also choose to submit a request to the Keeper for a determination of eligibility for a property on which FHWA and SHPO agree upon eligibility status, but a consulting party disagrees.

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<sup>10</sup> 36 CFR Part 63.

<sup>11</sup> If a disagreement arises regarding a resource located *on* tribal lands, the agency *must* seek a determination of eligibility from the Keeper. However, this provision is not currently applicable in Indiana because there are no tribal lands in the state. For information concerning federal regulations governing the Section 106 process and tribal consultation see <http://www.achp.gov/regs-tribes.html>.

The procedures outlined in 36 CFR Part 63 will be followed with regard to the determination. INDOT-CRO should be contacted for further guidance in such a situation.

## 6-2.5 Report Review and Distribution

### *6-2.5.1 INDOT-CRO Review*

Before distribution to SHPO and other consulting parties, one electronic copy of the HPR should be forwarded to INDOT-CRO for review. If the HPR is too large to send via email, use of an FTP site is acceptable. A copy of the HPR distribution letter and the transmittal email that will accompany the HPR should be sent to INDOT-CRO at the same time. Please use the Section 106 distribution letter template and the post-ECL submission email template found in Part 5 – forms, <https://www.in.gov/indot/crm/2341.htm>. **INDOT-CRO will not be able to complete a review of the HPR without the distribution letter and transmittal email.**

When submitting documents to INDOT-CRO, please make sure to use the document naming conventions found [here](https://www.in.gov/indot/files/INDOT-CRO%20Document%20Naming%20Conventions.pdf) (<https://www.in.gov/indot/files/INDOT-CRO%20Document%20Naming%20Conventions.pdf>)

All submissions should be emailed to the CRO Manager and the History Unit Team Lead. The Archaeology Unit Team Lead should be cc'd on the email. See Pt. 1, Ch. 3 of the CRM for contact information.

In the email submission to INDOT-CRO, the consultant should state the reason for submitting the project for full Section 106 review; i.e., why the project cannot meet the conditions of the MPPA.

Additionally, all HPR submissions to INDOT-CRO should include GIS polygon shapefiles or KMZ files of the following (GIS shapefiles preferred): the project area, the APE, and the boundaries for any properties that are being recommended eligible for the NRHP. Files should contain the following text attribute field: DES\_NO. The project des. no. should be entered in this field.

INDOT-CRO will incorporate these GIS files into a database that will catalogue the results of previous Section 106 processes, including eligibility determinations. As the database grows, it will help make future Section 106 reviews more efficient. INDOT-CRO plans to make this database public so that environmental consultants, government officials, transportation planners, and others may easily reference the results of past Section 106 undertakings.

### 6-2.5.2 Distribution

Once INDOT-CRO has reviewed and approved the HPR, distribution letter, and transmittal email, the consultant will “check-in” the HPR and distribution letter to [IN SCOPE](#), INDOT’s Section 106 electronic coordination website. Generally, the consultant should “check-in” the HPR and letter to IN SCOPE within two business days of receiving INDOT-CRO approval. The consultant should notify INDOT-CRO if unusual circumstances preclude the HPR’s timely “check-in” to IN SCOPE.

**Remember:**

**The SHPO must always receive a hard copy of the entire report.**

Not providing the report in hard copy format to the SHPO could result in delays in the review process.

After the documents are checked-in by the consultant, the INDOT-CRO reviewer and team leads will receive an email that the documents are ready for release and will be directed to review/approve. An email will be sent to the consultant and INDOT-CRO reviewer when the documents are released on IN SCOPE.

After the HPR and letter are released, the consultant will send a hard-copy to SHPO and email the non-tribal consulting parties (including the SHPO reviewers) notifying them that the HPR and letter have been posted to IN SCOPE and are ready for their review. The INDOT-CRO reviewer should be cc’d on the email.

Please note that when “checking-in” documents to IN SCOPE, consultants should ensure that the IN SCOPE comment deadline allows for the mandatory 30-day consulting party comment period. This period begins with the email to consulting parties notifying them that the documents are available on IN SCOPE. Therefore, INDOT-CRO recommends that, when setting a comment deadline on IN SCOPE, consultants allow for a grace period of a few days in case there are any delays between the the document’s “check-in” on IN SCOPE and the email notification to consulting parties.

At the time of the email notification to consulting parties, consultants should check IN SCOPE and verify that the documents are available for public viewing and that all of the document information is correct. In particular, consultants should ensure that the project name is consistent with other project documents and that the comment deadline allows for a 30-day comment period. If any information needs to be corrected, consultants should contact INDOT-CRO.

Refer to [Part 5-Forms](#) for distribution letter and email templates.

## 6-3.0 Historic Property Report Guidelines<sup>12</sup>

*The guidelines are meant to drive the content of the report. Format and structure of the report can vary somewhat based on what the authoring historian feels is appropriate, as long as the pertinent information is present and the substance of the report does not contradict the guidelines below.*

### Cover Sheet/Title Page

A cover sheet must be attached to all project reports and should include the following information:

- Report Title/Brief description of the project (i.e., Historic Property Report for the SR 45 Bridge Project over the White River, Johnson Township, Clark County) *The title should indicate if the report is a short report, i.e., a HPSR.*
- Principal Investigator, author, and organization including address, telephone number, and e-mail address
- Date
- INDOT Des. No.
- DHPA No. (if already known)

### Table of Contents

Arranged in accordance with the sequence of topical headings. Page numbers for each section or appendix must be provided.

### Lists of Figures, Photos, and Tables

### Management Summary or Abstract

The Management Summary should follow the format below. Additional information is not necessary.

*This report documents the identification and evaluation efforts for properties included in the Area of Potential Effects (APE) for the **[insert project title and location]**. Above-ground resources located within the project APE were identified and evaluated in accordance with Section 106, National Historic Preservation Act (NHPA) of 1966, as amended, and the regulations implementing Section 106 (36 CFR Part 800).*

*As a result of the NHPA, as amended, and CFR Part 800, federal agencies are required to take into account the impact of federal undertakings upon historic properties in the area*

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<sup>12</sup> These guidelines were largely influenced by those created by the Kentucky State Historic Preservation Office/Kentucky Heritage Council, *Specifications for Conducting Fieldwork and Preparing Cultural Resource Assessment Reports*:  
<https://heritage.ky.gov/Documents/FieldworkCRspecs.pdf>.



of the undertaking. Historic properties include buildings, structures, sites, objects, and/or districts that are eligible for or listed in the National Register of Historic Places (National Register). As this project is receiving funding from the Federal Highway Administration (FHWA), it is subject to a Section 106 review.

The APE contains [insert “no” or insert #] [insert “property” or “properties”] listed in the National Register [If there are listed properties, list names and addresses here. If there are multiple listed properties, please bullet-list them].

The APE contains [insert “no” or insert #] [insert “property” or “properties”] that are recommended eligible for listing in the National Register [If there are eligible properties, list names and addresses here. If there are multiple eligible properties, please bullet-list them].

### Introduction/Project Description

- Identify survey/research personnel. Indicate project personnel meeting Secretary of the Interior’s Professional Qualifications Standards, and what tasks these persons performed during the project.<sup>13</sup>
- Summarize the undertaking---identification of the project location, identification of the approximate project termini, and enough project scope information to support the APE delineation. Please focus the HPR on the identification and evaluation of properties, and not project details and effects-related discussions. Details concerning plan sheets should all be contained within the transmittal letter and *not* the HPR itself. Later changes in the project or effect findings may cause procedural confusion if a HPR contains different or contradictory information from that of the eventual finding/800.11 documentation.
- Describe the project area--include a *brief* summary of the setting (urban, suburban, rural), a description of present land-use (commercial, agricultural, etc.), a *brief* description of the physical environment (topography, physiography, vegetation), and a summary of the transportation facilities that bisect the project area.
- Include a map of the project area. This map should allow the reader to easily locate the project’s location within the state and identify the project limits.
- Define the APE and explain how it was determined.
- Include a map or maps of the APE. This/These map(s) should display aerial imagery and indicate the locations of any properties to be evaluated in the text of the HPR.

### Literature Review/Previous Investigations

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<sup>13</sup> [http://www.cr.nps.gov/local-law/Prof\\_Qual\\_83.htm](http://www.cr.nps.gov/local-law/Prof_Qual_83.htm)



- Describe and assess research materials consulted, including both primary and secondary sources.
- Names of investigators or institutions that have previously conducted historic architectural surveys in the project area, dates of research; purpose of the surveys; survey methodologies; and the results of the surveys, including sites or districts, or multiple resource areas identified.
- Include previously recorded sites/structures within the APE (from the National Register or State Register lists, county interim reports, etc.) in a list or table (whichever is appropriate given the number of resources listed) within the text. The author should employ information for analysis and development of a context. State the date of record and the responsible agency/organization. If a property has been recorded in the Indiana Historic Sites and Structures Inventory, please include full 11-digit survey number when referencing said property. Also, please provide the IHSSI-issued rating for the property for reference. If IHSSI properties are part of a historic district, this fact should be noted as well.
- Discuss and include copies of pertinent cartographic resources when available and relevant to the properties being evaluated (county atlases, plat maps, Sanborn Maps, topographic maps, etc.). These complement the discussion of the original land subdivision and its impact on the cultural landscape and should include a reasonable interpretation.
- If interurban lines, railroad lines, brick pavers or other transportation elements are identified through the literature review these should be identified in the HPR.

### Historic Context

- The objective of the historic context section is to provide the information necessary to assess the significance of properties that are within the APE and that are potentially eligible for the NRHP.
- Therefore, this section should only relate historic themes that are relevant to the properties being evaluated in the text of the HPR. In other words, the themes should only relate to those properties in the APE that are rated Notable or higher (and not already NRHP-listed) as well as any potential historic district in the APE. If an APE does not contain any properties rated Notable or higher or any potential historic district, a historic context is not needed. Additionally, themes should also be limited to the period of significance of the properties being evaluated.
- If there are no resources being evaluated in the text of the HPR, no historic context is needed. See 6-2.3 Methodology above and NRHP Eligibility and Evaluations section below for information regarding resources that require full, in-text evaluations.

- It is not necessary to recount historical themes that are not relevant to the properties that are being evaluated for the NRHP or that are outside of the properties' period of significance. For instance, when the only properties that are being evaluated date to the twentieth century, the historic context should not include a history of European settlement.
- It is not necessary to provide an overview of the natural history or environment of the region unless it is directly relevant to the properties that are being evaluated.
- Relate important events and persons that shaped the development of the resources that are being evaluated. When appropriate, mention or list architects, engineers, builders, craftsmen, or other designers who had an impact on the resources being evaluated.
- Themes included in the historic context should vary by project area depending on the setting and the resources that are being evaluated. For example, a historic context for a rural setting with potentially eligible farm properties and a potentially eligible school house should include information about the agricultural and educational history of that area during the properties' period of significance. As another example, if the only properties being evaluated are mid-twentieth-century houses, the historic context should focus on post-World War II suburban development and architectural styles of that period.
- Authors of HPRs should be sensitive to the fact that some of the sources that historians regularly draw upon neglect the histories of certain social groups, such as Native Americans and African Americans. In addition, some historical sources contain inaccurate or biased portrayals of these groups. When there is reason to provide historic context regarding the history of marginalized groups, such as Native American Tribes, authors should attempt to find more inclusive and accurate sources. INDOT-CRO recommends consultation with representatives of these groups, if and when possible, for their input regarding an HPR's historic context.

## **“Short” HPRs**

There are many instances when no historic context is needed because there are no above-ground resources that are receiving a full evaluation in the text of the HPR. See [6-2.3 Methodology](#) above and [NRHP Eligibility and Evaluations](#) section below for information regarding resources that require full, in-text evaluations. When an HPR doesn't have any full evaluations and therefore no historic context, it is referred to as a “Short” HPR or Historic Property Short Report (HPSR).

Instances when a “Short” HPR should be prepared include:

- No above-ground resources are present in the APE.
- Above-ground resources are present within the APE, but none will be fifty years old or older at the time of project letting AND none possess exceptional importance per National Register Criteria Consideration G.
- Above-ground resources fifty years old or older are present within the APE, but none exhibit enough significance and integrity to warrant at least a Notable rating in the Indiana Historic Sites and Structures Inventory system (in other words, the properties warrant a Contributing or Non-Contributing rating), and no potential historic district exists within the APE.
- The only above-ground resource fifty years old or older present within the APE that warrants at least a Notable rating in the Indiana Historic Sites and Structures Inventory system is a bridge that has been evaluated in the latest historic bridge inventory or *is exempt from individual review pursuant to the [Program Comment for Post-1945 Bridges](#)*.
- The only above-ground resource fifty years old or older present within the APE that warrants at least a Notable rating in the Indiana Historic Sites and Structures Inventory system is a property that is listed in the NRHP or was recently determined eligible for listing in the NRHP. See [NRHP Eligibility and Evaluations](#) section below for instructions for documenting such properties.

### Methods/Methodology

Field techniques shall be described in such a way that reviewers and future researchers may reconstruct what was done and why. The methods used to address cultural resources investigations vary depending on the scope and type of projects. It is expected that the investigator will follow all applicable INDOT, DNR-DHPA, and NRHP guidelines and requirements.

The following language should be incorporated into this section to help describe the methods employed:

*It should be noted that the Division of Historic Preservation and Archaeology (DHPA) has changed the methodology of the IHSSI program. Specifically, the IHSSI will no longer survey properties that are rated “contributing” and located outside of historic districts. The following resources will continue to be surveyed for the IHSSI: all properties that are rated “notable” or “outstanding,” properties that are rated “contributing” and located within historic districts, all bridges, and all cemeteries.*

*Notwithstanding DHPA’s amendment of IHSSI methodology, INDOT still requires all “contributing” properties within a proposed project’s APE to be surveyed and documented by a qualified professional historian. However, in recognition of the change to IHSSI methodology, “contributing” properties that are located outside of a historic district did not receive an individual NRHP-eligibility evaluation within the text of this HPR. Instead, if such properties are present in the APE they were documented in a table in the appendix, which includes photographs. As before, the IHSSI served as an aid in rating properties, but the historian was responsible for confirming or adjusting this rating—using the IHSSI criteria—based on their own field work and research. Likewise, the historian was responsible for identifying previously un-surveyed individual resources and historic districts.*

*With the exception of resources already listed in the NRHP (either individually and/or as part of a historic district), the text of the HPR includes NRHP-eligibility evaluations of all potential historic districts and all properties that the historian rated “notable” or “outstanding,” whether previously surveyed or not. The historian who prepared the HPR considered the potential NRHP eligibility of every above-ground resource within the APE.*

As noted below, explanation of the NRHP criteria and aspects of integrity can be included in the Methodology section of the report instead of NRHP Eligibility and Evaluations section, if preferred.

#### NRHP Eligibility and Evaluations

First, this section shall provide a general summary of all above-ground resources fifty years old or older in the APE based on the date of the proposed project letting. Unless it is part of an identified NRHP-eligible or NRHP-listed historic district, each previously or newly recorded property fifty years old or older that warrants a rating of Notable or higher (in the Indiana Historic Sites and Structures Inventory system) as well as any potential historic district shall be described and evaluated in the narrative. Properties currently listed in the NRHP or previously determined eligible for listing in the NRHP shall also be described.

If there are no properties that meet the above requirements for evaluation, i.e., the HPR is a “Short HPR, this section must provide a statement justifying the lack of full, in-text evaluations. The justification need not be lengthy and may be a simple statement, such as:

- “None of the above-ground resources within the APE will be 50 years old or older at the time of project letting nor do any of them possess exceptional importance per Criteria Consideration G.”
- “None of the above-ground resources within the APE warrant a rating of “Notable” in the IHSSI system nor are there any potential historic districts within the APE.”
- “The only above-ground resource within the APE that warrants a rating of “Notable” in the IHSSI system is a bridge that is exempt from individual review pursuant to the [Program Comment for Post-1945 Bridges](#).”

Properties that are over fifty years old that would warrant a “Non-Contributing” rating in the Indiana Historic Sites and Structures Inventory system should be mentioned, but not evaluated. A summary of the general type and number of these properties is adequate. The report author should maintain a level of documentation in their files on these properties that is sufficient to address questions if they should arise during the Section 106 process. However, a few representative photographs of these properties and/or streetscape photographs showing several of these properties is adequate within the HPR. A photograph of each “Non-Contributing” property is not necessary within the HPR.

Properties less than fifty years of age should be mentioned, but do not require documentation unless there is a question about their age. A brief summary of the general type and number of these properties is adequate.

In the case of “Contributing” properties, readers should be directed to the table in the appendix that includes photographs and information regarding Contributing properties.

For properties that have not been previously recorded as part of the Indiana Historic Sites and Structures Inventory and do not have an IHSSI number, it is suggested that a numbering system specific to the project be employed for these properties for easier reference (ie, “INDOT-1, INDOT-2,” etc. or “House 1, House 2, Church 1,” etc.).

***Please note that some properties less than fifty years old may be eligible or listed in the NRHP under National Register Criteria Consideration G (properties that have achieved significance within the last fifty years). Due consideration and analysis must be given to these properties.***

Precede the NRHP evaluations by listing the NRHP criteria and explain the aspects of integrity to set forth the framework for the NRHP evaluations. Explanation of the NRHP criteria and aspects of integrity can be included in the Methodology section of the report instead of this section, if preferred.

***Remember:***  
***Significance + Integrity = NRHP Eligibility.***

Unless it is part of an identified NRHP-eligible or NRHP-listed historic district, each previously or newly recorded property fifty years old or older that warrants a rating of Notable or higher shall be evaluated for NRHP eligibility within the framework of the established historic context. Properties rated “Contributing” should be summarized in a table.

Properties currently listed in the NRHP or previously determined eligible for listing in the NRHP shall be described with a brief explanation of their significance and the NRHP criteria under which they are listed/were determined eligible. The date of their listing/eligibility determination and a brief assessment of their current integrity should also be included. If these properties retain their significance and integrity, a statement should be made confirming their continued NRHP listing/eligibility. **No further analysis/evaluation is needed.** It should be noted that very rarely would a recommendation to de-list a NRHP-listed property receive SHPO concurrence unless severe and significant alterations have been made since the property's listing. The historic boundaries of these properties should be delineated on project maps contained within the report. Please consult with INDOT-CRO staff for any unusual situations.

For bridges surveyed and evaluated through the Indiana Historic Bridge Inventory, provide appropriate references to the Inventory and the determinations made in the Inventory. Include a brief explanation of the bridge's significance and the NRHP criteria under which it was listed/determined eligible along with a brief assessment of its current integrity. If conditions are the same as at the time of the Indiana Historic Bridge Inventory determination, a statement should be made confirming the bridge's continued NRHP listing/eligibility. **No further analysis/evaluation is needed.** Very rarely would a determination of eligibility or ineligibility through the Indiana Historic Bridge Inventory be overturned. If the status of the bridge has appeared to change, the Annual Reports should be checked. Please consult with INDOT-CRO staff for any unusual situations.<sup>14</sup>

The NRHP analysis for all properties that warrant a rating of Notable or higher must be provided fully in paragraph form in the text of the report as outlined below. **No analysis of "Contributing" properties is needed in the text of the report. "Contributing" properties should be summarized in a table.**

NRHP evaluations should include the following information:

- A detailed description of each property shall be provided highlighting the character-defining features of the properties.
- Each resource shall be mapped and illustrated with at least two photographs. In some cases, additional views may be needed to support recommendations, such as illustrating the resource's defining characteristics or showing its alterations. The photographs must clearly show the property. A final evaluation may be delayed if the property is obscured in the photographs by weeds, brush, or trees or if photographs are taken from too far away. Photographs shall be in the text immediately adjacent to the property description so the reader may easily compare the text to the photograph. All photographs shall be clearly labeled. If several photographs of each property have been taken, one or two only need to be included in the body of the report, and the rest may be included in appendix, if preferred.

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<sup>14</sup> Historic Bridge Inventory Summary and Results Documents and Annual Reports can be found here: <https://www.in.gov/indot/2531.htm>.

- The information provided on individual properties must be sufficient to support a NRHP eligibility evaluation. Alterations in material integrity should be shown as clearly as possible in photographs, especially if integrity issues are the main reason for not recommending a property NRHP-eligible. Additionally, alterations should be clearly described in detail in the text as they are not always easy to ascertain through photographs.
- The property must be evaluated individually against the NRHP Criteria A, B, C, and D. Writing off properties only with statements such as “the property is not eligible because there are better examples of this style elsewhere” or “the property is a vernacular example of ... (x) style and is therefore not eligible for the NRHP” are not acceptable since they fail to specifically address *all* of the NRHP criteria and aspects of integrity.
- The National Park Service’s NRHP Categories for Areas of Significance are inherently applicable when evaluating properties for eligibility: [http://www.cr.nps.gov/nr/publications/bulletins/nrb16a/nrb16a\\_III.htm#statement](http://www.cr.nps.gov/nr/publications/bulletins/nrb16a/nrb16a_III.htm#statement).
- Previously recorded properties documented in the IHSSI (rated Notable or Outstanding) but not listed in the NRHP should be evaluated properly against the NRHP Criteria. Recommending a property as NRHP eligible only with a statement such as “the property is NRHP eligible because it was rated ‘Outstanding’ in the Interim Report” is not acceptable since it fails to specifically address the NRHP criteria and aspects of integrity.
- Provide a property boundary map and a verbal boundary description with justification for each building or structure recommended eligible for the NRHP. The description and maps should include outbuildings and other features of interest, and distinguish between contributing and non-contributing elements of the property. Identifying the boundary and contributing features of the property is especially important if the project may have a physical impact on the property. The maps need not be in the body of the report, but can be located in the appendix.

## Conclusions

The Conclusion should follow the format below. Additional information is not necessary.

*The APE contains [insert “no” or insert #] [insert “property” or “properties”] listed in the National Register [If there are listed properties, list names and addresses here. If there are multiple listed properties, please bullet-list them].*

*As a result of identification and evaluation efforts for this project, [insert “no” or insert #] [insert “property” or “properties”] are recommended eligible for listing in the National Register [If there are eligible properties, list names and addresses here. If there are multiple eligible properties, please bullet-list them].*



## References Cited

All works cited, either directly or indirectly, must be included in this section. Proper footnotes, endnotes, or parenthetical notes should be used throughout the report to accurately give credit to cited and referenced sources. INDOT does not require a specific citation style for historic property reports. Any established convention may be used. However, uniformity must be maintained throughout the report.

## Appendices

Photos, tables, and maps can be integrated into the text of the report for ease of reference. If these items are not integrated into the text of the report they should be included as appendices. The appropriate place for these items is left to the author's discretion provided they are presented in a clear and understandable format.

### *Photos*

- The photos must be clearly labeled and keyed to maps and tables.
- Photographs of excellent quality are a requirement.
- Include panoramic or streetscape shots when appropriate to characterize a project area or historic district, whether it is an urban or rural setting.
- Photos should be of sufficient size to ascertain property details. When thumbnail photos are provided in tables and no other image of the properties is provided in the report, it is advisable to also submit a CD with the jpeg files of the images to INDOT and the SHPO to aid in their review.
- It is not necessary to include a photograph of every “non-contributing” resource. Photographs of representative examples of “non-contributing” resources are sufficient.
- It is not necessary to include a photograph of every “Contributing” property located within a historic district. Streetscape photographs are sufficient.

### *Maps*

\*In addition to the maps in the body of the report, please include the following in the appendix:

- A map indicating the location of all previously surveyed resources as well as newly identified resources that merit a rating of “contributing” or higher.
- Include any other maps that are of value in understanding results of the survey project or illustrate points raised in the report.
- Copies of historical maps illustrating the location of the project area should be included in the report when pertinent and available.
- In the event that a property is listed on the NRHP or is being recommended as eligible for listing on the NRHP and it is located in the APE, the historic property boundary must be indicated on at least one of the maps or as a separate graphic.









- Please note that maps from Google or other commercial web sites cannot be used in reports fully or partially funded by INDOT without proper licensing and attribution.

### *Tables*

- A survey table should be used to list the Contributing properties within the APE. “Contributing” properties within a historic district should not be included individually in the table. They are analyzed as part of the historic district and do not warrant individual inclusion in the table.
- The table may also include Notable and Outstanding properties. Their inclusion in the table, however, is not a substitute for their description and evaluation in the body of the report, as outlined above.
- An example table is shown below:

Table 6.1: Example Survey Results Table

Photo	INDOT No. & Rating / IHSSI No. & Rating	Property Name	Address	Date/Style	National Register recommendation/ Integrity Issues
	INDOT 1 (C)/ NA	Hobart Apartment Building	418 W. JACKSON ST.	c. 1895/ Vernacular	Not National Register eligible; lacks significance & integrity; vinyl siding & additions
	INDOT 2 (N)/ 035-442-45153 (C)	House	400 W. JACKSON ST.	c.1880/Italianate	Not National Register eligible; lacks significance & integrity; see discussion in text
	INDOT 3/ 035-442-36001 through 035-442-36127 (Varies from NC to O)	Walnut Street Historic District	Roughly Walnut St. from Washington St. to Victor St.	Mid-19 <sup>th</sup> to mid-20 <sup>th</sup> century; Varies: Italianate & Revival styles are prevalent	Listed in the National Register in 1989 under Criteria A & C; see discussion in text
	INDOT 4 (C)/ NA	House	401 W. JACKSON ST.	c.1890/Vernacular	Not National Register eligible; lacks significance & integrity; vinyl siding, some replacement windows & doors on front facade
	INDOT 5 (C)/ NA	Commercial Building- Muncie Music Center	225 W. JACKSON ST.	c.1960/Modern	Not National Register eligible; lacks significance; not a noteworthy example, does not possess high artistic value
	INDOT 6 (O)/ 035-442-45197 (O)	Muncie Public Library	301 E. JACKSON ST.	c.1903/Neoclassical	Listed in the National Register in 1976 under Criterion C; see discussion in text

## References

- 2011 *Survey Manual for Architectural and Historical Resources*. Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology. Document on file at IDNR, DHPA.

## **APPENDIX- Guidance for Specific Property Types**

Based on consultation with SHPO and consulting parties, this Appendix includes special guidance for completing identification and evaluation for resources that require special consideration or where consultation has resulted in specific procedures. This Appendix will be enhanced as new procedures or guidance are developed.

### Bridges-Historic Bridge Inventory

Bridges built through 1965 have been surveyed and evaluated through the Indiana Historic Bridge Inventory. More information about the bridge inventory can be found in Part IV of the CRM. A listing of surveyed bridges can be found on the INDOT website here: <http://www.in.gov/indot/2531.htm>.

If conditions are the same as at the time of the Indiana Historic Bridge Inventory determination, no new analysis/evaluation should be performed. Very rarely would a determination of eligibility or ineligibility through the Indiana Historic Bridge Inventory be overturned. If the status of the bridge has appeared to change, the Annual Reports should be checked. Please consult with INDOT CRO staff for any unusual situations.

Understanding the eligibility determination for any bridges within the APE will greatly determine the Section 106 course. For projects involving historic bridges, please refer to Part IV for specific information on processing a project through the Historic Bridge Programmatic Agreement.

### *Program Comment for Common Post-1945 Concrete and Steel Bridges*

For bridges built after 1965 there is another resource for assessing bridges for NRHP eligibility. On November 2, 2012, the Advisory Council on Historic Preservation (ACHP) issued the [Program Comment for Streamlining Section 106 Review for Actions Affecting Post-1945 Concrete and Steel Bridges](#). As a summary, the Program Comment relieves federal agencies from the Section 106 requirement to consider the effects of undertakings on most concrete and steel bridges built after 1945. On March 19<sup>th</sup> 2013, federal agencies were approved to use the Program Comment for Indiana projects.

When considering the Program Comment for your project the following considerations should be evaluated before the Program Comment can apply:

The Program Comment does NOT apply to bridges that are already listed in or eligible for the National Register of Historic Places or to those located in or adjacent to a historic district (Section IV.A). Please note that per the Indiana Historic Bridge Inventory, bridges built between 1945 and 1965 have already been evaluated for National Register eligibility. Therefore, it is important to reference the Historic Bridge Inventory.

The Program Comment does NOT apply to these bridges.

- The Program Comment does NOT apply to arch bridges, truss bridges, bridges with movable spans, suspension bridges, cable-stayed bridges, or covered bridges (Section IV.B).
- The Program Comment does NOT apply to bridges identified as having exceptional significance for association with a person or event, being a very early or particularly important example of its type in a State or the nation, having distinctive engineering or architectural features that depart from standard designs, or displaying other elements that were engineered to respond to a unique environmental context and included in a list to be developed by each state Division of FHWA (Section IV.C). Based on consultation between FHWA, INDOT, SHPO and interested parties, no bridges with exceptional significance were identified.

Please keep in mind that the Program Comment is not a waiver of the Section 106 review. It does relieve federal agencies from the need to individually evaluate and consider the effects of undertakings on bridges where the Program Comment applies. When submitting Section 106 materials where the Program Comment applies to a bridge, provide clear documentation that the criteria considerations were evaluated. In addition to providing some basic information and photographs of the subject bridge, below is an example of how application of the Program Comment might be explained in a historic property report:

*On November 2, 2012, the Advisory Council on Historic Preservation (ACHP) issued the Program Comment for Streamlining Section 106 Review for Actions Affecting Post-1945 Concrete and Steel Bridges (Program Comment). The Program Comment relieves federal agencies from the Section 106 requirement to consider the effects of undertakings on most concrete and steel bridges built after 1945. On March 19, 2013, federal agencies were approved to use the Program Comment for Indiana projects. The Program Comment applies for Bridge No. 041-42-02351 ANBL because it has not been previously listed in or determined eligible for listing in the National Register of Historic Places and it is not located in or adjacent to a historic district (Section IV.A of the Program Comment). As an example of a steel beam structure built in 1967, this bridge is also not one of the types to which the Program Comment does not apply (arch bridges, truss bridges, bridges with movable spans, suspension bridges, cable-stayed bridges, or covered bridges [Section IV.B]). Additionally, this bridge has not been identified as having exceptional significance for association with a person or event, being a very early or particularly important example of its type in the state or the nation, having distinctive engineering or architectural features that depart from standard designs, or displaying other elements that were engineered to respond to a unique environmental context (Section IV.C). This bridge also has not been identified as having some exceptional quality. Based on consultation between FHWA, INDOT, SHPO and interested parties, no bridges with exceptional significance were identified in Indiana (Section IV.C). Because the above criteria from the Program Comment have been met, no individual consideration under Section 106 is required for Bridge No. 041-42-02351 ANBL.*

For additional reference, please visit the FHWA website for a further description of the Program Comment and a Q&A: <http://www.environment.fhwa.dot.gov/histpres/bridges.asp>.

### Historic Districts

It is incumbent upon the project historian to be observant for unidentified historic districts within the APE, including rural historic districts. In some instances, a potentially NRHP-eligible historic district may lie both within and outside of a project's APE. When assessing such districts it is most important to define the boundary within the APE and to define the number and type of resources located therein. Because some effect from the project is possible within the APE, it is important to fully assess this portion of the district.

In order to fully determine the district's eligibility, a rough estimate of the boundary outside the APE is needed. Also, a rough estimate of the number and type of resources located outside the APE is needed. In difficult situations, such as a large district where large portions extend beyond the APE, it is possible to provide general boundaries, such as a road or physical feature where the district may end, and general descriptions of resources for those portions beyond the APE.

Previously identified historic districts (as identified through the interim reports, previous projects, or National Register listing) and newly identified historic districts should be described fully in the text of the report. Each district must be evaluated against the National Register Criteria A, B, C, and D. Provide a district boundary map and a verbal boundary description with justification for each district. The report shall address whether the original boundary descriptions of NRHP-listed districts are appropriate.

Previously or newly recorded properties fifty years old or older that warrant a rating of Contributing or higher that are located within an identified historic district do not need to be individually described or evaluated. Because it is known they are part of a historic district, it is not necessary to come to consensus on their individual eligibility.

### Mid-20<sup>th</sup> Century Residential Resources

When evaluating mid-20<sup>th</sup> century resources, please consult the Multiple Property Documentation Form *Residential Planning and Development in Indiana, 1940-1973*, which can be found [here](#).

### Other Multiple Property Documentation Forms

The NPS database includes other MPDFs for Indiana. Visit the [NPGallery Database](#), search Indiana and select "National register multiples (covers)" under "Record Category." These MPDFs should be consulted and referenced when applicable.