

2024 CDBG Section 106 Training



Robert Jonet
Environmental & Historic
Preservation Specialist
Robert.Jonet@IowaEDA.com

National Historic Preservation Act (NHPA)

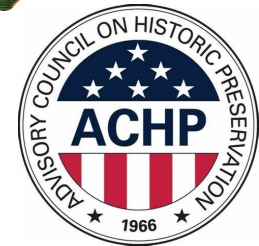
» Comprehensive preservation law passed in 1966

» The law established:

- **State Historic Preservation Offices (SHPOs)**
- **Tribal Historic Preservation Offices (THPOs)**
- **Advisory Council on Historic Preservation (ACHP)**
 - Federal agency that oversees all other agencies' compliance with the NHPA
- **Certification of Local Governments**
 - Allowing local governments to create local preservation commissions
- **National Register of Historic Places**
 - Repository of information on significant resources
 - The National Park Service (NPS) oversees many historic preservation requirements, including the National Register of Historic Places (NRHP)
- **Section 106 (36 CFR Part 800)**
 - Process all federal undertakings (including CDBG and CDBG-DR projects) must follow to consider the effect of the project on cultural resources
 - “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 effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register.*”



**STATE HISTORIC
PRESERVATION
OFFICE OF IOWA**
IOWA DEPARTMENT OF CULTURAL AFFAIRS



Section 106 Process

» Four-Point Approach

1. Initiate Section 106 Review Process

- Determine if the undertaking has the potential to affect cultural resources

2. Identify and Evaluate Historic Properties

- Identify the Area of Potential Effects (APE) – the area in which the undertaking has the potential to directly or indirectly affect any historical and/or archaeological resources
- Identify and evaluate resources within the APE to determine if they are listed on or eligible for listing on the National Register of Historic Places (NRHP)

3. Assess Effects

- In consultation with interested parties, determine how the project will affect any eligible or listed resources: No Historic Properties Affected, No Adverse Effect, or Adverse Effect

4. Resolve Adverse Effects

- If the project will result in an Adverse Effect, draft a Memorandum of Agreement (MOA), which outlines agreed-upon measures that will be taken to avoid, minimize, or mitigate the Adverse Effect resulting from the undertaking

Section 106 Process

» Four-Point Approach

1. Initiate Section 106 Review Process

- **Determine if the undertaking has the potential to affect cultural resources**

2. Identify and Evaluate Historic Properties

- Identify the Area of Potential Effects (APE) – the area in which the undertaking has the potential to directly or indirectly affect any historical and/or archaeological resources
- Identify and evaluate resources within the APE to determine if they are listed on or eligible for listing on the National Register of Historic Places (NRHP)

3. Assess Effects

- In consultation with interested parties, determine how the project will affect any eligible or listed resources: No Historic Properties Affected, No Adverse Effect, or Adverse Effect

4. Resolve Adverse Effects

- If the project will result in an Adverse Effect, draft a Memorandum of Agreement (MOA), which outlines agreed-upon measures that will be taken to avoid, minimize, or mitigate the Adverse Effect resulting from the undertaking

» Initiating the Section 106 Review Process

- » Does the project have the potential to affect cultural resources?
 - » IEDA has a Programmatic Agreement (PA) with SHPO in place to streamline the Section 106 process for CDBG projects
 - » Projects that are limited to the **Excluded Activities** listed in the PA have No Potential to Cause Effects to cultural resources
 - » Consider the entire project – undertakings cannot be segmented into excluded activities and non-excluded activities
 - » Either the entire project is excluded, or the entire project is not excluded
 - » Is the entire project covered under the PA Excluded Activities?
 - » Yes → the project is exempt from full Section 106 review
 - » No → the project has the potential to affect historic resources and must go through full Section 106 review



Step 1 – Initiate Section 106

» Programmatic Agreement (PA)

» Valid for **all** current and future CDBG-funded projects administered by IEDA

» *Except 2008 Disaster Awarded Projects which will continue to comply with the 2008 Disaster PA*

» Outlines roles and responsibilities for all parties involved in Section 106

» Allows IEDA to have on-site, qualified staff to review and approve Section 106 documentation

» This enables IEDA to collect, review, and process the Section 106 reviews in-house in lieu of SHPO

» Includes a list of Excluded activities that are exempt from full Section 106 review

» Appendix B

» https://www.iowaeda.com/UserDocs/2021-pa-amendment-and-2016-pa_final-signed_08.2021.pdf

PROGRAMMATIC AGREEMENT AMONG
THE IOWA ECONOMIC DEVELOPMENT AUTHORITY,
THE IOWA STATE HISTORIC PRESERVATION OFFICER, AND
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION REGARDING
RESPONSIBILITIES DELEGATED UNDER 24 CFR § 58

WHEREAS, the U.S. Department of Housing and Urban Development (hereinafter, HUD) allocates funds to the Iowa Economic Development Authority (hereinafter, IEDA) through various programs including the annual Community Development Block Grant Program (hereinafter, CDBG), authorized by Title I of the Housing and Community Development Act of 1974, in accordance with Section 104(g) (42 U.S.C. 5304(g)) and the allocation of future CDBG Disaster funds, should such funding be made available to the State of Iowa; and,

WHEREAS, Section 106 of the National Historic Preservation Act of 1966, as amended (U.S.C. §300101 *et seq.*, hereinafter, NHPA), requires federal agencies to take into account the effect of their undertakings on historic properties and to afford the Advisory Council on Historic Preservation (hereinafter, ACHP) a reasonable opportunity to comment on such undertakings; and,

WHEREAS, pursuant to 24 CFR § 58.2(7), the Responsible Entity (hereafter, RE) is defined as the recipient or grantee of CDBG funds provided by HUD for the implementation of an eligible program activity; and,

WHEREAS, pursuant to 24 CFR § 58.5, the RE must assume responsibilities for environmental review, decision-making, and action that would apply to HUD under Section 106 of the NHPA and its implementing regulations at 36 CFR § 800; and,

WHEREAS, the IEDA has consulted with the Iowa State Historic Preservation Officer (hereinafter, SHPO) and the ACHP and has determined that certain CDBG actions have the potential to cause effects to historic properties while others do not; and,

WHEREAS, given the breadth and number of Iowa's non-entitlement community funding recipients and the need for timely and efficient delivery of governmental assistance, the IEDA, SHPO, and ACHP have agreed that the Section 106 process for undertakings where the RE must assume HUD environmental review, decision-making, and action that would apply to HUD under Section 106 of the NHPA and its implementing regulations at 36 CFR § 800; and,

WHEREAS, the IEDA, SHPO, and ACHP have agreed that the Section 106 process for undertakings where the RE must assume HUD environmental review, decision-making, and action that would apply to HUD under Section 106 of the NHPA and its implementing regulations at 36 CFR § 800; and,

SIGNATORIES

Iowa Economic Development Authority
By: [Signature] Date: 8-1-16
Pam Waddell, Division Administrator

State Historic Preservation Officer
By: [Signature] Date: 01 AUG 2016
Steve King, Deputy State Historic Preservation Officer

Advisory Council on Historic Preservation
By: [Signature] Date: 8/23/16
John M. Fowler, Executive Director

CONCURRING PARTIES

Office of the State Archaeologist
By: [Signature] Date: 7/29/16
John Doernick, State Archaeologist

Preservation Iowa
By: [Signature] Date: 7/27/16
Caleb Giesel, Executive Director

» PA – Programmatically Excluded Activities

- » **Section 1: Admin Costs, Non-Brick-and-Mortar Financial Assistance**
- » **Section 2: Undertakings Involving Ground Disturbance**
 - » Non-Specific Activities:
 - » The APE was intensively surveyed after 1999 for Section 106 review and had no NRHP-listed, eligible, or unevaluated archaeological sites, and this finding was accepted by SHPO
 - » The entire three-dimensional area has been profoundly disturbed
 - » Specific Excluded Activities as listed in PA
- » **Section 3: Undertakings Involving Architectural/Historical Resources**
 - » Non-Specific Activities:
 - » Resources are under 50 years of age and do not have exceptional significance
 - » Evaluated in the past 5 years and determined not eligible
 - » Specific Excluded Activities as listed in PA
- » **Note:** If the project APE includes locations where there will be ground disturbance and architectural/historical resources, then the project will need to meet both Sections 2 and 3 to be PA Exempt.

Step 1 – Initiate Section 106

» PA – Excluded From Review

Appendix B (continued) Programmatically Excluded Activities

Excluded from Review, Project Determination Form

After referencing Appendix B of the Programmatic Agreement (PA) to verify that the project activity does not need further review, use this form to document compliance with the Section 106 of the NHPA. This form will be submitted to IEDA either with your Request for Release of Funds (RROF) or individually per building as applicable.

As an example, here are the steps you would take:

- Start Environmental Review
- See if the project is exempt from further review by referencing Appendix B of the PA..
- If the project activity meets either the Qualifying Criteria or the Specific Excluded Activities, fill out this form and include it in your environmental review record or upload it to iowagrants.gov as applicable.
- Use the "When to Consult with Tribes Under Section 106" included in the PA to determine if Tribal consultation is required. If so, mail letters to tribes; you must still do this even if your project activity meets and exemption under this PA.
- Complete the rest of the Environmental Review
- Publish Notice
- Submit the Request for Release of Funds: attach a copy of the notice and the *Exempt from Review, Project Determination Form*.

NOTE: You must still solicit comment about the project from the Native American Tribes even if your project activity is exempt from further review.

Recipient Name: [REDACTED] Contract Number: [REDACTED]
Recipient Address: [REDACTED]

For information on this request, contact:
Contact Name: [REDACTED] Contact Phone Number: [REDACTED]

Project Description (provide a brief description of the actual scope of work not just "housing rehab")
[REDACTED]

Project Address (Street, City, Zip): [REDACTED] **Project County:** [REDACTED]

Reason Project Activity is Excluded from Review (use Appendix B of the PA):
Section 1, 2 or 3:
Qualifying Criteria a. or b.:
OR
Specific Excluded Activity (include which specific activity):
Notes:
(include date of construction)

Pictures: Take a before picture of the primary façade of any buildings directly impacted by project activities. Attach them to this form.

Applicant Certification:
As the duly designated certifying official of the recipient, I also certify that: I am authorized to and do consent to assume the status of responsible federal official under the National Environmental Policy Act of 1969 and each provision of law designated in the 24 CFR 58.

[REDACTED]
Signature of the Certifying Officer of Applicant, Date

[REDACTED]
Print Name and Title of Certifying Officer of Applicant

Provide more information than just "rehab" – state something like "replace wood double hung windows with vinyl windows, install new vinyl siding, replace asphalt roof with metal roof, replace furnace," etc...

Be sure that the property address that you put on the form matches the address you will use on a draw. Don't put Lot #8 on this form, and then 101 Stream Lane on the draw. IEDA needs to be able to match these documents.

Cite the actual section of PA that makes the project exempt.

If property is less than 50 years old, state: "PA Appendix B Section 3. a. – less than 50. Building built in 1976."

If the area has been previously surveyed for archaeology, state: "PA Section 2.a., APE previously surveyed in 2013, and SHPO concurred with No Historic Properties Affected."

Attach photos and/or supporting documentation to help show why the project is PA Exempt

Include a date with signature so we can record when the evaluation occurred

Step 1 – Initiate Section 106

» PA – Excluded From Review

» If the project is PA Exempt:

- » Complete and sign the Excluded From Review Form (in Appendix B of PA)
- » Start a Section 106/Tier II compliance form in IowaGrants.gov
- » Read instructions and complete all relevant fields
- » Select “Yes” for “PA Exempt” and fill out the “Exempt Date Signed” and “PA Exemption”
- » Upload Excluded From Review Form with supporting documentation under “Exempt Form”
- » Submit form through IowaGrants.gov
- » IEDA HPS has 30 days to review and provide comments or approve

Programmatic Agreement
This section should only be completed after the Programmatic Agreement with SHPO has been signed.

PA Exempt ☒ Yes

If this project IS PA Exempt, provide exempt date signed and PA Finding

Exempt Date Signed **Section 3. a.**

Exempt Date Signed PA Exception

Exempt Form

- » If the project is **not** PA Exempt, it will need to go through full Section 106 review – continue with Step 2: Identify and Evaluate.

Section 106 Process

» Four-Point Approach

1. Initiate Section 106 Review Process

- Determine if the undertaking has the potential to affect cultural resources

2. Identify and Evaluate Historic Properties

- **Identify the Area of Potential Effects (APE) – the area in which the undertaking has the potential to directly or indirectly affect any historical and/or archaeological resources**
- **Identify and evaluate resources within the APE to determine if they are listed on or eligible for listing on the National Register of Historic Places (NRHP)**

3. Assess Effects

- In consultation with interested parties, determine how the project will affect any eligible or listed resources: No Historic Properties Affected, No Adverse Effect, or Adverse Effect

4. Resolve Adverse Effects

- If the project will result in an Adverse Effect, draft a Memorandum of Agreement (MOA), which outlines agreed-upon measures that will be taken to avoid, minimize, or mitigate the Adverse Effect resulting from the undertaking

Step 2 – Id. and Eval. Historic Properties

» Identification

» What are historic properties?

- » Resources that are listed in or eligible for listing in the National Register of Historic Places (NRHP), including:
 - » Buildings
 - » Districts
 - » Structures
 - » Objects
 - » Cultural landscapes
 - » Sites (including archaeological sites)

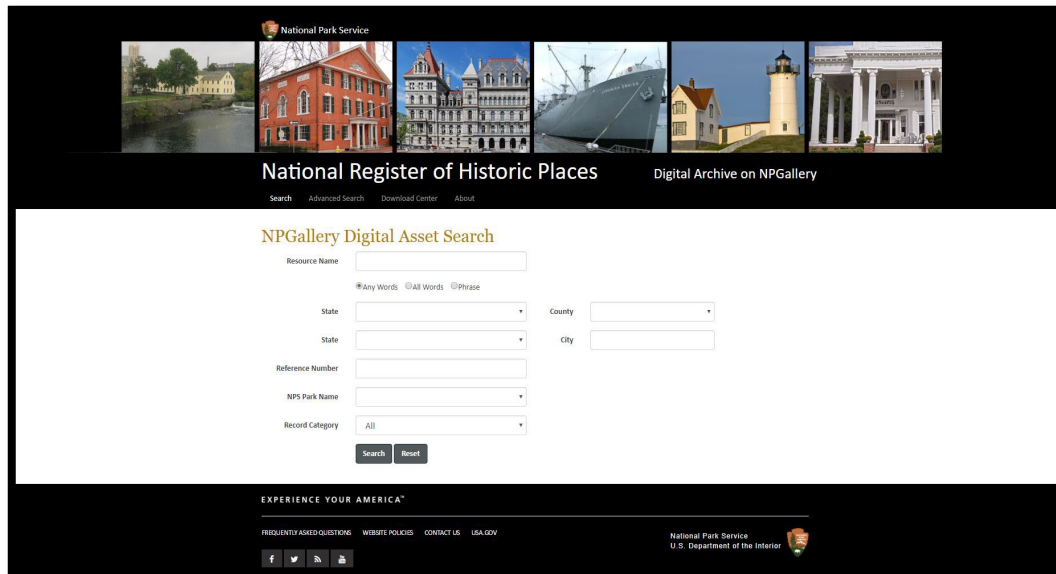


Step 2 – Id. and Eval. Historic Properties

» Identification

» Steps to identify historic properties:

- » Develop an **Area of Potential Effects (APE)** and see what resources are within
- » Identify **previously evaluated** properties from the State Inventory in the APE
- » Identify **National Register of Historic Places (NRHP)-listed** properties in the APE
- » Identify all other **unevaluated** resources in the APE
- » **Evaluate** to determine if resources are eligible for the National Register



The screenshot displays the NPGallery Digital Asset Search interface. At the top, there is a banner with the National Park Service logo and a row of six images: a river scene, a red brick building, a large historic house, a ship, a lighthouse, and a classical building. Below the banner, the text "National Register of Historic Places" and "Digital Archive on NPGallery" is visible. The main search area is titled "NPGallery Digital Asset Search" and contains several input fields: "Resource Name", "State" (with a dropdown menu), "County" (with a dropdown menu), "Reference Number", "NPS Park Name" (with a dropdown menu), and "Record Category" (with a dropdown menu). There are also radio buttons for "Any Words", "All Words", and "Phrase". At the bottom of the search area are "Search" and "Reset" buttons. The footer includes the text "EXPERIENCE YOUR AMERICA™", links for "FREQUENTLY ASKED QUESTIONS", "WEBSITE POLICIES", "CONTACT US", and "USA.GOV", and the National Park Service logo.

» Area of Potential Effects (APE)

» What is an APE?

» *...the geographic area or areas within which an undertaking may directly or indirectly cause alteration in the character or use of historic properties, if any such properties exists. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by undertakings. (36CFR800.16(d))*

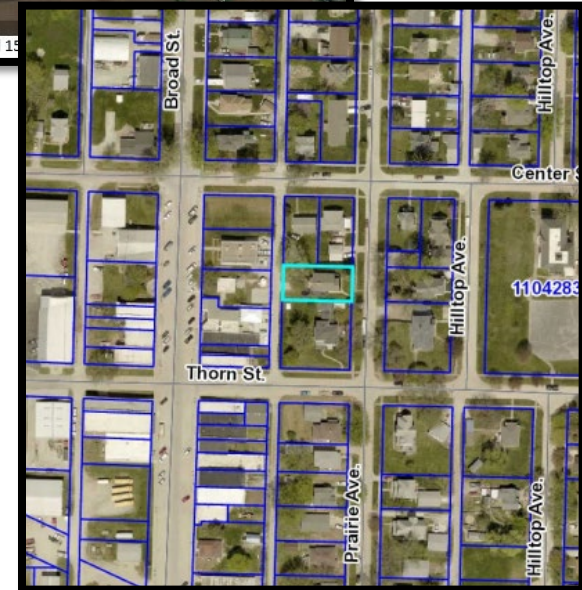
- » All projects **must** have a defined APE that is unique to the project.
- » The Responsible Entity (RE) will determine the APE based on the nature of the undertaking.
 - » The APE will not necessarily be limited to the resource receiving federal funds and may also encompass adjacent properties depending on what the potential effects of the project are.

Step 2 – Id. and Eval. Historic Properties

» Area of Potential Effects (APE)

» How to determine the project APE:

- » Consider the entire project, not just what the CDBG funds will be used for.
- » Consider all possible effects of your project:
 - » Direct – physical changes
 - » Indirect – viewshed, setting, etc.
 - » Immediate – occur at the time of the undertaking
 - » Further Removed in Time – activities that take place because of the undertaking but may take weeks, months, or years to occur
- » Once the project APE has been delineated, consider **all** resources in the APE as you move forward with the identification and evaluation of historic properties.



Step 2 – Id. and Eval. Historic Properties

» Identify Evaluated, Listed, and Unevaluated Resources

- » Identify **previously evaluated** (listed and unlisted) resources in the APE:
 - » Check the State of Iowa Inventory by contacting the inventory coordinator Berry Bennett at 515-281-8742 or Berry.Bennett@iowa.gov
- » Identify **NRHP-listed** resources in the APE:
 - » Check the NRHP Database for copies of National Register Nominations: <https://npgallery.nps.gov/nrhp>
- » Identify **unevaluated** potential historic properties in the APE:
 - » Is the property over 50 years old or of exceptional significance? – if yes, complete an ISIF and continue with evaluation

Storm Lake			
11-00310 - Buena Vista Memorial Park Cemetery .5 miles NW of Storm Lake SHPO - 2012	Not Evaluated	11-00228 - Karstens House 718 Cayuga St SHPO - 2004	Not Eligible
11-00112 - Chicago, Milwaukee, St. Paul and Pacific Railroad moved west of town SHPO - 1978 NPS - 1978	Opinion of Eligibility Determination of Eligibility	11-00298 - Huss House 611 College St SHPO - 2013	Not Eligible
11-00115 - House 220 E 10th St SHPO - 1987 Agency - 1987	Not Eligible Not Eligible	11-00290 - Villa House 712 College St SHPO - 2011	Not Eligible
11-00113 - Storm Lake Public Library 200 E 5th St SE corner of E 5th and Erie Streets Consultant - 1980 SNRG - 1981 NPS - 1983	Opinion of Eligibility Opinion of Eligibility Listed on NRHP	11-00117 - Buena Vista County Courthouse Courthouse Sq Non-Extant 1968	
11-00239 - Bells, Abner, Building 210 E 5th St SHPO - 2008 Agency - 2008	Not Eligible Not Eligible	11-00296 - Holmes, David A., House 713 Genesee St SHPO - 2012	Not Eligible
11-00133 - Steffen House 830 E 5th St SHPO - 1998 Agency - 1998	Not Eligible Not Eligible	11-00293 - Baker, Howard R. and Elnora R., House 715 Genesee St SHPO - 2011	Not Eligible
11-00288 - Foley House 610 W 6th St SHPO - 2010 Agency - 2010	Not Eligible Not Eligible	11-00241 - Naughton House 121 Hudson St SHPO - 2008	Not Eligible
11-00295 - Ocoquedda House 611 W 6th St SHPO - 2011 Agency - 2011	Not Eligible Not Eligible	11-00236 - Harrington House 201 Hudson St SHPO - 2008	Not Eligible
11-00182 - West Elementary School 1001 W 6th St Consultant - 2001	Not Evaluated	11-00237 - Schreier House 221 Hudson St SHPO - 2008	Not Eligible
11-00183 - North Elementary School 301 E 7th St Consultant - 2001	Not Evaluated	11-00118 - Elrich, Jennie, House 700 Hudson St SHPO - 1988	Not Eligible
11-00184 - Storm Lake High School 310 Cayuga St Consultant - 2001 SNRG - 2016 Consultant - 2016 NPS - 2017	Not Evaluated Opinion of Eligibility Opinion of Eligibility Listed on NRHP	11-00242 - Schulte House 220 Kenry St SHPO - 2006	Not Eligible
11-00232 - Flynn House 517 Cayuga St Agency - 2004 SHPO - 2008	Not Eligible Not Eligible	Agency - 2008	Not Eligible

Page 1 of 3

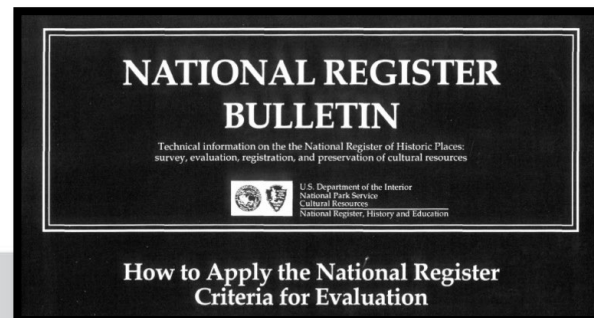
8/28/2020

» Evaluation: Can Old ISIFs Be Used for Section 106?

- » Once all previously evaluated resources have been identified, consider if they will need to be re-evaluated.
 - » Previous evaluations and ISIFs are good for 5 years
- » **If the inventoried property was evaluated within the last 5 years and has not been altered since the previous evaluation:**
 - » Use that ISIF in your consultation OR
 - » If determined not eligible, submit as PA Exempt and reference Section 3. b. of the Programmatic Exclusions in Appendix B
- » **If the inventoried property was evaluated more than 5 years ago or has been altered since the previous evaluation:**
 - » An updated ISIF and evaluation must be completed
 - » In the ISIF, state that a previous evaluation was completed and note what the determination was
 - » Make an updated determination of NRHP eligibility
 - » Many things can result in a change in NRHP evaluation – age, integrity, etc., so never assume that an old evaluation is set in stone

» Evaluation: National Register Criteria

- » Once all potential historic properties that need to be evaluated or re-evaluated have been identified, apply the National Register Criteria for Evaluation:
 - » **Criterion A: History/Historical Event** – is the resource associated with an event that made a significant contribution to our history? Can be important locally, such as an historic downtown being the center of the area's commercial history.
 - » **Criterion B: Significant Person** – is the resource associated with the lives of significant persons? Will rarely be used.
 - » **Criterion C: Architecture** – does the resource embody the distinctive characteristics of a significant type, period, style, or method of construction/architecture? Can be used in conjunction with A in downtowns, historic districts, etc.
 - » **Criterion D: Potential to Yield Information** – does the resource yield or is it likely to yield important information about our nation's history or pre-history? (Archaeology)



Step 2 – Id. and Eval. Historic Properties

» Evaluating Districts

- » There's been an uptick in incorrectly surveyed districts in the past decade or so.
 - » May find surveys stating a district has “lost integrity” dated from around 2009 – **assume these are all wrong and need to be reviewed for accuracy.**
- » Districts can be as small as one property or building – they do not need to have 15 different buildings all be historic.
 - » Just because a few buildings in a potential historic district are new infill or have been rehabbed does not mean that district is no longer eligible.
- » Most areas will have notable architectural similarities, but local history is also important in discerning eligibility.
 - » Ex.: Most small-town downtowns should be assumed eligible, as they were likely the commercial and social hub of these cities.
- » **Focus on including more information about local history into your submissions (ISIFs).**
 - ISIFs should include information about the history of the area surrounding the project site, about the history of the town, and about the history of any potential districts.
 - Can be as simple as “Town A is historically an agricultural community. This neighborhood was constructed around 1900. It's near the downtown, which was where citizens in the county would congregate to sell their agricultural products in the late 1800s.” You can keep it simple, but please include some historical background.

» Evaluation: Integrity

- » If the property meets any of the National Register Criteria, determine if it retains sufficient integrity for listing in the NRHP
- » Seven Aspects of Integrity:
 - » Location: where the property was constructed or where the historic event occurred.
 - » Design: the combination of elements that create the form, plan, space, structure, and style of a property.
 - » Setting: the physical environment of a historic property (the character of the place).
 - » Materials: the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property.
 - » Workmanship: the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
 - » Feeling: a property's extension of the aesthetic or historic sense of a particular period of time.
 - » Association: the direct link between an important historic event or person and a historic property.
- » Basically – would someone from the *period of significance* recognize the property today?

» Evaluation: Integrity

» Things that could diminish a property's integrity:

- » Overlay or replacement siding material (vinyl siding, metal siding, slipcovers, etc.)
- » Replacement of several windows and/or doors
- » Non-sympathetic replacement roof – single-seam metal roof on house
- » Significant addition – enclosed porch, removal of porch, large front addition

» Things that are unlikely to diminish integrity:

- » Painting a different color (unless painting previously un-painted surface such as brick)
- » Storm doors and windows that can be removed without damaging the original
- » Deterioration or deferred maintenance (chipped peeling paint, old roof, cracked window glass)



» Evaluation: Period of Significance

- » If a property is NRHP-eligible, determine the date or date range for when it achieved significance
- » For properties eligible under **Criterion A: History:**
 - » The Period of Significance is usually the time of the event. This can be a single event like a speech, rally, convention, tragic event, accident, etc. usually 1-3 days, or it can be a longer period such as the development and growth of a commercial corridor maybe 20-50+ years.
- » For properties eligible under **Criterion B: Significant Person:**
 - » The Period of Significance is usually the date the significant person used the property.
- » For properties eligible under **Criterion C: Architecture:**
 - » The Period of Significance is usually the date of construction.

Remember: Evaluation is needed for all resources in your APE:

» **Buildings**

» **Districts**

» **Objects**

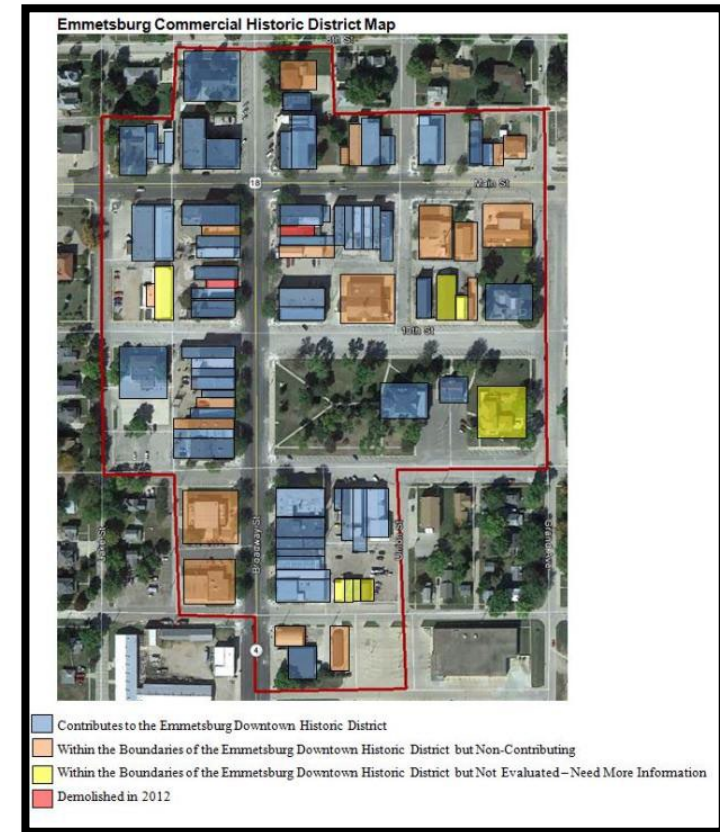
» **Structures**

» **Sites**

Step 2 – Id. and Eval. Historic Properties

» Evaluation: Historic Districts

- » If a project will take place within a potential historic district, then the potential historic district is within the APE and must be evaluated.
- » When to consider historic district evaluation:
 - » When the structure you are using federal funds on is located an area of similarly constructed resources:
 - » Built at the same time
 - » Similar design
 - » Same plat development
 - » Commercial corridor
 - » Connected use (industrial plant, campus, etc.)
 - » When the structure you are using federal funds on is located an area of connected context to its surroundings.
- » Applies to **all** projects (not just DTR)



» Evaluation: Historic Districts

- » Is the district eligible under any of the National Register Criteria?
 - » Especially A or C?
- » Does the district retain sufficient integrity?
 - » Compare historic photographs to current conditions of the district
 - » Consider the window openings, storefronts, cornices and other architectural details, building setback, overall feel of district, etc.
 - » Review historic maps (Sanborn maps, historic aerials, etc.) to get a sense of what developed around the same time and to determine what is new infill



Step 2 – Id. and Eval. Historic Properties

» Evaluation: Historic Districts

- » A historic district can be recorded and evaluated using an Iowa Site Inventory Form
- » Include:
 - » Narrative description
 - » Statement of significance with historic context
 - » Historic district boundary map
 - » Table of addresses with date of construction, property type, and NRHP eligibility (Contributing/Noncontributing)
 - » Streetscapes and photos of buildings
 - » Historic photographs and historic maps (Sanborn maps, historic aerials, etc.)



Step 2 – Id. and Eval. Historic Properties

» Tips for a Successful Evaluation

- » Begin to consider all potential properties and sites within the APE as early in project planning as possible.
- » Review the “National Register Bulletin on How to Apply the National Register Criteria for Evaluation”:
 - » Provides information on identification, evaluation, and integrity
 - » https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf
- » If the property *may* be National Register-eligible:
 - » Gather additional information, such as interior photographs or history of ownership, to help make final determinations
- » If, based on initial review, the National Register eligibility determination is not clear to the RE:
 - » Seek professional assistance from a qualified consultant



Step 2 – Id. and Eval. Historic Properties

» Completing an Iowa Site Inventory Form (ISIF)

Iowa Site Inventory Form
State Historic Preservation Office
(July 2014)

State Inventory Number: New ☐ Supplemental ☐
9-Digit SHPO Review & Compliance (R&C) Number:
☐ Non-extant Year:

Read the Iowa Site Inventory Form Instructions carefully, to ensure accuracy and completeness before completing this form. The instructions are available on our website: <http://www.iowahistory.org/historic-preservation/statewide-inventory-and-collections/iowa-site-inventory-form.html>

• **Property Name**
A) Historic name:
B) Other names:

• **Location**
A) Street address:
B) City or town: (Vicinity) ☐
County:
C) Legal description:
Rural: Township Name: Township No.: Range No.: Section: Quarter: of Quarter:
Urban: Subdivision: Block(s): Lot(s):

• **Classification**
A) Property category: Check only one
☐ Building(s)
☐ District
☐ Site
☐ Structure
☐ Object
B) Number of resources (within property):
Contributing Noncontributing
Buildings
Sites
Structures
Objects
Total

C) For properties listed in the National Register:
National Register status: ☐ Listed ☐ De-listed ☐ NHL ☐ NPS DOE

D) For properties within a historic district:
☐ Property contributes to a National Register or local certified historic district.
☐ Property contributes to a potential historic district, based on professional historic/architectural survey and evaluation.
☐ Property does not contribute to the historic district in which it is located.
Historic district name: Historic district site inventory number:

E) Name of related project report or multiple property study, if applicable:
MPO title: Historical Architectural Data Base #

• **Function or Use** Enter categories (codes and terms) from the Iowa Site Inventory Form Instructions
A) Historic functions:
B) Current functions:

• **Description** Enter categories (codes and terms) from the Iowa Site Inventory Form Instructions
A) Architectural classification:
B) Materials:
Foundation (visible exterior):
Walls (visible exterior):

C) Narrative description ☒ SEE CONTINUATION SHEETS, WHICH MUST BE COMPLETED

Site Number: Address: City: County: District Number:

• **Statement of Significance**
A) Applicable National Register Criteria: Mark your opinion of eligibility after applying relevant National Register criteria
Criterion A: Property is associated with significant events. ☐ Yes ☐ No ☐ More research recommended
Criterion B: Property is associated with the lives of significant persons. ☐ Yes ☐ No ☐ More research recommended
Criterion C: Property has distinctive architectural characteristics. ☐ Yes ☐ No ☐ More research recommended
Criterion D: Property yields significant information in archaeology/history. ☐ Yes ☐ No ☐ More research recommended
B) Special criteria considerations: Mark any special considerations; leave blank if none
☐ A: Owned by a religious institution or used for religious purposes. ☐ E: A reconstructed building, object, or structure.
☐ B: Removed from its original location. ☐ F: A commemorative property.
☐ C: A birthplace or grave. ☐ G: Property less than 50 years of age or achieved significance within the past 50 years.
☐ D: A cemetery.
C) Areas of significance
Enter categories from instructions:
D) Period(s) of significance

E) Significant dates
Construction date: ☐ check if circa or estimated date
Renovations, including renovations:
F) Significant person
Complete if Criterion B is marked above

G) Cultural affiliation
Complete if Criterion D is marked above

H) Architect/Builder
Architect:
Builder/contractor:

I) Narrative statement of significance ☒ SEE CONTINUATION SHEETS, WHICH MUST BE COMPLETED

• **Bibliography** ☒ See continuation sheets for the list research sources used in preparing this form

• **Geographic Data** Optional UTM references ☐ See continuation sheet for additional UTM or comments
Zone Easting Northing NAD Zone Easting Northing NAD
1 2
3 4

• **Form Preparation**
Name and Title: Date:
Organization/firm: E-mail:
Street address: Telephone:
City or Town: State: Zip code:

• **ADDITIONAL DOCUMENTATION** Submit the following items with the completed form
A) For all properties, attach the following, as specified in the Iowa Site Inventory Form Instructions:
1. Map of property's location within the community.
2. Glossy color 4x6 photos labeled on back with property/building name, address, date taken, view shown, and unique photo number.
3. Photo key showing each photo number on a map and/or floor plan, using arrows next top each photo number to indicate the location and directional view of each photograph.
4. Site plan of buildings/structures on site, identifying boundaries, public roads, and building/structure footprints.
B) For State Historic Tax Credit Part 1 Applications, historic districts and farmsteads, and barns:
See lists of special requirements and attachments in the Iowa Site Inventory Form Instructions.

State Historic Preservation Office (SHPO) Use Only Below This Line
The SHPO has reviewed the Site Inventory and concurs with above survey opinion on National Register eligibility:
☐ Yes ☐ No ☐ More research recommended
☐ This is a locally designated property or part of a locally designated district.
Comments:
SHPO authorized signature: Date:

Step 2 – Id. and Eval. Historic Properties

» Completing an Iowa Site Inventory Form (ISIF)

- » Complete an ISIF for each above-ground property in the APE
- » A blank ISIF and instructions can be found on the IEDA website under subsection “Environmental Compliance”:
 - » [CDBG Management Guide | Iowa Economic Development Authority \(iowaeda.com\)](https://www.iowaeda.com)
 - » Read through the ISIF instructions carefully to complete the form and continuation pages.
- » The following slides provide some additional guidance on filling out the form and completing the continuation pages.

STATE HISTORIC PRESERVATION OFFICE OF IOWA
IOWA DEPARTMENT OF CULTURAL AFFAIRS

IOWA SITE INVENTORY FROM INSTRUCTIONS
STATE HISTORIC PRESERVATION OFFICE OF IOWA

The Iowa Site Inventory Form is an important tool for gathering information about historic features and aspects of a property. This data is used by the State Historic Preservation Office of Iowa to evaluate a property's potential eligibility to be listed in the National Register of Historic Places. The inventory items assist with identifying and locating a property, explaining how it meets one or more of the National Register criteria, and making a case for historic significance and integrity.

The Iowa Site Inventory Form is also used for preparing documentation for potential historic districts, applying for the State Tax Credit Program (see specific guidance on completing the site inventory form for the State Historic Tax Credit program), and evaluating properties for Section 106 requirements. Applicants can also transfer the data to the National Register of Historic Places registration form.

For more guidance on evaluating historic resources and writing narrative descriptions and statements of significance, see the National Register Bulletin 16A: How to Complete the National Register Form, available from the National Park Service.

Guidelines

Read these instructions carefully before completing the form, to ensure accuracy and completeness. Complete one form for each building on a property. This allows historians to compare and locate similar properties to facilitate statewide historic research and understanding. A building is defined as any shelter built principally to house human activity. Examples include houses, barns, stables, sheds, garages, courthouses, city halls, commercial buildings, libraries, factories, schools, and theaters. Use a computer to enter information into the form. Continuation Sheets (the last page of the form) should be used to "continue" information that does not fit within the first two pages of the form.

- State inventory number (top right-hand corner): Leave blank and check the box marked New, unless: 1) the property has already been assigned an inventory number and is being re-evaluated. If so, check the box marked Supplemental. 2) this is part of a historic survey that includes a separate survey report. In that case, contact the SHPO statewide inventory coordinator (Berry.Bennett@iowa.gov) to obtain a 7-digit site number for each property; include the full street address.
- Review & compliance number: Leave blank.
- Non-extant: Check the box and indicate the year the building was demolished if a building is torn down after being inventoried or a site form is used to compile information about a building that no longer exists.

Name of Property

A. Historic name: If the building is listed in the National Register of Historic Places or a historic district, include the existing historic property name. If no historic property name has been previously recorded, enter the name that best reflects the property's historic importance or the name that was commonly used for the property during the period of significance. Example: Zep's Café, Younker's Warehouse, or Jacob Brown Farm.

B. Other names: Enter any other names by which the property has been commonly known.

IOWA DEPARTMENT OF CULTURAL AFFAIRS
STATE HISTORICAL BUILDING • 600 E. LOCUST ST. • DES MOINES, IA 50319 • IOWACULTURE.GOV

Step 2 – Id. and Eval. Historic Properties

» Completing an Iowa Site Inventory Form (ISIF)

Site Inventory Number	37-00347 not previously evaluated and in the SHPO inventory
-----------------------	---

» What is a State Inventory Number?

- » When properties are included in the SHPO inventory, they are assigned a unique number for that address
 - » It consists of the two-digit county code followed by the assigned five digits (XX-XXXXX)
 - » It is included on the “city list” and/or any previous Iowa Site Inventory Forms
- » If the property has a number from an old ISIF → check the “**supplemental**” box on the ISIF and add the State Inventory Number
 - » Also include the number in the “Site Inventory Number” field in IowaGrants.gov
- » If this is the first ISIF created for the property → check the “**new**” box and leave the State Inventory Number field blank
- » Some properties are associated with a Review & Compliance (R&C) number.
 - » This number (for example, R&C# 170782012) is the year and month of Section 106 submittal followed by the county code and sequential number – this is **NOT** the State Inventory Number and should **NOT** be entered in the inventory field in IowaGrants.gov.

Iowa Site Inventory Form State Historic Preservation Office (January 2016)	State Inventory Number:	☐ New	☐ Supplemental
	9-Digit SHPO Review & Compliance (R&C) Number:		
☐ Non-extant Year:			
<i>Read the Iowa Site Inventory Form Instructions carefully, to ensure accuracy and completeness before completing this form. The instructions are available on our website.</i>			

Step 2 – Id. and Eval. Historic Properties

» Completing an Iowa Site Inventory Form (ISIF)

- » Once it has been determined if the property is significant under one of the National Register criteria and if it retains sufficient integrity to be eligible, fill out the Applicable National Register Criteria section of the form
 - » Ideally, check a “yes” or “no” box for criterion A, B, and C – avoid checking the “more research recommended” box unless at least one “yes” box is checked for a different criteria; otherwise, it is unclear if the property is eligible or not.

A) Applicable National Register Criteria: <i>Mark your opinion of eligibility after applying relevant National Register criteria</i>			
Criterion A: Property is associated with significant events.	☐ Yes	☐ No	☐ More research recommended
Criterion B: Property is associated with the lives of significant persons.	☐ Yes	☐ No	☐ More research recommended
Criterion C: Property has distinctive architectural characteristics.	☐ Yes	☐ No	☐ More research recommended
Criterion D: Property yields significant information in archaeology/history.	☐ Yes	☐ No	☐ More research recommended

Step 2 – Id. and Eval. Historic Properties

» Completing an Iowa Site Inventory Form (ISIF)

» Continuation pages **must** include:

- » Narrative Description
- » Statement of Significance
- » Current photographs of each visible elevation
- » Current photographs of the building interior (if possible)
- » Streetscapes showing neighboring properties

- » **Note:** The ISIF should describe and evaluate the property *as it stands at the time it is being written and in its current condition* and must not discuss the CDBG funds, Scope of Work, or any future alterations to the property.

Iowa Department of Cultural Affairs State Historical Society of Iowa Iowa Site Inventory Form Continuation Sheet		Site Number Related District Number
Page 2		
Name of Property	Scott	
1310 Eastern Avenue	County	
Address	Davenport	
	City	



Front of 1310 Eastern, facing west

Step 2 – Id. and Eval. Historic Properties

» Completing an Iowa Site Inventory Form (ISIF)

Narrative Description:

This one-and-one-half-story mid-century cream brick church was constructed in 1948. It has a front gable roof covered in asphalt shingles with a small square brick chimney, poured concrete foundation, and raised basement with metal fixed windows. The church retains its original fixed square and Gothic arch stained-glass windows with concrete sills and features streamlined rectangular buttresses capped with concrete on the side (east and west) elevations. A bell tower is located near the northeast corner of the building.

The front (north) elevation has a cross at the gable peak and features three Gothic arch stained-glass windows. The gabled entrance has vertical wood paneling with an engraved cross in the gable end. The metal and glass double doors are flanked by stepped brick detailing and wall-mounted lights. Rectangular fixed windows are located on either side of the gabled entrance.

The side (east) elevation has four streamlined rectangular buttresses capped with concrete that are flush with the wall. Between each buttress is a main-level metal fixed stained-glass window with a concrete sill and a basement-level single-light metal fixed window. A shed roof portion extends from the south end of the elevation; it has three main-level metal hung sash windows with concrete sills and three basement-level single-light metal fixed windows.

The rear (south) elevation has minimal detail. Three fixed stained-glass windows with concrete sills are in the gable end. A single metal door with a small concrete overhang is located at the ground level. The west end of the elevation has a single main-level metal fixed window, two basement-level single-light metal fixed windows, and one basement-level six-light metal window.

The side (west) elevation mirrors the east elevation and has four streamlined rectangular buttresses capped with concrete. Between each buttress is a main-level metal fixed stained-glass window with a concrete sill and a basement-level single-light metal fixed window. The south end of the elevation has a gable and shed roof portion with two main-level metal fixed windows with concrete sills, one main-level metal hung sash windows, two basement-level single-light metal fixed windows, and a paneled door with a small concrete overhang. A second paneled door with a small concrete overhang and small concrete stoop is located at the north end of the elevation. A concrete cornerstone reading "St. John's Ev. Lutheran Church U. A. C. 1877 – 1948" is located at the northwest corner of the building.

The building interior includes a dining room, living room with several sleeping spaces, two bathrooms, and a playroom. The interior retains its original wood panel doors, stained-glass windows, wood trim, wood rafters, and wood choir loft on the main floor. In 2018 the church interior was altered to function as a community center and no longer has any other original interior features such as the original pews, pulpit, or altar. Furthermore, modern carpet flooring has been installed on the basement level and first floor.

Narrative Statement of Significance:

This 1948 church building was evaluated for the National Register of Historic Places (National Register) under *Criteria A, B, and C*. Research did not uncover any evidence of the property's association with a significant event or person. Although it has some features reminiscent of the Gothic Revival style, including three Gothic arch windows and streamlined buttresses, it is nevertheless a modest example of a mid-century church with Gothic elements. Additionally, the interior space has been modified to convert the church into a community center, which has diminished the building's integrity. Furthermore, there is little potential for a historic district due to the church's rural location. The only other historic-age resource in the vicinity of the church is a c.1910 house, which lacks integrity due to its aluminum siding, vinyl windows, enclosed porch, and modern garage. The church is therefore recommended not eligible for the National Register individually or as part of an eligible historic district.

C) Narrative Description

Include a narrative description of the property describing the size and form of the resource, how many stories it is, what the exterior materials are, what the roof form is, distinct details or characteristics, and visible changes or alterations made to the building. If the resource is located within a neighborhood or collection of similar resources, briefly describe the setting as well.

I) Narrative Statement of Significance

Describe why the property is or is not eligible for listing in the National Register of Historic Places. Make sure this section matches the boxes you filled out on the first two pages of the form and explains your "yes" or "no" determination for each of the NRHP criteria. Talk about any integrity issues and make your definitive statement about NRHP eligibility both as an individual property and as part of a potential historic district.

Tip: The person completing the ISIF and writing the Narrative Description and Statement of Significance should be familiar with the property and should not just be using photographs someone else took to write up the form.

Step 2 – Id. and Eval. Historic Properties

» Completing an Iowa Site Inventory Form (ISIF)

Iowa Site Inventory Form
State Historic Preservation Office
Continuation Sheet

Site Number: Z0-00926
Related District Number:

Page 3

YMCA Building
Name of Property
312 Iowa Ave
Address

Muscatine
County
Muscatine
City



Image 1. USGS Map of Muscatine. The red star indicates the location of 312 Iowa Avenue.



Image 2. Google Earth Aerial of 312 Iowa Avenue in Muscatine.

Iowa Site Inventory Form
State Historic Preservation Office
Continuation Sheet

Site Number: Z0-00926
Related District Number:

Page 5

YMCA Building
Name of Property
312 Iowa Ave
Address

Muscatine
County
Muscatine
City

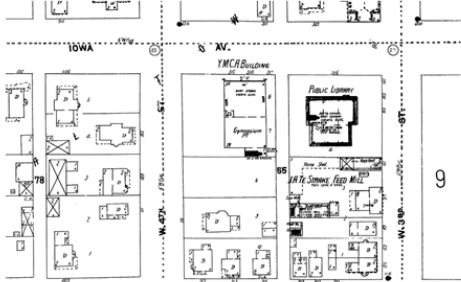


Image 5. 1905 Sanborn map with the YMCA building at 312 Iowa Avenue.



Image 6. c. 1910 photograph of the Jackson Motor Car Company garage adjacent to the original YMCA building and gymnasium, view facing southwest.

Iowa Site Inventory Form
State Historic Preservation Office
Continuation Sheet

Site Number: Z0-00926
Related District Number:

Page 7

YMCA Building
Name of Property
312 Iowa Ave
Address

Muscatine
County
Muscatine
City



Image 9. 1957 photograph of the original YMCA building and 1957 addition.



Image 10. 1960s aerial showing the 1957 addition. The red star indicates the location of 312 Iowa Avenue.

Continuation Pages may also be used for:

- Historic images; maps and aerials; floor plans; renderings; drawings; archival materials such as newspaper articles, pamphlets, brochures, etc.
- Historic images and aerials may help document the age and integrity of the resource

Step 2 – Id. and Eval. Historic Properties

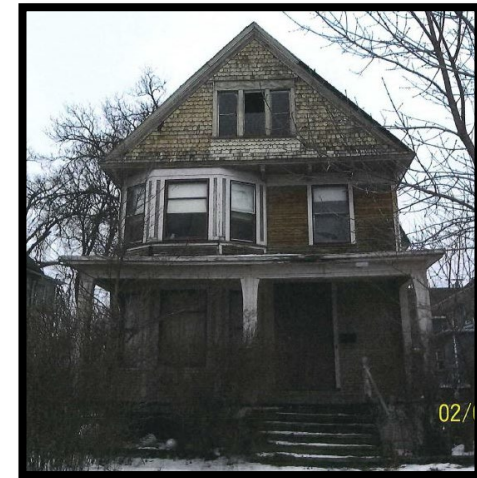
» Tips for Photographing Buildings



Try to photograph in the late fall, winter, or early spring before leaves and blossoms block the view. Consider taking one photograph of any house that might participate prior to award, or the first winter after award.



Consider the lighting and time of day; try to take photos that don't result in glare or hot spots.



Get at least one image that is the full front of the building

Step 2 – Id. and Eval. Historic Properties

» Tips for Photographing Buildings



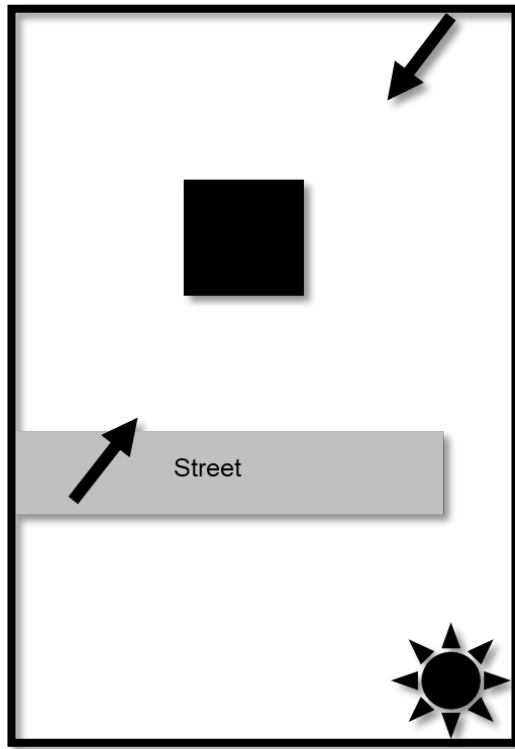
Keep orientation consistent on each page



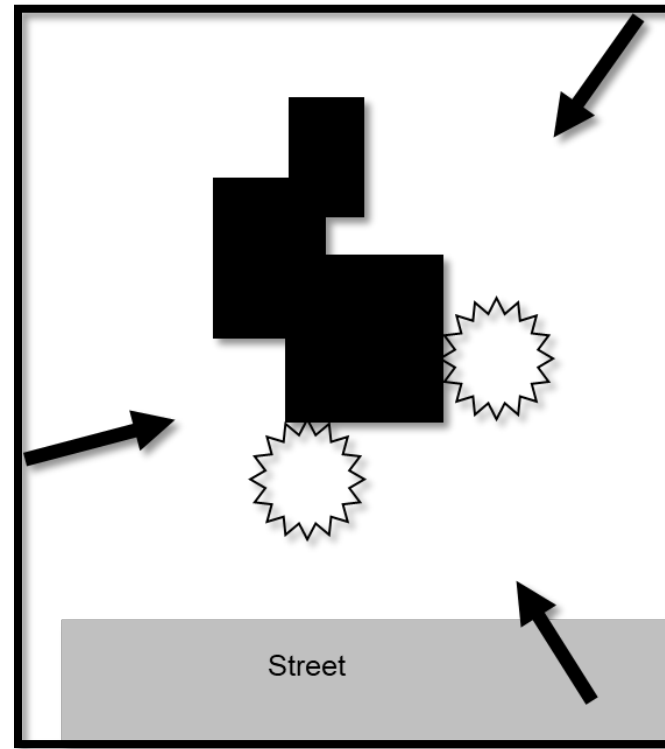
Try to locate/ask property owner for an older photograph of the building, before trees and bushes were so tall. This will help to convey what the building looks like and will also help tell the story of what changes have occurred over time.

Step 2 – Id. and Eval. Historic Properties

» Tips for Photographing Buildings



Capture two elevations by taking photos from corners

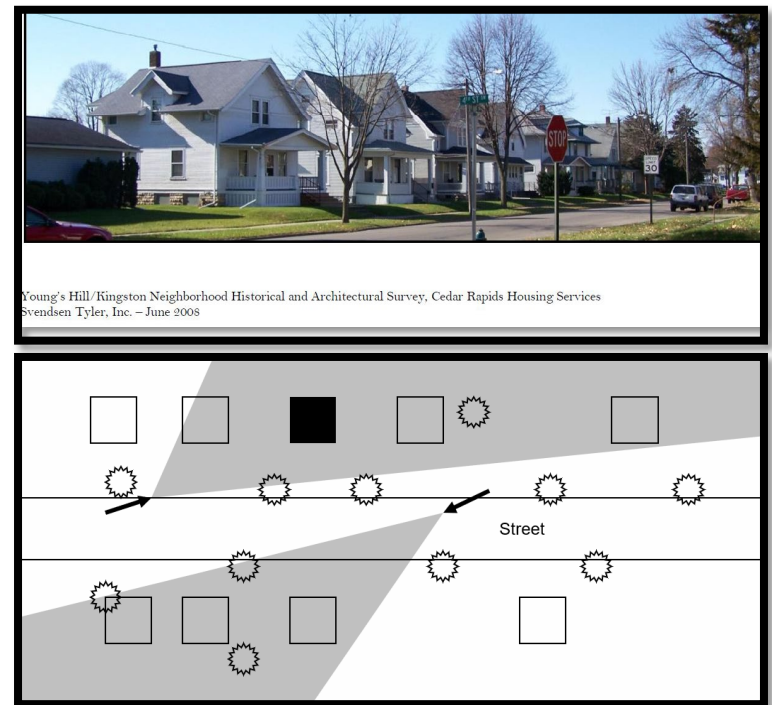


Take photos from multiple angles to avoid obstructions

Step 2 – Id. and Eval. Historic Properties

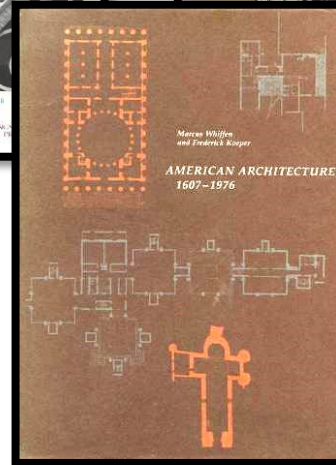
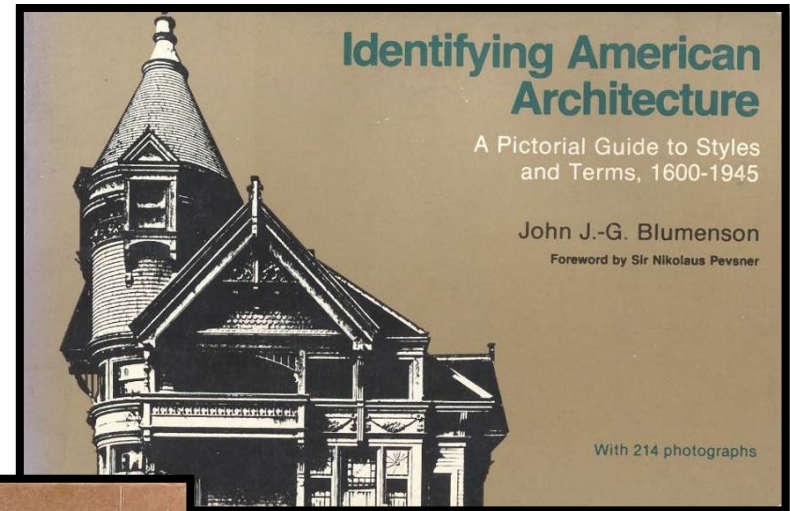
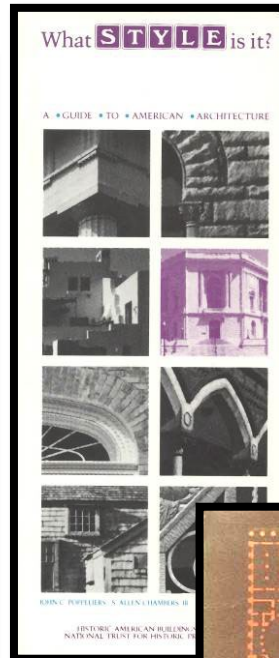
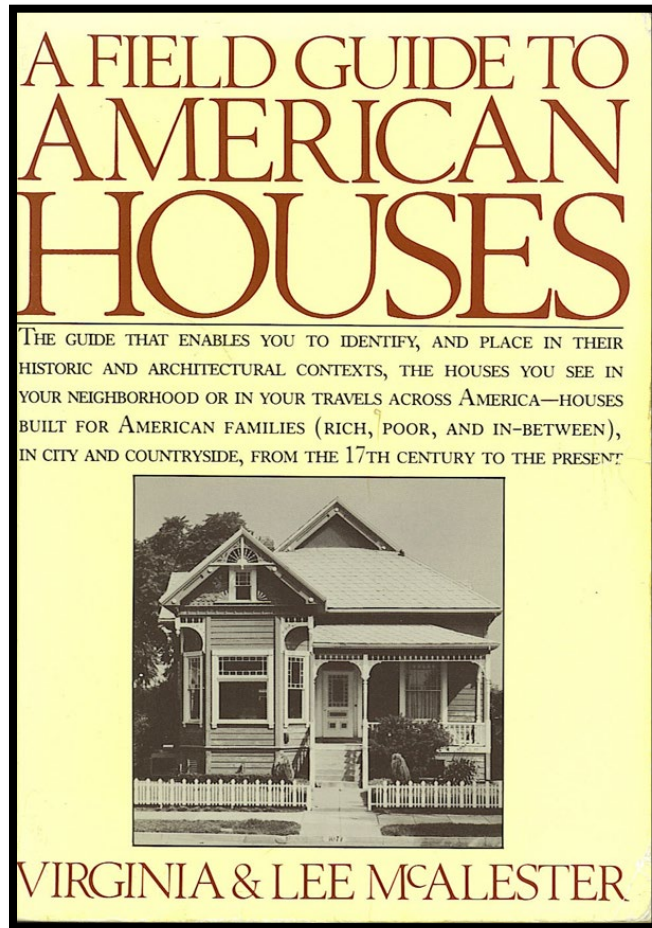
» Tips for Photographing Streetscapes

- » Streetscapes help show if there is any potential for a historic district.
- » We do not want photos of streets:
- » We do want photos of streetscapes:



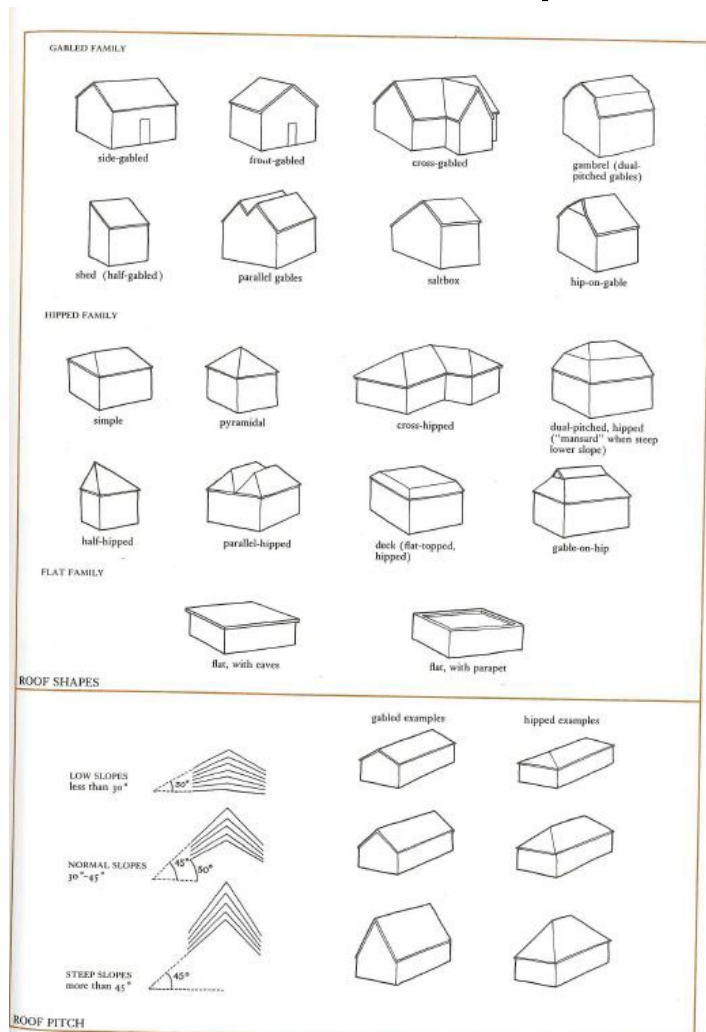
Step 2 – Id. and Eval. Historic Properties

» Tools for Completing an Iowa Site Inventory Form



Step 2 – Id. and Eval. Historic Properties

» Tools for Completing an Iowa Site Inventory Form



Structure: Pictorial Key

Roof-wall junction		TRY THESE FIRST	
slight eave overhang with wide band of trim below		Greek Revival	
wide eave overhang, boxed without brackets		Prairie	
wide eave overhang, boxed with brackets		Italianate, Italian Renaissance, Prairie, occasionally Mission	
wide eave overhang, open, not boxed		Craftsman, Mission	
Dormers		TRY THESE FIRST	
hipped		Prairie, French Eclectic, Shingle	
gabled		Craftsman, Colonial Revival, Adam, Georgian, Shingle, Queen Anne, Stick, Gothic Revival, Tudor, Chateausque, French Eclectic	
shed		Dutch Colonial, Craftsman, Colonial Revival	
arched top		French Eclectic, Second Empire, Beaux Arts	
round or oval		French Eclectic, Beaux Arts	
pedimented		Colonial Revival, Georgian, Adam	
wall dormers		Gothic Revival, Chateausque, Richardsonian Romanesque, Mission	
eyebrow		Shingle, Richardsonian Romanesque	
Other roof elaborations		TRY THESE FIRST	
shaped		Mission, Queen Anne, Tudor	
towers, square		Italianate, Stick, Second Empire, occasionally Queen Anne, Mission, Italian Renaissance	
towers, round		Queen Anne, Richardsonian Romanesque, Chateausque, Shingle, French Eclectic, occasionally Spanish Eclectic	
roof-top cupolas		Italianate, Octagon, Second Empire, Greek Revival	
decorated verge boards		Tudor, Gothic Revival, Queen Anne	
trusses in gables		Craftsman, Stick, Gothic Revival, Queen Anne, Tudor	
false beams at gable end		Craftsman, Prairie	
flared eaves		French Eclectic, French Colonial, Prairie, Stick, Dutch Colonial, Craftsman	
multi-level eaves		Tudor, Shingle, French Eclectic, others occasionally	
tile roof		Spanish Eclectic, Mission, Italian Renaissance, Prairie	
flat pantries		Tudor, occasionally Neoclassical, Colonial Revival, Italian Renaissance	
exposed rafters		Craftsman, Stick, Mission, occasionally Prairie or Gothic Revival	

Other roof elaborations		DOORS	
IF YOU SEE	TRY THIS FIRST	IF YOU SEE	
pinnacles		Chateausque, Richardsonian Romanesque	transom lights
castellations		Gothic Revival, Tudor	round fanlight or elliptical fanlight with sidelights
roof-top or roof-line balustrade		Neoclassical, Colonial Revival, Adam, Georgian, Beaux Arts, Early Classical Revival, Italian Renaissance	rectangular transom and side lights
metal roof cresting		Queen Anne, Chateausque	six- to eight-panel door
Arched doors, windows, porches		board-and-batten door	
IF YOU SEE	TRY THIS FIRST		
segmental		Georgian, Adam, Colonial Revival, Italianate	pillars to sides of door (may have pediment)
round		Italian Renaissance, Italianate, Richardsonian Romanesque, Spanish Eclectic, less common in Adam, Colonial Revival, Beaux Arts, Mission, Tudor	pediment
Syrian		Richardsonian Romanesque, Shingle	broken pediment
pointed (Gothic)		Gothic Revival	Windows IF YOU SEE
Tudor (barreled Gothic)		Tudor, Gothic Revival	
barrelhandle (elliptical)		Chateausque, Beaux Arts, Italianate	
ogee		Exotic Revivals, Chateausque	Palladian

» Technical Assistance

- » Technical Assistance should be used for any current and future **HSG** awards and is provided by Ray Werner at Tallgrass.
- » To receive Technical Assistance:
 - » Prepare the Iowa Site Inventory Form (ISIF)
 - » Send the draft ISIF to Ray at Tallgrass:
 - » The draft ISIF **must** include a draft narrative description, statement of significance, maps, photos, etc. – Tallgrass **will not** complete the form from scratch
 - » Send via email, use a shared link, drop box, etc.
 - » Reach out to Leah to make sure she received your document
- » Tallgrass will review and provide comments/revisions within no more than 10 working days from submittal.
- » The Grant Administrator will incorporate the changes/comments into the form prior to submitting through IowaGrants.gov.

Step 2 – Id. and Eval. Historic Properties

» Technical Assistance: Complex Historic Properties

- » This is a separate service that comes at a separate cost for IEDA.
- » **Contact Tallgrass in advance and request a Full Evaluation**
 - » Tallgrass will request basic information
 - » Tallgrass will likely make a site visit
 - » Tallgrass will generate a full Iowa Site Inventory Form
- » The Responsible Entity will make sure the form is consistent with project scope and finding prior to submitting through IowaGrants.gov.



Ray Werner

Tallgrass Archaeology LLC

2460 S. Riverside Drive

Iowa City, IA 52246

319-354-6722

ray.werner@tallgrassarchaeology.com

<https://www.tallgrassarchaeology.com/>



Step 2 – Id. and Eval. Historic Properties

» Archaeological Investigation

» If a project includes ground disturbance:

- » The Responsible Entity (RE) must make a *reasonable and good-faith effort* to identify the presence or potential presence of historic resources, including buried archaeological sites.
- » The level of archaeological investigation will depend on the scope and scale of disturbance – either provide supplemental information on the condition of the area where there will be ground disturbance or provide a full archaeological survey.



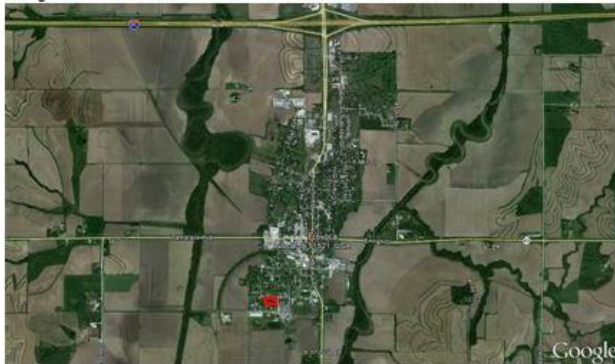
Step 2 – Id. and Eval. Historic Properties

» Archaeological Investigation: Supplemental Information

Archaeological Figures

08-DRH-203
Construction of two New Homes
751 W Grant Street
Avoca, IA

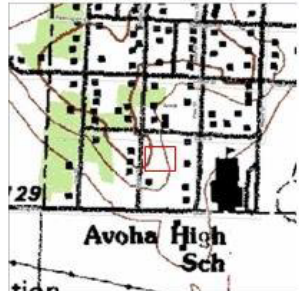
Determination: There are no known archaeological sites within the Area of Potential Effects, the closest identified sites, located approximately .5 miles from the APE consist of historic scatter and did not include determinations of eligibility for listing in the National Register of Historic Places. An archaeological survey was conducted in 2010 for a Habitat for Humanity project just one block north-west of the APE, and no sites were identified during that investigation. The new construction is confined to two in-town lots, which have been previously disturbed by the construction and subsequent demolition of earlier structures as both lots contained residential structures as noted on the 1932 Sanborn Fire Insurance Map. Based on this desk-top review, no archaeological survey is required in advance of the undertaking and no archaeological monitoring is required during construction activities.



Google Earth, December 13, 2012



General Land Office Survey Map



Topographic Map

08-DRH-203 City of Avoca – New Construction 751 W Grant

- » For projects with minimal ground disturbance, the RE may be able to provide supplemental information to show that the APE is *unlikely to contain archaeological resources and there is no compelling evidence to warrant further archaeological review.*

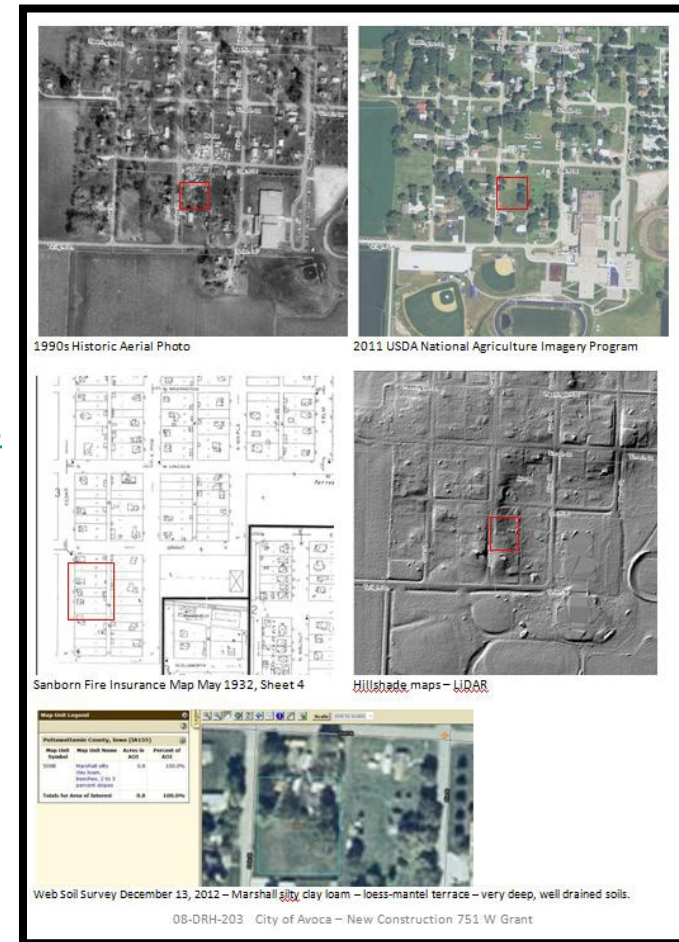
- » See HP Fact Sheet #6 in Appendix D of PA
- » Include a narrative about why there is no further compelling evidence that would require an archaeological survey
 - » Be sure to check with the Office of the State Archaeologist (OSA) on whether a previous archaeological survey was conducted in the APE and if any sites were identified
- » Provide clear supplemental maps that show the condition of the area

Step 2 – Id. and Eval. Historic Properties

» Archaeological Investigation: Supplemental Information

» Resources:

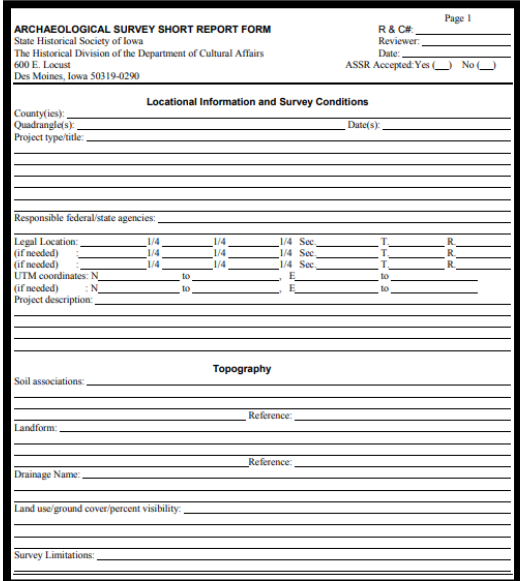
- » Google Maps
- » Historic Aerial Maps, General Land Office Survey Maps, Topographic Maps, Lidar:
 - » <https://ortho.gis.iastate.edu/>
- » Sanborn Fire Insurance Maps:
 - » <https://www.statelibraryofiowa.gov/index.php/iowans/online-resources>
 - » <https://www.loc.gov/collections/sanborn-maps/>
- » Web Soil Survey:
 - » <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>
- » I-Sites Public and/or OSA Site File Search:
 - » [ISites Public Data Web Map \(arcgis.com\)](https://isitespublicdata.arcgis.com/)



Step 2 – Id. and Eval. Historic Properties

» Archaeological Investigation: Archaeological Survey

- » If a project has substantial disturbance and/or there is information that leads to the probability for archaeological resources, **an archaeological survey must be completed.**
 - » The RE will need to procure for such services.
 - » Archaeological surveys **must** be completed by a qualified archaeologist and must comply with the Association of Iowa Archaeologists Guidelines.
- » If an initial investigation results in the recommendation for continued investigation in order to determine if the site is eligible:
 - » The RE **must** continue in order to complete the identification and evaluation of archaeological resources or revise the scope to fully avoid unevaluated areas.
- » If any pre-historic archaeological sites are identified:
 - » The results of tribal consultation must be considered for eligibility determinations.



The form is titled "ARCHAEOLOGICAL SURVEY SHORT REPORT FORM" and is labeled "Page 1". It is issued by the "State Historical Society of Iowa, The Historical Division of the Department of Cultural Affairs, 600 E. Locust, Des Moines, Iowa 50319-0290". It includes fields for "R & G#:", "Reviewer:", "Date:", and "ASSR Accepted: Yes () No ()". The form is divided into several sections: "Locational Information and Survey Conditions" (with fields for County, Date, Project type, and Responsible federal/state agencies), "Legal Location" (with fields for Section, Township, Range, and UTM coordinates), "Topography" (with fields for Landform, Drainage Name, and Land use/ground cover/percent visibility), and "Survey Limitations".

Section 106 Process

» Four-Point Approach

1. Initiate Section 106 Review Process

- Determine if the undertaking has the potential to affect cultural resources

2. Identify and Evaluate Historic Properties

- Identify the Area of Potential Effects (APE) – the area in which the undertaking has the potential to directly or indirectly affect any historical and/or archaeological resources
- Identify and evaluate resources within the APE to determine if they are listed on or eligible for listing on the National Register of Historic Places (NRHP)

3. Assess Effects

- **In consultation with interested parties, determine how the project will affect any eligible or listed resources: No Historic Properties Affected, No Adverse Effect, or Adverse Effect**

4. Resolve Adverse Effects

- If the project will result in an Adverse Effect, draft a Memorandum of Agreement (MOA), which outlines agreed-upon measures that will be taken to avoid, minimize, or mitigate the Adverse Effect resulting from the undertaking

Step 3 – Assess Effects

» Effect Determinations

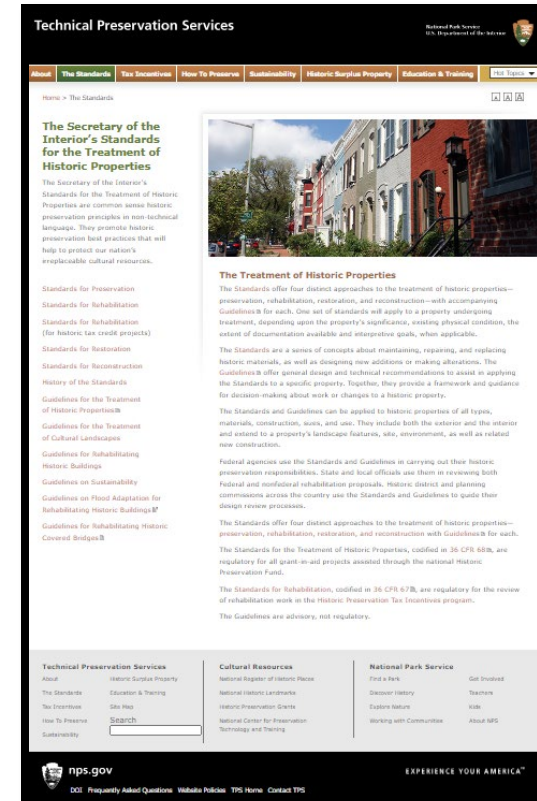
- » Once all the resources in your APE have been identified and evaluated – continue with Step 3: Assess Effects.
- » Select a federal finding/effect determination:
 - » **No Potential To Cause Effects:**
 - » Activities are covered in PA; submit Exempt From Review Form (see Step 1).
 - » **No Historic Properties Affected:**
 - » There are no eligible or listed resources in the APE.
 - » Submit Section 106/Tier II form to IEDA through IowaGrants.gov
 - » **No Adverse Effect to Historic Properties:**
 - » There are eligible or listed resources in the APE, but the project has been designed to avoid any adverse effects.
 - » Submit Section 106/Tier II form to IEDA through IowaGrants.gov
 - » **Adverse Effect to Historic Properties:**
 - » There are eligible or listed resources in the APE, and there is no way to avoid altering the character-defining features of an eligible or listed resource.
 - » Consult with SHPO and continue with Step 4: Resolve Adverse Effects
- » The Responsible Entity must make this determination.

Step 3 – Assess Effects

» No Adverse Effect to Historic Properties

» What does “No Adverse Effect” mean?

- » Project does not diminish to the characteristics that qualify a property eligible for the NRHP and **avoids altering character-defining features**
 - » Such as the original wood windows, original doors, original siding, decorative features, front porch, etc.
- » Also consider the **Seven Aspects of Integrity**:
 - » *Location, design, setting, materials, workmanship, feeling, and association*
- » Consider all reasonably foreseeable effects caused by the undertaking
 - » These effects may occur later in time, be farther removed in distance, or be cumulative
- » To avoid Adverse Effects, 1. **Retain** existing historic materials and features → 2. **Repair** instead of replace when necessary → 3. **Replace** only when you cannot retain or repair original features
 - » Documentation of deterioration beyond repair is required for the replacement of historic building materials (window survey, photographs, etc.)
 - » If necessary, replacement should be in-kind and compatible



Step 3 – Assess Effects

» Secretary of the Interior's (SOI) Standards

Standards for Rehabilitation

Please note: For the Historic Preservation Tax Incentives Program use the *Standards for Rehabilitation* that are codified separately in 36 CFR 67 and are regulatory for the review of rehabilitation work for that program.

The Standards will be applied taking into consideration the economic and technical feasibility of each project.

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.
4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations or related new construction will not destroy historic materials, features and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

- » A series of best practices and concepts for maintaining, repairing, and/or replacing historic materials, as well as designing new additions or making alterations to historic resources.

- » <https://www.nps.gov/tps/standards.htm>

- » <http://www.nps.gov/tps/standards/rehabilitation.htm>

- » Technical Preservation Services: Rehabilitation Standards and Guidelines:

- » Provides additional guidance on how to follow the SOI Standards

- » <https://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm>

- » **CDBG projects must comply with the SOI Standards to avoid Adverse Effects to Historic Properties**

Step 3 – Assess Effects

» Effect Determinations: Historic Districts

- » If the project will take place within an eligible or listed historic district, then the finding must be **No Adverse Effect to Historic Properties**, even if the individual building is non-contributing.
- » For contributing resources, the scope of work must follow the SOI Standards on both the interior and exterior to avoid adverse effects to both the building and district.
- » For non-contributing resources, the scope of work must follow the SOI Standards on the exterior to avoid adverse effects to the district.



Step 3 – Assess Effects

» How to Proceed with a Federal Finding

- » If there are **No Historic Properties Affected** or **No Adverse Effect to Historic Properties**, the review process may end here.
 - » Submit a Section 106/Tier II form to IEDA through IowaGrants.gov
- » CDBG projects are usually designed to avoid Adverse Effect, but if **Adverse Effect to Historic Properties** is unavoidable:
 - » The PA requires consultation with SHPO and Step 4: Resolve Adverse Effects must be completed.

STATE HISTORIC
PRESERVATION
OFFICE OF IOWA

IOWA DEPARTMENT OF CULTURAL AFFAIRS

Section 106 Process

» Four-Point Approach

1. Initiate Section 106 Review Process

- Determine if the undertaking has the potential to affect cultural resources

2. Identify and Evaluate Historic Properties

- Identify the Area of Potential Effects (APE) – the area in which the undertaking has the potential to directly or indirectly affect any historical and/or archaeological resources
- Identify and evaluate resources within the APE to determine if they are listed on or eligible for listing on the National Register of Historic Places (NRHP)

3. Assess Effects

- In consultation with interested parties, determine how the project will affect any eligible or listed resources: No Historic Properties Affected, No Adverse Effect, or Adverse Effect

4. Resolve Adverse Effects

- If the project will result in an Adverse Effect, draft a Memorandum of Agreement (MOA), which outlines agreed-upon measures that will be taken to avoid, minimize, or mitigate the Adverse Effect resulting from the undertaking

Step 4 – Resolve Adverse Effects

» Memorandum of Agreement (MOA)

- » The only way to resolve Adverse Effects:
 - » Develop, execute, and implement an MOA in consultation with SHPO and interested parties
- » What is an MOA?
 - » Outlines agreed-upon measures that IEDA and the RE will take to avoid, minimize, or mitigate the adverse effect resulting from the undertaking.
- » This process can add both time and cost to the project.

ACHP Template Agreement Documents

Included below are two agreement templates: a two-party Memorandum of Agreement (MOA) template (followed by instructions on how to turn it into a three-party MOA template), and a template to amend an MOA or a project Programmatic Agreement (project PA).

ACHP Model Two-Party MOA Template:

**MEMORANDUM OF AGREEMENT
BETWEEN [insert Agency]
AND THE
[insert name of State or Tribe] ["STATE" or "TRIBAL"] HISTORIC PRESERVATION
OFFICER
REGARDING THE [insert project name and location]**

WHEREAS, the [Agency] ([insert Agency abbreviation]) plans to ["carry out" or "fund" or "approve"/"license"/"permit" or other appropriate verb] the [insert project name] (undertaking) pursuant to the [insert name of the substantive statute authorizing the federal agency involvement in the undertaking], [insert legal cite for that statute]; and

and

WHEREAS, the undertaking consists of [insert a brief explanation of the undertaking];

and

WHEREAS, [Agency abbreviation] has defined the undertaking's area of potential effects (APE) as [insert written description and/or "described in Attachment XXX"]; and

WHEREAS, [Agency abbreviation] has determined that the undertaking may have an adverse effect on [insert name of historic property(ies)], which ["is" or "are"] ["listed in" or "eligible for listing in"] the National Register of Historic Places, and has consulted with the [insert name of State or Tribe] ["State" or "Tribal"] Historic Preservation Officer (["SHPO" or "THPO"]) pursuant to 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108); and

WHEREAS, [Agency abbreviation] has consulted with the [insert name of Indian tribe(s) or Native Hawaiian organization(s)], for which [insert name of historic property(ies)] ["has" or "have"] religious and cultural significance, [Insert this whereas clause if appropriate]; and

WHEREAS, [Agency abbreviation] has consulted with [insert names of other consulting parties, if any] regarding the effects of the undertaking on historic properties and has invited them to sign this MOA as a ["invited signatory(ies)" or "concurring party(ies)"]; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), [Agency abbreviation] has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation, and the ACHP has chosen *not to* participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

Step 4 – Resolve Adverse Effects

» Memorandum of Agreement (MOA)



» Typical MOA timeline:

- » Consult with SHPO on the “Adverse Effect” finding (30 days)
- » SHPO concurs with the “Adverse Effect” finding
- » Notify the Advisory Council on Historic Preservation (ACHP) of the Adverse Effect and invite them to participate in resolution (15 days)
- » Notify the public and interested parties of the Adverse Effect and solicit ideas for ways to avoid, minimize, and mitigate the effects
- » Through consultation with SHPO and all identified interested parties, select mitigation measures that are commensurate with the Adverse Effect on the resource
 - » Mitigation measures **must** be agreed-upon by all parties before they are included in the MOA (especially by the federal agency and SHPO)
- » Draft the MOA to outline the agreed-upon mitigation measures and the roles and responsibilities of who will implement them
 - » The MOA **must** clearly state who is responsible for each task
- » Distribute the draft MOA to all signatories and invited signatories for review and comment
- » Once agreed upon, all signatories sign and execute MOA
- » Complete all stipulations of the MOA

Step 4 – Resolve Adverse Effects

» Drafting an MOA

» ACHP's Resources:

- » MOA Guidance: <https://www.achp.gov/initiatives/guidance-agreement-documents>
- » e106 Form and Instructions: <https://www.achp.gov/e106-email-form>
- » MOA Template: https://www.achp.gov/template_moa
- » Section 106 Agreement Checklist – Content: <https://www.achp.gov/node/8396>
- » Section 106 Agreement Checklist – Reviewer's Guide: <https://www.achp.gov/node/8397>

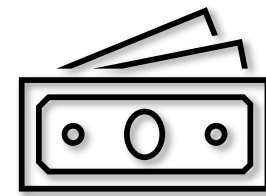
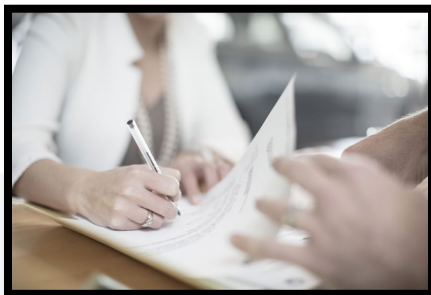
» Example mitigation measures include:

- » Resource Specific:
 - » Recordation and Documentation – typically completed before a historic building is demolished or altered by the federally funded project
 - » Booklet or other publication on the history and significance of the resource
 - » Signage or interpretive kiosk at the location of the resource
- » Alternate Mitigation:
 - » Survey and National Register Nomination of other nearby resources
 - » Historic Preservation Education and Technical Assistance Workshops
 - » Comprehensive Preservation Plan
 - » Bricks and Mortar repairs to other local historic properties
 - » Digitization of archival documentation for public use

Step 4 – Resolve Adverse Effects

» Considerations for MOAs and Mitigation

- » Time frame to complete the mitigation measures as it relates to the time frame of the federal funding source
 - » Mitigation could take longer than the project itself
 - » The federal funding source and federal responsible entity will need to keep the project open for as long as it takes to complete the mitigation
- » Ability to pay for the mitigation measures
 - » Will it be covered by the federal funds, or do you need to look for donations or other funds?
- » Identify mitigation measures that are most beneficial to historic preservation and the public
 - » Stay away from private interests or isolated benefits
- » Ensure that there are resources and admin available to implement the mitigation measures



Section 106 Consultation

» Interested Parties



- » Who are interested parties?
 - » IEDA Historic Preservation Specialist (in lieu of SHPO per Programmatic Agreement) is the primary interested consulting party
 - » Depending on the nature of the undertaking, the following may also be consulting parties:
 - » Tribes with an interest in the area (PA list and HUD portal): <https://egis.hud.gov/tadat/>
 - » Local Historic Preservation Commissions (HPC)
 - » City or County Historical Societies
 - » Any other party identified as having an interest in the federal project
- » When to consult interested parties:
 - » When you know the full scope of work for the project, including project plans, specifications, access areas, borrow sites, utilities, etc.
 - » After you've defined your Area of Potential Effects (APE)
 - » When you've completed Step 2 (Identify and Evaluate) and Step 3 (Assess Effects)
 - » At least 3 months prior to an estimated construction start date (or earlier)
- » Consultation should be an **open process**, where both the RE and the interested parties can discuss options, make suggestions, and agree on a finding

Section 106 Consultation

» When to Consult with Tribes under Section 106

- » Consultation with the IEDA HPS does **not** replace the potential need to consult with federally recognized Native American Tribes and Tribal Preservation Officers
- » “When To Consult With Tribes Under Section 106” form:
 - » Includes a list of projects that would require you to contact the tribal authorities
 - » Available on the HUD Exchange website:
<https://www.hudexchange.info/resource/3770/when-to-consult-with-tribes-under-section-106-checklist/>
 - » If your project type is not on the list, you do not need to consult with tribes; instead, fill out the “When to Consult With Tribes Under Section 106” form and include it in your ERR.

When To Consult With Tribes Under Section 106

Section 106 requires consultation with federally-recognized Indian tribes when a project may affect a historic property of religious and cultural significance to the tribe. Historic properties of religious and cultural significance include: archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, traditional cultural places, traditional cultural landscapes, plant and animal communities, and buildings and structures with significant tribal association. The types of activities that may affect historic properties of religious and cultural significance include: ground disturbance (digging), new construction in undeveloped natural areas, introduction of incongruent visual, audible, or atmospheric changes, work on a building with significant tribal association, and transfer, lease or sale of properties of the types listed above.

If a project includes any of the types of activities below, invite tribes to consult:

- ☐ **significant ground disturbance (digging)**
Examples: new sewer lines, utility lines (above and below ground), foundations, footings, grading, access roads
- ☐ **new construction in undeveloped natural areas**
Examples: industrial-scale energy facilities, transmission lines, pipelines, or new recreational facilities, in undeveloped natural areas like mountaintops, canyons, islands, forests, native grasslands, etc., and housing, commercial, and industrial facilities in such areas
- ☐ **incongruent visual changes**
Examples: construction of a focal point that is out of character with the surrounding natural area, impairment of the vista or viewshed from an observation point in the natural landscape, or impairment of the recognized historic scenic qualities of an area
- ☐ **incongruent audible changes**
Examples: increase in noise levels above an acceptable standard in areas known for their quiet, contemplative experience
- ☐ **incongruent atmospheric changes**
Examples: introduction of lights that create skyglow in an area with a dark night sky
- ☐ **work on a building with significant tribal association**
Examples: rehabilitation, demolition or removal of a surviving ancient tribal structure or village, or a building or structure that there is reason to believe was the location of a significant tribal event, home of an important person, or that served as a tribal school or community hall
- ☐ **transfer, lease or sale of a historic property of religious and cultural significance**
Example: transfer, lease or sale of properties that contain archeological sites, burial grounds, sacred landscapes or features, ceremonial areas, plant and animal communities, or buildings and structures with significant tribal association

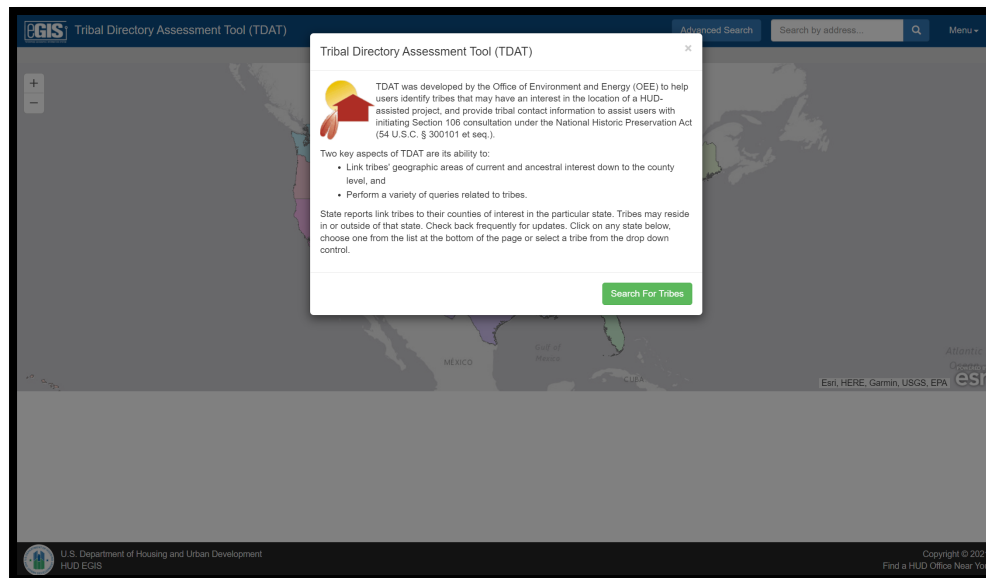
☐ **None of the above apply**

Project/ Date **Reviewed By**

Section 106 Consultation

» Tribal Consultation

- » A list of tribal authorities who would like to be contacted can be found in Appendix A of the PA
- » Refer to the HUD Tribal Directory (<https://egis.hud.gov/tdat/>) to identify the current contact for tribes interested in the specific area of the project.



Section 106 Consultation

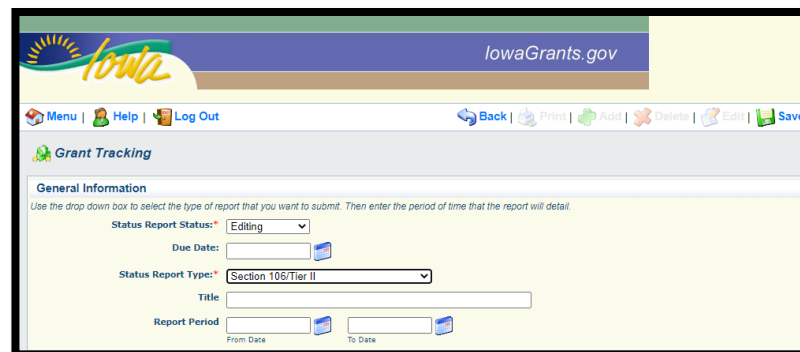
» Tribal Consultation

- » Tribal consultation resources:
 - » First reference IEDA's PA
 - » Then reference HUD's "Process for Tribal Consultation in Projects That Are Reviewed Under 24 CFR Part 58": <https://www.hudexchange.info/resource/2448/notice-cpd-12-006-tribal-consultation-under-24-cfr-part-58/>
- » Tribal consultation letters:
 - » Refer to HUD's "Section 106 Tribal Consultation Letter Template": <https://www.hudexchange.info/resource/3785/tribal-consultation-letter-template/>
 - » Consultation with the Tribe **must** be on City letterhead from the Chief Elected Official and not from the grant administrator
 - » Tribes have 30 days to indicate their desire to consult
- » Once complete, add consultation documentation to the Section 106/Tier II form in IowaGrants.gov:
 - » Upload the letter(s) and distribution list in the Supplemental Documentation section
- » Include tribal consultation in ERR

How to Submit Section 106 Documentation to IEDA

» Section 106/Tier II Submittals

- » Once Steps 2 (Identify and Evaluate) and 3 (Assess Effects) of the Section 106 process have been completed:
 - » Start a Section 106/Tier II compliance form in IowaGrants.gov
 - » Read instructions and complete all relevant fields
 - » Note the Site Inventory Number on the Section 106/Tier II form if previously inventoried
 - » Select “No” for “PA Exempt” if you are submitting evaluation documents (ISIF, Archaeological Survey, etc.)
 - » Select a “Finding” (No Historic Properties Affected, No Adverse Effect, Adverse Effect)
 - » Upload all Supporting Documentation
 - » Submit Section 106/Tier II form for review
 - » IEDA HPS has 30 days to review and provide comments or approve



The screenshot displays the IowaGrants.gov website interface. At the top, there is a header with the Iowa state logo and the text "IowaGrants.gov". Below the header, a navigation bar includes links for "Menu", "Help", "Log Out", "Back", "Print", "Add", "Delete", "Edit", and "Save". The main content area is titled "Grant Tracking" and contains a "General Information" section. This section includes a dropdown menu for "Status Report Status" set to "Editing", a "Due Date" field, a dropdown menu for "Status Report Type" set to "Section 106/Tier II", a "Title" text field, and a "Report Period" section with "From Date" and "To Date" fields.

How to Submit Section 106 Documentation to IEDA

» Section 106/Tier II Submittals

Programmatic Agreement

This section should only be completed after the Programmatic Agreement with SHPO has been signed.

PA Exempt No

If this project IS PA Exempt, provide exempt date signed and PA Finding

Exempt Date Signed

Exempt Date Signed PA Exception

If this project IS NOT PA Exempt, please provide the finding and supporting documents in the section below.

Finding No Historic Properties Affected
Finding

If No Adverse Affect or Adverse Effect,
please describe what historic resources
are in the APE and how the RE came to
the finding.

Programmatic Agreement

This section should only be completed after the Programmatic Agreement with SHPO has been signed.

PA Exempt No

If this project IS PA Exempt, provide exempt date signed and PA Finding

Exempt Date Signed

Exempt Date Signed PA Exception

If this project IS NOT PA Exempt, please provide the finding and supporting documents in the section below.

Finding No Adverse Effect
Finding

If No Adverse Affect or Adverse Effect,
please describe what historic resources
are in the APE and how the RE came to
the finding.

The house is a contributing structure to the Harmon & LeValley NW Historic District. The scope of work includes replacing the asphalt shingled roof with like materials, but will not replace, cover, or substantially disrupt any original materials other than old layers of paint.

How to Submit Section 106 Documentation to IEDA

» Section 106 Submittals: Supporting Documentation

» Required Supporting Documentation:

- » Authorization for Alternate Signatories Form (per program/city) or Request for Comment Form signed by City Official (per address) – blank forms can be found in PA
- » APE map
- » If work involves above-ground resources over 50 years of age:
 - » Iowa Site Inventory Form (ISIF) with current photographs of all visible elevations, streetscapes, etc.
 - » Photos **must** be integrated into the ISIF
 - » Even if building or district is listed in NRHP, current condition photographs are still required
- » If work involves ground disturbance:
 - » Supplemental Archaeological Information or Archaeological Survey (Phase 1; contact Bear Creek or OSA)
- » Scope of work conveying that the proposed project meets SOI standards
 - » Include a narrative description of the project work
 - » Ideally, also include architect renderings showing any changes to exterior elevations of any eligible or listed properties – otherwise, we may go back and ask for them
 - » Make sure project activities are **clearly stated** and easy to find
- » Copies of tribal letters or other consultation, if required
- » Any other supplemental documentation that will help IEDA concur with finding, such as the Assessor's webpage, old ISIFs, historic district nominations, window surveys, etc.
- » Upload **all** documents as PDFs

How to Document Section 106 Compliance in ERR

» How to Document Compliance from Other Agency

» Environmental Assessment (EA)

- » If other agency (DNR, USDA, FEMA, etc.) completed Section 106 compliance
 - » Add the statement below to the ERR checklist
 - » Add the Section 106 compliance/approval documentation to your ERR
 - » No other form is required

10. Historic Preservation [36 CFR 800]		This project is jointly funded with other federal funds. As such, the ___(other agency)___ consulted with the State historic preservation office on ___(date)___ with a finding of ___(Finding)___ and the State Historic Preservation Office concurred with their finding on ___(date)___ . The ___(other agency)___ sent correspondence to tribes with an interest in the area on ___(date)___ , and no comments were received back.
--	--	---

How to Document Section 106 Compliance in ERR

» How to Document Compliance for IEDA

» Environmental Assessment (EA)

- » If no other federal agency is involved – complete and submit a Section 106 form in IowaGrants.gov for your project
- » IEDA HPS will review, and if everything is correct, will “approve” form.
- » Once the Section 106 form has been approved:
 - » Add the statement below to the ERR checklist
 - » Take a screenshot of Section 106 approval and add to EA
 - » Add tribal consultation documentation to EA
 - » Once complete, submit ERR and RROF to IEDA through IowaGrants.gov*
 - » Release of Funds will not be issued if an approved Section 106 Form is not included in the ERR

10. Historic Preservation
[36 CFR 800]

According to the Programmatic Agreement, CDBG recipients are to consult with IEDA's Section 106 Coordinator instead of the SHPO. The Section 106 consultation with IEDA was concluded on #/##/##. They agreed with the “XXX” finding. List of tribes interested in the project county are located here: <http://egis.hud.gov/tdat/Tribal.aspx> Tribes consulted on #/##/##. Letters to the tribes and IEDA consultation memo are located in the appendix.

How to Document Section 106 Compliance in ERR

» How to Document Compliance for IEDA

- » Categorically Excluded Subject to 58.5(a)(3): (HSG, DTR, etc.)
 - » The ERR will be completed **prior to** individual house/site Section 106/Tier II reviews.
 - » Add the statement below to the ERR checklist
 - » Add tribal consultation documentation to ERR
 - » Once complete, submit ERR and RROF to IEDA through IowaGrants.gov

10. Historic Preservation [36 CFR 800]		According to the Programmatic Agreement, CDBG recipients are to consult with IEDA's Historic Preservation Specialist instead of the SHPO. Each house/building as it is identified will be submitted to the IEDA Historic Preservation Specialist for section 106 consultation. No bidding/construction will occur on the house/building prior to conclusion of this consultation. Due to the nature of the activity, the Tribes were not consulted. The "when to consult tribes" memo is located in the appendix.
---	--	---

Questions

Robert Jonet

Environmental and Historic Preservation Specialist

Iowa Economic Development Authority

Robert.Jonet@IowaEDA.com

