

CHAPTER 12

ARCHAEOLOGICAL AND HISTORICAL RESOURCES

TABLE OF CONTENTS

12-1 OVERVIEW	12-1
12-2 PROCEDURE	12-2
12-2.1 Type 1 and Programmatic Categorical Exclusions	12-2
12-2.2 Type 2 Categorical Exclusion, Environmental Assessment, Draft Environmental Impact Statement, and State Environmental Impact Report	12-3
12-3 PROCESS	12-3
12-3.1 Conducting the Cultural Resource Assessment Survey	12-3
12-3.1.1 Determine the Area of Potential Effect (APE)	12-3
12-3.1.2 Cultural Resource Assessment Information Package	12-4
12-3.1.3 Determining the Level of Assessment Required	12-5
12-3.1.4 Conduct Background Research	12-5
12-3.1.5 Prepare a Research Design for the Project	12-6
12-3.1.6 Conduct the Archaeological Field Survey	12-6
12-3.1.7 Conduct the Historic Resources Survey	12-7
12-3.1.8 Artifact Processing and Analysis	12-8
12-3.1.9 Artifact and Record Curation	12-8
12-3.2 Documenting the Cultural Resource Assessment Survey	12-8
12-3.2.1 The Cultural Resource Assessment Survey Report	12-8

12-3.2.2	Cultural Resource Assessment Survey Report Distribution	12-9
12-3.3	Cultural Resource Assessment Findings	12-10
12-3.3.1	No Cultural Resources Identified	12-10
12-3.3.2	Cultural Resources Identified	12-10
12-3.3.3	Results of the Assessments	12-12
12-3.4	Assessment of Impacts to National Register Properties	12-12
12-3.4.1	Application of the Criteria of Effect and Adverse Effect	12-14
12-3.5	Development of a Memorandum of Agreement (MOA)	12-15
12-3.5.1	Failure to Agree	12-16
12-3.5.2	The FHWA Does Not Accept the Recommendations(s)	12-16
12-3.5.3	The FHWA Accepts the Recommendations(s)	12-17
12-4	DOCUMENTATION IN TYPE 2 CE, EA, EIS, OR SEIR	12-17
12-4.1	No Involvement with Cultural Resources	12-17
12-4.2	Involvement with Non-National Register Properties	12-18
12-4.3	Involvement with National Register Properties	12-18
12-4.3.1	Finding of No Effect	12-18
12-4.3.2	Determination of Adverse Effect / Memorandum of Agreement	12-19
12-5	OFF-SITE CONSTRUCTION-RELATED ACTIVITIES BY CONTRACTORS .	12-20
12-5.1	Initiation of Cultural Resource Assessment	12-20
12-5.2	Results of Assessment Request	12-21
12-5.3	Conducting the Cultural Resource Field Survey	12-21
12-5.4	Results of the Cultural Resources Field Survey	12-21
12-6	REFERENCES	12-22

LIST OF FIGURES

FIGURE 12.1	Section 106 Process (Continued)	12-23
FIGURE 12.1	Section 106 Process (Concluded)	12-24
FIGURE 12.2	Example Project Location Map	12-25
FIGURE 12.3	No Effect Determination Letter	12-26
FIGURE 12.4	Contractor's Request for a Cultural Resource Assessment	12-27

12. ARCHAEOLOGICAL AND HISTORICAL RESOURCES

12-1 OVERVIEW

Various transportation projects conducted by the Florida Department of Transportation (FDOT), hereafter referred to as the “Department,” require a Cultural Resource Assessment Survey (CRAS) to locate, document, evaluate, assess effects on, and mitigate adverse impacts to, archaeological and historical properties. Cultural resources or “historic properties,” as defined by the National Historic Preservation Act of 1966 (as amended), are any “prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in the *National Register of Historic Places (NRHP)*.” Cultural resources are found both above and below ground. Archaeological sites, also referred to as “archaeological resources,” represent the locations of prehistoric or historic activities. The term “historic structures” includes bridges, houses, buildings, and constructed features which, with few exceptions, are at least fifty years old. Historic districts consist of historic buildings and other elements which retain identity and integrity as a whole. Cemeteries and burial places are also considered cultural resources. A broader discussion of the types of cultural resources is included in the Cultural Resource Management (CRM) Handbook in Chapter 1.

A body of federal and State laws, rules, and regulations mandates that the Department’s project development process takes into consideration cultural resources that may be affected by project activities. The major authorities governing this process include the National Historic Preservation Act (NHPA) of 1966 (Public Law 89-665, as amended) and its implementing regulations (36 CFR 800), Executive Order 11593, Chapter 267 of the Florida Statutes (F.S.), and Chapter 872 F.S. Other pertinent legislation addressing the treatment of cultural resources includes the National Environmental Policy Act (NEPA) of 1969 (Public Law 91-190) and the Department of Transportation Act (DOTA) of 1966 (Public Law 89-670). A detailed discussion of historic preservation law is provided in the CRM Handbook in Chapter 1 and Appendix A.

The basic process for performing cultural resource assessments is provided by Section 106 of the NHPA of 1966. Section 106 pertains to actions or undertakings performed, assisted, permitted, or licensed by a federal agency. Such agencies under the U.S. Department of Transportation include the Federal Highway Administration (FHWA), the United States Coast Guard (USCG), The Federal Aviation Administration (FAA), the Federal Transit Administration (FTA), and the Federal Railroad Administration (FRA). The Department is primarily involved with FHWA, as “lead agency”, in terms of Department activities. For this reason, the FHWA is generally designated as the coordinating agency in the Section 106 process throughout this manual. The FHWA should provide the results of cultural resource assessments, for example, those involved in fulfilling permitting requirements, to other agencies (e.g. USCG) as necessary. State law, Chapter 267 F.S., mimics the requirements set forth by the federal legislation. The Department of State, Division of Historical Resources, has incorporated the Section 106 process into the State’s historic compliance review program. The compliance review program is ultimately overseen by the State Historic Preservation Officer (SHPO). Therefore, whether a project is federally-funded or State-funded, similar requirements for the assessment of cultural resources apply. The only difference is that for federally-funded projects the

federal agency is the lead agency while for state-funded projects consultation occurs directly between the Department and SHPO. The latter applies, for example, in the case of consultation involving a State Environmental Impact Report (SEIR). Department cultural resource assessments shall be conducted by professionals meeting at least the minimum criteria for archaeologists, historians, architectural historians, and other professionals set forth in “Archaeology and Historic Preservation: Secretary of the Interior’s Standards and Guidelines” (Federal Register, 1983, Vol. 48, No. 190, Pages 44738-44739) and Chapter 1A-46.004, Florida Statutes, “Criteria for Qualifications for Archaeologists.” The professional qualifications required to perform cultural resource assessments for the Department are fully described in the CRM Handbook, Chapter 1.

The five-step Section 106 process begins with the identification and evaluation of cultural resources (Step 1). If a significant historic property, that is, one listed or eligible for listing in the *NRHP*, is located within the project impact zone or Area of Potential Effect (APE), then the effects of the transportation project on the property are determined by applying the Criteria of Effect (Step 2). The effects assessment may result in a finding of “No Effect,” “No Adverse Effect,” or “Adverse Effect.” In cases where it is determined that the project will have an adverse effect, consultation with the Advisory Council on Historic Preservation (ACHP) is initiated (Step 3). Following agreement among the consulting parties on the appropriate means of mitigating adverse effects (for example, the Department, FHWA, ACHP, SHPO) a Memorandum of Agreement (MOA) is developed and executed. Following comments and acceptance of the MOA by the ACHP, the FHWA (or other “lead agency”), in concert with the Department, carries out the terms of the MOA (Step 4). The Section 106 process is completed with the initiation of the transportation undertaking (Step 5). The following Manual sections define the Department’s responsibilities in participating in the Section 106 process and, concomitantly, the State process under Ch. 267 F.S. A detailed overview of the process is presented in detail in the CRM Handbook.

The Section 106 process is outlined in Figure 12.1.

12-2 PROCEDURE

Regardless of the Class of Action, a cultural resource assessment must be performed for all projects.

12-2.1 Type 1 And Programmatic Categorical Exclusions

The identification of National Register properties is to be accomplished prior to completion of the class of action process (PD&E Manual, Part 1, Chapter 3) for projects classified as Type 1 and Programmatic Categorical exclusions. The District will consult the lists of National Register properties to determine whether or not any properties are located within the project limits (APE). The lists identify historic properties that are officially listed on the *NRHP* or that are potentially eligible for listing on the *NRHP*. A copy of this list of National Register properties has been provided each District and will be updated every six months by the Environmental Management Office following publication by DHR.

If National Register properties are located adjacent to the project right-of-way (i.e., APE), then the District requests consultation for the application of the criteria of effect as discussed in Section 12-3.4. This consultation is completed and documented in the project file before proceeding with the project.

This evaluation completes the CRAS for Type 1 and Programmatic Categorical Exclusions.

12-2.2 Type 2 Categorical Exclusion, Environmental Assessment, Draft Environmental Impact Statement, and State Environmental Impact Report

For all Type 2 Categorical Exclusions (CEs), Environmental Assessments (EAs), Draft Environmental Impact Statements (DEISs) classified as such in the class of action process defined in Part 1, Chapter 3, and State Environmental Impact Statements (SEIR) as discussed in Part 1, Chapter 13, the District should perform the following procedures in the order that they are discussed in the process described below in Section 12-3.

12-3 PROCESS

The following process should be completed in conducting a cultural resource assessment of a proposed transportation project or facility.

12-3.1 Conducting the Cultural Resource Assessment Survey

12-3.1.1 Determine the Area of Potential Effect (APE)

The Department Project Manager, in consultation with qualified professionals (e.g., Archaeologists, Historians, Architectural Historians) shall establish the Area of Potential Effect for the project, in coordination with the FHWA and SHPO as applicable. The APE is the “geographic area(s) within which the proposed undertaking may cause changes in the character or use of historic properties listed or eligible for listing in the *NRHP*” (36 CFR 800.2(c)). In defining the APE, the full range of possible project impacts, both direct and indirect, must be considered. Direct impacts include ground-disturbing activities and audio and visual effects. Indirect or secondary impacts include changes in transportation patterns, land use, population densities and/or growth rates.

The APE is not to be generally considered commensurate with project right-of-way limits, particularly in regard to the assessment of historic structures that may be impacted by the proposed project. The type and extent of construction activities, the horizontal and vertical limits of proposed ground disturbance, and the possible placement of project related staging, waste, and mitigation areas must also be considered. Potential retention/detention pond areas should also be considered as well as right-of-way acquisitions, temporary easements, temporary access roads, flood plain compensation and wetland mitigation areas. In addition, the introduction of project associated visual and aesthetic, noise and atmospheric impacts, as well as changes in vehicular access should be considered.

The initial definition of the APE should be large enough to accommodate minor project changes without necessitating additional cultural resource investigations. The APE should be clearly defined in the Cultural Resource Assessment package developed to establish the parameters of the cultural resource assessment survey. The package should contain a narrative description of the APE and an aerial photograph(s) on which the APE is clearly marked. Refer to Chapter 3 of the CRM Handbook for a detailed discussion of the Area of Potential Effect.

12-3.1.2 Cultural Resource Assessment Information Package

The CRAS information package for a project is prepared by the District Project Manager in concert with the District Cultural Resource Coordinator. It should contain enough information to enable Department or Consultant professional archaeologists and historians to make a comprehensive assessment of any cultural resources in the vicinity for all viable project alternatives.

The assessment request package should contain, at a minimum, the following information :

1. Memorandum (Transmittal Letter)

The Memorandum is addressed to the professional cultural resource management staff who will be conducting the assessment including field survey, as applicable.

The subject of the memorandum should contain the Financial Management Number, the work program item number, and, if appropriate, the Federal-aid project number.

The body of the memorandum should contain a description of the project, including the termini and the nature of the project (e.g., the addition of two lanes to the existing facility, the replacement of the existing bridge on either present or new alignment, etc.). If additional right-of-way is to be acquired, a description of the location and total amount of acreage involved should also be included. If water retention sites or other facilities (e.g., flood plain compensation areas, wetland mitigation areas) are required, the location and size of each should be included. The narrative should also include a complete description of the project APE based on the above listed parameters.

2. Project Location Map

This should be a map of the general project area showing the limits of the project. An example of such a map is shown in Figure 12.2.

3. Aerial Photograph

For major projects, aerials should be provided. They should be scaled no smaller than 1"=100' for urban areas and 1"=400' for rural areas, each depicting the alternatives under consideration, and any other facilities such as retention sites (size and location). The APE for the project should be clearly marked on these aerials.

4. Project Schedule

A project schedule should be provided in the cultural resource assessment package to allow the cultural resource management professionals to conduct the assessment in a timely and efficient manner commensurate with the overall scheduling requirements of the project.

It cannot be overemphasized that the project should be developed to the extent that all viable, and only viable, alternatives are submitted for Cultural Resource Assessments. Consideration of additional alternatives after submittal of the initial assessment request package may result in considerable delay which could *seriously impair the project schedule*.

12-3.1.3 Determining the Level of Assessment Required

Based on the nature of the proposed transportation project activities (e.g., resurfacing, road widening, bridge replacement), and with reference to the project classes of action discussed in Section 12-2 above and Part 1, Chapter 3 of the PD&E Manual, the Department Project Manager will determine the level of cultural resource assessment and documentation required. Levels of effort can range from a records review and reconnaissance survey only to a full scale intensive survey supported by extensive background research. Survey requirements will generally depend on right-of-way needs, extent of ground disturbing activities, and projections as to the potential impacts of the proposed project. Three options are applicable:

- (1) No Cultural Resource Assessment Survey is required,
- (2) Records Review and SHPO/FHWA Consultation is required,
- (3) A standard Cultural Resource Assessment Survey is required.

With the third option noted above, a two-phase investigation may be employed, for example, in the case of undertakings which require a preliminary alternatives analysis or a corridor study. The two phases of the cultural resource investigation for a corridor study include (1) background research and reconnaissance survey of the study corridor, including alternative alignments for the purpose of determining the relative cultural resource involvement of each alignment, and (2) field survey and standard CRAS report for the APE of the preferred alignment(s).

There are a number of steps to be followed in conducting a standard CRAS. These are listed below:

12-3.1.4 Conduct Background Research

Background research is conducted to identify and review the types of cultural resources present in the project area, their chronological associations, settlement patterning, and other pertinent information. This research is also critical in that it provides the contexts useful in evaluating the *NRHP* eligibility of existing and newly discovered archaeological sites and historic structures

identified during the cultural resource assessment survey. Data sources exist at the State, regional, and local levels. The Florida Site File(FSF), Division of Historical Resources, Department of State, located in Tallahassee, Florida must be accessed as the primary source of background information. A variety of information may be obtained at the FSF, including:

- National Historic Landmark listings and nominations
- National Register of Historic Places listings and nominations
- FSF forms for historic structures and archaeological sites
- FSF forms for cemeteries and bridges
- Previous Cultural Resource Assessment Survey Reports
- FDOT County Highway Maps
- USGS Quadrangle Maps
- State Historic Highway list

The Division of Historical Resources, Survey and Registration Section, should also be consulted for cultural resource information, including the Preliminary Site Information Questionnaire, which is a good source of information about potentially eligible *NRHP* properties that are under consideration by DHR. The Survey and Registration Section may also contain information that is not yet on file in the FSF. Other sources that should be checked include the Florida Department of Environmental Protection (DEP), the Department itself (e.g., topographic section), local governments, and regional and local libraries, preservation boards, and historical societies. A list of such resources and a general description of the types of information available from them is provided in Chapter 3 of the CRM Handbook.

12-3.1.5 Prepare a Research Design for the Project

The research design provides an overall plan to guide the location, identification, and evaluation of cultural resources within the APE of a project. It addresses all phases of investigation, from background research to report preparation. At a minimum, the research design contains the project name and location, the overall approach and scientific methodologies to be employed, a listing of previously identified *NRHP* sites, structures, and districts; as well as previously recorded archaeological sites and historic structures. A map identifying zones of archaeological probability (i.e., high, medium, low) is included along with discussion of the potential for the occurrence of previously unrecorded archaeological sites. The potential for the occurrence of unrecorded historic structures is also addressed. The research design is reviewed by the District Project Manager in consultation with the Cultural Resource Coordinator and others (SHPO/FHWA) as applicable for sufficiency. Chapter 3 of the CRM Handbook provides a detailed discussion concerning the development of a research design including developing prehistoric and historic archaeological site prediction models and consideration of historic structures and bridges.

12-3.1.6 Conduct the Archaeological Field Survey

The purpose of the archaeological portion of the cultural resource assessment survey is to locate, identify, and assess the significance of any archaeological resources within the Area of Potential Effect established for the project. The survey is meant to provide the Department, FHWA,

and SHPO with data sufficient to determine whether a proposed undertaking may affect significant archaeological resources. The survey requires proper planning, equipment, and supporting documentation (e.g., maps and aerial photographs) to be successfully accomplished. The APE should be clearly defined on these documents. Archaeological sites should be properly identified, tested, and recorded. The proper survey methodology for conducting the archaeological survey is fully explained in Chapter 3 of the CRM Handbook.

Safety is an important issue to be considered in conducting the archaeological survey. Plans and preparation to assure worker safety must be an integral part of every project. Because ground-disturbing activities characterize this type of survey, steps must also be taken to comply with the Underground Facility Damage Prevention and Safety Act (Chapter 556, F.S.). This act was designed to protect both underground utilities and the excavator(s) from possible injury. The requirements of this Act and discussion of the Act's potential impacts to project scheduling along with other general safety issues are described in detail in Chapter 3 of the CRM Handbook.

Archaeological survey often requires the examination of lands still in private ownership. The rights of individual property owners are to be respected and permission of the owner or property manager must be obtained before accessing such lands. To facilitate this process, an "authorization for access" letter shall be provided to individuals conducting the archaeological survey by the Department. The letter should identify the individuals conducting the survey as agents of the Department and state the purpose of the survey. If permission to access private lands is denied, the surveyors shall vacate the property and notify the Department of the constraint on the survey. A discussion of the property access issue and a sample of the "authorization for access" letter is provided in Chapter 3 of the CRM Handbook.

12-3.1.7 Conduct the Historic Resources Survey

The purpose of the historic portion of the cultural resources assessment survey is to locate, identify, and assess, according to *NRHP* criteria, the significance of any historic resources which may be impacted by the proposed project. The survey is meant to provide the Department, FHWA, and SHPO with data sufficient to determine whether a proposed undertaking may affect significant historical resources. The survey requires proper planning, equipment, and supporting documentation (e.g., maps and aerial photographs) to be successfully accomplished. The APE should be clearly defined on these documents. All historic properties (e.g., structures, bridges) that may be impacted by the proposed project shall be properly identified and recorded. The proper survey methodology for conducting a historic assessment survey is provided in Chapter 3 of the CRM Handbook.

Historical survey often requires the examination of lands still in private ownership. The rights of individual property owners are to be respected and permission of the owner or property manager must be obtained before accessing such lands. To facilitate this process, an "authorization for access" letter shall be provided to individuals conducting the archaeological survey by the Department. The letter should identify the individuals conducting the survey as agents of the Department and state the purpose of the survey. If permission to access private lands is denied, the surveyors shall vacate the property and notify the Department of the constraint on the survey. A discussion of the property

access issue and a sample of the “authorization for access” letter is provided in Chapter 3 of the CRM Handbook.

12-3.1.8 Artifact Processing and Analysis

Artifacts recovered from the field survey should be properly bagged, labeled, identified, and categorized. Artifact processing and analysis aids in determining the resource’s chronological placement and function, provides information as to the potential significance of the resource, and is used to preserve and prepare the artifacts for long-term storage (i.e., curation). The analysis and processing of artifacts typically encountered in Department cultural resource surveys is described in Chapter 3 of the CRM handbook.

12-3.1.9 Artifact and Record Curation

At the completion of the cultural resources assessment survey, all artifacts, field notes, maps, photographs, and other documents shall be prepared for storage and curation in a Department designated repository. The standard curation process and requirements are fully described in Chapter 8 of the CRM Handbook.

12-3.2 Documenting The Cultural Resource Assessment Survey

The results of all cultural resource assessments must be documented regardless of whether or not significant cultural resources were identified. A full-scale Cultural Resource Assessment Survey (CRAS) report will be required for most transportation projects involving archaeological sites and historic structures. In the case of extremely minor projects involving minimal APEs and either no or minimal involvement with cultural resources, a Technical Memorandum (TM) may be substituted for a full-scale CRAS report. Other actions, such as the addition of a drainage facility (e.g. detention pond) on a project for which a previous full-scale CRAS and report was completed, only require what is effectively an addendum to the original CRAS report. In such instances, an abbreviated report in the form of a TM may be completed and submitted for the proposed action. When a previous CRAS report is associated with the TM, the CRAS report should be clearly referenced. The reasons for using the abbreviated report format must be fully explained and justified in the Technical Memorandum. Both of these types of reports must first be prepared in draft form and submitted to the appropriate Department personnel for review and comment. Following this review, the report will be revised, if necessary, and resubmitted in its final form. The contents and distribution of the CRAS and TM reports are addressed in the following sections.

12-3.2.1 The Cultural Resource Assessment Survey Report

The standard CRAS report is a detailed, organized, and suitably illustrated document divided into a number of topical sections. In those cases where the CRAS has resulted in the identification and evaluation of archaeological sites and/or historic structures, relevant documents such as the FSF forms for each resource, or Determination of Eligibility (DOE) package in the case of potentially significant resources, is appended to the body of the report. The CRAS will generally contain chapters which provide the following information:

Description of the Project, including:

The nature of the undertaking

The project location and parameters

The APE for the project

The Purpose of the Assessment Survey

Environmental, Archaeological, and Historic Overviews

Research Design

Survey Methodology

Survey Results

Site Evaluations

Appendices (FSF forms and DOEs)

A Survey Log sheet also accompanies the CRAS. This is a simple form required by the DHR which provides important information about the survey in abbreviated form. The Survey Log sheet must accompany the report when it is transmitted to the Historic Compliance Review Section of DHR (i.e., SHPO).

12-3.2.2 Cultural Resource Assessment Survey Report Distribution

The CRAS Report (or TM, as appropriate) is submitted to the District Cultural Resource Coordinator for final distribution upon approval of the Project Manager. The CRAS Report is submitted in the following manner unless specified differently by the Cultural Resource Coordinator:

Three bound copies of the report containing original photographs

Three bound photocopies of the report with photocopied photographs

Original unbound FSF forms with original photographs

Original unbound DOE package(s) with original photographs, as applicable

Original FSF survey log sheet with map

The Cultural Resource Coordinator then submits two bound copies (with original photographs), one set of original site file forms with photographs, original DOE package(s) with photographs (as

applicable), and one completed FSF Survey Log to the FHWA along with a transmittal letter describing the project and summarizing the survey results. For projects with no FHWA involvement (e.g., state-funded projects), the Cultural Resource Coordinator submits this package directly to the SHPO. The CRAS report and TM contents and distribution are fully detailed in Chapter 5 of the CRM Handbook.

12-3.3 Cultural Resource Assessment Findings

12-3.3.1 No Cultural Resources Identified

If no cultural resources are identified during the assessment process, the SHPO will issue a "no effect" determination letter (Figure 12.3) to the appropriate District Environmental Management Office and, if the project is federally-funded, to FHWA. The findings should be included in the appropriate environmental document (Section 12.4).

12-3.3.2 Cultural Resources Identified

Two types of cultural resources may be identified during the CRAS: those properties already listed on the National Register (these will be identified during the background research portion of the assessment) and those other resources which are not listed (these may be identified during the background research or during the field survey). For those resources assessed or identified during the survey which are potentially eligible for the National Register, the Archaeologist, Historian, or Architectural Historian prepares a Determination of Eligibility (DOE) package for each property. This DOE package, as discussed in Chapter 4 of the CRM Handbook, consists of :

- a. *The National Register of Historic Places* Registration Form (NPS 10-900),
- b. Florida Master Site File Form and Number,
- c. Maps (U.S.G.S. Quad and aerial maps),
- d. 4" X 6" (or larger) black and white photographs, and
- e. Statement of historical significance.
- f. A site plan displaying the proposed NRHP boundaries of the resource

This package is submitted to FHWA for an official "determination of eligibility" (this process must be completed by FHWA). The FHWA must apply the National Register Criteria of Significance to determine the possible eligibility of each resource for listing on the *National Register of Historic Places*.

The National Register Criteria of Significance is used in evaluating properties for National Register eligibility. The criteria are :

1. Properties that are associated with events that have made a significant contribution to the broad patterns of our history;
2. Properties that are associated with the lives of persons significant in our past;
3. Properties that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic value, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
4. Properties that have yielded, or may be likely to yield, information important in prehistory or history.

Any one of these criteria may qualify the property for eligibility to the National Register.

The FHWA requests the opinion of the SHPO as to the possible eligibility of each resource. As a result of this process, one of the following three conditions would apply :

1. If FHWA and the SHPO agree that a resource does not satisfy the Criteria of Significance, FHWA documents the finding. The SHPO will issue a "no effect" letter to the FHWA and transmit copies to the District Environmental Management Office (DEMO) and the Central Environmental Management Office (CEMO). The findings and documentation should be incorporated into the appropriate environmental document (Section 12-4.2).
2. If FHWA and the SHPO agree that a resource does satisfy the Criteria of Significance, then the property has been determined to be eligible for the *National Register of Historic Places*. The SHPO will provide a letter to FHWA that, in its opinion, the resource is eligible for the *National Register of Historic Places*. The FHWA will provide a copy of the determination, and a copy of the opinion of the SHPO, to DEMO and CEMO. When a determination is made that the cultural resource is eligible for listing on the *National Register of Historic Places*, the determination and the SHPO letter should be incorporated into the appropriate environmental document (Section 12-4.3). The FHWA and DEMO should assess the impact(s) to the resources in coordination with the SHPO (Section 12-3.4.1).
3. If FHWA and the SHPO disagree as to whether or not a resource satisfies the Criteria of Significance, a letter from FHWA, along with the opinion of the SHPO, if available, is sent to the Keeper of the National Register requesting the Keeper's opinion as to the *NRHP* eligibility of the resource. A copy of the request is provided by FHWA to the DEMO and CEMO. If the opinion of the SHPO is not included, it will be requested by the Keeper. The SHPO has three weeks to provide an opinion, after which the Keeper will proceed with the determination. The Keeper will provide copies of the determination to the SHPO and FHWA. The FHWA will provide a copy

of the determination to the DEMO and CEMO. Depending upon the determination of the Keeper, one of the following two conditions would apply :

- a. If the Keeper determines that the cultural resource is not eligible for listing on *The National Register of Historic Places*, the determination and documentation should be incorporated into the appropriate environmental document (Section 12-4.2)
- b. If the Keeper determines that the cultural resource is eligible for listing on *The National Register of Historic Places*, the determination and documentation should be incorporated into the appropriate environmental document (Section 12-4.3). The FHWA should assess the impact(s) to the resource(s) in coordination with the SHPO (Section 12-3.4).

12-3.3.3 Results of the Assessments

The results of the assessments are included in the Type 2 CE, FONSI, and FEIS listed below. Assessment results are also included in the SEIR with SHPO functioning as the lead agency in consultation and review.

1. When no cultural resources are identified, the same information as discussed concerning the consultation process in Section 12-3.3.1 is provided.
2. When cultural resources are identified but determined not to be National Register properties by FHWA and the SHPO, the same information as discussed concerning the consultation process in Section 12-3.3.2(1) is provided.
3. When cultural resources are identified but determined not to be National Register properties by the Keeper of the National Register, and FHWA and the SHPO disagree, the same information as discussed concerning the consultation process in Section 12-3.3.2(3) is provided.
4. When cultural resources are identified and determined to be eligible for the National Register, the same information as discussed concerning the consultation process in Section 12-3.3.2(2) is provided.

12-3.4 Assessment of Impacts to National Register Properties

If there is any “taking” of a National Register property in the case of federally-funded or assisted projects, the Section 4(f) process must be initiated in accordance with the procedures contained in Part 2, Chapter 13, concurrently with the procedures described below. An exception to the Section 4(f) process, but not the Section 106 process, would be an archaeological site determined significant because of the data it contains.

Once the resource has been determined to be a National Register property, the DEMO should informally assess any impacts to the property. The impacts to be assessed are those described in Part 1, Chapter 3 for a CE, Chapter 4 in Table 4.1 for an EA, or Chapter 6, Table 6.1 for a DEIS, as appropriate. In all cases, the minimum factors to be assessed, and how they relate to the project, are:

- E Access (pedestrian and vehicular),
- E Noise,
- E Landscaping,
- E Usage of the property,
- E Right-of-way needs, and
- E Visual / aesthetic qualities.

After the information on impacts is compiled, it should be prepared for presentation to FHWA and the SHPO as a “Case Study” (CS) report. The Case Study report represents all available documentation pertaining to the significance and characteristics of the *NHRP* listed or eligible property(ies) as well as a discussion of any and all effects the proposed undertaking may have on the said property(ies). The Case Study report also includes a description and evaluation of all potential alternatives considered to avoid or minimize impacts to the property(ies) including the “no build” alternative. The information should be formatted in a manner that allows for a non-technical interpretation and understanding, and should include, as a minimum:

- A general description of the scope and purpose of the proposed project
- A description of the environmental, physical, and cultural setting
- A description of the NRHP involved property(ies)
- A description and analysis of all project alternatives
- A description of the preferred alternative and why selected
- A discussion of potential effects on NRHP properties
- A discussion of the measures employed to avoid or mitigate effects

In certain cases, information available in other pertinent documents associated with the project may be used to compile or (when practicable) substitute for a formal Case Study report. Chapter 6 of the CRM Handbook fully defines the requirements of the Case Study report.

The District should request the initiation of the consultation meeting from the FHWA once the impact assessment information has been compiled. The request, either verbal or written, is informal in nature.

During the informal consultation process, the District may wish to make use of a slide or verbal presentation, reports, or graphics. This, however, is at the discretion of the District.

Following the informal consultation meeting, the SHPO will transmit a letter addressing the issues raised on impacts to each National Register property. The letter will be sent to FHWA and a copy provided to the DEMO and CEMO.

12-3.4.1 Application of the Criteria of Effect and Adverse Effect

After the alternatives have been established and their relationship to the National Register property has been determined, the criteria of effect and adverse effect are applied. This is done in cooperation with FHWA and the SHPO. The following procedures, as detailed in Chapter 6 of the CRM Handbook, are followed :

The District requests the FHWA to initiate the process.

The following criteria are used to determine whether a project will have an effect or an adverse effect on a historic property :

1. An undertaking has **an effect** on a historic property when the undertaking may alter characteristics of the property that may qualify the property for inclusion in the National Register. For the purpose of determining effect, alteration to features of the property's location, setting, or use may be relevant depending on a property's significant characteristics and should be considered.
2. An undertaking is considered to have **an adverse effect** when the effect on a historic property may diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Adverse effects on historic properties include, but are not limited to :
 - a. Physical destruction, damage, or alteration of all or part of the property;
 - b. Isolation of the property from, or alteration of, the character of the property's setting when that character contributes to the property's qualification for the National Register;
 - c. Introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting; and
 - d. Neglect of a property resulting in its deterioration or destruction.
3. Effects of an undertaking that would otherwise be found to be adverse may be considered as being **not adverse** effects for the purpose of these evaluations:
 - a. When the historic property is of value for its potential contribution to archaeological, historical, or architectural research, and when such value can be substantially preserved through the conduct of appropriate research, and

such research is conducted in accordance with applicable professional standards and guidelines;

- b. When the undertaking is limited to the rehabilitation of buildings and structures and is conducted in a manner that preserves the historical and architectural value of affected historic property through conformance with the Secretary's "Standards for Rehabilitation and Guidelines for Rehabilitating Buildings"; or
- c. When the undertaking is limited to the transfer, lease, or sale of a historic property, and adequate restrictions or conditions are included to ensure preservation of the property's significant historical features.

During the consultation meeting between FHWA, the SHPO and FDOT, when the criteria of effect are applied, three decisions can be reached :

1. No effect,
2. No adverse effect, or
3. Adverse effect.

When a no effect decision is made and no disagreement occurs, the decision is documented in accordance with Section 12-4.

When an effect is found but after application of the criteria of adverse effect and the unanimous decision that the effect is not adverse, then the decision is documented in accordance with Section 12-4.

When the effect is determined to be adverse and no disagreement occurs, the agencies proceed to the development of an MOA (Section 12-3.5).

The SHPO will provide a letter as to its evaluation of the project. This letter will be addressed to FHWA and incorporated into the environmental document. The draft environmental document which contains documentation will serve as the case report when consultation occurs with the Advisory Council. Documentation should be in accordance with Section 12-4.

12-3.5 Development of a Memorandum of Agreement (MOA)

After completing the consultation process and after the agencies involved have determined mitigation measures, if any exist, to reduce or avoid effects, FHWA will prepare an MOA between FHWA, the SHPO, and FDOT. These three agencies will sign the MOA and submit it to the Executive Director of the ACHP for his/her review and/or adoption.

The contents of the MOA will vary, depending on the kind of historical and archaeological resource involved, the nature of the project, and the kind of effect it is expected to have. The MOA should specify that :

- a. The FHWA has an involvement in the project,
- b. The project will have an adverse effect on the property,
- c. The consultation procedures of the ACHP have been followed, and
- d. The consulting parties agree that undertaking the project in accordance with the procedure described in the MOA will satisfactorily mitigate any adverse effects.

The MOA should clearly describe the action to be taken to mitigate the adverse effect. It should be specific about the relevant issues in terms of the adverse effect, such as distance, dimensions, locations, and materials.

Once executed, the MOA is forwarded to the Chairman of the ACHP, who either institutes a 30-day review period or, as it rarely happens, refers the matter to the full ACHP. The MOA becomes final either through the expiration of the 30-day review period with no action taken or by the Chairman signing it. The Chairman will return the finalized MOA to FHWA, which will provide a copy to the DEMO and CEMO. The project may then proceed, incorporating specific mitigation measures of the MOA into the appropriate environmental document (Section 12-4)

12-3.5.1 Failure to Agree

In the unlikely event that the consulting parties do not execute an MOA, that is, if they cannot agree on a means to avoid or mitigate the adverse effect of the project, the matter is referred to the full ACHP.

One of the following two conditions would apply after receipt of the notice of failure to agree by the Advisory Council.

- a. The Executive Director of the Advisory Council asks the Chairman to determine whether or not the matter should be considered by the Advisory Council. If the Chairman determines it does not need full Advisory Council consideration, the reasons for this decision are circulated among the Advisory Council members. If there are not three objections to the determination, FHWA, the SHPO, and any other consultation process parties are notified of the decision and the project may proceed. The FHWA will provide a copy of the Advisory Council's determination to the DEMO and CEMO. The process should be included in the appropriate environmental document (Section 12-4).
- b. The Chairman determines that the matter should be considered, or if three objections were expressed to his determination not to consider the matter, five members of the Advisory Council are designated as a panel to hear the case.

12-3.5.2 The FHWA Does Not Accept the Recommendation(s)

If FHWA does not accept the recommendations (comments) of the five member panel, the case is scheduled for the next regular meeting of the full Advisory Council by the Chairman. The Chairman notifies FHWA and the SHPO of the date of the meeting and asks the Executive Director

to prepare a case report (the members of the Advisory Council must receive the case report at least two weeks prior to the meeting).

At one of their regular meetings, the Advisory Council hears oral statements from the interested parties. The Advisory Council's comments are proposed after the meeting in a three-part written statement, including an introduction, findings, and conclusions. The comments are made to FHWA and forwarded to the President and Congress. The comments are considered by the U.S. Secretary of Transportation, who makes a decision on what to do about the project and its effect on the property. The decision is transmitted in a report to the Advisory Council.

The FHWA provides a copy of the U.S. Secretary of Transportation's decision to the DEMO and CEMO, and the project may proceed. The process and findings should be included in the appropriate environmental document (Section 12-4.3).

12-3.5.3 The FHWA Accepts the Recommendation(s)

If FHWA does accept the recommendations (comments) of the five member panel, the project may proceed. FHWA provides a copy of the U.S. Secretary of Transportation's decision to the DEMO and CEMO and the project may proceed. The process and findings should be included in the appropriate environmental document (Section 12-4.3).

12-4 DOCUMENTATION IN TYPE 2 CE, EA, EIS, OR SEIR

12-4.1 No Involvement with Cultural Resources

After the CRAS is complete and no resources are identified, the Cultural Resource Impacts Section of the Type 2 CE, EA, or EIS must include the following standard statement:

"A Cultural Resource Assessment, conducted in accordance with the procedures contained in 36 CFR Part 800 and including background research and a field survey coordinated with the State Historic Preservation Officer (SHPO), was performed for the project. No archaeological or historical sites or properties were identified, nor are any expected to be encountered during subsequent project development. The Federal Highway Administration, after consultation with the SHPO, has determined that no resources listed or eligible for listing on the National Register of Historic Places would be impacted. The SHPO coordination letter is shown as Exhibit XX."

In the Comments and Coordination Section of the document, discuss the coordination efforts related to the assessment process.

In the case of the SEIR, the use of the above standard statement is optional. If used, any reference to FHWA should be deleted and SHPO becomes the consulting agency. Part 1, Chapter 13 (e.g., 13-2.4) of the PD&E manual should be consulted for general information concerning a SEIR.

12-4.2 Involvement with Non-National Register Properties

This situation arises when, during the cultural resource assessment, historical properties are identified, but, after consultation with the SHPO, are determined not to be eligible for the National Register.

In the Cultural Resource Impacts Section of the Type 2 CE, EA, or EIS, make the following statement:

"A Cultural Resource Assessment, conducted in accordance with the procedures contained in 36 CFR Part 800 and including background research and a field survey coordinated with the State Historic Preservation Officer (SHPO), was performed for the project. As a result of the assessment, (number) of properties, sites (Include Florida Master Site File Numbers), were identified. The Federal Highway Administration, after application of the National Register Criteria of Significance, found that the site(s) was (were) not eligible for listing on the National Register of Historic Places. The SHPO rendered the same opinion. Based on the fact that no additional archaeological or historical sites or properties are expected to be encountered during subsequent project development, the Federal Highway Administration, after consultation with the SHPO, has determined that no National Register properties would be impacted. The SHPO coordination letter is shown on page XX."

In the Comments and Coordination Section, discuss in chronological order the coordination efforts related to the assessment process and the application of the National Register Criteria of Significance.

(It is an accepted policy at both the Federal and State level to not include the actual location of archaeological sites in public documents. This is designed to prevent the disturbance of the sites by unscrupulous "relic collectors" or "pot hunters".)

In the case of the SEIR, the use of the above standard statement is optional. If used, any reference to FHWA should be deleted and SHPO becomes the consulting agency. Part 1, Chapter 13 (e.g., 13-2.4) of the PD&E Manual should be consulted for general information concerning a SEIR.

12-4.3 Involvement with National Register Properties

12-4.3.1 Finding of No Effect

In the Affected Environment Section of EISs or the Impacts Section for EAs Type 2 CEs, or SEIRs describe all National Register properties in the vicinity of the project, including their location and significance.

In the Cultural Resource Impacts Section of the Type 2 CE, EA, or EIS (Part 1, Chapters 3, 4 and 6), include the following statement :

"In accordance with the procedures contained in 36 CFR, Part 800, a Cultural Resource Assessment, including background research and a field survey coordinated with the State Historic Preservation Officer (SHPO), was performed for the project. As a result of the assessment, (number of sites with the Florida Master File Site Numbers), were identified, which were determined eligible for listing on (or listed on) the National Register of Historic Places (see Exhibit XX). Through the application of the Criteria of Adverse Effect, the Federal Highway Administration in consultation with the SHPO determined that (describe here the impact which was found to be an effect) did not constitute an adverse effect on the (or any of the) properties (see Exhibit XX). Based on the fact that no additional archaeological or historical sites or properties are expected to be encountered during subsequent project development, the Federal Highway Administration has determined that no other National Register properties would be impacted."

In the Comments and Coordination Section, discuss in chronological order the coordination efforts related to the assessment process, the application of National Register Criteria of Significance, and the determination of effect and no adverse effect. This should include the date of each meeting, involved parties, issues raised, treatment of those issues, and any follow-up documentation of letters. Reference should be made to all correspondence related to the Section 106 process.

In the case of the SEIR, the use of the above standard statement is optional. If used, any reference to FHWA should be deleted and SHPO becomes the consulting agency. Part 1, Chapter 13 (e.g., 13-2.4) of the PD&E Manual should be consulted for general information concerning a SEIR.

12-4.3.2 Determination of Adverse Effect / Memorandum of Agreement

In the Affected Environment Section of an EIS, describe all National Register properties in the vicinity of the project including their location(s) and significance.

In the Cultural Resource Section of the Type 2 CE, EA, EIS, make the following statement :

"In accordance with the procedures contained in 36 CFR, Part 800, a Cultural Resource Assessment, including background research and a field survey coordinated with the State Historic Preservation Officer (SHPO), was performed for the project. As a result of the assessment, (number of properties) sites, (Include Florida Master Site File Numbers), were identified, which were determined eligible for listing on (or listed on) the National Register of Historic Places (see Exhibit XX)."

One of the following two statements should then be made :

"Through the application of the Criteria of Adverse Effect, the Federal Highway Administration, in consultation with the SHPO, concluded that the project would have an adverse impact on the (or any of the) properties. The Executive Director of the Advisory Council of Historic Preservation concurred with the conclusion (see Exhibit XX). It was further concluded that all prudent and feasible alternatives had been considered, and it was therefore necessary to adversely affect the site since every effort had been made to consider its avoidance."

or this statement is applicable,

"Through the application of the Criteria of Adverse Effect, the Federal Highway Administration, in consultation with the SHPO, determined that (describe here the effect which was determined not to be adverse) did not constitute an adverse impact on the (or any of the) properties. However, the Executive Director of the Advisory Council of Historic Preservation disagreed with the finding (see Exhibit XX). Based on these conclusions, (or "Because of the objection of the Executive Director to the finding of no adverse effect"), a Memorandum of Agreement (MOA) was developed, and approved by the Federal Highway Administration, the SHPO and the Advisory Council (see Appendix). The MOA contains the following stipulations to mitigate any adverse effects : (at this point the specific provisions agreed upon in the MOA should be enumerated and this Section completed)."

In the Comments and Coordination Section, discuss in chronological order the coordination efforts related to the assessment process, the application of National Register Criteria of Significance, and the determination of effect and no adverse effect, the consultation process, and the development of the MOA. This should include the date of each meeting, involved parties, issues raised, treatment of those issues, and any follow-up documentation or letters. Reference should be made to all correspondence related to the Section 106 process.

In the case of the SEIR, the use of any of the above standard statements is optional. If used any reference to FHWA should be deleted and SHPO becomes the consulting agency. Part 1, Chapter 13 (e.g., 13-2.4) of the PD&E Manual should be consulted for general information about a SEIR.

12-5 OFF-SITE CONSTRUCTION-RELATED ACTIVITIES BY CONTRACTORS

12-5.1 Initiation of Cultural Resource Assessment

The contractor initiates the assessment process by requesting from the SHPO, in writing, an assessment of the area to be used for an off-site, construction-related activity. The request, as shown in Figure 12.4, should be addressed to :

Mr. George W. Percy, Director
Division of Historical Resources
And State Historic Preservation Officer
Florida Department of State
500 South Bronough Street
Tallahassee, Florida 32399-0250

The request should contain the Financial Management Number, a description of the proposed activity (i.e., borrow pit, asphalt plant, equipment storage area, etc.), the dimensions or acreage of the affected area, the location (County, township, range, Section, and portion of Section, as appropriate), and a location map. Copies of the request should be sent to the District Materials Engineer, District Environmental Management Engineer, and the District Construction Engineer (for transmittal to the Project Engineer).

12-5.2 Results of Assessment Request

If the SHPO determines that a field survey is not necessary, then the SHPO will provide a clearance letter to the contractor and copies to the District Environmental Management Engineer. After receipt of the clearance letter by the District, the proposed off-site activity can proceed.

12-5.3 Conducting the Cultural Resources Field Survey

If an archaeological and/or historical field survey is recommended by the SHPO, then it is the responsibility of the contractor to ensure that it is performed by individuals or organizations certified to do such work by the Division of Historical Resources.

12-5.4 Results of the Cultural Resources Field Survey

As a result of the field survey, one of the following three procedures will apply :

1. If no cultural resources are identified during the field survey, the SHPO, after receipt of the survey report from the contractor or surveyor, will provide a clearance letter to the contractor or surveyor with a copy to the District Environmental Management Engineer. After receipt of the clearance letter by the District, the proposed off-site activity may proceed.
2. If cultural resources are identified during the field survey, the SHPO, after receipt of the survey report, will apply the National Register Criteria of Significance to the identified resources and render an opinion as to the eligibility. If the resources do not satisfy the Criteria of Significance, the SHPO will provide a clearance letter to the contractor or surveyor with a copy to the District Environmental Management Engineer. After receipt of the clearance letter by the District, the proposed off-site activity may proceed.
3. If it is the opinion of the SHPO that the resources satisfy the Criteria of Significance, the SHPO will request determinations of eligibility from the Keeper of the Register (*NRHP*). The Keeper will provide copies of the Determinations of Eligibility to the SHPO, who will provide copies to the District Environmental Management Engineer. Next, the procedures in Sections 12-3.4(Coordination with SHPO), 12-3.4.1(Application of Criteria of Effect), and 12-3.5(Development of Memorandum of Agreement) are applied, as appropriate, with the involvement of the contractor rather than FHWA, or the District. In most cases, the contractor will forego the use of this facility when this process is required.

12-6 REFERENCES

1. National Historic Preservation Act of 1966 (16 USC 470), Public Law 89-665, as amended by Public Law 91-243, Public Law 93-54, Public Law 94-422, Public Law 94-458, and Public Law 96-515.
2. 36 CFR, Part 800, "Procedures for the Protection of Historic and Cultural Properties".
3. Presidential Executive Order 11593, "Protection and Enhancement of the Cultural Environment".
4. Chapter 253.034, Florida Statutes.
5. Chapter 267.061, Florida Statutes.
6. 36 CFR, Parts 60 and 63.
7. Florida Department of Transportation "Standard Specifications for Road and Bridge Construction", Sections 120-1 and 120-6.2.

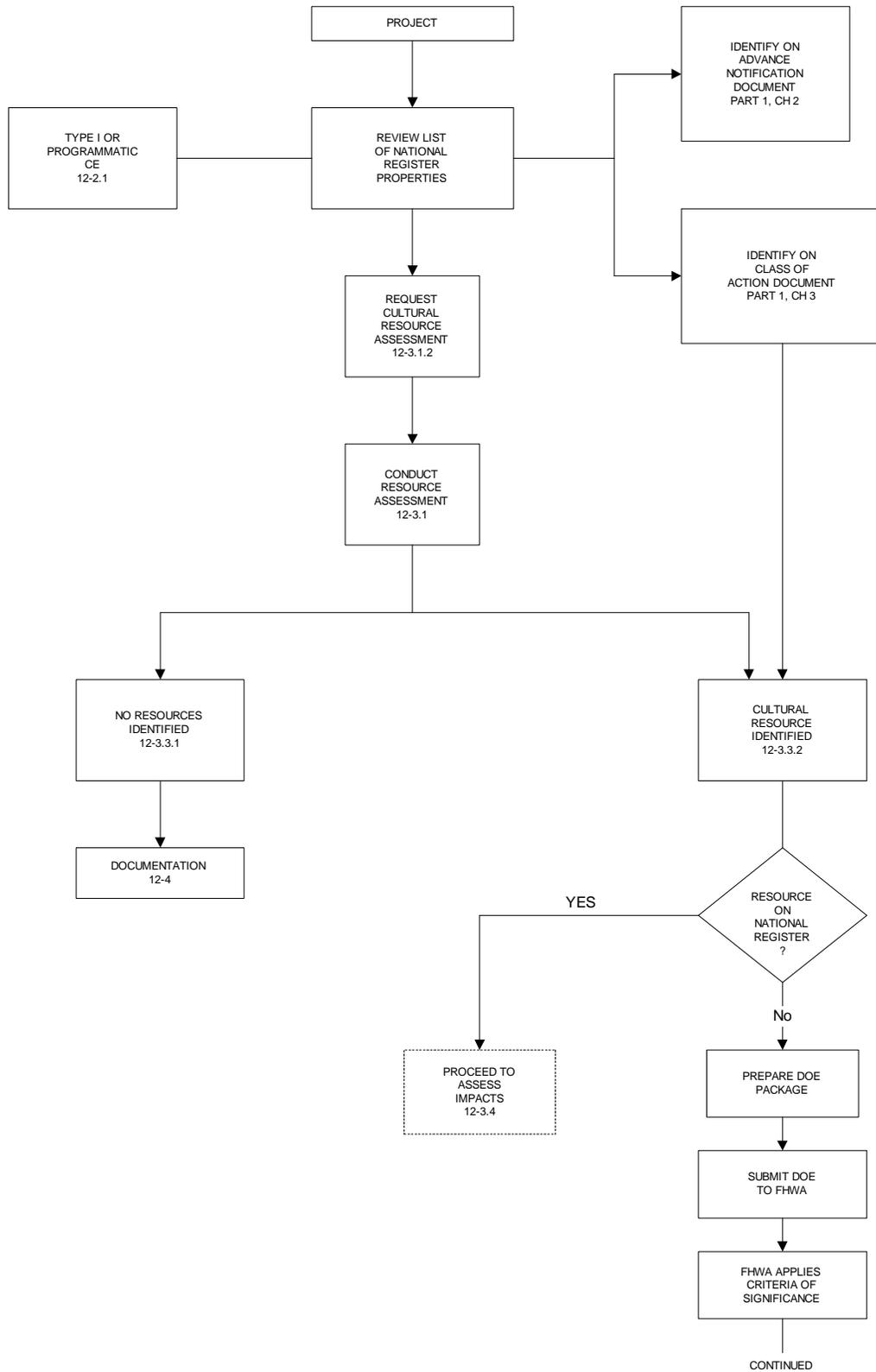


FIGURE 12.1 Section 106 Process (continued)

FIGURE 12.2 Example Project Location Map

(Date)

Mr. C. L. Irwin
Environmental Management Office
Department of Transportation
Burns Building, M.S. 37
Tallahassee, Florida 32399-0450

RE : Survey Received (Date)
Financial Management Number XXXXX-XXXX
Federal Aid Number X-XXX(X)-X

Proposed Improvements to :

Dear Mr. Irwin :

In accordance with the procedures contained in 36 CFR, Part 800 ("Procedures for the Protection of Historic and Cultural Properties"), we have reviewed the above referenced project for possible impact to archaeological and historical sites of properties listed, or eligible for listing, in *The National Register of Historic Places*. The authorities for these procedures are the National Historic Preservation Act of 1966 (public Law 89-665) as amended by P.L. 91-243, P.L. 93-54, P.L. 94-422, P.L. 94-458 and P.L. 96-515, and presidential Executive Order 11593 ("Protection and Enhancement of the Cultural Environment").

We have reviewed the results of a field survey of the above referenced project performed by William Browning and Melissa Wiedenfeld of the Florida Department of Transportation, Bureau of Environment. No sites listed, or eligible for listing, in *The National Register of Historic Places*, or otherwise of National, State or local significance were discovered during the survey. It is the determination of the office, therefore, that this project will have no effect on any such resources, and that the project may proceed without further involvement with our agency.

If you have any questions concerning our comments, please do not hesitate to contact us.

Your interest and cooperation in helping to protect Florida's archaeological and historical resources are appreciated.

Sincerely,

George W. Percy
State Historic Preservation Officer

GWP/xxx

FIGURE 12.3 No Effect Determination Letter

(Date)

Mr. George W. Percy, Director
Division of Historical Resources and
State Historic Preservation Officer
R.A. Gray Building
Tallahassee, Florida 32399-0205

Re : Financial Management Number XXXXX-XXXX
Contract Number XXXXXXXXXX
Any County, Florida

Dear Mr. Percy :

We propose to conduct off-site highway construction activities for the above referenced Department of Transportation project. The proposed off-site area, which covers (acreage or dimensions), is depicted on the attached map and is located as follows :

County _____ Township _____ Range _____
Section _____ 1/4 Section _____ 1/4 1/4 Section _____

Please initiate an assessment of the proposed off-site area to determine the possible impact of our operations on archaeological, architectural or historic sites or properties. Please advise at your earliest convenience as to whether the project may proceed without further involvement with your agency or a cultural resources field survey is required.

If you have any questions in regard to this request, contact (contractor's representative) at (telephone number).

Sincerely,

John Doe
ABC Construction Company
(Address)

Attachment CC : C. L. Irwin, Chief
Environmental Management Office
Florida Department of Transportation
605 Suwannee Street
Tallahassee, Florida 32399-0450

Mr. _____, District Materials Engineer
Mr. _____, District Resident Engineer
Mr. _____, District Project Development and Environment Engineer

FIGURE 12.4 Contractor's Request for a Cultural Resource Assessment