

**MEMORANDUM OF UNDERSTANDING
AMONG
ARIZONA STATE PARKS & TRAILS
AND
THE STATE HISTORIC PRESERVATION OFFICE
REGARDING STATE HISTORIC PRESERVATION ACT CONSULTATION
FOR
ADOA (ARIZONA DEPARTMENT OF ADMINISTRATION) – SFOB (SCHOOL
FACILITIES OVERSIGHT BOARD)**

This Memorandum of Understanding (MOU) recognizes interests, concerns, and mutual responsibilities of Arizona State Parks & Trails (ASPT) and the State Historic Preservation Office (SHPO) in ensuring that properties eligible for, or listed in, the Arizona Register of Historic Places (Arizona Administrative Code R12-8-301 and 302) and the National Register of Historic Places (36 CFR 60.4) (hereafter A/NRHP) are taken into consideration at all levels of planning and development, and through the ASPT compliance with the State Historic Preservation Act (SHPA), Arizona Revised Statute (A.R.S.) § 41-861, et seq.

The participants to this MOU consist of ASPT Operations and Development and SHPO, a division of ASPT. Together, these entities shall be identified as the “Parties.”

I. BACKGROUND

- A. Archaeological and historical properties that are eligible or listed in the A/NRHP are located throughout lands owned or managed by ASPT. These resources are collectively referred to as “historic properties” (Stipulation IV.H).
- B. Plans (i.e., proposed projects/actions – including administration of ASPT’s various grants programs) undertaken by ASPT are subject to compliance with the SHPA and require review by the SHPO.
- C. In recognizing ASPT’s Mission Statement goals of managing and conserving Arizona’s natural, cultural, and recreational resources for the benefit of the people, the Parties support preservation of historic properties within ASPT-owned or managed land. These goals are supported by identification and evaluation of cultural resources and implementation of measures that:
 1. Ensure avoidance of historic properties (see definition in Stipulation IV), whenever possible;
 2. Mitigate adverse impacts to prehistoric and historic properties through data recovery if avoidance cannot be attained; or through state-level historic building or structure documentation for historic properties, if preservation or rehabilitation cannot be achieved;
 3. Ensure long-term monitoring of archaeological historic properties by Arizona Site Steward volunteers in order to facilitate continued avoidance and preservation.

II. PURPOSE

To further cooperative efforts in fulfilling the Parties' statutory responsibilities and agency mission to protect and preserve the cultural heritage of the State, and to streamline the SHPA process of consulting on and reviewing cultural resource compliance activities on lands owned or managed by ASPT.

III. AUTHORITIES

- A. The SHPO and ASPT are authorized under A.R.S. § 11-952, et seq. to enter into agreements.
- B. The SHPO administers the A/NRHP as per A.R.S. § 41-511.04 A.9 and the SHPA, and advises, assists, and cooperates with State Agencies and Subdivisions of the State to ensure that properties eligible for inclusion in the A/NRHP are taken into consideration at all levels of planning and development. The SHPO conducts reviews of State Agency plans pursuant to the SHPA, A.R.S. § 41-864.
- C. ASPT is responsible for the identification, treatment, and preservation of historic properties under the agency's ownership or control according to the provisions of the SHPA, A.R.S. § 41-861 to -863.
- D. ASPT is responsible for consulting with the SHPO on plans as per the SHPA, A.R.S. § 41-862 to -863. Plans include projects/ actions that have the potential to alter the characteristics that make a historic property eligible for the A/NRHP.
- E. Archaeological investigations on state land require authorization under the Arizona Antiquities Act (AAA) and its implementing rules (A.R.S. 15-1631 and 41-841 et seq.)
- F. Archaeological investigations on federal land require authorization under the Archaeological Resources Protection Act, issued by the federal land-managing agency.

IV. DEFINITIONS

For the purposes of this MOU, the following definitions apply:

- A. AZSITE: The state's electronic cultural resources inventory.
- B. Chief: As used in this Agreement, Chief refers to ASPT Chief of Development, Chief of Operations, and/or the Chief of Grants and Trails. The Chief may delegate consultation with SHPO, and shall be copied on all consultation.
- C. Class I Inventory or Survey: Background research consisting of a review of archaeological records, historical maps, and other sources to identify previous surveys and previously recorded sites. The information is for management purposes, to help determine if new survey is needed and must be completed for each new project.

- D. Class III Cultural Resources Survey: an intensive, systematic pedestrian survey with 100 percent coverage based on transect intervals spaced no more than 20 m apart, as defined by the Arizona State Museum (ASM).
- E. Cultural Resources Consultant (CRC): The CRC shall conduct archaeological investigations on behalf of ASPT, and is responsible for all archaeological permitting, curation and submittals to AZSITE. ASPT shall refer to the Arizona State Museum's list of qualified consultants to conduct archaeological investigations on State land.
- F. Cultural resource: Any material consisting of artifacts, features, sites, buildings, districts, or structures resulting from past human activities that is at least 50 years old.
- G. Cumulative impacts: Impacts to a historic property that result from the incremental impact of the project when added to other past, present, and reasonably foreseeable future actions. Cumulative impacts may be individually minor, but collectively significant.
- H. Direct impacts: Impacts to a historic property that are directly caused by the project activities during implementation of the action (e.g., during activities associated with construction, maintenance, operation, etc.).
- I. Impact Findings: No Impact, No Adverse Impact, Conditional No Impact, Adverse Impact
1. No Impact: The project will not impact any historic properties.
 2. No Adverse Impact: The project will not impact historic properties in a manner that will result in a loss of integrity (the loss of character-defining features).
 3. Conditional No Adverse Impact: The project has the potential to impact historic properties and requires application of avoidance measures or monitoring to ensure that the impact is not adverse. In cases of built environment, a conditional no adverse impact may be issued with a commitment to continue consultation with SHPO to ensure that phased plans not affect character defining features of the property.
 2. Adverse Impact: The project will impact the character-defining features of a historic property and requires an appropriate mitigation before project implementation.
- J. Emergency: An immediate threat to life or property.
- K. Historic property: A district, site, building, structure, or object that is at least 50 years of age and significant in Arizona's history, architecture, engineering, archaeology, or culture at the national, state, or local level that is listed, or eligible for listing, in the A/NRHP. Determinations of eligibility for cultural resources located on state, city or county land are made by the SHPO.
- L. Indirect Impacts: Impacts to a historic property that are caused by the action that are later in time or removed in distance, but are reasonably foreseeable when the project is

planned. These impacts can occur outside the project footprint, right-of-way, or project area, but still impact the character-defining features of the historic property.

- M. In-kind replacement: In-kind means replacement with the same type of material (e.g., mahogany to mahogany); same feature pattern (e.g., 2 panel to 2 panel door or 2 over 2 lite to 2 over 2 lite window) and same texture (e.g., smooth paint to smooth paint). The same rules apply for all character-defining features (e.g., existing kerfed trim 3/4" x 3 5/8" with rounded outer edge should be replaced with the same, etc.).
- N. Minimal/Limited ground disturbance: Any activity that does not remove more than 10 cubic feet of soil or a lateral displacement of soil more than 2 feet in any direction (outside the boundary of a historic property).
- O. Partners: Groups that provide assistance to ASPT through fund-raising, marketing, and/or special projects.
- P. Previously Disturbed: Refers to areas where previous construction or other activity by human or natural agents has physically altered soils within the APE to the point where there is no potential for an in situ archaeologically significant property to be affected. These areas may include the original footprint of an existing structure or building. Informal coordination with SHPO is recommended before proceeding to construction if there is any question about the depth and extent of the previous disturbance.
- Q. State Land: any land owned, or managed by or for, the State of Arizona. Includes, but is not limited to, State Trust land administered by the Arizona State Land Department, Game and Fish-commission owned land, Department of Transportation, ASPT-owned land.

V. RESPONSIBILITIES

A. ASPT shall:

1. Require Park Managers, Chiefs, GIS Specialist, Field Staff and Partners attend State Historic Preservation Act Training every five years. Training shall be conducted by the SHPO compliance staff and initiated within 6 months of the signing of this MOU.
2. Require Archaeological Resources Protection Act (ARPA) training for parks on federal land; training should be solicited from the federal land manager and repeated at a cadence of five years.
3. Ensure that all Park Field Staff and Partners receive tribal cultural sensitivity training every five years.
4. New employees should receive all training identified in Stipulation V.A.1, 2, and 3 within six months of hire.
5. ASPT shall keep a record of all training and provide it to SHPO with the annual report.

6. Maintain a staff position for a dedicated GIS Specialist (GS) with access to AZSITE. The GS shall conduct Class I inventories for each project with ground-disturbing activities to determine the need for new survey and consultation with SHPO.
7. Maintain and utilize the services of a CRC to assist with its historic preservation requirements, as necessary, for both historic and prehistoric cultural resources.
8. Ensure that, for all activities on land within a State Park boundary owned by ASPT, impacts to historic properties will be considered at all levels of planning, operation, and development according to the provisions of the SHPA.
9. Ensure that, for land within a State Park boundary that is owned by a federal agency (e.g., Bureau of Land Management Recreation and Public Purpose (R & PP) leases; US Forest Service land; etc.), all compliance activities will be coordinated with the federal agency as provided by implementing regulations 36 CFR Part 800 for Section 106 of the National Historic Preservation Act, or a Memorandum of Agreement or Programmatic Agreement between the federal agency, the SHPO, and ASPT.
10. Ensure that Class III cultural resource surveys will be conducted on previously unsurveyed lands within each State Park, and assess the adequacy of previous surveys for areas inventoried more than 10 years ago, pursuant to SHPO Guidance Point No. 5 (2004; SHPO Position on Relying on Old Archaeological Survey Data), with the intent that all ASPT owned or managed lands will be completely surveyed to current standards.
11. Ensure that a Class I inventory has been completed for all projects with ground-disturbing activities. The results of the Class I inventory will be used to assess the need to perform a Class III (intensive, field) survey.
12. Ensure that all cultural resources inventories will be conducted or directly supervised by a qualified, professional archaeologist who is permitted as a Principal Investigator by the ASM, or a Project Director under their direct supervision, and has relevant archaeological knowledge to conduct such surveys. ASPT shall submit the written results of these investigations to SHPO and other consulting parties for review and comment. Building inventories shall be conducted by a professional who meets the Secretary of the Interior's Professional Qualifications for architecture or historic architecture.
13. Ensure that the cultural resources survey reports meet the SHPO's Standards for Documents Submitted for SHPO Review in Compliance with Historic Preservation Laws, as amended.
14. Ensure that, if previous surveys conducted within the past 10 years meet current ASM and SHPO standards and have resulted in the identification of cultural resources (archaeological sites, districts, buildings, structures, objects), these cultural resources are re-located and their condition assessed, their eligibility for inclusion in the

- A/NRHP is re-evaluated, and A/NRHP-eligibility consultation with the SHPO is initiated.
15. Ensure that each project area definition includes indirect and cumulative impact areas associated with an action, as well as the direct impact areas.
 16. Ensure that the GS and/or Chief is provided with a list of planned ground-disturbing actions on State Parks owned or managed land in order to decide if any cultural resources actions, such as a cultural resources survey, archaeological monitoring, or data recovery, and consultation with the SHPO and Tribes are necessary.
 17. Ensure that the GS or Chief submits survey reports to the SHPO for review and comment, as per Stipulation VI.
 18. Ensure that the CRC maintains a current Arizona Antiquities Act permit and follows all rules per the stipulations of the permit. Additionally, ASPT shall ensure that the CRC submits site cards for newly recorded or re-recorded sites to AZSITE.
 19. Ensure that Operations and Development Sections and the GS create and maintain maps of cultural resources (including historic buildings and structures) within each State Park for planning purposes. These maps would have restricted access pursuant to A.R.S. §39-125, in order to protect sensitive site locational information, but would be available to appropriate Park personnel. These maps would be kept in a secure and confidential location.
 20. Ensure self-monitoring of the process embodied in this Agreement. If any problems are encountered in implementing this Agreement, the CRM or ASPT Chief will notify the SHPO and seek advice on rectifying the situation(s).
 21. Ensure that proposed above-ground development and construction work is submitted to SHPO for consultation per Stipulations VI and VII.

B. The SHPO shall:

1. Provide expedited reviews of compliance submittals when possible.
2. Provide training on relevant cultural resources laws and regulations to ASPT and help coordinate cultural sensitivity training with Tribes and federal land managers.

C. ASPT and the SHPO shall meet annually to review ASPT's performance under this MOU for the previous fiscal year. The meeting will occur in August of each year.

VI. CONSULTATION PROTOCOL FOR GROUND DISTURBING ACTIVITIES

All ground-disturbing activities within a State Park must be reviewed by the Chief or GS (and SHPO Architect if the work is in within 50 feet of a historic building or structure) prior to implementation. The Chief or GS will determine whether a cultural resources survey, or other

type of cultural resources investigation, is necessary and if consultation with the SHPO is required pursuant to the following situations:

- A. No or Minimal Ground Disturbance: For any ASPT actions on lands owned or managed by ASPT that will result in “No or Minimal Ground Disturbance,” the Chief or GS will determine that no cultural resources survey is warranted, and consultation with the SHPO is not needed, if:
1. The geographic area affected by the plan contains previous ground disturbance that has eliminated the possibility of intact archaeological resources to a depth that exceeds that of the planned project. Disturbance of the surface of the ground does not automatically preclude the necessity of a cultural resources survey or other type of investigation (e.g., monitoring, a Class I inventory, etc.).
 2. A Class III survey of the geographic area affected by the project was completed within the past 10 years, meets current ASM and SHPO standards, and was conducted by an AAA-permitted archaeologist, or qualified designee (for federal land), and:
 - a. either no cultural resources were identified wholly or partially within the area affected (except for isolated occurrences of artifacts or features not meeting ASM site designation criteria and that are not A/NRHP-eligible), or
 - b. cultural resources identified were previously determined by the SHPO to be ineligible for inclusion in the A/NRHP, or
 - c. The geographic area affected by the plan occurs totally within a dry or active riverbed, and as a result there is no potential for finding intact archaeological resources.
 3. The Chief or GS will make this determination from examination of project area photographs and site file checks on AZSITE and other relevant sources, as necessary.
 4. ASPT can informally consult with SHPO about whether new survey is necessary; however, all background research must be completed first by ASPT.
 5. Appendix A provides a list of activities normally exempt from consultation with the SHPO under Section VI.A, unless there are extenuating circumstances, such as the previously documented presence of human remains and/or funerary objects (per A.R.S. §41-844) in the project area.
- B. Class III Surveys: For any ASPT actions on lands owned or managed by ASPT that require a Class III survey, as determined by the Chief or GS, ASPT will contract the services and consult with SHPO on the adequacy of the report and the appropriate measures to move the project forward.
1. The CRC shall use the Survey Results Summary Form and Historic In-Use Structure Form, if appropriate, to document the results of negative survey (see [SHPO website](#))

- for forms). The SHPO will respond to negative surveys within 10 calendar days of the receipt of the ASPT-SHPO consultation form (see Appendix C).
2. If the survey results in the identification of cultural resources (even if those resources will be avoided by the project), ASPT shall e-mail SHPO the survey report written to SHPO and ASM standards, and submit it to SHPO with the ASPT-SHPO consultation form. SHPO will review the report in 30 calendar days and provide ASPT with determinations of eligibility and recommendations for avoidance or other treatment.
 3. ASPT will relay any avoidance measures to the ASPT field personnel; monitoring, if needed, shall be conducted by an archaeologist to ensure that avoidance is attained. Flagging sites for avoidance may be completed by the GS specialist or a qualified archaeologist.

C. Unanticipated Discoveries

1. Under any circumstances, the discovery of cultural resources, human bone, potential human bone, or funerary objects requires immediate cessation of activities within 30 meters (100 feet) of the find and it must be secured from public viewing; no photographs may be taken. The ASPT Chief must be notified immediately. The ASPT Chief shall notify and consult with the ASM pursuant to A.R.S. §41-844. The ASPT Chief shall also notify the SHPO of any such discovery.
2. ASPT shall ensure that the discovery is documented and evaluated for A/NRHP eligibility by a qualified archaeologist, and ASPT shall consult with SHPO and other relevant consulting parties.
3. For discoveries that do not include human remains and/or funerary objects, the CRC, ASPT, the ASM, and the SHPO will work together to develop a plan of action for evaluating and treating the discovery, as appropriate, within five (5) working days.
4. Project work must not resume in the area of the discovery without notification from SHPO that all evaluation, documentation, and treatment has occurred.

VII. CONSULTATION FOR BUILT ENVIRONMENT ACTIVITIES

All activities which may affect historic buildings and structures within a State Park must be reviewed by the ASPT Chief and the SHPO Architect (and/or if the proposed work is in within 50 feet of a historic building or structure) prior to implementation. The ASPT Chief will determine whether consultation with the SHPO is required pursuant to the following stipulations:

- A. A list of routine ASPT maintenance activities performed on or within view of historic buildings or structures that may be conducted without SHPO review is attached as Appendix B. All activities completed on historic properties shall be included in the annual report.

B. Any activities that affect historic buildings or structures that are not listed in Appendix B will require consultation with the SHPO Architect. This consultation process shall follow the steps outlined below:

1. In cases where the A/NRHP status of the building is not known, ASPT will consult with SHPO to receive a determination of A/NRHP eligibility for the subject historic building or structure. SHPO will have 10 working days to determine the eligibility of the historic building or structure.
2. If the historic building or structure is determined by SHPO to be ineligible for listing in the A/NRHP, then no further consultation is required and the activity may proceed.
3. If the historic building or structure is determined by SHPO to be eligible for listing in the A/NRHP, then a full scope of the activity (project) shall be submitted by ASPT to the SHPO with the impact of the proposed action presented. The SHPO has 14 calendar days to review the submitted scope and ASPT's determination of impact.
4. If the proposed activity will not adversely impact the eligible historic building or structure, SHPO will concur with a finding of "No Adverse Impact", and will sign and date the concurrence. The "No Adverse Impact" decision allows an activity to begin. Any subsequent changes to the scope of work, building materials, or proposed procedures must be reviewed by SHPO before proceeding.
5. If the proposed activity is determined to adversely impact the eligible historic building or structure, SHPO will inform the ASPT Chief that the SHPO requests:
 - a. Further information to explain the activity/procedure in greater detail to understand the true impact to the historic building or structure (this could include the plans and specifications for the proposed project); and/or
 - b. Further information to explain why this activity must impact the historic building or structure (i.e., International Building Code [IBC] requirement, Americans with Disabilities Act regulation); and/or
 - c. Communication to review additional options or techniques to avoid impacts to the historic building or structure (e.g., modified adobe procedures, revised grading/drainage, etc.); and/or
 - d. Mitigation measures that could include demolition documentation (e.g., measured drawings, archival photos, narrative history, etc.). Specific requirements are outlined by the State Historic Preservation Office Standards for Documentation of Historic Properties (latest revision).

C. The following supporting documentation shall be provided for built environment SHPO consultations:

1. Proposed Treatment (Scope of Work): Provide a detailed description of the proposed work. The work scope description shall include materials and features proposed to be repaired or replaced (particularly any character-defining features); new mechanical, electrical or plumbing systems (including any new ground disturbing activities which may trigger archaeological review – see Section VI); and landscaping (including fencing and other site modifications).
2. Property Information: Provide current photographs of the building/structure and/or features affected by the proposed action; building/structure age (construction date); A/NRHP eligibility status (if unknown, see eligibility determination process in Section VII.B.1).

VIII. COORDINATION AND COMMUNICATION PROTOCOL

- A. All communication shall be conducted via email. The initial consultation request shall be submitted to the SHPO consultation email address (azshpo@azstateparks.gov). The project will be logged into the SHPO database and the appropriate reviewers will be assigned. Once assigned to the reviewers, the ASPT representative will communicate directly with the SHPO reviewer(s) (by phone, email, meetings and/or site visits).
- B. Park Managers shall coordinate all proposed ground-disturbing activities and activities on or near historic buildings or structures, including those undertaken by Partners, with the ASPT Chief of Development or Chief of Operations as appropriate before proceeding with the work, allowing time for agency and SHPO review and consultation as defined in this MOU. Park Managers or Partners should not directly contact SHPO unless so delegated by the Chief, and the Chief must be copied on all correspondence.
- C. Consultation with SHPO shall be conducted by the GS or ASPT Chief using the ASPT-SHPO Consultation Form (Appendix C). All consultation with SHPO by the GS shall be copied to the Chief of Development or Chief of Operations, as appropriate.

IX. EMERGENCIES

If an emergency occurs, immediate rescue and salvage operations conducted to preserve life or property are foremost. If consultation with the SHPO is necessary, but not immediately feasible, follow-up documentation shall be submitted to SHPO within 30 days of the emergency.

X. TERMINATION

This MOU may be terminated by either party with 30 days written notice. In the event of termination, ASPT will revert to consultation with SHPO under the SHPA on a case-by-case basis for all ASPT plans/projects.

XI. DURATION

The term of this MOU shall be for five (5) years, commencing upon the date of the last signature to the MOU, and shall be renewed automatically for additional five-year periods, unless either party notifies the other in writing at least 60 calendar days in advance of the next date of expiration, of the intent of a party to re-negotiate or not renew.

SIGNATORIES

Arizona State Parks & Trails

Robert Broscheid
Executive Director

Date

State Historic Preservation Office

Kathryn Leonard
State Historic Preservation Officer

Date

Appendix A. Screened Exemptions, Archaeology.

The following List of Operations and Development Activities are exempt from SHPO review, unless cultural resources or potential human remains and/or funerary objects have been previously identified in the project area. The GS must make this determination, and these activities will only be exempt if located within a previously surveyed area (that meets current standards as per SHPO Guidance Point #5) that documents negative findings in the project footprint, and the depth of disturbance does not exceed the previous depth of disturbance. Archaeological monitoring is necessary within 50 feet of a known Register eligible site. Additions to this list may be negotiated with ASPT Operations and Development and SHPO.

1. Routine repair and maintenance of existing potable water, irrigation, electrical/fiber optic, and sewer lines within the existing extent of ground disturbance.
2. Repair, replacement, or upgrading of above-ground utility lines and related equipment (in kind).
3. Installation of temporary prefabricated structures such as kiosks and sheds without surface or subsurface ground disturbance.
4. Repair, and maintenance of fencing using only hand tools, and replaced in-kind, if historic.
5. Adding gravel to an existing gravel or dirt road within the existing road prism.
6. Grading within an existing road prism.
7. Cattle guards placed in an existing roadbed.
8. Use of wheeled, non-tracked vehicles on existing two-track, dirt, or gravel roads.
9. Routine repair and maintenance of existing trails (in-kind). This does not include widening or rerouting of a trail.
10. Repair or replacement of existing concrete or asphalt sidewalks (in-kind).
11. Repair of existing concrete or asphalt roads, drives, or entryways (in-kind).
12. Small-scale excavation using only hand tools. Some specific activities include: Tree, bush, and seed plantings; post holes for fencing and signs. Maximum size of the hole should not exceed that of emplacing a 15-gallon horticultural container.
13. Adding clean fill dirt to an area in the area to be covered.
14. Temporary stockpiling of materials.
15. Use of dredged fill so long as the borrow location does not have evidence of cultural resources based on a professional survey.
16. Removal of deposited flood-related soil and debris, provided that the current ground surface is left undisturbed.
17. Vegetation removal at or above ground level, excluding historic trees.
18. Application of herbicides, fertilizers, pesticides, or other chemical treatments.
19. Creation of firebreaks by removal of surface vegetation or raking.
20. Modern trash cleanup activities, limited to raking the ground surface.

Appendix B. Screened Exemptions, Historic Buildings and Structures.

The following **List of Routine Operations and Development Activities** located on or in historic buildings or structures that ordinarily may be conducted without SHPO review. Activities not on this list require consultation with SHPO prior to conducting that activity (see Stipulation VII).

1. Removal of graffiti should be accomplished as soon as possible by the gentlest means possible, such as water and brush or application of “Elephant Snot” product (or equivalent). Painting remediation should match existing adjacent painted surfaces.
2. Repair or replacement of HVAC, evaporative coolers, heater units in the same location, and of same size, or not visible, if larger. If the units need additional roof structural bracing and/or condensate and drainage lines, this project should be submitted for SHPO consultation.
3. Repair or replacement of water heaters of the same size, in the same location.
4. Repair or replacement of plumbing lines that are under the structure, accessible from non-public areas and do not cut into existing historic materials such as wood floors, plaster walls, etc. (see Appendix A #1).
5. Repair or replacement of existing fire sprinkler lines (or devices) or gas lines in the same location. New systems/lines or change in size requires SHPO consultation.
6. Repair or replacement of non-historic plumbing fixtures (toilets, sinks, tubs, drinking fountains, etc.) or equipment. Replacement of non-historic kitchen appliances. Both of these activities are replacement only without cutting historic walls, floors, etc. for installation of any new utility lines.
7. Repair or replacement of electrical, communication, fire alarm and security systems. This includes lines and panels located in the same location. Installation of new devices on the structure or ground mounted requires SHPO consultation.
8. Replacement of non-historic doors and windows in non-public areas, such as utility rooms, staff offices, etc. In-kind repair should be the first option for historic doors, then replacement with matching door from building stockpile or non-public area, then in-kind replacement. Hardware should be reused, if possible. ADA compliance may require new knob/lever handle hardware. Fire Code could require added closer. Compliance with locally adopted Fire Code is allowed.
9. Repair or replacement of non-historic glass in historic doors and windows. Replacement glass must match adjacent glass in color, texture, and thickness. Historic glass should be replaced with historic glass wherever possible and must match adjacent glass in color, texture, and thickness. Unique glass, such as stained glass requires consultation. All glass replacement must meet International Building Code (IBC) compliance.
10. Repair of historic windows provided that materials, pattern, and texture are matched in-kind. Replacement of historic windows requires consultation.
11. Repair and replacement of wood interior or exterior trim on buildings and structures provided that materials, pattern, texture, and exact size are matched. These trim elements may include: baseboards, stair treads, balustrade spindles, column corbels, fascias, shutters, etc.

12. Repair or replacement of porches, decks and railings if it is replaced in-kind.
13. Repair or replacement of roofing or siding materials over portions of a structure provided that material, texture, pattern, color and size are matched. An entire structure re-roof or a complete re-siding requires SHPO consultation.
14. Bee and vermin removal/extermination, including capping of inactive chimneys provided removal doesn't require destruction of character defining features. If the situation is an emergency, as defined in this Agreement, notification to SHPO should be made as early as possible and consultation should be initiated once the emergency is over.
15. Replacement or installation of metal gutter and downspouts (in-kind). Replacement with a different size and/or shape of gutter and downspout requires SHPO consultation.
16. Repair of interior finishes and painting, such as wall and ceiling patches provided that material, texture, patterns, and color are matched.
17. Removal of hazardous materials must be conducted due to health and safety regulations; however, such removal should be done with the least impact possible to historic materials. (Hazardous materials include Asbestos Containing Building Materials, such as, floor tiles, drywall tape, flooring mastic, etc., and lead-based materials, such as lead painted pipes.) Encapsulation of hazardous materials should not harm historic materials.
18. Ideally, replacement of window coverings (e.g., drapes, mini-blinds, etc.) should have minimal visual impact from the exterior. Replacement of non-historic floor covering (carpet, vinyl tile, etc.). Installation of new floor and/or window coverings should not damage historic materials.
19. Installation of perimeter fencing and planting (see Appendix A #4) that is consistent with Zoning, Building Codes and the Master Plan and/or Management Plan for the Park (setbacks, view corridors, drought tolerant plants, historic plantings, etc.), and not within 50 feet of historic properties.
20. Installation of moveable site furnishings, e.g., benches and potted plants (see Appendix A #11).
21. Installation of signage on buildings that can be removed without damage to historic building materials (see Appendix A #13).
22. Installation of prefabricated structures (e.g., kiosks, sheds, compost/vault toilets) not visible from the historic building/structure or the immediate surrounding area. If ground disturbance is associated with installation, SHPO should be consulted.
23. Routine repair and maintenance on buildings, dams, and water-control structures (e.g., weirs, culverts, screens, and pumps) that have previously been determined by SHPO to be ineligible for listing in the A/NRHP.

Appendix C. ASPT-SHPO Consultation Form