

# **NATIONAL REGISTER OF HISTORIC PLACES ELIGIBILITY**

*Requested by:*

American Association of State Highway  
and Transportation Officials (AASHTO)

Standing Committee on the Environment

*Prepared by:*

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# 1 INTRODUCTION

Transportation and historic preservation professionals have been voicing concerns for many years about the National Register eligibility evaluation process. During the 1996 Transportation Research Board (TRB) *Environmental Research Needs in Transportation Conference*, the conference's Cultural Resources Group identified "Review and Improvement of the Existing Process and Procedures for Evaluating Cultural Resource Significance" as the group's highest priority research need.<sup>1</sup> Subsequent to the TRB conference, the National Cooperative Highway Research Program (NCHRP) funded a study to begin to address this research need. This study (NCHRP Project 8-40), published in 2002 involved a survey of state Departments of Transportation (DOTs), Federal Highway Administration (FHWA) state division offices, State Historic Preservation Offices (SHPOs), tribes, and private sector cultural resource management (CRM) firms. These agencies and organizations were asked to describe how they managed and organized cultural resource inventory data and historic contexts; and if information technology applications were useful in developing resource inventories and historic contexts, and in making National Register eligibility evaluations. This study found that SHPO and state DOT staff rarely use historic contexts to evaluate the National Register eligibility of properties. These findings were surprising given that in 1999, during a TRB, FHWA, and National Park Service (NPS) sponsored "National Forum on Assessing Historic Significance for Transportation Programs," the majority of the 190 historic preservation and transportation professionals attending the forum strongly supported the development of usable and up-to-date historic contexts as the best way to improve National Register eligibility evaluations. The NCHRP Project 8-40, unfortunately did not explore why historic contexts were not used. The project also did not explore more fully what methods were actually being used by transportation and historic preservation specialists in making National Register eligibility evaluations.

Since the 2002 NCHRP study, there have been additional conferences, meetings, and working groups discussing the National Register eligibility process in the context of transportation projects. These different venues all found that this process continues to be conducted in an ad hoc fashion, and is inconsistent across the country (and even within a single state).

What is needed is a clear understanding of how practitioners actually conduct the National Register evaluation process. With a better understanding of how this process is conducted across the country, transportation and historic preservation professionals can assess if current practices are in fact working well, and if not, how the evaluation process can be improved. As is discussed in the following section, evaluating National Register eligibility is a critical component of compliance with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act. The presences or absence of National Register listed and eligible properties also has a role in the selection and analysis of project alternatives under the National Environmental Policy Act review process.

The first objective of the current NCHRP 25-25, Task 33 study is to identify how practitioners actually evaluate the National Register eligibility of properties, in the context of transportation projects. A nationwide survey is used to identify the current state of the practice. The second

objective is to identify and/or develop best practices for evaluating National Register eligibility, using the result of this survey.

Before discussing the survey, it is important to review the role of the National Register evaluation process in the context of transportation project delivery. It is also important to review current national guidance on the eligibility evaluation process. As evident from the survey results (discussed in Section 4 of this report), many practitioners seem to have forgotten, do not understand, or have ignored how eligibility evaluations are to supposed to be performed, following national guidance developed by the National Park Service, the official home of the National Register of Historic Places. The following Background section reviews this official guidance, in addition to the function of National Register evaluations within environmental and historic preservation regulatory compliance. We will evaluate the survey results presented in Section 4 in the context of this official guidance, looking at how current practices mirror or diverge from this official guidance.

## 2 BACKGROUND

Section 106 of the National Historic Preservation Act (NHPA) states:

The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effects of the undertaking *on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register* [emphasis added]. The head of any such Federal agency shall afford the Advisory Council on Historic Preservation established under Title II of this Act a reasonable opportunity to comment with regard to such undertaking.<sup>2</sup>

This statute requires federal agencies, such as FHWA, to take into account the effects of their actions on properties listed in or eligible for listing in the National Register. Determining whether or not a property is eligible for listing in the National Register, therefore, is an important step in any federal agency's historic preservation compliance efforts. In addition, National Register eligibility determinations have management implications. If a property is listed in or eligible for listing, and will be adversely affected by a federal undertaking, the federal agency must resolve these effects, at time requiring extensive commitments of time and money.

National Register listing and eligibility is also critical for compliance with Section 4(f) of the Department of Transportation Act. Section 4(f) states that U.S. transportation agencies, such as FHWA, cannot approve a project that uses a Section 4(f) resource unless there is no feasible or prudent alternative to such use, and the project includes all possible planning to minimize harm to the protected resource. Section 4(f) resources include "historic sites," which the FHWA Section 4(f) Policy Paper defines as a property that is listed in or eligible for listing in the National Register of Historic Places.<sup>3</sup>

The FHWA's policies and procedures for implementing the National Environmental Policy Act (NEPA) are found in 23 CFR Part 771. The latter stipulates that FHWA manages the NEPA project development and decision-making process as an "umbrella" under which all applicable environmental laws, executive orders, and regulations are considered and addressed prior to final project decisions and NEPA document approvals. FHWA's compliance with Section 106 of the NHPA and Section 4(f) is generally accomplished under this NEPA umbrella. In addition, the presence or absence of National Register properties is considered, along with other environmental factors, in the selection and retention of project alternatives analyzed under the NEPA review process.

The regulation specifying how federal agencies are to comply with the requirements of Section 106 can be found in 36 CFR 800. Section 800.4(c) of the regulation describes how a federal agency is to evaluate the significance (i.e., National Register eligibility) of properties present in the agency's project area. First, the agency applies the National Register criteria, listed in 36

CFR 60.4, to properties identified within the project area that have not been previously evaluated for National Register eligibility. This is done in consultation with the appropriate State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO) and “any Indian tribe or Native Hawaiian organization that attaches religious and cultural significance to identified properties...”<sup>4</sup> The agency’s evaluation is also guided by “the Secretary [of the Interior’s] standards and guidelines for evaluation...”<sup>4</sup> Then, as stated in Section 800.4(c)(2),

If the agency official determines any of the National Register criteria are met and the SHPO/THPO agrees, the property shall be considered eligible for the National Register for section 106 purposes. If the agency official determines the criteria are not met and the SHPO/THPO agrees, the property shall be considered not eligible.<sup>4</sup>

The National Register is maintained by the National Park Service on behalf of the Secretary of the Department of the Interior. The National Park Service has published a number of guidance documents to assist practitioners in evaluating whether or not a property qualifies for listing in the National Register. One of the more important documents is the National Register Bulletin entitled *How to Apply the National Register Criteria for Evaluation*.<sup>5</sup> This document lays out the steps for determining if a property qualifies for the National Register. As the intent of this guidance is to provide a national approach to the National Register evaluation process, we felt it was important to discuss this guidance in detail below.

Under the section entitled “Criteria for Evaluation,” the National Register Bulletin states that “the quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structure, and objects that possess integrity of location, design, setting, workmanship, materials, feeling, and association.” In addition, these properties must meet one or more of the following evaluation criteria (as listed in 36 CFR 60.4):

- Criterion a – are associated with events that have made a significant contribution to broad patterns of history
- Criterion b – are associated with the lives of persons significant in the past
- Criterion c - embody the distinctive characteristics of a type, period or method of construction; or represent the work of a master; or possess high artistic values; or represents a significant and distinguishable entity whose components lack individual distinction
- Criterion d – has yielded or may be likely yield information important in prehistory or history.<sup>5</sup>

A property meets one of the above criteria by “being associated with an important historic context *and* retaining historic integrity of those features necessary to convey its significance.” In addition, “[e]valuation of a property is most efficiently made when following this sequence:”

Categorize the property... A property must be classified as a district, site, building, structure, or object for inclusion in the National Register.

Determine which prehistoric or historic context(s) the property represents... A property must possess significance in American history, architecture, archaeology, engineering, or culture when evaluated within the historic context of a relevant geographic area.

Determine whether the property is significant under the National Register Criteria. This is done by identifying the links to important events or persons, design or construction features, or information potential that makes the property important.

Determine whether the property retains integrity. Evaluate the aspects of location, design, setting, workmanship, materials, feeling, and association that the property must retain to convey its historic significance.<sup>5</sup>

As noted above, a critical component of the evaluation process is the historic context. As defined in the *Secretary of the Interior's Standards and Guidelines for Preservation Planning*, a historic context is a framework that "...organizes information based on a cultural theme and its geographical and chronological limits."<sup>6</sup> The National Register Bulletin notes that "[t]he significance of a historic property can be judged and explained only when it is evaluated within its historic context." The importance of historic contexts is also emphasized in *Secretary of the Interior's Standards and Guidelines for Evaluation*:

Properties are evaluated using a historic context that identifies the significant patterns that properties represent and defines expected property types against which individual properties may be compared. Within this comparative framework, the criteria for evaluation take on particular meaning with regard to individual properties.<sup>7</sup>

The National Register Bulletin provides a list of items that need to be identified or evaluated in order to decide if a property is significant within its historic context:

The facet of prehistory or history of the local area, State, or the nation that the property represents;

Whether the facet of prehistory or history is significant;

Whether it is a type of property that has relevance and importance in illustrating the historic context;

How the property illustrates that history; and finally

Whether the property possesses the physical features necessary to convey the aspect of prehistory or history with which it is associated.<sup>5</sup>

Historic contexts include a listing of associated property types, descriptions of the ways in which these property types reflect the significance of the historic context, and descriptions of the physical characteristics and integrity an archaeological or historical property must possess in order to be considered representative of one of the historic context's property types. The National Register Bulletin provides some examples of historic contexts and their associated



property types. The context “Civil War Military Activity in Northern Virginia,” for example might be represented by the following property types: “an open field where a battle occurred ... a sunken transport ship, the residences or public buildings that served as company headquarters ... and earthworks exhibiting particular construction techniques.”<sup>5</sup>

In developing the survey for this study, we anticipated that not all practitioners actually follow National Register guidance, and the standards and guidance presented in *Secretary of the Interior’s Standards and Guidelines for Evaluation*. We also examine, therefore, the reasons why practitioners do not use these guidance and standards, and identify what alternative approaches are used in their stead.

### 3 SURVEY METHODS

The primary goal of NCHRP 25-25, Task 33 is to identify how practitioners actually conduct National Register eligibility evaluations. This was accomplished through a nationwide survey of historic preservation and transportation professionals. The survey questionnaire (Appendix A) is divided into two parts. The first eleven questions examine the use of historic contexts as a tool for evaluating National Register eligibility. The remaining questions look at other approaches to National Register evaluations.

We used *Survey Monkey* ([www.surveymonkey.com](http://www.surveymonkey.com)) to conduct the survey. This on-line survey vehicle allows users to collect and analyze information through customized survey questionnaires. *Survey Monkey* uses email addresses to send the questionnaire to survey participants. This on-line survey tool guides survey respondents through the questionnaire. For example, if a survey respondent indicates that they do not use historic contexts (as asked in Question No. 1), they are automatically taken to Question No. 12, which begins the questions on alternative methods for conducting National Register evaluations. The questionnaire also provides survey participants an opportunity to comment on each question.

We sent the survey questionnaire to all state DOTs and SHPOs, focusing on the staff that have Section 106 responsibilities within their respective agencies. We also sent the survey to CRM contractors. The latter included all members of the American Cultural Resource Association (ACRA). Finally, the survey was also sent to eleven FHWA offices around the country that had staff with professional training in CRM, archaeology, historic architecture, or related fields. A list of all the survey participants is presented in Appendix B.

The survey questionnaire was emailed to 259 prospective participants at the end of March 2007. Completed surveys were due three weeks later. To increase the response rate, several reminders were sent to these individuals, and the due date was extended to early May 2007. The survey response rates, by group, are presented below.

	DOTs	SHPOs	Contractors	FHWA Offices	Total
<b>Total Contacted</b>	50	54	144	11	259
<b>Individual Responses</b>	41 (82%)	38 (70.3%)	58 (40.2%)	9 (82%)	146 (56.4%)

## 4 ANALYSIS OF SURVEY RESULTS

### INTRODUCTION

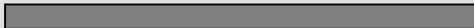

Responses to each survey question are presented below. First, the survey analysis summarizes the responses from all respondents. These responses are then broken out by the three survey groups: state DOTs, SHPOs, and CRM firms. The responses from the FHWA offices were not included in the group comparisons. The number of responses from the FHWA offices (i.e., nine) was too small for a separate group analysis; however, the FHWA responses were included in analyses that summarized the responses from all participants.

As noted earlier, the first eleven questions examine the use of historic contexts as a tool for evaluating National Register eligibility. The remaining questions look at other approaches to National Register evaluations.

### HISTORIC CONTEXTS AND NATIONAL REGISTER ELIGIBILITY

#### 1. Do you use historic contexts in making decisions about National Register eligibility? If you answer no, you will be routed to question 13.

To begin, it was important to establish how many people use historic contexts for evaluating National Register eligibility. There were 146 responses to Question 1.

		Response Percent	Response Count
Yes		84.2%	123
No		15.8%	23
		Total	146

Most survey respondents use historic contexts to make decisions about National Register eligibility. There is also no appreciable difference in the responses to this question among the DOTs, SHPOs and CRM Contractors.

## 2. Please indicate how useful are the following historic context elements in evaluating eligibility.

This question asks survey participants to evaluate the three basic elements of a historic context, as defined by National Register guidance and the *Secretary of the Interior's Standards and Guidelines for Evaluation*.

Answer Option	Very Useful	Useful	Somewhat Useful	Not Useful	Response Count
<b>The overviews/syntheses illustrating the historic context's theme, time period, and geographic area</b>	52.3% (58)	33.3% (37)	14.4% (16)	0.0% (0)	111
<b>The listing of property types associated with the historic context's theme, time period, and geographic area</b>	48.6% (53)	28.4% (31)	18.3% (20)	4.6% (5)	109
<b>The listing of the physical features a property must possess in order for it to reflect the significance of the historic context, and thus be eligible for listing in the National Register</b>	54.1% (59)	23.9% (26)	15.6% (17)	6.4% (7)	109
			<b>answered question</b>		<b>111</b>
			<b>skipped question</b>		<b>35</b>

Most indicated that all three elements of historic contexts are important in making eligibility evaluations. In general, the responses of the three survey groups (see table below) are similar to the combined responses from all survey respondents. One difference is that 39% of SHPOs view the listing of property types as “Very Useful” compared to 50% of the state DOTs and 54% of CRM Contractors. Also, though all three groups ranked overviews and syntheses the same in terms of “Very Useful,” 50% of the state DOTs said they were “Useful” while only 20% of the SHPOs and 30% of the Contractors agreed with the DOTs. This suggests that the DOTs see overviews and syntheses to be somewhat more important than the SHPOs and Contractors. Finally, it is interesting to note the number of Contractors that responded to this question is considerably higher than the number of SHPOs and state DOTs. This is not the case for any of the other questions on the survey.

Answer options	Very Useful	Useful	Somewhat Useful	Not Useful	Response Count
<b>The overviews/syntheses illustrating the historic context's theme, time period, and geographic area</b>					
DOT	43%	50%	6%	0%	30
SHPO	55%	20%	24%	0%	29
Contractor	57%	30%	13%	0%	47
<b>The listing of property types associated with the historic context's theme, time period, and geographic area</b>					
DOT	50%	27%	17%	6%	30
SHPO	39%	36%	18%	7%	28
Contractor	54%	24%	20%	2%	46
<b>The listing of the physical features a property must possess in order for it to reflect the significance of the historic context, and thus be eligible for listing in the National Register</b>					
DOT	43%	26%	17%	13%	23
SHPO	54%	21%	21%	4%	28
Contractor	52%	26%	15%	7%	46

In responding to Question 2, one individual provided the following comment: “All of the selections in #2 are useful in theory. In practice we rarely get the latter two.” This admission reminds us that following National Register guidance, all three of these elements are necessary for eligibility evaluations, but in practice, historic contexts are often incomplete.

### **3. Please list any additional historic context elements that you find useful in making eligibility evaluations.**

There were 27 responses to this question, falling into three general categories:

- Examples of Properties
- Measures of Integrity
- Bibliographies of Previous Research

#### *Examples of Properties*

Most individuals responding to this question said they look for comparative examples to guide eligibility evaluations. “A listing of previously evaluated properties [sic] examples of an evaluation, both positive and negative” was deemed particularly useful by one survey

respondent. Another found, “Example properties that are already listed or determined eligible” to be important. A third added, “Examples of properties listed under the historic context.”



### *Measures of Integrity*

The second most frequent response to Question 3 is “Measures of integrity.” One survey participant noted that “Explicit guidance on the various aspects of integrity as they relate to specific property types” was important. A second commented “In addition to physical characteristics, I like to use objective measures of which elements of integrity are necessary.” One respondent discussed the importance of explicitly defining the level of integrity a property must retain, noting that it is necessary to determine “How much loss of integrity a property can stand and still reflect its significance.”

### *Bibliographies of Previous Research*

Several survey participants commented on the value of “Bibliographies of Previous Research,” particularly those involving sites similar to the one being evaluated or covering the same or similar geographic area. “Often items are included in the bib [sic] that are helpful to contextualizing properties not covered thoroughly in the context/property type/registration requirements.”

**4. Do you find that historic contexts work better for evaluating some types of properties as opposed to other types of properties? If you answer no, you will be routed to question 8.**

		Response Percent	Response Count
Yes		77.9%	88
No		22.1%	25
answered question			113
skipped question			33

Clearly, a majority of survey respondents believe that historic contexts do not work equally well for all types of properties. This response is the same among SHPOs, state DOTs, and Contractors.

Responses	DOTs	SHPOs	Contractors
<b>YES</b>	78% (25)	77% (23)	79% (37)
<b>NO</b>	22% (7)	23% (7)	21% (10)
<b>Response Count</b>	32	30	47

**5. Please indicate how useful historic contexts are in evaluating the eligibility of each property type listed below.**

Answer options	Very Useful	Useful	Somewhat Useful	Not Useful	Response Count
<b>Historic archaeological sites</b>	40.0% (28)	34.3% (24)	22.9% (16)	2.9% (2)	<b>70</b>
<b>Prehistoric archaeological sites</b>	21.7% (15)	24.6% (17)	44.9% (31)	8.7% (6)	<b>69</b>
<b>Buildings/structures</b>	48.2% (40)	39.8% (33)	10.8% (9)	1.2% (1)	<b>83</b>
<b>Engineered features (e.g., bridges, roads, canals, etc.)</b>	50.0% (41)	41.5% (34)	8.5% (7)	0.0% (0)	<b>82</b>
<b>Cultural/historical landscapes</b>	33.7% (28)	32.5% (27)	24.1% (20)	9.6% (8)	<b>83</b>
<b>Traditional cultural properties</b>	29.2% (21)	19.4% (14)	20.8% (15)	30.6% (22)	<b>72</b>
			<b>answered question</b>		<b>83</b>
			<b>skipped question</b>		<b>63</b>

Historic contexts are considered very useful for evaluating engineered features (by 50% of survey participants) buildings and structures (48%) and historic archaeological sites (40%). Contexts are viewed as less useful for evaluating cultural/historical landscapes and traditional cultural properties (TCPs). Interestingly, 29% percent said that historic contexts are very useful in evaluating the eligibility of TCPs while an equal number (31%) said they are not useful at all.

The responses involving archaeological sites are also very interesting. Forty percent said that historic contexts are very useful for historic period sites, but only 22% said they are very useful

for prehistoric sites. In fact, the survey respondents are almost split in terms of finding historic contexts as “Very Useful” and “Useful” (46.3 %) versus “Somewhat Useful” and “Not Useful” (53.6%) for evaluating prehistoric sites. The overall trend, however, is that historic contexts are not as useful for prehistoric sites when compared to other types of properties. What is puzzling is why historic contexts are seen as more useful for historic period archaeological sites than for prehistoric sites.

The low utility of historic contexts for evaluating prehistoric sites is also reflected in the responses of each survey group (see table below). Fifty-nine percent (59%) of the Contractors say that historic contexts are somewhat useful and 3% said they are not useful. Twenty-two percent (22%) of the state DOTs said historic contexts are not useful, the most negative response of the three groups. Interestingly, the SHPOs are not as negative as the Contractors and state DOTs. For other property types, the group comparative analysis is similar to the combined survey results, though state DOTs have a more negative opinion on the utility of historic contexts for evaluating TCPs and cultural/traditional landscapes compared to SHPOs and Contractors.

Answer options	Very Useful	Useful	Somewhat Useful	Not Useful	Response Count
<b>Historic archaeological sites</b>					
DOTs	21%	42%	32%	5%	19
SHPOS	41%	24%	29%	6%	17
Contractors	48%	38%	14%	0%	29
<b>Prehistoric archaeological sites</b>					
DOTs	11%	33%	33%	22%	18
SHPOS	35%	29%	29%	6%	17
Contractors	21%	17%	59%	3%	29
<b>Buildings/structures</b>					
DOTs	43%	48%	4%	4%	23
SHPOS	48%	33%	19%	0%	21
Contractors	53%	38%	9%	0%	34
<b>Engineered features (e.g., bridges, roads, canals, etc.)</b>					
DOTs	65%	35%	0%	0%	23
SHPOS	55%	35%	10%	0%	20
Contractors	41%	47%	12%	0%	34
<b>Cultural/historical landscapes</b>					
DOTs	26%	30%	35%	9%	23
SHPOS	33%	33%	10%	24%	21
Contractors	41%	38%	18%	3%	34
<b>Traditional cultural properties</b>					
DOTs	25%	15%	20%	40%	20
SHPOS	39%	17%	11%	33%	18
Contractors	30%	30%	21%	24%	29



**6. Please list any additional property types for which historic context are useful in evaluating eligibility.**

Question 6 asks survey respondents about the usefulness of historic contexts for evaluating types of properties not listed in Question 5. There were 19 responses to Question 6. Many respondents said historic contexts are useful for evaluating battlefields and related features, such as military fortifications. Other categories included mills, factories, mines, and smelters; ranching and farming properties; properties from the recent past; and cemeteries. Three respondents noted that historic contexts are particularly useful in evaluating linear features, such as “Historic irrigation properties (canals, ditches, etc.),” “Ditches and road systems,” and “Historic roads and trails ...”

**7. Based upon your experience, please comment on why you think historic contexts work better for evaluating some types of properties as opposed to other types of properties.**

There were 51 responses to Question 7. The responses can be organized into the following categories:

- Knowledge and Understanding
- General Versus Specific
- Uncommon or Idiosyncratic
- Integrity
- Objectivity
- Confusion about Historic Contexts

*Knowledge and Understanding*

A number of respondents said properties are more easily evaluated when more is known about them. One respondent noted,

Geographical and thematic historic contexts seem to work better for historic sites and landscapes than for prehistoric ones simply because we have more documentation of their variety, patterns, and complications, plus a better understanding of the historical roots of these patterns.

*General versus Specific*

Several noted that historic contexts are useful for specific, discrete types of properties:

A well-developed historic context can be very useful in the evaluation of a discrete category of very similar resources, such as bridges. Broader contexts, dealing with a wider array of resources types, can be less immediately useful...

Some classes of resources include more diversity, complexity, or range of aspects to be considered than other classes of resources. The broader the diversity exhibited by a class of resources, the less likely an existing historic contexts will help.

If there are specific contexts on a particular subject matter or building/structure type, they are useful for comparing similar properties. Among similar properties they can help determine which ones are significant or not significant. Also, if there is a rare or unique property, the contexts are sometimes helpful for establishing a broader understanding that may help guide the assessment of a property.

One respondent echoed these comments and also noted the value of historic contexts for evaluating problematic properties.

In our experience, historic contexts work best (meaning both effective and efficient) in two situations: when dealing with poorly understood resources, and when dealing with clearly defined resources with limited variations in terms of their type or physical features. For common or well-understood historic properties, historic contexts are "useful" but generally more trouble to develop than they are worth on a day-to-day basis."

### *Uncommon and Idiosyncratic*

One respondent noted,

Some historic properties (particularly Euro-American buildings, engineered features, and archeological sites) fit well into broad categories while others are more idiosyncratic and cannot easily be pigeon-holed or fit into a standardized historic context.

Another commented that "Sometimes, single specific sites/structures do not easily fit in local/regional area context/thematic schemes. The non-ubiquitous sites that seem to fall between the context themes."

### *Integrity*

The issue of integrity was brought up a number of times in responses to this question, generally in terms of archaeological sites. As one respondent noted "...where I work, you don't need a detailed historic context to determine the significance of an antebellum farm complex. If it has reasonably good integrity it's a safe bet that it's eligible and I don't need to study a context to determine that." Another individual observed that "...eligibility often rests not on whether a site has potential to yield important scientific information, but whether it has sufficient physical integrity to yield that information." As will be discussed in subsequent sections of this report, this approach to the evaluating archaeological sites does not follow National Register guidance. It is, however, the approach used by most archaeologists. As one respondent notes,

For prehistoric archaeological sites, historic contexts are generally culture histories, and although culture histories are valuable, there seems to be a sense that if a site can provide any information, it is significant information. Rarely do we recommend a site as not eligible based on a historic context that demonstrates we know a great deal about sites from a certain temporal period.

### *Objectivity*

Several individuals highlighted the problem of applying a standard, objective measure to properties whose identity and value are dependent on the subjective views of a traditional community. For example, one respondent said, “The very nature of some types of properties such as TCPs--make it more difficult to develop effective historic contexts in the first place.” Others suggest that because “objectivity” is not possible, it does not matter whether or not there is an associated historic context.

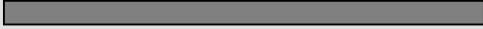

I think TCP's are not easily amenable to context statements, as significance will be often be determined on the basis of unique values held by local and tribal groups, not professional evaluators.

Historic contexts are not very useful for evaluating TCPs because the communities associated with the property generally don't provide objective data for evaluation.

### *Confusion about Historic Contexts*

Some of the responses to Question 7 indicate confusion about the purpose and use of historic contexts. For example, one respondent said “Some types of archaeological sites, specifically prehistoric, obviously don't have historic context.” Another suggested that “...prehistoric sites have no historic context and buildings and structures can be significant based on architecture and not historic context.” Clearly, some practitioners do not understand what a historic context is, as defined by the National Register and *Secretary of the Interior's Standards and Guidelines for Evaluation*.

**8. Do you find that historic contexts work better for evaluating properties under some National Register criteria as opposed to other criteria? If you answer no, you will be routed to question 11.**

		Response Percent	Response Count
Yes		65.4%	70
No		34.6%	37
answered question			107
skipped question			39

Approximately two out of every three survey participants said historic contexts work better for evaluating properties under some criteria as opposed to other criteria.

Responses	DOTs	SHPOs	Contractors
<b>YES</b>	72% (23)	57% (17)	64% (27)
<b>NO</b>	28% (9)	43% (13)	36% (15)
<b>Response Count</b>	32	30	42

There are, however, some differences among the three survey groups. More of the State DOTs said yes to this question than the SHPOs. The latter had a somewhat more negative response to the question.

**9. Please indicate how useful historic contexts are for evaluating eligibility under the following National Register criteria.**

Answer options	Very Useful	Useful	Somewhat Useful	Not Useful	Response Count
<b>Criterion A</b>	49.3% (33)	26.9% (18)	20.9% (14)	3.0% (2)	67
<b>Criterion B</b>	31.8% (21)	24.2% (16)	27.3% (18)	16.7% (11)	66
<b>Criterion C</b>	40.3% (27)	38.8% (26)	19.4% (13)	1.5% (1)	67
<b>Criterion D</b>	27.6% (16)	29.3% (17)	27.6% (16)	15.5% (9)	58
				<b>answered question</b>	67
				<b>skipped question</b>	79

Survey participants said historic contexts are most useful for evaluating properties under National Register criteria A and then C. They are less useful for evaluating properties under criteria B and D. The latter is similar to the responses to Question 5, since archaeological sites are generally found to be eligible under criterion D.

As seen in the table below, the Contractors find historic contexts to be very useful for evaluating historic properties under criterion A (61%), much higher than the response rate from the DOTs (45%) and the SHPOs (40%). When the response rate for “Very Useful” and “Useful” are combined, however, the differences are less distinct: 82%, 70% and 73% respectively; but, the Contractors still value historic contexts more in this situation than the other two groups.

Answer options	Very Useful	Useful	Somewhat Useful	Not Useful	Response Count
<b>Criterion A</b>					
DOTs	45%	25%	20%	10%	20
SHPOS	40%	33%	27%	0%	15
Contractors	61%	21%	18%	0%	28
<b>Criterion B</b>					
DOTs	19%	29%	29%	24%	21
SHPOS	21%	21%	36%	21%	14
Contractors	44%	19%	26%	11%	27
<b>Criterion C</b>					
DOTs	50%	30%	15%	5%	20
SHPOS	53%	40%	7%	0%	15
Contractors	25%	36%	32%	0%	28
<b>Criterion D</b>					
DOTs	11%	33%	33%	22%	18
SHPOS	36%	27%	27%	9%	11
Contractors	40%	32%	16%	12%	25

The CRM firms see historic contexts as more useful for evaluating properties under criterion B than do the SHPOs and state DOTs. Interestingly, state DOTs and SHPO view historic contexts as more useful for evaluating properties under criterion C than do the Contractors. In terms of criterion D, state DOTs generally see historic contexts as less useful (55% when combining “Somewhat Useful” and “Not Useful”) than the Contractors (28%) and SHPOs (36%), though 33% of the state DOTs said that historic contexts are “Useful.” Contractors value historic contexts somewhat more than SHPOs, when combining the “Very Useful” and “Useful” responses (72% and 63% respectively).

**10. Based on your experience, please comment on why historic contexts work better for evaluating properties under some National Register criteria as opposed to other criteria.**

There were 42 responses to this question.

*Criterion A*

Respondent comments included statements such as “Historic contexts help to provide structure for evaluating properties with regard to Criterion A, providing the broad historical framework needed as a comparison with the historic property.” Another noted “Contexts work well with Criterion A, especially if the “event” is a long term cultural/economic trend or something like a war.” A third individual made a similar point,

Using historic contexts to evaluate properties listed under criterion A and C is very useful, because it is easiest to associate a broad theme or architectural style. In these cases the context provides a great deal of support for the association that one is trying to make.

These comments suggest that historic contexts work well for evaluating properties under criterion A because this criterion applies to properties associated with patterns or trends in the

past that can be easily observed and understood. As noted in the above comment and discussed further below, criterion C is viewed in the same way.

### *Criterion B*

Survey participants were less enthusiastic about historic contexts and criterion B. The following three comments reflect the opinion of most respondents: “In my state, Criterion B has been very difficult to use in any contextual way. Nobody seems able to agree on who is “significant” and what constitutes the significant periods of a person’s life;” “The contexts that we use establish broad patterns but do not identify individuals important to history;” and “Criterion B is least helped because the contexts often do not identify significant persons, especially at the local level.”

### *Criterion C*

The greatest number of responses to this question involved criterion C. The comments on criterion C suggest that the elements associated with the latter can be more easily observed and defined in a historic context, compared to criteria B and D, and in some cases, criterion A. As explained by one individual, “C is most applicable because it pertains to physical characteristics more so than historical trends or movements. C is most concrete.” Another offered the opinion that “Contexts involving criterion C tend to be more widely recognizable, specific, and quantifiable.” A third respondent noted that “Often A and B appear to be more subjectively applied as well as D, while C is based more on objectivity.”

### *Criterion D*

Historic contexts are generally not useful for evaluating properties under criterion D, according to most respondents. For example, one respondent said,

I think contexts involving criterion d are most difficult for the same reasons that many archaeological properties are difficult to evaluate in advance [at the inventory stage]. Also contexts for criterion d tend to be either too generic or quickly outdated.

Another respondent thought that historic contexts were not specific enough to provide useful guidance.

For Criterion D, it seems that it is a bit more difficult to develop historic contexts based on data needs--data-driven historic contexts can end up being pretty loose and not altogether very useful.

A third individual was more optimistic, stating that “Contexts are research-driven and hence work best with Criterion D.” Another respondent noted, however,

According to some archaeologists, since all archaeological sites have the potential to contribute to our knowledge, and because all new information is important, all sites should be eligible. This is a conundrum of an academic context.

As with some of the responses to Question 7, a few responses to Question 10 show some confusion about the nature and purpose of historic contexts. This confusion generally involves criterion D and archaeological sites. For example, “For criterion D, which is most often used for archaeological sites, then historic context is less important particularly in prehistoric sites, which date before written history.” And “Criterion D can be difficult to capture in a historic context because often the data that is considered significant to prehistory is the data that has not yet been collected. How can data that may or may not exist be captured in a historic context?” There was one comment involving criterion C and architectural properties: “Contexts are not as useful in evaluating a resource under Criterion C because it is primarily the physical aspects of the resource that are being assessed, rather than its history.”

### **11. How can historic contexts be improved to make them more useful for evaluating National Register eligibility?**

There were 78 responses to this question. As one might expect with an open-ended question like this, there were a wide variety of responses; however, most could be grouped into one of the following categories:

- More Historic Contexts
- Greater Availability/Accessibility
- Be More Explicit
- Synthesize Existing Information
- More Examples
- More Objective/Systematic
- Update Existing Historic Contexts

#### *More Historic Contexts*

The lack of historic contexts was one of the more frequent complaints emerging from this survey, and correcting this problem was one of the most frequent recommendations.

I find few existing historic contexts available in the course of much of my work. While the existing ones are useful, simply having more of these broader studies available would be huge step in the right direction.

Another respondent noted, “We need to put more of an emphasis on completing more contexts.” One individual recommended that the use of historic contexts be required.

More historic contexts need to be written, peer reviewed, and disseminated to NRHP [National Register of Historic Places] evaluators, and their use should be required in all NRHP eligibility decisions, just as the NRHP criteria for evaluation are required.

#### *Greater Availability/Accessibility*

Many survey respondents identified “availability” as another big problem. Several individuals said their jobs would be easier if historic context studies were more universally available,

particularly through searchable databases: “It would be useful if states could share historic contexts;” “Provide a readily accessible, nation-wide, interactive, index to historic contexts, searchable by keywords that searches all states at once instead of one state at a time;” and “Make them available universally so that the context does not need to be reinvented with each project or nomination.” Several individuals identified the SHPOs as the responsible party for fixing this problem.

In order for historic contexts to become more useful, they should first be made more readily available. It would be very helpful if SHPOs would establish a framework for historic contexts, then include all published historic contexts on their website with an abstract that gives a synopsis of the context, its intent, and applicable use.

Another individual said “SHPOs should make historic contexts information more accessible to the public.”

### *Be More Explicit*

“Make them more explicit” was the most frequent comment received in response to Question 11. Practitioners want better guidance on creating and using historic context studies. The three comments presented below all argue that historic contexts are not useful because they do not explicitly identify relevant property types and the associated physical attributes needed for assessing significance.

Just to clarify, I don't think formal contexts are valuable as stand-alone documents. They need to be part of some kind of survey effort that directly links the historical information with actual resources on the ground. The "empty" contexts that many SHPOs prepared in the 1980s and '90s are largely worthless. They are usually much too general, especially given that significance is usually at the local level, a level that the statewide contexts simply cannot address.

Ensure that they [historic contexts] recognize and are geared towards making eligibility determinations. All too often a context will wax on and on providing wonderful background data but never get to the meat of how you might distinguish one site from another. All too often the "what characteristics need to be in place to make a site eligible" question goes unanswered or answered in a highly cursory manner.

Historic contexts need to focus on the resource being evaluated. Too often, generic thematic information is used and not specific information about the resource being evaluated.

Another respondent noted it is “[i]mperative that they [historic contexts] contain clear registration requirements and discuss all 7 aspects of integrity and their relative importance according to the various property types.” And finally, “DOTs and DOT contractors need to more explicitly develop contexts according to accepted NR [National Register] definitions. SHPO staff need to actually use contexts to consider the eligibility of properties.”



### *Synthesize Existing Information*

There were also some comments involving the need for synthesizing existing information, especially in terms of archaeological properties.

For criterion D sites - a summary of current research issues and questions that is periodically updated should work. It is also of critical importance to **SNYTHESIZE** existing data with respect to current research issues. We have more answers to research questions than we think we do -- we just haven't had time to think about [them]. For A, B, and C sites - synthesis, rather than context - is the key. We are getting to the point where sufficient work has been done, enough farmsteads, roads or ditches have been researched, that it should be more than possible to identify which specific sites are or are not eligible...

### *More Examples*

Several survey participants recommended the use of more examples as a way of improving the utility of historic contexts. One individual stated, "I am always in favor of including more successful models, as well as unsuccessful examples." Another respondent noted that "Examples of other evaluated properties or hypothetical properties are often the most informative, especially for making determinations of non-significance."

### *More Objective/Systematic*

There are some who believe that the evaluation process is too subjective, and call for a more objective process.

"They [historic contexts] should provide almost a "check list" procedure for determining significance (presence/absence and integrity of key features). Remove as much of the subjectivity as is possible. Be very straight forward regarding what is important and what is not. Minimize "gray" areas.

In addition, some noted the absence of a systematic approach for developing historic contexts.

It is often difficult to find historic contexts and there is no systematic approach for developing contexts on specific subject matters... It would be very helpful if SHPOs would establish a framework for historic contexts, then include all published historic contexts on their website with an abstract that gives a synopsis of the context, its intent, and applicable use.

### *Update Existing Historic Contexts*

Another frequent recommendation is updating existing historic contexts. For example,

The challenge of updating historic contexts must be better recognized and resources provided to meet this challenge. In our experience, it is almost as difficult to "update" an

existing context (for example, to change the registration requirements based on more familiarity with a wide range of associated resources) as it is to prepare the context in the first place. But without updates, the context runs the risk of being counter-productive ... and in some cases it becomes so obsolete as to be a hindrance rather than a help.

Keep them up to date, using most recent published and gray literature.

There should be a consistent effort on the part of Historic Preservation Offices and federal agencies to update existing historic contexts on a regular basis.

Another individual recommended that “Regional or statewide historic contexts should be reevaluated and updated regularly or not used after a certain time. Contexts should include general guidelines for elements that must/should be present.”

#### *Additional Recommendations*

One individual noted that “To build on historic contexts, the preparation of a thematic study can be undertaken as mitigation, if possible.” Another remarked on how different property types present different challenges: “Perhaps historic contexts need to be made more flexible depending on the type of historic resource that is being nominated as eligible.” Finally, one survey respondent recommended an approach that does not follow current National Register guidance, recognizing the unique issues and problems associated with evaluating archaeological sites:

Historic contexts for prehistoric sites are long detailed documents that become rapidly outdated. It would be more helpful to establish a committee of CRM representatives who updated a list of relevant questions each year that could help contractors and agencies determine what sites are important.

### **THE NATIONAL REGISTER DEFINITION OF A HISTORIC CONTEXT AND THE REAL WORLD**

Before continuing the analysis of the survey responses, we would like to present the results of a follow-up survey to the original survey questionnaire. Even though over 80% of the survey participants said they used historic contexts in making decisions about National Register eligibility, we were concerned that many of these individuals were not using the term as originally defined in both National Register guidance and in the *Secretary of the Interior’s Standards and Guidelines for Evaluation*. As can be seen in the responses to the first eleven questions, there is in fact some confusion about historic contexts. Clearly, not everyone views historic contexts in the same way as the National Register.

We consequently developed a follow up question (Appendix B) to see what survey respondents meant when they used the term “historic context.” This follow-up survey was sent only to those who, in the original survey, said they use historic contexts to make eligibility evaluations.

The follow-up survey asked respondents to match their understanding of the term “historic context” with one or more of the following definitions:

- Historic or prehistoric overviews of a region, state, or area, most often included as a chapter(s) in a cultural resource management report or other Section 106 compliance document.
- Formally developed studies of a specific theme, time period and geographic area
- Personal research using primary or secondary sources of information on an area's history or prehistory.

Twenty-two individuals responded to the follow-up survey. Most of the respondents commented that all three definitions corresponded to their definition of a historic context. As indicated by the comments below, many individuals use a variety of information sources to evaluate properties, and they refer to these sources as "historic contexts."

I think it could be any or all of the above. I don't see it as an 'either or' decision among these three choices. In everyday practice, depending on the resource(s) being studied and the area in which they are being studied, historic context could be developed from all three of these approaches, or two, or one...

All of the above. I define a historic context as the themes by which a significance determination is made. It can be as general as an overview, it can formally developed and specific, it can be formed through personal research - whatever level of specificity is appropriate enough to make the significance call.

One respondent to the follow-up survey said "I understand all three of the above to be attempts to construct/define one or more historic contexts. If I had to choose which one I utilize most heavily in my own NR eligibility evaluations, it would have to be the third."

Another individual noted,

I consider all of the above examples of historic contexts. However, in the purist sense and what I would primarily consider a historic context is the "formally developed studies of a specific theme, time period and geographic area...."

One individual commented "I would say both the top two fit my understanding, and we use both in making decisions about NR eligibility." Another explained, "Our office uses both the first and the second; the second being formally developed Multiple Property Documentation Forms that we have had consultants do for certain property types."

Several individuals said their understanding of the term "historic context" is consistent with the National Register definition: "We try to use the term historic context the way it is defined in the various NR Bulletins put out by the DOI." It is interesting that this respondent included the word "try" in their comment. This suggests that it is sometimes not possible to use formally developed historic contexts. Another stated,

Basically I agree with "formally developed studies" (answer #2 above. [Our state] has completed and published studies of the historical and architectural development of towns and/or neighborhoods statewide, as well as a number of thematic studies such as bridges, historic engineering and industrial sites, landscapes, Native American sites, domestic architecture. These studies generally include inventories of specific properties and recommendations on potential NR eligibility.

A few of the comments indicate that some practitioners develop historic contexts in relation to a specific project.

We use various contexts that could meet the first two definitions provided, depending on the scope of the project and the need for detailed analysis to complete Section 106 coordination. The commonality between them is the development of property type analyses and registration requirements, as based on the formal contextual approach defined by NRHP guidelines.

Another said,



The nature of a context has everything to do with the nature of the investigation. That being the case, I have prepared context statements that undergo modification as new information becomes available. I develop theme, chronological, or spatially sensitive historical contexts for specific resources. And on large projects with many cultural resources, I conduct research using primary and secondary sources, the understanding of which cannot be fully gained from existing sources.

It is clear from the follow-up survey that there is a range of views as to the definition of a historic context. Most respondents believe that all of the definitions listed above can be considered historic contexts.

## **OTHER APPROACHES TO NATIONAL REGISTER ELIGIBILITY EVALUATIONS**

Beginning with Question 12, the survey questionnaire switches focus from historic contexts to alternative means of evaluating National Register eligibility.

**12. Do you use other methods besides historic contexts in making decisions about National Register eligibility? If you answer no, you will be routed to question 21.**

		Response Percent	Response Count
Yes		81.7%	85
No		18.3%	19
<b>answered question</b>			<b>104</b>
<b>skipped question</b>			<b>42</b>

Interestingly, the percentage of respondents that said yes to Question 12 is almost identical to the percentage for Question 1 (Do you use historic contexts in making decisions about National Register eligibility?). The positive response to the latter was 84.2%. And as with Question 1, there is no appreciable difference in the responses to this question among the DOTs, SHPOs and Contractors (see table below), though a somewhat higher percentage of SHPOs said they use other methods compared to the other two groups.

Responses	DOTs	SHPOs	Contractors
<b>YES</b>	76% (22)	89% (25)	77% (33)
<b>NO</b>	24% (7)	11% (3)	23% (10)
<b>Response Count</b>	29	28	43

**13. Please indicate how important the following factors are in your decision not to use historic contexts.**

Answer options	Very Important	Important	Somewhat Important	Not Important	Response Count
There are no historic contexts that apply to the properties you normally have to evaluate	47.9% (45)	25.5% (24)	11.7% (11)	14.9% (14)	94
The historic contexts are not readily available	17.4% (16)	34.8% (32)	27.2% (25)	20.7% (19)	92
The historic contexts are out of date	33.7% (31)	33.7% (31)	14.1% (13)	18.5% (17)	92
The historic contexts are of poor quality	32.6% (30)	35.9% (33)	14.1% (13)	17.4% (16)	92
The historic contexts are too difficult to use	7.9% (7)	14.6% (13)	32.6% (29)	44.9% (40)	89
The historic contexts are limited to overviews and syntheses, with no specific guidance on how to evaluate the eligibility of properties associated with the historic context's theme, time period or geographic area	32.6% (30)	32.6% (30)	14.1% (13)	20.7% (19)	92
				answered question	94
				skipped question	52

“No historic contexts apply” is the primary reason why survey respondents do not use historic context, followed by “historic contexts are out of date,” “historic contexts are of poor quality,” and “historic contexts are limited to overviews...” When “Very Important” and “Important” are combined, these four reasons receive the highest rankings.

As indicated in the table below, 60% of the DOT respondents view the lack of applicable historic contexts to be a very important factor, as do 50% of the SHPOs and 45% of the CRM firms. The percentages associated with the other reasons are not as high, except in terms of how the state DOTs ranked the statement “historic contexts are limited to overviews and syntheses...” Forty-eight percent of the DOTs said this reason is “Very Important,” compared to 21% of the SHPOs and 36% of the Contractors. When combining “Very Important” and “Important,” the Contractors see the focus on overviews and syntheses as a greater hindrance to the use of historic contexts (81%) than do the state DOTs (68%) and SHPOs (46%). It should also be noted that 42% of the SHPOs view this reason as “Not Important.”

Answer options	Very Important	Important	Somewhat Important	Not Important	Response Count
<b>There are no historic contexts that apply to the properties you normally have to evaluate</b>					
DOTs	60%	16%	8%	16%	25
SHPOS	50%	35%	4%	12%	26
Contractors	45%	24%	11%	18%	38
<b>The historic contexts are not readily available</b>					
DOTs	16%	32%	36%	16%	25
SHPOS	20%	44%	18%	24%	25
Contractors	16%	32%	30%	22%	37
<b>The historic contexts are out of Date</b>					
DOTs	25%	42%	25%	8%	24
SHPOS	36%	32%	12%	20%	25
Contractors	39%	26%	11%	24%	38
<b>The historic contexts are of poor quality</b>					
DOTs	36%	44%	12%	8%	25
SHPOS	25%	38%	21%	17%	24
Contractors	37%	26%	13%	24%	38
<b>The historic contexts are too difficult to use</b>					
DOTs	13%	9%	48%	30%	23
SHPOS	8%	13%	21%	58%	24
Contractors	5%	16%	28%	49%	37
<b>The historic contexts are limited to overviews and syntheses, with no specific guidance on how to evaluate the eligibility of properties associated with the historic context's theme, time period or geographic area</b>					
DOTs	48%	20%	16%	16%	25
SHPOS	21%	25%	13%	42%	24
Contractors	36%	45%	11%	13%	38

#### 14. Please discuss any additional reasons why you do not use historic contexts.

There were 39 responses to this question, which can be organized into the following categories:

- Too Few
- Not Enough Funding
- No Time
- No Need
- Write Your Own

### *Too Few*

“Too few” is the number one response to this question, mirroring the responses to Question 13. For example, one respondent said “There are many resources that have now come into play that don't have context provided.” Another individual noted,

Either they don't exist or they are difficult to find. Also, most resources I deal with are archaeological sites and I have not seen many contexts that identify specific topics or data gaps that could be used as a basis for evaluation.

### *Not Enough Funding*

Several survey participants pointed out that the reason there are too few historic contexts is because there has not been enough funding to develop contexts. As one individual stated, “The main reason that we by far and large do not use historic contexts is that there have been so few financial resources available to develop the few historic contexts we have.” Another noted, “For me as NR coordinator what context there is usually in my head. We have never had money to make context development a priority.” This statement anticipates the findings of Question 15 below, where many survey respondents said “personal knowledge” is most frequently used to make National Register eligibility evaluations.

### *No Time*

A corollary to the problem of no funding is no time. One survey respondent remarked,

We use them if we have access to them and if they are appropriate. If the appropriate historic contexts have not been developed or are not available for a particular property type, we generally don't do the research necessary to develop them since we generally work on a project by project basis and it would be far too time consuming.

Another individual noted that “For section 106 review, evaluations are typically based on architectural integrity and significance. There is usually no time in a project's budget to do much background/historic research.”

### *No Need*

Several respondents believe that spending time and money developing historic contexts is not warranted. For example,

In many cases a historic resource is so common and well understood that developing and using a historic context does not seem to be a good use of limited staff and financial resources...In other cases, a resource may be so "singular" as to warrant some context-like study but not to the point of developing eligibility guidelines for a large class of resources that doesn't exist...In yet other cases, there may be more than enough "contextual" information readily available, but not in the form of a "context," so that spending time and money on developing and using a historic context is not prudent.



Another respondent viewed the formal National Register definition of historic contexts as being limited and not applicable to real world situations.

It appears that you are defining "historic contexts" in the limited sense of formal, written papers prepared by historians and placed on file somewhere. While I believe that most of us field historians do use those formal "top-down" historic context papers, I also believe that all of us who do National Register eligibility evaluations are constantly building, using, and maintaining informal historic contexts - dozens of them, hundreds of them - "from-the-bottom-up." These contexts are based on our field work, our research, our reading in professional and scholarly journals and books, and they reside in our heads and in the masses of files and databases that we each establish. Top-down historic contexts can be useful, but you would need thousands of them to deal with all the themes of national, regional, state and local significance that can be used to qualify a property for listing in the National Register

### *Write Your Own*

Four comments stressed the importance of writing one's own historic context for a project, if an appropriate, formal context is not available. For example, "I always use historic contexts; if there are no pre-existing ones available I do research and write my own. Isn't that what everyone does?" Another said, "I am adamant about using historic contexts for evaluating. You can't evaluate without one. If there isn't one, go do research and write one." And,

If the survey is asking if I use historic contexts as a product of my own research to make informed evaluations, then the answer is yes. If the survey is asking if I use historic contexts from government-sponsored publications, then the answer is no.

Why would anyone in their right mind use a context someone else writes for evaluating a cultural resource they find? In 30 years I have NEVER used a canned historical context. I write a unique to semi unique context for every project because most projects are unique.

**15. Please indicate how often you use the following alternative methods for evaluating eligibility.**

<b>Answer options</b>	<b>Always</b>	<b>Most of the Time</b>	<b>Sometimes</b>	<b>Never</b>	<b>Response Count</b>
<b>Your personal knowledge of an area, time period, property type, etc.</b>	42.7% (41)	35.4% (34)	19.8% (19)	2.1% (2)	96
<b>The personal knowledge of other experts on an area, time period, property type, etc.</b>	24.2% (23)	35.8% (34)	40.0% (38)	0.0% (0)	95
<b>The results of previous National Register eligibility evaluations</b>	19.8% (19)	37.5% (36)	40.6% (39)	2.1% (2)	96
<b>A set of physical features that a property must possess in order to be considered significant</b>	34.0% (32)	36.2% (34)	26.6% (25)	3.2% (3)	94
<b>For archaeological sites, a set of physical characteristics that have previously been found to indicate the presence of important information</b>	37.7% (29)	50.6% (39)	9.1% (7)	2.6% (2)	77
				<b>answered question</b>	97
				<b>skipped question</b>	49

Forty-three percent of the respondents “Always” use “personal knowledge” as an alternative method for evaluating eligibility. This answer was followed by “a set of physical features...” and then “the knowledge of other experts.” “The results of previous National Register evaluations” received the lowest rank. For archaeological sites, 38% of the respondents (presumably archaeologists) indicate they “Always” use physical attributes to make eligibility evaluations, and 51% answered “Most of the Time.”

Analysis of the three survey groups shows 84% of the DOT respondents use their personal knowledge “Always” and “Most of the Time.” The Contractors are very similar in their responses (82%). The SHPOs use their personal knowledge somewhat less, at 66%.

Answer options	Always	Most of the Time	Sometimes	Never	Response Count
<b>Your personal knowledge of an area, time period, property type, etc.</b>					
DOTs	48%	36%	12%	4%	25
SHPOS	33%	33%	33%	0%	27
Contractors	44%	38%	15%	3%	39
<b>The personal knowledge of other experts on an area, time period, property type, etc.</b>					
DOTs	33%	33%	33%	0%	24
SHPOS	11%	37%	52%	0%	27
Contractors	23%	41%	39%	0%	39
<b>The results of previous National Register eligibility evaluations</b>					
DOTs	38%	33%	29%	0%	24
SHPOS	15%	33%	52%	0%	27
Contractors	13%	43%	40%	5%	40
<b>A set of physical features that a property must possess in order to be considered significant</b>					
DOTs	35%	42%	23%	0%	26
SHPOS	19%	44%	30%	7%	27
Contractors	43%	30%	24%	3%	37
<b>For archaeological sites, a set of physical characteristics that have previously been found to indicate the presence of important information</b>					
DOTs	38%	57%	0%	5%	21
SHPOS	28%	55%	17%	0%	18
Contractors	40%	48%	9%	3%	33

DOTs and Contractors do consult other experts to help make eligibility evaluations, more so than SHPOs, who consult with others “Sometimes.” The DOTs appear to use the results of previous National Register eligibility evaluations more than either the SHPOs or the Contractors. Overall, the three groups use “sets of physical features” at the same frequency, though the DOTs and CRM firms “Always” used this approach more than the SHPOs. Finally, in terms of archaeological sites, the three groups had similar responses.

**16. In making eligibility evaluations, do you use any methods not listed in Question 15? If so, please list these additional methods below.**

Forty-Two individuals responded to this question. Several listed the information sources they use in making eligibility evaluations. For example,

For architectural nominations, we use reviews of our historic structure surveys.

A search of available data, other reports, plain old history books, etc.

Historic maps, other primary resources.

A review of relevant scholarship.

For archaeological sites, we consider geomorphological context to be crucial for evaluating integrity of the sites.

I try to review prior studies to determine what issues archaeologists working in a given region consider important in evaluating sites.

A few comments refer to the use of multiple methods and approaches, for example, “The personal knowledge of the researcher or other experts may be a factor but it is not the sole basis for determining eligibility. Any of the methods above [in Question 15] may influence the determination but are not alternative methods.” And, “Items listed in Question 15 are routinely used in combination with highly developed state contexts, not in place of context-based evaluation.”

To one respondent, integrity is the most important consideration no matter what methods are used: “Integrity (archaeology = depositional integrity and preservation potential, and architecture = setting and constructional integrity) is the #1 consideration. This is used with the methods listed in 15 by almost all practitioners I am aware of.” Finally, one individual noted,

Essentially, the questions I use most frequently are: What is the density of artifacts? What variety of artifact? Is there a potential for intact features? Does the site have the potential for good faunal and/or botanical preservation? Are human remains likely to be present? Is this a common or rare site type? Will it provide SIGNIFICANT information (as opposed to just information)?

**17. If you use one or more alternative methods for making eligibility evaluations, please indicate how important the following reasons are in your decision to use that method**

<b>Answer options</b>	<b>Very Important</b>	<b>Important</b>	<b>Somewhat Important</b>	<b>Not Important</b>	<b>Response Count</b>
<b>It facilitates eligibility evaluations – is quick and easy</b>	22.6% (19)	39.3% (33)	22.6% (19)	15.5% (13)	<b>84</b>
<b>It results in consistent evaluations</b>	27.4% (23)	42.9% (36)	21.4% (18)	8.3% (7)	<b>84</b>
<b>It is the most cost effective</b>	21.2% (18)	28.2% (24)	32.9% (28)	17.6% (15)	<b>85</b>
<b>It is the only method that works</b>	10.4% (8)	22.1% (17)	31.2% (24)	36.4% (28)	<b>77</b>
<b>It is the only method that is available for me to use</b>	23.4% (19)	20.9% (17)	22.2% (18)	33.3% (27)	<b>81</b>
				<b>Answered question</b>	<b>85</b>
				<b>Skipped question</b>	<b>61</b>

In terms of “Very Important” or “Important,” survey participants noted that “facilitating eligibility evaluations,” “consistency in results,” and “cost effectiveness” were all reasons for using alternative approaches, with “consistency in results” receiving a somewhat higher ranking. Of these three reasons, “cost effectiveness” was ranked the lowest. It is interesting to note, however, that “Somewhat Important” was also a frequent response, suggesting these three are not the only reasons why alternative methods are used, and these other reasons are not listed in Question 17.

For the most part, these results were also reflected in the comparisons of the three groups (see table below), but with a few differences. For example, “facilitating eligibility evaluations” was “Very Important” for DOTs and SHPOs, but not Contractors. “Consistency in results,” was most important to the DOTs and CRM firms.

Answer options	Very Important	Important	Somewhat Important	Not Important	Response Count
<b>It facilitates eligibility evaluations – is quick and easy</b>					
DOTs	35%	35%	22%	9%	23
SHPOS	33%	33%	17%	17%	24
Contractors	9%	47%	25%	19%	32
<b>It results in consistent evaluations</b>					
DOTs	39%	26%	26%	9%	23
SHPOS	12%	56%	16%	16%	25
Contractors	32%	45%	19%	3%	31
<b>It is the most cost effective</b>					
DOTs	17%	26%	39%	17%	23
SHPOS	24%	20%	28%	28%	25
Contractors	25%	31%	31%	13%	32
<b>It is the only method that works</b>					
DOTs	19%	14%	29%	38%	21
SHPOS	4%	17%	48%	38%	24
Contractors	11%	26%	26%	37%	27
<b>It is the only method that is available for me to use</b>					
DOTs	24%	19%	24%	33%	21
SHPOS	33%	13%	25%	29%	24
Contractors	19%	29%	16%	35%	31

**18. Please list any additional reasons why you use alternative methods for making eligibility evaluations.**

There were 19 responses to this question. Here is a sample of the responses:

There are no context documents or they are very old. It forces us to use alternative methods

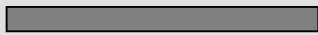

I would note that the alternative methods are "sometimes" the only methods that work or that are available to us, and that in those situations they are always "very important" because we have no other choice. In other cases, they are the most practical--quick, cost-effective--and yet I would emphasize that they are "responsible" as well, always based on professional staff's assessment, and "responsive" to the kinds of day-to-day situations we have to deal with one way or the other.

The questions above make it sound like you must use either historic contexts or an alternative evaluation process. In reality it is not nearly that cut and dried. We almost always use alternative methods in conjunction with the available historic contexts. In general, the better developed the historic context, the less we rely on alternative methods.

If the use of informal historic contexts is an alternative method, we use it because the collective knowledge of buildings, bridges, and landscapes here at [state] DOT is broad, deep, and readily accessible.

**19. Within your organization, do you have an established process for transferring knowledge about the methods you use to new staff?**

It is widely acknowledged that many senior CRM staff within state DOTs and SHPOs will be retiring in the not too distant future. In developing the survey questionnaire, we anticipated that many practitioners would state that personal knowledge was a very important factor in making National Register evaluations. This expectation was confirmed by the responses to Question 15. Given the potential “brain drain” within these agencies, we were interested in discovering if these agencies, and CRM firms, had a process for passing on their collective experience in making eligibility evaluations to new staff.

		Response Percent	Response Count
Yes		45.1%	46
No		54.9%	56
<b>answered question</b>			<b>102</b>
<b>skipped question</b>			<b>44</b>

As shown in this table, slightly more than half of the respondents said they do not have an established process for transferring knowledge to new staff. In terms of the three survey groups, the state DOTs are more likely to have an established process than the SHPOs or Contractors.

Responses	DOTs	SHPOs	Contractors
<b>YES</b>	55% (16)	43% (12)	43% (17)
<b>NO</b>	45% (13)	57% (16)	57% (23)
<b>Response Count</b>	29	28	40

**20. If your answer to question 19 is yes, briefly describe your process for transferring knowledge to new staff.**

Forty-one people responded to this question. Tutoring and mentoring are the most frequent answers to this question. Most organizations use an apprenticeship type arrangement where senior staff mentor new staff.

Mentor program. An experienced historian/archaeologist is assigned to a new employee to guide them through their first few months on the job.

Training on the evaluation of historic properties is given upon hiring. New staff are mentored by experienced staff and is given guidance on what constitutes a sound evaluation. All work is reviewed by senior staff and the comments supplied are important to develop the abilities of new staff.

Written manuals and guidelines was the second most common answer. One respondent noted, for example,

For archaeology, the information is in the Guidelines for Archaeological Investigations issued in 1999 which theoretically will be regularly updated. For history and architectural history, several documents have been prepared already and several more are being developed to help transfer this knowledge.

Several survey respondents make National Register evaluations using a group or team approach: "We have written procedures that address some of our evaluation processes, and we work in teams so there is also a shared decision-making process that is perpetuated." New staff often participate in these group discussions and decisions: "We use a Determination of Eligibility team (DOE) team, and new staff people often sit in on the DOE team discussions."

Formal training courses, workshops and conferences are frequent vehicles for educating new staff. For example, one respondent explained, "We try to encourage conference and training attendance that stress [state] resources, especially ones that aren't covered by standard contexts. We also conduct some in house training." Another individual commented "In CRM there is such a vast turn over of personnel; it isn't always prudent or useful. When it is prudent, we have new staff examine past relevant reports, books, etc. or have them take a Section 106 course."

Finally, one individual provided a laundry list of items used to train new staff, several of which have been touched on above.

Lists of available historic contexts. (2) Orientation materials including slide shows/PowerPoint presentations about types of historic resources. (3) "Good examples" of documents and reports that deal effectively with certain kinds of resources. (4) "Templates" for certain kinds of resources, developed over the years that summarize our understanding of their significance. (5) Group review meetings where available knowledge, past precedents, good examples, etc., are brought to bear on new situations.



## 21. Do you have any recommendations on how to improve the National Register eligibility evaluation process?

There were 67 responses to this last question, many repeating recommendations made in response to previous survey questions. The recommendations can be grouped into the following categories:

- More Funding/More Historic Contexts
- Update/Rewrite Bulletins
- Create Different Standards for Archaeological Sites
- Better Standards
- More Workshops/Training
- Use What We Have Better
- Make Data More Available
- Be More Flexible

### *More Funding/More Historic Contexts*

As with Question 11, the most frequent responses to this last question are more historic contexts of higher quality, increased funding to develop, and update existing contexts.

Every day as I'm reading local histories, looking at very old survey cards, and using every means I can think of to better understand the resources out there, I'm wishing there was more context development to serve as guidance.

The SHPOs and THPOs need more financial resources available for developing historic contexts which can be used by the consultants instead of the consultants having to develop a historic context for every project.

Nationwide context documents would be helpful. FUNDING to write statewide context statements would be great. We haven't had the funding to complete context statements in years.

### *Update/Rewrite Bulletins*

Many comments called for rewriting or updating the National Register Bulletins, particularly *How to Apply the National Register Criteria for Evaluation*<sup>5</sup> and *How to Complete the National Register Registration Form*.<sup>8</sup> Some respondents recommended the development of new guidance in addition to updated existing bulletins: "Bulletins need to be updated. More guidance on the recent past and traditional cultural properties is needed. The TCP bulletin is very vague and difficult to use." And,

Consistency between states would help the public better understand the process is not arbitrary. For god sake its time to rewrite the bulletin. It's jargony, repetitive and at places nonsensical and does not define words like "significant."

One survey respondent commented on the differences between evaluating National Register eligibility pursuant to 36 CFR 800.4, which deals with “consensus” eligibility determinations between a federal agency and the SHPO/THPO, on the one hand, and formal nomination of properties to the National Register on the other.

The focus of the National Register bulletin guidance is on nominating and finding properties eligible, while the reality of Section 106 is that the majority of properties are found ineligible. There could be a better connection between the NR guidance and Section 106 - a subset of guidance on applying it to Section 106.

### *Create Different Standards for Archaeological Sites*

Some survey participants believe that archaeological sites have not received the same attention from the National Register as other historic properties. In addition, the process laid out in National Register bulletins is not applicable to archaeological sites.

I feel that there most definitely needs to be more focus on archaeological sites. The NRHP does not seem to be particularly applicable or be as relevant in the evaluation of archaeological sites.... I am not sure how to improve this other than to set up different standards/guidelines for archaeological sites.

Make a new set of criteria/characteristics that are more applicable to archaeological sites. The seven qualities of integrity really do not apply to most archaeological sites, and provide a very poor framework for evaluation.

### *Better Standards*

Several individuals called for better standards and greater consistency:

Some land-managing agencies should have higher standards for recommendations of site significance. It is one of our industry's most important roles, but untenable significance recommendations are common.

Currently, there is no consistent approach for developing historic contexts. The National Register has three potential levels of significance, national, state, and local. Currently, the NPS establishes national historic contexts for federal properties and National Historic Landmarks, but little else. SHPOs develop varying levels of historic contexts for state and local significance. Certified local governments often develop their own historic contexts for their community that may or may not fit into the contexts established by the SHPO for their state. The result of these greatly differing efforts is a mixed bag of historic contexts that are piecemeal at best in regards to their usefulness and applicability. A unified approach is needed to developing historic contexts and they should be prepared within an organized framework.

There was also a call to improve the qualifications of those making National Register eligibility evaluations:

A historic context is the best way to evaluate a resource. Having consistent standards for evaluation is important. Also having qualified professionals making these calls is important.

Tighten the professional standards to rid the system of unqualified consultants and SHPO staff. This would go a long way to professionalizing the evaluation process. Good contexts are valuable tools, but in the wrong hands they become convenient substitutes for sound evaluation.

### *More Workshops/Training*

Several survey participants recommend increased training as a way to improve the current state of the practice. For example, “National Register staff across the country get no chance to interact and learn from each other. We need workshops on NR evaluation, integrity calls, and other issues.” And,

There needs to be training for SHPO staff by the NPS National Register staff on the evaluation process. Training once every ten or 15 years does not make it. Also, the NPS staff need to get out of Washington D.C. and visit the states and the resources they are evaluating.

We sometimes wish that the NPS offered training sessions for SHPO NR/Survey staffs. We have found, in discussions with other states' SHPO staffs, that there seems to be a wide variety of liberalness vs. conservativeness in what states determine eligible.

We desperately need more and better training programs. By this I don't mean more field schools, we have plenty of those. But more actual CRM training programs staffed by people who have actually done it...

### *Use What We Have Better*

A number of individuals simply recommended the use of existing guidance as a means to improve National Register evaluations.

People need to follow the guidelines already laid out! Too many times I have a consultant say a historic building is NOT ELIGIBLE based on the fact that paint is peeling off of the exterior walls! Follow the guidelines!

If cultural resource consultants would follow NPS guidelines for NR eligibility determinations, this would improve the process by making these determinations more systematic and consistent. Too often these determinations appear to be made according to the whim or opinion of a consultant who does not justify the determination using the NPS guidance on NR eligibility.

### *Make Data More Available*

Again, as seen in Question 11, there are many recommendations for improving the evaluation process through better data sharing.

We must stop the reliance on "corporate knowledge." Funding needs to be established to establish databases of this information that can be searched and cross referenced.

Better data bases at the SHPOs to have research material (contexts) available but most importantly, better survey data bases that are readily accessible about the properties they have inventoried as well as evaluated and said were/were not eligible.

Since SHPOs want good NR evaluations, it should be incumbent upon them to make the wealth of data, analysis, contexts, HSRs, NR listings, CRM reports, mitigation products, etc. more organized, accessible, and available to consultants or whoever is charged with an NR evaluation.

### *Be More Flexible*

Several survey participants argued for greater flexibility in how eligibility decisions are made.

Contexts are good, when done well. BUT, contexts are also expensive to produce. Thus, I think it's worth considering a middle ground, emphasizing to people that you don't have to have some big fat document that says "CONTEXT" on it, but that you can do background research etc. in a reasonable manner and make a reasonable argument.

Work with Federal agencies and SHPOs to establish early on the necessary level of information needed to make determinations relative to the size and effects of the proposed undertaking. Flexibility should focus on outcome rather than standard processes.

### **The Existing Process is Just Fine**

It should be noted that some survey respondents said nothing was wrong with how practitioners currently evaluate National Register eligibility:

Not really. As a contractor you need to realize that all the agencies, and people within these agencies, will have a slightly different take on NRHP eligibility. All in all, I think the benefits of this sometimes exasperating system outweigh a more standardized, one-size-fits-all approach.

There is nothing wrong with the process. The process is fine and it has always been fine.

I think it works great.

## 5 SUMMARY AND CONCLUSIONS

The primary goal of this study is to identify how practitioners actually evaluate National Register eligibility, in the context of transportation projects. This was accomplished through a nationwide survey of historic preservation and transportation professionals. The survey questionnaire was sent to all state DOTs and SHPOs, members of the American Cultural Resource Association (i.e., CRM firms), and a small number of state FHWA division offices. The questionnaire was divided into two parts. The first eleven questions examined the use of historic contexts as a tool for evaluating National Register eligibility. The remaining questions looked at other approaches to National Register evaluations. The survey questionnaire was emailed to 259 prospective participants. Eighty-two percent of the state DOTs, 70% of the SHPOs, and 40% of the CRM contractors responded to the survey. Nine of eleven state FHWA divisions offices also responded to the survey.

### General Observations

#### *Historic Contexts*

The National Park Service, through the office of the National Register, provides national guidance on how to determine if a property qualifies for listing in the National Register. The primary guidance documents are *How to Apply the National Register Criteria for Evaluation*,<sup>5</sup> along with *How to Complete the National Register Registration Form*.<sup>8</sup> Another important document is the *Secretary of the Interior's Standards and Guidelines for Evaluation*, which is referenced in 36 CFR 800.4(c). The latter section of the Section 106 regulation describes how a federal agency is to evaluate the significance (i.e., National Register eligibility) of properties present in the agency's project area.

A critical component of any National Register eligibility evaluation, according to the National Register and the Secretary of the Interior, is the historic context. As noted in *How to Apply the National Register Criteria for Evaluation*, “[t]he significance of a historic property can be judged and explained only when it is evaluated within its historic context.”<sup>5</sup>

The first question in the NCHRP survey questionnaire asked if practitioners use historic context in making decisions about National Register eligibility. Eighty-four percent said yes. When asked if they used other methods besides historic contexts in making decisions about National Register eligibility, an almost equal number of survey participants said yes (82%). Why, then, do historic preservation and transportation professionals follow existing national guidance and also use other approaches to conducting National Register evaluations? The answer is found in the responses to Questions 5, 7, 8, 9 and 10, where survey participants said historic contexts work well in some situations and not so well in others.

Historic contexts are said to work well for engineered features such as bridges, roads and canals; buildings and structures; and historic period archaeological sites. They work less well for prehistoric archaeological sites, cultural/historical landscapes, and traditional cultural properties. In addition, historic contexts work best for evaluating properties under National Register criteria

A and C, less so under criterion B, and poorly under criterion D. Survey participants noted that properties are more easily evaluated when more is known about them, and this is the case for buildings and engineered features. Further, many elements associated with National Register criteria A and C (under which buildings and engineered features are most often evaluated) can be more easily observed, quantified, and defined in a historic context than the elements associated with the other criteria.

The primary reason why practitioners do not use historic contexts is that existing historic contexts are often not applicable to the properties they are evaluating. In these situations, practitioners use other methods for evaluating National Register eligibility. Additional reasons for not using historic contexts are: historic contexts out of date, are of poor quality, and often limited to overviews and syntheses with no specific guidance on how to evaluate properties.

The survey clearly shows that most practitioners do not consider historic contexts to be a useful tool for evaluating archaeological sites. Assessing site integrity is seen as the most important tool in evaluating these properties, and, as a result, historic contexts are viewed as unnecessary. This is most evident in the responses to Question 15. Eighty-eight percent of the survey participants said they “Always” or “Most of the Time” use “a set of physical characteristics that have previously been found to indicate the presence of important information” to evaluate archaeological sites. The responses to Question 5 seem to indicate that these findings do not apply to historic period archaeological sites. Forty percent of the respondents view historic contexts as very useful for evaluating historical archaeological sites, and 34% find them useful. This is not the case for prehistoric sites, where 45% noted that historic contexts are only somewhat useful. Why this difference between these two types of archaeological properties? The answer may lay in how survey participants define the term “historic context.”

As noted in the previous report section, we were concerned that many of survey participants were not using the term “historic context” as originally defined in both National Register guidance and in the *Secretary of the Interior’s Standards and Guidelines for Evaluation*. This concern was validated by the responses to the first eleven questions. Not everyone views historic contexts in the same way as the National Register. This was further supported by the follow-up survey (Appendix B). The majority of those responding to the follow-up survey said they view historic contexts as all of the following:

Historic or prehistoric overviews of a region, state, or are, most often included as a chapter(s) in a cultural resource management report or other Section 106 compliance document.

Formally developed studies of a specific theme, time period and geographic area

Personal research using primary or secondary sources of information on an area’s history or prehistory.

In particular, many survey participants stressed the last item listed above. It seems that the background, archival, and documentary research, conducted as part of CRM projects, is

considered by many to result in a “historic context,” though this clearly does not meet the National Register definition of a historic context.

If some practitioners correlate historic contexts with project-specific background research, it is easy to understand why many survey respondents view historic contexts as very useful for evaluating historical archaeological sites. Historical archaeologists use deeds, tax records, maps, and a wide range of other primary (and secondary) records to understand a historic period archaeological site. Compiling and analyzing these historical sources becomes, then, in the view of some historical archaeologists, a “historic context” for evaluating these sites. This type of research and evaluation process does not occur on most pre-contact archaeological sites.

Why do practitioners use the term “historic context” in such different ways; and, why this divergence from the National Register’s and Secretary of the Interior’s definition of a historic context? Survey comments suggest that some individuals are unaware of or rarely reference existing National Register guidance. If this guidance was used more frequently, there would be less confusion about the content and function of historic contexts. The lack of formal and frequent training in how to conduct National Register evaluations may also be a reason for this confusion. Several survey participants commented on the need for increased training as one way to improve National Register eligibility evaluations.

Many survey respondents discuss the difficulty in developing historic contexts. Agencies and CRM contractors do not have the time, staff, or funding needed to develop these contexts, particularly given the project-focus of most Section 106 compliance. As a result, historic preservation professionals are forgoing the development of historic contexts, and use background research as a proxy “context” for evaluating National Register eligibility of properties found within a project area. In some peoples’ mind, therefore, these background sections of CRM reports have become “historic contexts.”

It seems that SHPOs, state DOTs and CRM firm staff do not follow National Register guidance because of the day-to-day, project-by-project circumstances in which they find themselves. Though the National Register bulletins do not recognize a difference between nominations and “consensus” eligibility determinations (the latter, pursuant to 36 CFR 800.4(c)(2)), individuals within the SHPOs, state DOTs and contracting firms do recognize a difference. As noted by one of the survey respondents:

The focus of the National Register bulletin guidance is on nominating and finding properties eligible, while the reality of Section 106 is that the majority of properties are found ineligible. There could be a better connection between the NR guidance and Section 106 - a subset of guidance on applying it to Section 106.

#### *Alternative Methods to Evaluating National Register Eligibility*

Eighty-two percent of the survey participants use other methods besides historic contexts in making decisions about National Register eligibility. The alternative methods used most frequently, in ranked order, are:

Personal knowledge of an area, time period, property type, etc.

A set of physical features that a property must possess in order to be considered significant

The knowledge of other experts

Interestingly, the response “results of previous National Register eligibility evaluations” was ranked last.

The reasons for using these alternative methods are increased consistency, greater efficiency, and cost effectiveness. As discussed earlier, practitioners do not use these alternative methods to the exclusion of using historic contexts. As one survey participant noted:

The questions above make it sound like you must use either historic contexts or an alternative evaluation process. In reality it is not nearly that cut and dried. We almost always use alternative methods in conjunction with the available historic contexts. In general, the better developed the historic context, the less we rely on alternative methods.

### *Passing on Knowledge to the Next Generation*

A little less than half of the survey participants’ organizations have an established process for transferring knowledge to new staff. The most popular means for transferring knowledge are mentoring, training courses, and written guidance on conducting National Register eligibility evaluations. It should be a concern that over half of these organizations have no formal mechanism to pass on the experience and knowledge of staff that will soon be retiring.

### *The Three Survey Groups: State DOTs, SHPOs and Contractors*

In general, state DOTs, SHPOs and contractors responded to the survey questions in the same manner, with a few minor differences. For example, state DOTs and SHPO view historic contexts as more useful for evaluating properties under criterion C than do the CRM firms. The CRM firms see historic contexts as more useful for evaluating properties under criterion B than do the SHPOs and state DOTs. In addition, state DOTs use previous National Register eligibility evaluations more frequently than do the other two groups. In fact, most SHPOs use previous National Register evaluations infrequently. Further, state DOTs view historic contexts as less valuable than do the SHPOs and contractors because the DOTs see historic contexts as limited to overview and syntheses, with no specific guidance on how to evaluate the eligibility of properties.

The reasons for these differences are not evident based on the results of the survey. We would suggest, however, that these differences may be the result of the different roles each of these organizations play in the Section 106 process, and the nature of their respective staffs and work environments. For example, Contractors may not understand the value of historic contexts for evaluating properties under criterion C. Unlike many SHPOs, CRM firms are generally under the direction of and more fully staffed by archaeologists than by architectural historians or historical architects, so they may have less experience in using this criterion. State DOTs tend to have both



archaeologists and architectural historians on staff. One possibility as to why CRM firms see a more effective linkage between historic contexts and evaluations under criterion B could be the local focus of contractors' work. CRM firms conduct extensive local research and may have a greater knowledge of the actions and importance of local individuals when evaluating associated properties than do the SHPOs and state DOTs.

State DOTs' more frequently use previous National Register eligibility evaluations than do the SHPOs. Could this difference be linked to the size of DOT staff compared to SHPO staff? SHPO staff are generally much smaller than the state DOTs' staff, and have had to do more with less for many years. SHPO staff may not have the time to refer back to and do research on previous National Register evaluations. The SHPOs, therefore, must make rapid evaluation decisions, and make these decisions based on their personal knowledge or the knowledge of other experts in their office. Another possible explanation is that state DOTs desire some consistency in their eligibility evaluations. Consistency in National Register evaluations results in more consistent project outcomes and predictability, two important considerations given project costs and scheduling. These issues are not as important to SHPOs.

Finally, state DOTs tend to not use historic contexts because they view these contexts as limited to overviews and syntheses, with no specific guidance on how to evaluate the eligibility of properties. SHPOs and CRM firms do not consider this as important an issue as the state DOTs. A possible explanation for these differing views is that the state DOT CRM staff have to make clear, justifiable decisions that have real world consequences in terms of both project delivery costs and schedules. The state DOTs, therefore, see historic contexts as being less useful for evaluating the eligibility (particularly for prehistoric archaeological sites) because historic contexts lack the level of specificity that DOT's need to justify their decisions to others in their Departments.

We should reiterate that these explanations are only suggestions. Additional research is needed to more fully explore these and other differences among the practices of state DOTs, SHPOs and CRM contractors.

### **Best Practices**

A secondary goal of this NCHRP study is to identify and/or develop best practices for evaluating National Register eligibility. The survey participants recommended a number of actions and practices for improving the evaluation process. These recommendations are discussed in the next and last section of this report.

## 6 RECOMMENDATIONS

### IMPROVING THE NATIONAL REGISTER EVALUATION PROCESS

The survey participants provided several recommendations on how to increase the use of historic contexts and also to improve their effectiveness:

- Develop more historic contexts and update existing contexts.
- Make existing historic contexts more accessible through the use of the Internet, in addition to making the contexts fully searchable.
- Make historic contexts more explicit. Historic contexts need to contain all of the key components described in National Register and the Secretary of the Interior's guidance. Historic contexts should identify the property types associated with the context. They should include descriptions of the physical characteristics/attributes an archaeological site, historic building, historic engineered feature, etc. must possess in order to be considered representative of one of the historic context's property types. Historic contexts should also include examples of real world properties that would be considered National Register eligible.

In terms of improving the overall National Register evaluation process, survey respondent recommended:

- Updating or rewriting existing National Register guidance. Some survey participants also recommended more guidance on problematic properties such as those dating to the recent past and traditional cultural properties.
- Using existing guidance. Several individuals noted that historic preservation professionals often do not use existing National Register guidance. If practitioners actually used this guidance, there would be a great improvement in eligibility evaluations.
- Developing standards for creating historic contexts. Having such standards would result in greater consistency in National Register evaluations.
- Improving the qualifications of the individuals conducting National Register eligibility evaluations.
- Increasing training opportunities. Some survey respondents called for National Register staff to actively participate in training efforts across the country.
- Creating a separate process for evaluating the National Register eligibility of archaeological sites.

Participants at the 1999 TRB forum on “Assessing Historic Significance for Transportation Programs” made similar recommendations. The most frequent recommendation of the forum’s working groups was the development of more and improved historic contexts. Other recommendations dealt with increased training, improved national guidance, updating existing contexts, and creating a clearing house for searchable historic contexts. The Cultural Resource Working group at the 2002 TRB *Environmental Research Needs in Transportation Conference* recommended “streamlining the evaluation of cultural resources by using historic contexts” as their highest research priority.<sup>1</sup> The actions items for meeting this research need include:

Development of guidance for the preparation and application of historic contexts. The guidance will emphasize what a historic context must accomplish and how it is completed.

Development of a shared national database on historic contexts that can include a shelf list of completed contexts and their location to ensure easy, widespread dissemination of existing and newly generated data.<sup>1</sup>

There already exist two prototype tools which would make historic contexts both more accessible and more explicit. Their use would address some of the recommendations discussed above. Developed as a follow-up to NCHRP Project 8-40, these two prototype tools are discussed in NCHRP Report 542.<sup>9</sup> They are the Historic Property Screening Tool (HPST) and the Electronic Cultural Resource Evaluation Library (ECRL). The latter is a

...web-base tool that includes searchable historic contexts and other documents used in making decisions on National Register eligibility. Development of this tool involved (1) designing a document profile (i.e., index values [metadata] collected for each document), (2) defining acceptable index values and a keyword baseline, and (3) collecting and scanning paper documents and loading the documents into the database. Electronic documents were also placed within the database.<sup>9</sup>

The documents placed within the ECRL included stand-alone historic contexts, National Register multiple property forms, and background and overview sections and chapters from cultural resource management reports on file at a sample of State Historic Preservation Offices and state DOT offices. NCHRP Report 542 includes recommendations and costs for implementing ECRL nationally. It should be noted that the use of ECRL did not extend beyond the life of the NCHRP Project 8-40(2) study, and is currently inactive.

The Historic Property Screening Tool (HPST) makes historic contexts “more explicit.” The HPST

...guides a user through the National Register eligibility evaluation steps, using the evaluation components of a historic context, as defined in *National Register Bulletin 15* [i.e., *How to Apply the National Register Criteria for Evaluation*] and the *Secretary of the Interior’s Standards for Historic Preservation Planning*. The HPST database allows users to select a historic context and the property type most appropriate to the resource being evaluated. The “registration” criteria for the property type (based in part on aspects of integrity) are then used to determine National Register eligibility.<sup>9</sup>

The HPST database is populated with searchable, historic contexts from the ECRL. After selecting the historic context most appropriate for the property being evaluated, the HPST user completes each step in the evaluation process, moving through a series of windows, justifying the decisions made at each step. The HPST is not a simple “check-the-box” type of evaluation, but requires critical thinking and explicit statements on why (or why not) a property is recommend as eligible for the National Register. An important aspect of the HPST is that it electronically captures the National Register evaluation of a property, and this evaluation can be easily located and used in future evaluation efforts. NCHRP Report 542 includes recommendations and costs for implementing HPST nationally. As with the ECRL, the HPST did not extend beyond the life of the NCHRP Project 8-40(2) study, and is currently inactive.

We recommend that these two prototype tools be revisited and re-evaluated, given the results of the current NCHRP survey.

### **KEY RECOMMENDATIONS FOR IMPROVING NATIONAL REGISTER ELIGIBILITY EVALUATIONS**

Both past conferences/forums and the current NCHRP survey resulted in a number of recommendations to improve the National Register evaluation process. Some recommendations have been repeatedly raised through these different venues, and thus have a particular importance in the minds of historic preservation and transportation professionals. These key recommendations are discussed below.

#### **Developing Historic Contexts on Problematic Properties**

As one survey participant noted,

In our experience, historic contexts work best (meaning both effective and efficient) in two situations: when dealing with poorly understood resources, and when dealing with clearly defined resources with limited variations in terms of their type or physical features. For common or well-understood historic properties, historic contexts are "useful" but generally more trouble to develop than they are worth on a day-to-day basis.

There are a huge number of potential historic contexts that could be developed. As noted in the above comment and in many of the responses to the survey questionnaire, developing all of these possible historic contexts is not very productive. Focusing on critical, problematic properties would be a much more effective use of limited staff, money, time, and resources. As recommended in the 1999 national forum, agencies need to prioritize the development of historic contexts. During the 2002 TRB research needs conference, the Cultural Resource Working Group recommended focusing on problematic properties commonly encountered in transportation projects, such as post-World War II subdivisions, lithic scatters, roads and railroads, and standard design houses. The working group noted that use of historic contexts eliminates inconsistency and confusion over National Register eligibility and expedites environmental review and scoping processes. Historic contexts identify what is eligible while eliminating consideration of the great number of resources that are not eligible.<sup>1</sup>

Creation of these historic contexts needs to be a cooperative effort among state DOTs, SHPOs, CRM firms, and historic preservation groups, in addition to the interested public. In this way, the resulting historic contexts will hopefully represent a common and agreed upon understanding of what constitutes an eligible property and what does not. These contexts can be developed at any level: national, state, or local. The scale would need to be appropriate to the type of property being considered.

These historic contexts should focus on properties that can be evaluated under National Register criteria A and C, and would include properties such as buildings, structures, bridges, roads, canals, etc. The NCHRP survey showed that historic contexts are not considered useful in evaluating other types of properties nor for evaluating properties under other National Register criteria.

To be of value, these historic contexts need to be explicit in terms of how to evaluate a property, and should follow National Register and the Secretary of the Interior's guidance. It may also be necessary to have the individuals developing the historic contexts take a refresher course on how to evaluate National Register eligibility. As a companion to this training, it may be necessary to develop additional guidance on creating historic contexts, as recommended by the Cultural Resource Working Group at the 2002 TRB research needs conference and by several of the current NCHRP survey participants.

### **Recognizing a Different Process for Nominations and “Consensus” Eligibility Determinations**

As noted previously, National Register bulletins do not recognize a difference between nominations and “consensus” eligibility determinations. SHPOs, state DOTs and contracting firms, however, do recognize a difference. This is especially the case for archaeological sites, which is discussed further below. There needs to be a way to formally recognize the project-specific focus of Section 106 compliance, and that this focus is not compatible with many aspects of current National Register guidance. In particular, this focus restricts the ability of historic preservation and transportation professionals to develop anything close to an actual historic context.

We recommend that National Register staff, and historic and transportation professionals work together to formally recognize and identify a separate eligibility evaluation process for Section 106 compliance efforts. A first step is to have a working conference. It has been almost eight years since the 1999 forum, and clearly the same issues and concerns voiced at the 1999 forum are still with us today. Participants in this new working conference should include representatives from all of the key players in transportation-related Section 106 compliance: the Advisory Council on Historic Preservation, SHPOs, FHWA, state DOTs, and CRM firms. The National Register also has a key role in this effort. As the issues discussed at this conference are not unique to transportation projects, it might be appropriate to have representatives from other federal agencies. Other participants should include the National Trust for Historic Preservation and other groups representing national historic preservation interests.

## **Creating a Separate Approach to Evaluating Archaeological Sites**

The responses to the survey questionnaire clearly show that archaeologists focus on a set of evaluation criteria that do not follow National Register guidance. In fact, several survey participants stated that the guidance provided by the National Register bulletins is not applicable to archaeological sites. In addition, how archaeologists evaluate these sites is different from how other historic preservation professionals evaluate other types of properties.

Along with the need to recognize the difference between nominations and “consensus” eligibility determinations, there is a need to formally recognize a different evaluation process for archaeological sites. The reasons are as follows. First, as noted above, it is difficult to follow current National Register guidance in the context of project-specific Section 106 compliance, which is how most archaeological investigations are conducted. Secondly, there are few usable historic contexts that address archaeological properties. Thirdly, compared to buildings and engineered features, archaeological sites are much more difficult to understand, and more difficult to observe, quantify, and define. As a result, using historic contexts as a framework to evaluate archaeological sites is difficult, at best.

We recommend that the working conference discussed above also strive to create an appropriate process for evaluating the National Register eligibility of archaeological sites. It will be important, therefore, to have representation for key archaeological organizations at this conference, including representatives from the Society for American Archaeology and the Society for Historical Archaeology.

## **Traditional Cultural Properties and Tribes**

Issues associated with traditional cultural properties, which do include archaeological sites, are unique. As one survey participant noted,

I think TCP's are not easily amenable to context statements, as significance will be often be determined on the basis of unique values held by local and tribal groups, not professional evaluators.

In addition, consultation about traditional cultural properties involves a unique government-to-government process. Further, consultation about properties of religious and cultural significance to tribes cannot (and should not) be standardized. Given these factors, we will leave it up to the working conference organizers as to whether or not there will be discussions focusing on traditional cultural properties. If such discussions do not take place, it would still be important for conference participants to recognize that archaeological sites can be properties of religious and cultural significance to tribes. Any consideration of alternative approaches to evaluating the National Register eligibility of archaeological sites needs to take this into account; therefore, conference attendees should include representation from the National Association of Tribal Historic Preservation Officers and federally-recognized tribes.

## REFERENCES

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<http://environment.fhwa.dot.gov/projdev/4fpolicy.asp>
4. 36 CFR Part 800 - Protection of Historic Properties  
<http://www.achp.gov/regs-revo4.pdf>
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## **APPENDIX A: SURVEY QUESTIONNAIRES**

### **Purpose of Survey**

The purpose of this survey is to answer the following questions:

- What methods and tools are being used to evaluate National Register eligibility?
- If historic contexts are used, what aspects of historic contexts are most useful in evaluating National Register eligibility?
- If historic contexts are generally not used, why?

### **Goals**

The answers to these questions will be used to:

- Identify a set of best practices for conducting National Register eligibility evaluations,
- Develop recommendations on how to improve National Register eligibility evaluations and the Section 106 process
- Find out how agencies and the private sector are transferring knowledge about the eligibility evaluation process to new staff, particularly with the looming retirement of preservation professionals.
- Prepare and distribute nationwide a report on the study's findings.

### **Defining Historic Contexts**

Before completing the survey questionnaire, please read and consider the following definition of a historic context:

National Register Bulletin 15 states that “[to] qualify for the National Register, a property must be significant; that is, it must represent a significant part of the history, architecture, archeology, engineering, or culture of an area, and it must have the characteristics that make it a good representative of properties associated with that aspect of the past ... The significance of a historic property can be judged and explained only when it is evaluated within its historic context.”

Historic contexts are organized around a specific theme(s), geographical limit, and chronological period “that provide a perspective from which to evaluate a property’s significance.”

### **Survey Instructions**

- Questions marked with an asterisk (\*) require an answer in order for you to proceed with the survey.
- You must click "NEXT" after answering each question to proceed with the survey.
- For some questions, when you click "NEXT" you will be routed to another question based on your response.



## Using Historic Contexts

**1. Do you use historic contexts in making decisions about National Register eligibility? If you answer no, you will be routed to question 13.**

Yes

No

## What Makes Historic Contexts Useful?

**2. Please indicate how useful are the following historic context elements in evaluating eligibility.**

	Very Useful	Useful	Somewhat Useful	Not Useful
The overviews/syntheses illustrating the historic context's theme, time period, and geographic area				
The listing of property types associated with the historic context's theme, time period, and geographic area				
The listing of the physical features a property must possess in order for it to reflect the significance of the historic context, and thus be eligible for listing in the National Register				

**3. Please list any additional historic context elements that you find useful in making eligibility evaluations.**

## Historic Contexts and Property Types

**4. Do you find that historic contexts work better for evaluating some types of properties as opposed to other types of properties? If you answer no, you will be routed to question 8.**

Yes

No

## Using Historic Contexts for Evaluating Eligibility of Different Property Types

**5. Please indicate how useful historic contexts are in evaluating the eligibility of each property type listed below.**

	Very Useful	Useful	Somewhat Useful	Not Useful
Historic archaeological sites				
Prehistoric archaeological sites				
Buildings/structures				
Engineered features (e.g., bridges, roads, canals, etc.)				
Cultural/historical landscapes				
Traditional cultural properties				

**6. Please list any additional property types for which historic context are useful in evaluating eligibility.**

**7. Based upon your experience, please comment on why you think historic contexts work better for evaluating some types of properties as opposed to other types of properties.**

**Historic Contexts and National Register Criteria**

**8. Do you find that historic contexts work better for evaluating properties under some National Register criteria as opposed to other criteria? If you answer no, you will be routed to question 11.**

- Yes
- No

**Using Historic Contexts for Evaluating Eligibility Under Different National Register Criteria**

**9. Please indicate how useful historic contexts are for evaluating eligibility under the following National Register criteria.**

	Very Useful	Useful	Somewhat Useful	Not Useful
Criterion A				
Criterion B				
Criterion C				
Criterion D				

**10. Based on your experience, please comment on why historic contexts work better for evaluating properties under some National Register criteria as opposed to other criteria.**

## Improving Historic Contexts

**11. How can historic contexts be improved to make them more useful for evaluating National Register eligibility?**

## Using Alternatives Methods for Evaluating Eligibility

**12. Do you use other methods besides historic contexts in making decisions about National Register eligibility? If you answer no, you will be routed to question 21.**

Yes

No

## Using Alternatives to Historic Contexts

**13. Please indicate how important the following factors are in your decision not to use historic contexts.**

	Very Important	Important	Somewhat Important	Not Important
There are no historic contexts that apply to the properties you normally have to evaluate				
The historic contexts are not readily available				
The historic contexts are out of date				
The historic contexts are of poor quality				
The historic contexts are too difficult to use				
The historic contexts are limited to overviews and syntheses, with no specific guidance on how to evaluate the eligibility of properties associated with the historic context's theme, time period or geographic area				

**14. Please discuss any additional reasons why you do not use historic contexts.**

**15. Please indicate how often you use the following alternative methods for evaluating eligibility.**

	Always	Most of the Time	Sometimes	Never
Your personal knowledge of an area, time period, property type, etc.				
The personal knowledge of other experts on an area, time period, property type, etc.				
The results of previous National Register eligibility evaluations				
A set of physical features that a property must possess in order to be considered significant				
For archaeological sites, a set of physical characteristics that have previously been found to indicate the presence of important information				

**16. In making eligibility evaluations, do you use any methods not listed in Question 15? If so, please list these additional methods below.**

**17. If you use one or more alternative methods for making eligibility evaluations, please indicate how important the following reasons are in your decision to use that method.**

	Very Important	Important	Somewhat Important	Not Important
It facilitates eligibility evaluations – is quick and easy				
It results in consistent evaluations				
It is the most cost effective				
It is the only method that works				
It is the only method that is available for me to use				

**18. Please list any additional reasons why you use alternative methods for making eligibility evaluations.**

**19. Within your organization, do you have an established process for transferring knowledge about the methods you use to new staff?**

**20. If your answer to question 19 is yes, briefly describe your process for transferring knowledge to new staff.**

**Recommendations for Improving the Evaluation Process**

**21. Do you have any recommendations on how to improve the National Register eligibility evaluation process?**

## FOLLOW-UP SURVEY QUESTIONNAIRE

### Follow-up Question

**1. You indicated that you use historic contexts to make decisions about National Register eligibility. Which of the following matches your understanding of the term “historic context”?**

Historic or prehistoric overviews or syntheses of a region, state or area, most often included as a chapter(s) in a cultural resource management report or other Section 106 compliance document.

Formally developed studies of a specific theme, time period and geographic area, e.g. Post Offices in Arizona, 1900-1941.

Personal research using primary or secondary sources of information on an area’s history or prehistory.

Other (please describe)

## **APPENDIX B: SURVEY PARTICIPANTS BY ORGANIZATION**

### **DEPARTMENTS OF TRANSPORTATION**

Alabama Department of Transportation  
 Alaska Department of Transportation  
 Arkansas Highway and Transportation  
 Department  
 California Department of Transportation  
 Delaware Department of Transportation  
 Georgia Department of Transportation  
 Idaho Department of Transportaiton  
 Illinois Department of Transportation  
 Indiana Department of Transportation  
 Iowa Department of Transportation  
 Kansas Department of Transportation  
 Kentucky Department of  
 Transportation  
 Louisiana Department of Transportation and  
 Development  
 Maine Department of Transportation  
 Maryland Department of Transportation  
 Michigan Department of Transportation  
 Massachusetts Department of Transportation

Minnesota Department of Transportation  
 Mississippi Dept. of Transportation  
 Missouri Department of Transportation  
 Montana Department of Transportation  
 New Jersey Department of Transportation  
 New York Department of Transportation  
 Ohio Department of Transportation  
 Oregon Department of Transportation  
 Pennsylvania Department of Transportation  
 Rhode Island Department of Transportation  
 South Carolina Department of  
 Transportation  
 Tennessee Department of Transportation  
 Texas Department of Transportation  
 Utah Department of Transportaiton  
 Virginia Department of Transportation  
 Washington Department of Transportation  
 West Virginia Department of Transportation  
 Wyoming Department of Transportation

### **STATE HISTORIC PRESERVATION OFFICES**

Alabama Historical Commission  
 Alaska Department of Natural Resources,  
 Office of History & Archaeology  
 Arkansas - Department of Arkansas  
 Heritage  
 California Office of Historic Preservation  
 Connecticut Commission on Culture and  
 Tourism, Historic Preservation and Museum  
 Division  
 Delaware Division of Historical and  
 Cultural Affairs  
 Georgia Historic Preservation Division,  
 Department of Natural Resources

Federated States of Micronesia  
 Hawaii State Historic Preservation Office  
 Iowa – State Historical Society of Iowa  
 Idaho State Historical Society  
 Kansas State Historical Society  
 Kentucky Heritage Council  
 Louisiana Department of Culture,  
 Recreation & Tourism  
 Maryland Historical Trust  
 Massachusetts Historical Commission  
 Michigan Historical Center

Mississippi Department of Archives & History  
 Montana State Historic Preservation Office  
 Nevada State Historic Preservation Office  
 New Mexico Historic Preservation Division  
 New York State Parks, Recreation & Historic Preservation  
 North Dakota - State Historical Society of North Dakota  
 Ohio Historic Preservation Office  
 Oklahoma State Historic Preservation Office  
 Oregon Parks & Recreation Department

Pennsylvania Historical and Museum Commission  
 Puerto Rico - State Historic Preservation Office  
 Rhode Island Historic Preservation & Heritage Commission  
 South Carolina Department of Archives & History  
 Texas Historical Commission  
 Utah - Department of Community & Culture  
 Virginia Department of Historic Resources  
 Washington - Office of Archeology & Historic Preservation

## CRM CONTRACTORS

Aeo Screens Ltd  
 AF Consultants  
 Alexander Archaeological Consultants  
 Alpine Archaeological Consultants Inc.  
 Applied Archaeology & History Associates Inc.  
 Archaeological Services Inc.  
 ASC Group Inc.  
 Bland & Associates Inc.  
 CCRG Inc.  
 Circa Inc.  
 Coastal Carolina Research Inc.  
 CSA Group, Inc.  
 Cultural Resource Consulting Group  
 Cultural Resource Management Services  
 Earth Search Inc.  
 GAI Consultants Inc.  
 Gray & Pape Inc.  
 Hartgen Archaeological Associates Inc.  
 Heberling Associates Inc.  
 Heritage Research Associates Inc.  
 Horizon Research Consultants Inc.  
 HRA Inc. Conservation Archaeology  
 InteResources Planning

Joan H. Geismar Ph.D. LLC.  
 John Milner Associates Inc.  
 Legacy 106 Inc.  
 Legacy Consulting Services  
 LSA Associates Inc.  
 Mead & Hunt Inc.  
 Metcalf Archaeological Consultants Inc.  
 Metis Cultural Resource Consultants  
 MRS Consultants LLC  
 New South Associates Inc.  
 Northwest Archaeological Associates Inc.  
 Prewitt and Associates Inc.  
 Public Archaeology Laboratory, Inc.  
 Richard Grubb & Associates  
 Rivanna Archaeological Services LLC  
 S&ME, Inc.  
 SITE, Inc.  
 Soil Systems Inc.  
 Southern Research Historic Preservation Consultants Inc.  
 Statistical Research Inc.  
 The 106 Group Ltd.  
 The Louis Berger Group Inc.  
 TRC Garrow Associates, Inc.  
 Trish Fernandez - Consultant  
 William Self Associates Inc.



**FHWA OFFICES (STATE DIVISION OFFICES, FEDERAL LANDS, AND RESOURCE CENTERS)\***

Colorado  
District of Columbia  
Georgia  
Illinois  
Maryland  
New York

Oklahoma  
Oregon  
Pennsylvania  
Texas  
Washington State

\* Nine of the eleven offices responded to the survey. To keep the responding individuals anonymous, the specific offices responding to the survey are not reported.