



Memorandum

To: PRDOH & PRHFA CDBG-DR Gap to LIHTC Program Team
GM CDBG-DR Gap to LIHTC Program Team

Cc: Sally Z. Acevedo-Cosme, MEPM
PRDOH Permits and Environmental Compliance Specialist

From: GM Environmental Team

Re: Historic Preservation Consolidated Guidance for the
CDBG-DR Gap to Low Income Housing Tax Credits Program

Date: July 16, 2020

This Memorandum serves to consolidate guidance provided to the Puerto Rico Department of Housing (**PRDOH**) and the Puerto Rico Housing Finance Authority (**PRHFA**), and the Low Income Housing Tax Credits Project Developers regarding the Historic Preservation process for the **CDBG-DR Gap to Low Income Housing Tax Credits (LIHTC) Program**. It includes the applicability of the allowances outlined in Appendix B of the Second Amendment to the Programmatic Agreement (**PA**), for Section 106 Review, among the Federal Emergency Management Agency, the Puerto Rico State Historic Preservation Officer, and the Puerto Rico Central Office for Recovery, Reconstruction and Resiliency. It also includes guidance for those tasks that are involved in completing the required forms that were developed in conjunction with the Puerto Rico State Historic Preservation Office (**SHPO**) when Standard Consultation is necessary.

Prior completing any of the forms, the Developer should provide the *Resumé* or *Curriculum Vitae*, that includes degrees, certifications, licenses, and years of relevant experience of the SOI-Qualified Professional (Professional who complies with the Secretary of the Interior Professional Qualification Standards) who will be completing the form.

General Clarifications for Historic Preservation Process for the CDBG-DR Gap to LIHTC Program:

- On behalf of PRDOH, the consulting party to the PA, CDBG-DR Grant Manager (**HORNE**) Historic Preservation staff consulted with SHPO to develop the Architectural and Archaeological forms for the CDBG-DR Gap to LIHTC Program. These forms reflect the requirements of SHPO and the CDBG-DR Gap to LIHTC Program, and have been approved by SHPO and PRDOH, as the official forms of record for the Program.

- On behalf of PRDOH, HORNE Historic Preservation staff will submit all completed forms to SHPO and conduct the consultation process with SHPO in coordination with PRDOH.
- On behalf of PRDOH, HORNE Historic Preservation staff will conduct a one-hundred percent (**100%**) audit of all Architectural and Archaeology forms prior to submission to SHPO. HORNE SOI-Qualified staff must approve all forms prior to SHPO submission.

Definitions:

- The definition of **forty-five (45) years old** in reference to these allowances is dependent on the age of the structure at the time of the environmental review (i.e. For reviews conducted in 2020 this year will be 1975).
- **Historic Property:** as defined by the National Park Service (**NPS**) is “a district, site, building, structure, or object significant in American history, architecture, engineering, archaeology or culture at the national, State, or local level.”
- The definition of **adjacent to an eligible or listed Historic Property:**
 - a. All lots directly abutting the lot where a Historic Property is located;
 - b. All lots of the opposing side of a street partially or fully opposite the lot where a Historic Property is located; and
 - c. If a lot where a Historic Property is located faces fully or partially on a square or plaza, the lots on all sides of said square shall be considered adjacent.
- **Non-Contributing Property:** “A non-contributing property is a building, structure, object, or site within the boundaries of a district that does not add to the historic association, historic architectural qualities, or archaeological values for which the historic district is significant. Typically, this means that the property is less than fifty years old, has been significantly altered, or is not associated with the historic theme or time period of the district.”
- **In-kind:** shall mean of the same or similar material, and the result shall match all physical and visual aspects, including: form, color, and workmanship. When severity of deterioration requires replacement of a character-defining feature, the new feature shall match the existing in design, color, texture and, where possible, materials. Per the PA (page 34 of 60).
- **Character-defining:** refers to all those visual aspects and physical features that comprise the appearance of every historic building. Character-defining elements include the overall shape of the building, its materials, craftsmanship, decorative details, interior spaces and features, as well as the various aspects of its site and environment. Per the PA (page 34 of 60).

- When referenced in the allowances, “**previously disturbed soils**” shall refer to soils that are not likely to possess intact and distinct soil horizons and have the reduced likelihood of possessing historic properties within their original depositional contexts in the area and to the depth to be excavated. Per the PA (page 34 of 60).
- **Disturbed Ground:** is defined for the purposes of (the 2nd Amendment to the PA) as the modification of natural landscapes or landforms through the removal of natural soils through ground-disturbing activities such as cuts, grading and excavation and/or the deposition of non-native soils or materials to existing or original ground surface such as fill (page 34 of 60).
- **Area of Potential Effect (APE):**
 - a. Not individually eligible or listed AND not within/adjacent to an eligible or listed Historic Property; the APE is defined as the building itself.
 - b. Individually eligible or listed OR within/adjacent to eligible or listed Historic Property the APE is defined as the structure and historic properties that can be affected by the repairs/reconstruction (i.e. the district/zone/traditional urban center).

Historic Preservation Process for the CDBG-DR Gap to LIHTC Program:

As per the 2nd Amendment to the Programmatic Agreement there are two ways that properties can be processed for historic preservation for architecture and archaeology. They either meet the allowances as outlined in the PA, or they undergo Standard Consultation. Regardless if the property is not considered historic by the SOI-qualified staff, if it does not meet the allowances in PA, it must be submitted to SHPO for compliance per the PA.

Year-Built Protocol:

The purpose of this protocol is to ensure compliance with the PA and determine if historical review is required by SHPO. The focus is on utilizing best available data.

1. Structure Age Determination methodology in order of utilization:
 - a. Property Records (Official Online database, i.e. CRIM)
 - b. Historical Aerial Imagery (i.e. USGS Earth Explorer: <https://earthexplorer.usgs.gov/>; Google Earth Pro can also be utilized for aerial imagery from the 1990s-present day if needed.)
 - c. Historical Topographic Maps (i.e. USGS online data: <https://ngmdb.usgs.gov/topoview/viewer/#4/40.00/-100.00>)
 - d. SOI-qualified Architectural Historian evaluation of building style and materials (using photos from EFO following site inspection)
 - e. Information provided by property owner

2. The actual construction year will be recorded and used if available from property records, otherwise a circa five (5) year range will be determined.
3. If two (2) sources of information conflict (Determination methods 1b, 1c, or 1d), the **most conservative date would be used**. (For example, the presence of a building on aerial imagery would prompt the completion of the form, even if it was absent from maps and was of a style that suggests the possibility of more recent construction.)
4. Historical Review will be required if year built is circa-1975, or older.
5. If no circa five (5) year date can be determined Historical Review will be required.

Overview of Tier I and Tier II Programmatic Allowances as Described in Appendix B of the PA:

- “The Programmatic Allowances consist of two tiers – First Tier and Second Tier. Staff may apply First Tier allowances whether or not they meet professional historic preservation qualification standards, while only staff meeting the applicable SOI Professional Qualifications Standards in accordance with Stipulation I.B(1)(a) of this Agreement may apply Second Tier allowances” (Page 34 of 60 of the PA).
- Ensure that all allowances are verified for applicability for each case.
- Application of Tier I Allowances:
 - **Architecture:** Projects that meet the allowances under Appendix B, Tier I, Allowance B for Buildings and Structures. The most common of these allowances that will be applied is Allowance B.1. which states: “Repair, retrofit, and reconstruction of buildings, and structures less than forty-five (45) years old, unless located in or adjacent to a historic district” (page 37 of 60). This applies to properties that are not within or adjacent to a listed or eligible National Register of Historic Places (**NRHP**) historic district, Traditional Urban Center, or Historic Zone, and not adjacent to or within the visual Area of Potential Effect (APE) of an individual eligible or listed National Register (NR) property. Any questions regarding the visual APE of a project should be directed to HORNE Historic Preservation staff.
 - **Archaeology:** The vast majority, *but not all*, Repair projects meet the allowances under Appendix B, Tier I Allowance A for Ground Disturbing Activities and Site Modification (Pages 35 through 37 of 60 of the PA).

Upon completion of the year-built determination, if it is determined that a project does not meet the allowances as outlined in the PA, the project will require Standard Consultation with SHPO. Conditions guiding the use of SHPO forms is provided below.

Conditions for Use of SHPO Forms:

The scope of work for each project should be thoroughly evaluated to ensure that the allowances can or cannot be applied prior to completing any of the forms listed below. Verify project intent and year-built prior to the completion of forms.

Architecture Form, Non-Historic (Short Form):

The Architecture Form, Non-Historic (Short Form) was developed for the intent of use for buildings 45 years in age or greater that are not individually eligible for listing in the NRHP or located within or adjacent to a NRHP-listed or eligible district/zone/traditional urban center.

- Staff members meeting the SOI Professional Qualification Standards for Architecture or Architectural History must complete the Short Form.
- The use of the Short Form is appropriate for buildings that are 45 years in age or greater at the time of the environmental review, are not within or adjacent to a listed or eligible NRHP historic district, Traditional Urban Center, or Historic Zone, and not adjacent to or an individual eligible or listed NR property nor within the visual APE, and that do not completely meet Tier II Allowances for that scope of work.
- The following APE applies to buildings for which the Short Form is appropriate per the PA: “For standing structures or buildings not adjacent to or located within the boundaries of a National Register listed or eligible district, Qualified staff may define the Area of Potential Effect (APE) as the individual structure or building when the proposed Undertaking is limited to its repair or rehabilitation (as defined in 36 CFR § 68.2(b))” (page 16 of 60).
- Unless the SOI-qualified professional is recommending a property as potentially eligible for listing in the National Register of Historic Places (Criteria A-C), the Short Form should be used for all buildings that are 45 years in age or greater that are not individually eligible for listing in the NRHP or located within an eligible district/zone/traditional urban center.
- The Short Form was developed at the request of SHPO to expedite the review process. Upon review of the Short Form, SHPO has reserved the right to request a Long Form for any property.

Architecture Form, Historic (Long Form):

The use of the Architecture Form, Historic (Long Form) is appropriate for buildings of any age that are either individually eligible or listed in the NRHP, are adjacent to an individually eligible or listed NR property or within the visual APE, or are within or adjacent to a listed or eligible NRHP historic district, Traditional Urban Center, or Historic Zone.

- Staff members meeting the SOI Professional Qualification Standards for Architecture or Architectural History must complete the Long Form.
- This form should apply to buildings of any age that meet the above stated criteria, as even buildings less than 45 years in age that are within or adjacent to a NRHP-listed or eligible district or historic zone can affect the historical integrity of the surrounding historic properties.

Archaeology Form:

The use of the Archaeology Form is necessary when the construction intent is one of the following: (1) reconstruction on the same property, (2) demolitions, (3) repairs that includes ground disturbance, or (3) new construction.

- Staff members meeting the SOI Professional Qualification Standards for Archaeology must complete the Archaeology Form.
- An Archaeology Form may be required for certain Repair projects that involve ground disturbing activities beyond what is covered by Appendix B, Tier I, Allowance A.

Guidelines for the Completion of SHPO Forms:

General:

- Ensure that the headers are completely filled out on each page.
- Ensure that all sections of the form are completed.
- Ensure that the information in the headers is consistent across the document (ex. forms, maps, photos).
- Ensure that information is consistent with that found in Canopy. Make any corrections to erroneous data in Canopy prior to submitting a form for review.
- If submitting both Architecture and Archaeology forms, ensure that information is consistent across the forms (ex. acreage, coordinates, year built).
- The Traditional Urban Centers of all 78 municipalities in Puerto Rico and seven (7) additional communities are considered eligible for the National Register of Historic Places per SHPO and should be treated as historic districts. These maps have been provided to each Developer. SHPO is in the process of re-evaluating these boundaries, so please note that these boundaries may change.

Guidelines for the Completion of the Architecture Form, Non-Historic (Short Form)

As stated above, the Short Form was developed at the request of SHPO to expedite the review process. The use of the Short Form is appropriate for buildings 45 years in age or greater that are not individually eligible for listing in the NRHP or located within an eligible district/zone/traditional urban center.

- **Applicant Name:** Full name, as it is recorded in Canopy
- **TIPD (Número de Castrato):** CRIM (<https://www.crimpr.net/CMS/28>) and MIPR (<http://gis.jp.pr.gov/mipr/>) should be consulted.
- **Type of Undertaking:** Select one checkbox
- **Construction Date (tax card):** N/A (unless a tax card with date is available for the property)
- **Construction Date (AH est):** SOI-Qualified professional's estimate, please support this date in Building Description section.
- **Vacant Lot:** Choose one, delete what isn't chosen
- **Property Size (acres):** Acreage only. Verify with CRIM.
- **SOI-Qualified Architectural Historian:** Name only
- **Date Reviewed:** Date that the form was completed only
- **Photograph:** Include one photo of each façade of the property.
- **Date:** The date the photo was taken.
- **Photograph Description (include direction):** Please verify the direction of photos. Make sure the photo is not distorted and that the entire elevation is visible. The caption should identify the building elevation and the direction from which the photo was taken (ex. Primary, east-facing façade of the residence, facing west.)
- **Building Description:** Please include information supporting the architectural historian's date of construction (ie. maps, aerial imagery, architectural style). The building description should include a detailed discussion of the architectural style, plan, and materials visible on the outside of the property. Additional information such as the interior layout can also be included but is not necessary.
- **Formatting Note:** The goal is for the short forms to be no more than two pages long. If needed, resize the photograph so the caption and date are on the bottom of the first page. With the building description, delete any blank lines, as needed, to ensure the SHPO signature line is at the bottom of the second page.
- **Include site plan and preliminary drawings.**

Guidelines for the Completion of the Architecture Form, Historic (Long Form)

The use of the Architecture Form, Historic (Long Form) is appropriate for buildings that are either individually eligible or listed in the NRHP, are adjacent to an individual eligible or listed NR property or within the visual APE, or are within or adjacent to a listed or eligible NRHP historic district, Traditional Urban Center, or Historic Zone. This form should apply to buildings of any age that meet the stated criteria, as even buildings less than 45 years in age that are within or adjacent to a NRHP-listed or eligible district or historic zone can affect the historical integrity of the surrounding historic properties.

- Verify the structure is individually eligible or listed in the NRHP, is adjacent to an individual eligible or listed NR property or within the visual APE or is within or adjacent to a listed or eligible NRHP historic district, Traditional Urban Center, or Historic Zone. Digital data that can be used to verify:
 1. National Park Service, NRHP GIS Page at - <https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466> (Public, non-restricted data)
 2. Suggest downloading the National Register of Historic Places geospatial dataset from the National Park Service located at - <https://irma.nps.gov/DataStore/Reference/Profile/2210280>. This should also be rechecked on a regular basis due to the inclusion of new properties;
 3. SHPO's Interactive GIS Page, Puerto Rico: Registro Nacional de Lugares Históricos at - <http://oech.maps.arcgis.com/apps/OnePane/basicviewer/index.html?appid=62443199488c4cbea51369978f92ae33>;
 4. Planning Board Cultural Layers at - <http://gis.jp.pr.gov/mipr/>; and
 5. Maps showing the Traditional Urban Centers of each municipality (available at SHPO in PDF format).

- Site file review for the completion of the long form should include a review of SHPO GIS mapping available at the PR SHPO office and the identification of any previously recorded historic properties within a 1-mile radius of the project. This review may also include research at ICP, at the discretion of the SOI-qualified staff.

Detailed Form Guidance:

- **Applicant Name:** Full name
- **TPID** ("Número de Catástro"): as listed on CRIM or MIPR
- **Type of Undertaking:** Select one checkbox
- **Construction Date (tax card):** N/A (unless a tax card with date is available for the property)
- **Construction Date (AH est):** SOI-Qualified professional's estimate, please support this date in Building Description section.
- **Vacant Lot:** Choose one, delete what isn't chosen
- **Property Size (acres):** Acreage only
- **SOI-Qualified Architectural Historian:** Name only
- **Date Reviewed:** Date that the form was completed only

Subsection: Building Description

Use National Register terminology for Building Descriptions to ensure consistency with the SHPO Database.

- **Classification:** Per National Register Bulletin 16A, How to Complete the National Register Registration Form.
- **Architectural Category and Subcategory:** Please see National Register Bulletin 16A, pages 25-26 for applicable terms.
- **Number of Stories:** Spell out the number followed by the numeric representation in parenthesis [i.e. One (1)]
- **Materials (Describe Below):** Enter the materials used for the construction of the following: Foundation, Walls, Windows, Doors, Roof, and Other (use for other significant architectural elements, as needed). Please see National Register Bulletin 16A, page 27 for applicable terms.
- **Building Description:** Please include information supporting the architectural historian's date of construction (ie. maps, aerial imagery, architectural style). The building description should include a discussion of the architectural style, plan, and materials visible on the outside of the home. Additional information such as the interior layout can also be included.

Overall Exterior Condition of Structure

Select one that best characterizes the overall condition of the building's exterior.

Subsection: Scope of Work

- **LIHTC Program Undertaking:** Select one checkbox.
- **Scope of Work** – Insert the of Damage Assessment Scope of Work for Repair projects only.
- **Define the Area of Potential Effects (Describe the project location and visual APE):** Describe the project location and identify any NRHP-eligible properties located within the visual APE that can/will be affected by the Scope of Work and discuss how the project undertaking will affect those identified NRHP-eligible properties. Please note if no NRHP-eligible properties are present within the visual APE.

Presence of Historic Properties Table: Answer each of the four questions in the table. If the project area is located within an eligible or listed NRHP Properties/Districts or Historic Zones, include the name of the Historic Property and indicate if the house within the project area is a contributing property to the Historic Property.

Proximity to Eligible or Listed National Register of Historic Places Properties/Districts: Provide a brief discussion of the project area's proximity to eligible or listed NRHP Properties/Districts or Historic Zones. Note the presence of any NRHP-eligible or listed properties within a one-mile radius of the project area. Please note if no NRHP-eligible or listed properties are located within a one-mile radius of the project area.

Project Location Building Integrity Assessment: Answer each of the 12 questions in the table.

Subsection: Determination of Potential Effects

- **Statement of Significance:** The SOI-qualified staff member must address the NRHP Criteria and Criteria Considerations as outlined in National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation (https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf)
- **Recommendation:** Select only one checkbox.
- **No Adverse Effect Conditions or Proposed Adverse Effect Resolution here, if needed:** Describe the proposed conditions for a No Adverse Effect Recommendation or the proposed resolution for any Adverse Effect. Leave this section blank, if the recommendation is No Historic Properties Affected.

The following attachments are required by SHPO:

1. **Maps** (in the following order):
 - a. **Project (Parcel) Location: USGS Topographic Map** showing the location of the project area.
 - b. **Project (Parcel) Location: Aerial Map (or satellite imagery)** showing the location of the project area. The map should be at an appropriate scale so that the property is identifiable yet shows the surrounding context.
 - c. **Project (Parcel) Location with Previous Investigations: USGS Topographic Map** showing the locations of previously identified NRHP-eligible or listed properties/districts or Historic Zones within one-mile of the project area. Please include one-mile buffer on map for reference.
 - d. **Project (Parcel) Location with Previous Investigations: Aerial Map (or satellite imagery)** showing the locations of previously identified NRHP-eligible or listed properties/districts or Historic Zones within one-mile of the project area. Please include one-mile buffer on map for reference.
2. **Photographs of the project location and building.** These should include photos of all four sides of the structure, examples of doors and windows in the home, any other significant architecture details, and streetscapes that show surrounding properties. Photographs taken during the Environmental Site Visit must be sufficient to successfully describe the building and materials, as well as the context of the surrounding neighborhood.
3. **Site plans and preliminary drawings.**

Guidelines for the Completion of the Archaeology Form

The use of the Archaeology Form is necessary when the construction intent is one of the following: (1) new construction, or (2) the repair includes ground disturbance.

An Archaeology Form may be required for certain Repair projects that involve ground disturbance activities beyond what is covered by Appendix B, Tier I, Allowance A. However, in these cases the Developer should contact HORNE Historic Preservation Staff prior to completing any Archaeological Form for a Repair project to ensure the proper

application of PA allowances.

Site file review for completion of the Archaeology Form should include a review of SHPO GIS mapping available at the PR SHPO office and the identification of any previously identified archaeological sites and the identification of any previous cultural resource investigations within a 1-mile radius of the project. This review may also include research at ICP, at the discretion of the SOI-qualified staff.

Detailed Form Guidance:

- **Applicant Name:** Developer Full name
- **TPID** (“Número de Catástro”): as listed on CRIM or MIPR
- **Type of Undertaking:** Select one checkbox
- **Construction Date (tax card):** N/A (unless a tax card, with date is available for the property)
- **Construction Date (if applicable):** If an Architecture form is also being completed for this project, please use the SOI-Qualified Architectural Historian’s date from the Architecture form for consistency.
- **Vacant Lot:** Choose one, delete what isn’t chosen.
- **Property Size (acres):** Acreage only
- **SOI-Qualified Archaeologist:** Name only
- **Date Reviewed:** Date that the form was completed only

Subsection: Scope of Work:

Define the Area of Potential Effects (Describe the location and extent [size and depth] of all potential ground disturbing activities):

- Include a brief discussion of the proposed activities and the extent and depth of anticipated ground disturbance. This should include the dimensions of the existing structure and a brief description of its placement within the parcel.
- Description of Maximum size of new construction.
- Description of demolition activities and how they follow the Low Impact Debris Removal Stipulations as outlined in Appendix E of the PA.
- Definition of the Area of Potential Effects.

Presence of Known Archaeological Concerns Table: Answer each of the four questions in the table. If the project area is located within a NRHP-listed or eligible district or Historic Zone, within a NRHP-listed or eligible Archaeology district, or within a Traditional Urban Center, include the name of the NRHP-eligible district, historic zone, or Traditional Urban Center. The information in the table must match the data presented in later sections of the form.

Archaeological Site Potential Factors Table: Answer each of the four questions in the table and provide a description of soil disturbance within the project area, as applicable.

Natural Setting (Discuss the natural setting of the proposed project including location, landform, slope, distance to water, soils, and vegetation.):

- Include a brief discussion of project location related to the natural setting, in particular address the following topics that commonly effect settlement patterns (include additional relevant topics as needed to characterize the project area): Landform (ex. mountains, coastal plain), Slope, Distance to Water (nearest permanent body of water), Soils (ex. mapped soil series, urban land), and Vegetation (ex. ornamental vegetation, secondary regrowth).

Cultural Setting and Previous Investigations (Discuss the cultural setting for the proposed project including previously identified archaeological sites, NRHP listed/eligible historic properties, and cultural resource studies conducted within one mile of the project area.):

- Include a brief discussion of previously identified archaeological sites, NRHP listed/eligible historic properties, and cultural resource studies conducted within one mile of the project area. This can be done as a narrative or by providing a summary of findings with detail presented in an attached table. As applicable, include a brief history of land use and occupation.
- The following minimum information must be provided:
 1. Has the Research Area been defined? (ie. Urban ¼-mile, Rural ½-mile, or 1-mile). And is that definition consistent throughout the form?
 2. Previously identified archaeological sites
 3. Previously identified NRHP listed/eligible properties, including Districts and Traditional Urban Centers
 4. Previously identified cultural resource studies and their findings
 5. If a previous investigation yields positive findings outside of the Research Area, is that clearly stated/noted? (ex. If sites were identified during a large linear survey that was conducted within the Research Area, but those sites were all located outside of the Research Area.)
 6. History of land use and occupation (as applicable).
 7. Does this information match that provided elsewhere in the form? (ex. Tables, Maps)

Subsection: Determination of Potential Effects

- **Statement of Significance:** The SOI-qualified staff member must address the potential for the presence of intact archaeological deposits within the project area. For example: in cases where the recommendation is “No Historic Properties Affected” state why the project will have no impact on archaeological deposits (ie. distance from previously identified deposits, excessive slope, previous disturbance.)
- **Recommendation:** Select only one checkbox.
- **No Adverse Effect Conditions or Proposed Adverse Effect Resolution here, if needed:** Describe the proposed conditions for a No Adverse Effect Recommendation or the

proposed resolution for any Adverse Effect. Leave this section blank, if the recommendation is No Historic Properties Affected.

The following attachments are required by SHPO:

1. **Maps** (in the following order):
 - a. **Project (Parcel) Location: USGS Topographic Map** showing the location of the project area.
 - b. **Project (Parcel) Location: Aerial Map (or satellite imagery)** showing the location of the project area. The map should be at an appropriate scale so that the property is identifiable yet shows the surrounding context.
 - c. **Soils Map:** showing the location of the project area and identifying the soils mapped for the area.
 - d. **Project (Parcel) Location with Previous Investigations: USGS Topographic Map** showing the locations of previously identified archaeological sites and NRHP-eligible or listed properties/districts within one-mile of the project area. Please include one-mile buffer on map for reference.
 - e. **Project (Parcel) Location with Previous Investigations: Aerial Map (or satellite imagery)** showing the locations of previously identified archaeological sites and NRHP-eligible or listed properties/districts within one-mile of the project area. Please include one-mile buffer on map for reference.
2. **Photographs of the project location and building.** These should include representative photos of the structure, parcel, and streetscape. Photographs taken during the Environmental Site Visit must be sufficient to successfully describe the context of the project area.
3. **Site plans and preliminary drawings.**