Tennessee State Historic Preservation Office

Section 106 Architectural Survey Report Standards and Guidelines

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Section 106 Regulations (36 CFR 800)

The Section 106 process is codified in 36 CFR 800 of the National Historic Preservation Act of 1966. Section 106 requires Federal agencies to take into account the effects of their undertakings on historic properties (36 CFR 800.1). In doing so, Federal agencies must identify historic resources and assess effects to historic resources for their undertakings. This often requires an architectural survey report to identify historic resources and assess effects so that Federal agencies can fulfill their responsibilities under Section 106. This chapter lays out standards and guidance for architectural surveys completed for the identification and assessment effects steps of the Section 106 process.

Professional Qualification Standards

Any person conducting architectural surveys for Section 106 architectural survey reports are required to meet the Secretary of the Interior's Professional Qualification Standards for Architectural History established by the National Park Service and published in the Code of Federal Regulations 36 CFR Part 61.

Required Section 106 Architectural Survey Report Components

Methodology/Background Research

Section 106 architectural survey reports require background research. Our office's National Register files, Information files, and Survey files must be checked to complete proper identification efforts as required by 36 CFR 800.4 to identify historic properties within an undertaking's Area of Potential Effects (APE).

Previously surveyed resources and National Register points can be found on the Tennessee Historical Commission Viewer. Our survey staff (THC.Survey@tn.gov) should also be contacted and provided with a map that shows your project's APE to access survey files not on the Viewer and photographs of previously surveyed resources. Lists of National Register listed resources and of our Information Files, which contain previously determined eligible resources, can be found on our website. Contact our National Register staff (National.Register@tn.gov) for any files needed from the National Register or Information Files lists.

After checking our office's files, it may be necessary to check additional records such as historic maps, state or local archives, and/or online resources.

The methodology section of the survey report should explain the background research conducted, and the efforts made to survey and identify potential historic properties within the undertaking's APE.

Project Description

Section 106 architectural survey reports must include a detailed project description for the undertaking that explains the specifics of an undertaking in enough detail to determine an appropriate Area of Potential Effects (APE).

Area of Potential Effects (APE)

Establishing an APE is required for every undertaking in accordance with 36 CFR 800.4(A)(1). APE is defined in 36 CFR 800.16(d) as the "geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist. [It] is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."

Every Section 106 architectural survey report should contain both a written justification for the APE based on the scope and scale of the undertaking along with a map that delineates the APE.

Survey Information

Survey refers to the process of identifying, collecting, and recording data on historic resources. Section 106 architectural survey reports should contain survey information on all properties within your Area of Potential Effects (APE) that are 50+ years or older. Our office also recommends surveying resources 45+ years or older for planning purposes or in case the undertakings may require years to complete. Surveyors should also consider the possibility that a resource less than 50 years old may meet the requirements for listing under exceptional significance (Criterion G).

Our office considers there two different levels for Section 106 architectural surveys: Level 1 and Level 2 Surveys. Survey includes both field work and background research (for historic contexts for a local area and on individual resources). Your Section 106 report can contain both types of survey levels.

Level 1 Surveys

Level 1 surveys are used to investigate whether a Level 2 survey is warranted. For Section 106 purposes, Level 1 surveyed properties will only include resources determined not eligible. Resources that are surveyed at this level will include those that initial background research indicates no possibility of significance under any criteria or those that have substantial integrity issues that warrant no further investigation for eligibility under any criteria.

Please note that “common type” is not an acceptable argument for a resource not to be eligible. A “common” property type must still be evaluated. “Common” property types have been listed in the past both for their historical significance or for their architecture if they are representative of a type, style, period, or method of construction. Evaluating a “common” property type requires understanding the property within its historic and architectural context, just like any other resource.

Our office prefers that Level 1 surveys not be put into a chart format unless the photographs are large, clear, and easy to see.

Level 1 surveyed resources should contain the following information in a Section 106 architectural survey report:

- Temporary survey number or TN SHPO survey number if the property has a survey number from our office.
- Historic Name/Common Name if applicable.
- Address or approximate address/location.
- Construction date or approximate construction date (this includes dates for any known additions/alterations).
- Survey Forms for each surveyed resource (see requirements below).
- At least two photographs of the resource, preferably one façade and one oblique (see requirements below).
- Maps (see requirements below).
- Table (see requirements below).
- Brief architectural description that includes an assessment of integrity.
- Any known information on the history of the resource based off initial background research (what it was built as/used for, etc.).
- Information on any associated outbuildings, including everything noted above.
- A definitive statement that based on background research and field survey, the resource is not eligible under Criteria A, B, or C with reasons explained.

Level 2 Surveys

For Section 106 architectural report purposes, Level 2 surveyed resources are resources that warranted further investigation after initial background research and field work. Further investigation may be warranted because the property’s history was connected to an established area of significance under Criterion A; the property was associated with a significant person or event; or the property is representative of an architectural style, type, method of construction, or the work of a master. If a resource appears to have any possibility for eligibility under any of the National Register criteria, then a Level 2 survey is needed. Level 2 surveys are more in-depth and require more research and investigation than Level 1 surveys. Level 2 surveys identify and thoroughly document potential historic resources in the context of the National Register Criteria.

Level 2 surveyed resources should contain the following information in a Section 106 architectural survey report:

- Temporary survey number or TN SHPO survey number if the property has a survey number from our office.
- Historic Name/Common Name if applicable.
- Address or approximate address/location.
- Construction date or approximate construction date (this includes dates for any additions).
- Survey Forms for each surveyed resource (see requirements below).
- Photographs of all elevations of the resource (see requirements below).
- If available, historic images.
- Maps (see requirements below).
- Table (see requirements below).
- Detailed architectural description. This should include any alterations/additions and their approximate dates along with known original materials.
- History of the resource and historic contexts (geographic and thematic).
- Information about any associated outbuildings, including everything noted above.
- An evaluation of the eligibility of the resource in accordance with National Register guidelines that considers eligibility under all National Register Criteria (see guidance below). This should also include proposed National Register boundaries for any resources determined eligible.
- Effects Assessment in accordance with 36 CFR 800.5 for any resources listed in the National Register, previously determined eligible for the National Register, or determined eligible for the National Register through the current survey (see guidance below).

Survey Forms

Architectural survey reports submitted to fulfill Section 106 or Section 110 responsibilities must use the Tennessee Historical Commission's Survey123 application to complete digital survey forms to accompany the reports. Instructions for using the Survery123 application can be found in Chapter 2. The digital survey forms should be submitted prior to submitting the report, and a confirmation of completion statement should be provided in the report. Chapter 2 should be referenced when filling out the survey forms to ensure compliance with the data dictionary and to minimize the need for corrections. Our staff will quality check the submissions and fix any minor mistakes. If there are substantial issues with the digital survey forms, they will be sent back for correction, and a Section 106 response letter will not be issued until the forms are corrected, resubmitted, and accepted.

THC.Survey@tn.gov should be contacted with any questions on the Survey 123 application.

Photographs

All Section 106 architectural survey reports should contain photographs that meet the following requirements:

- Photographs of surveyed resources should be clear and high resolution. Your pixel dimension on your camera should be at least 10 megapixels, and the photograph should not become grainy upon zooming in on the image.

- The surveyed resources should be the focus within the frame of the photograph and not obscured by vegetation. If the resource is obscured, a detailed architectural description should accompany the photograph to provide detail not seen in the photograph.
- Reports should include at least two photographs (preferably façade and oblique angles) of all Level 1 surveyed resources unless access was restricted. Note any access restrictions in the report.
- Reports should include photographs of every elevation of a Level 2 surveyed resource unless access was restricted. Note any access restrictions in the report.
- Photographs of details on the exterior of the building may be needed if they cannot clearly be seen from photographs of the elevations.
- Reports that contain surveyed resources with associated outbuildings should contain at least one photograph of every outbuilding unless access was restricted. Note any access restrictions in the report.
- Photographs of the interior of resources may be needed to evaluate a resource's potential for eligibility under Criterion C unless access was restricted. Note any access restrictions in the report.
- Google Street images are not acceptable unless 1. Access was restricted and this is the only available image to accompany your architectural description or 2. You are trying to show change over time and are using the Google Street image as one of many images.
- Past survey photographs should be included in the report if you are trying to argue a resource is not eligible due to loss of integrity, and the past survey photographs demonstrate that there have been changes over time OR if the past survey photograph shows an elevation or detail of the resource that was not accessible during the current survey.
- For effects assessments, it is helpful to include photographs from the historic resource towards the project location.
- All photographs should be labeled with a clear caption describing the photo.

Maps

All Section 106 architectural survey reports should contain:

- An aerial map that delineates the Area of Potential Effects (APE) for the project, all surveyed resources within the APE (including previous and newly surveyed resources), all listed or previously determined eligible resources within the APE, and the location of the project.
- A USGS topographical map that delineates the APE for the project, all surveyed resources within the APE (including previous and newly surveyed resources), all listed or previously determined eligible resources within the APE, and the location of the project.
- A screenshot from our office's Tennessee Historical Commission Viewer that delineates the project location and APE and shows all available data points from the viewer within the APE. Currently these data points show previously surveyed and National Register listed resources. Please read the disclaimer on the website to help interpret the data.
- If you have a large APE with a high number of potential historic resources within your APE, you may need to provide multiple maps so the resources may be distinguished between one another.
- If the report determines a resource eligible, a map is required that shows the proposed National Register boundary for the resource and all contributing and noncontributing resources within the boundary.
- If a resource is listed, previously determined eligible, or determined eligible through the survey report, our office requests the effects assessment include an aerial map for each of those resources with their listed National Register or recommended National Register boundary that clearly shows the relationship between the historic property and the undertaking.

- All maps should contain legends or detailed descriptions in the caption explaining aspects of the map.

Tables

All Section 106 architectural survey reports should include at least one table that compiles basic information and the eligibility determination for all surveyed resources. The report can include one table that encompasses all surveyed resources or a table each for Level 1 and Level 2 surveyed resources. The table(s) should include the following information:

- Temporary survey number or TN SHPO survey number if the property has a survey number from our office.
- Historic Name/Common Name if applicable.
- Address or approximate address/location.
- Construction date or approximate construction date (this includes dates for any additions).
- Eligibility determination.

Guidance for Section 106 Architectural Survey Reports

Identification of Historic Properties (36 CFR 800.4)

Under 36 CFR 800.4(b)(1), it is the responsibility of the federal agency to "make a reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews, sample field investigations, and field survey" in order to identify historic properties within the Area of Potential Effects (APE).

Potential historic resources identified should be evaluated in accordance with the National Register of Historic Places Criteria for Evaluation, found in National Register Bulletin 15.

How to Evaluate Significance

For a property to be eligible for listing in the National Register, it must meet one or more of the National Register criteria for significance:

- Criterion A: Associated with events that have made a significant contribution to the broad patterns of our history.
- Criterion B: Association with the lives of persons significant in our past.
- Criterion C: 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 values, or that represent a significant and distinguishable entity whose components may lack individual distinction.
- Criterion D: Ability to yield, or have yielded, information important in prehistory or history.

Some properties may need to meet additional requirements known as Criteria Considerations:

- Criteria Consideration A: Religious Properties
- Criteria Consideration B: Moved Properties
- Criteria Consideration C: Birthplaces or Graves
- Criteria Consideration D: Cemeteries
- Criteria Consideration E: Reconstructed Properties
- Criteria Consideration F: Commemorative Properties
- Criteria Consideration G: Properties that have achieved significance within the last fifty years

A property type affected by criteria consideration requirements must still meet the normal National Register criteria for significance and integrity. The criteria consideration simply means that the property type must meet extra requirements to be eligible, as further explained in National Register Bulletin 15.

How to Evaluate Integrity

For a property to be eligible for listing in the National Register, it must retain its historic integrity. This does not mean a property must remain completely unaltered as properties change over time. The question to ask when evaluating integrity is: Does the resource still have the aspects of integrity that convey its significance?

The seven aspects of integrity are location, design, setting, materials, workmanship, feeling, and association. A property does not necessarily need to retain every aspect of integrity to be eligible. Whether a property retains enough integrity will be determined by its significance and what features and aspects of integrity are necessary to convey that significance. For example, a property eligible under Criterion C will typically need to retain a high degree of integrity for design, materials, and workmanship whereas a property eligible under Criterion A may be physically altered but retain a high degree of integrity in location, setting, feeling, and association. A historic property could retain enough integrity to be eligible under one Criterion and not another. Guidelines for evaluating integrity of a property can also be found in National Register Bulletin 15.

Keep in mind that historic alterations may now be considered historic in and of themselves if they occurred during a property's Period of Significance. Also keep in mind that condition does not equate to integrity. A property could be in poor condition but maintain a high degree of integrity.

An integrity assessment for an individual property is different than that of a district. A district is an entity comprised of multiple resources which collectively should maintain integrity on the exterior, primarily on the visible facades and overall form. Interior alterations or changes on non-visible elevations do not typically affect integrity of a historic district. The physical layout and features of the district as a whole are also important to consider when evaluating integrity. These may include spatial relationships, street patterns, or landscape features.

Individual property evaluations should consider interior and exterior features, where possible. If interior access is restricted, see if information can be obtained through the internet such as real estate listing websites. Buildings owned by public entities, non-profits, or churches often have interior photos on their websites or social media. If no information about the interior can be obtained, THC recommends assuming the interior is intact for purposes of a Section 106 evaluation.

It is also important to evaluate the integrity of any supporting resources when surveying individual properties. Examples of supporting resources include outbuildings, barns, garages, shops, bridges, etc. These resources are important for evaluating both a property's significance and its integrity. For example, a survey may identify a locally important seed distribution business. Located on the property is a storefront, warehouse, two seed sorting buildings, and a garage. Evaluating only the storefront is inadequate, as the business could not have operated without its supporting buildings. A survey must include information on the supporting resources and evaluate their integrity and how they contribute to the significance of the property.

Context

Properties must be evaluated within appropriate geographic, thematic, and temporal historic contexts. Historic contexts are the "patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear."[1] The specific circumstance of each property determines the appropriate context(s). For example, a school should be evaluated within the context of local education history and architectural trends, particularly as applied to institutional buildings. An evaluation of a building for representing a particular style should consider that style's general character-defining features but also how that style is generally expressed in the local architectural context. In some cases, it may be appropriate to consider a state or national level context, but all properties should at least consider local contexts.

Evaluating within a context sometimes requires a comparative analysis of similar properties in that same

[1] *National Register Bulletin 15 How to Apply the National Register Criteria for Evaluation*, 7

context. THC does not expect exhaustive surveys or comparative analysis for Section 106 reports, but the report should contain enough information to understand a property's role within its appropriate contexts, and, if applicable, in comparison to similar properties. National Register Bulletin 15 and Bulletin 16A contain detailed explanations of how to evaluate a property within its context.

Please note that NR does not only recognize 'best' properties within a particular context. NR recognizes any property that is significant and retains age and integrity. In some cases, multiple properties with similar significance(s) in the same context can be listed, such as those nominated under a Multiple Property Submission.

Assessment of Adverse Effects (36 CFR 800.5)

Under 36 CFR 800.5(a), it is the responsibility of the federal agency to "apply the criteria of adverse effect to historic properties within the Area of Potential Effects (APE)" to determine if their undertaking will adversely affect any historic properties.

According to 36 CFR 800.5(a)(1), "an adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association." When applying the criteria of adverse effects, "consideration must be given to all characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register." When assessing adverse effects, an evaluation should determine the aspects of integrity integral to the historic property's National Register significance, and then an assessment of effects should be completed to determine if the undertaking will adversely affect those aspects of integrity/characteristics.

Keep in mind that in accordance with 36 CFR 800.5 (a)(1) adverse effects may also include "reasonably foreseeable effects cause by the undertaking that may occur later in time, be farther removed in distance, or be cumulative."

When assessing the effects of preservation, rehabilitation, or restorations, refer to the Secretary of the Interior's Standards for Preservation, Rehabilitation, or Restoration to ensure the undertaking meets the appropriate Standards for that treatment.

Establishing National Register Boundaries for Evaluations in Section 106 Reports

Boundaries for National Register eligible or listed resources encompass the resources that contribute to a property's significance. When assessing effects to a historic property under Section 106, the entire National Register boundary must be considered. If a resource's boundary extends well beyond the Area of Potential Effects (APE), it may be appropriate in consultation with the SHPO to estimate the boundary or provide a partial boundary that encompasses resources within the APE. However enough information should still be provided to assess the significance of the resource and determine the defining characteristics and aspects of integrity that may be affected by the undertaking. Refer to National Register Bulletin 21 for more guidance on defining boundaries for National Register Properties.

Properties listed in the National Register prior to 1980 may have undefined boundaries. Surveyors should suggest a reasonable boundary that encompasses all resources or landscape features noted in the National Register nomination. Additional research may reveal that a larger boundary is warranted. For example, the THC's office at Clover Bottom Mansion was listed in 1975 under Criterion C with an undefined boundary of nine acres. Research revealed additional significances under Criterion A, C, and D, which justified expanding the boundary to fifty-three acres. In some cases, a smaller boundary may be justified if the property has experienced changes, but the surveyor must justify the new boundary using National Register criteria.

Guidance for Evaluating Eligibility for Different Property Types

Evaluating Underrepresented Community Resources

Resources associated with underrepresented communities (non-white populations, American Indians, LGBTQ+, etc.) are often the only, or one of few, resources associated with that community in an area. When evaluating resources associated with underrepresented communities, it is important to note that the significance and rarity of the site as representative of an underrepresented community may allow for the resource to experience more changes and still be eligible for listing in the National Register of Historic Places.

Evaluating Historic Districts

Per National Register Bulletin 15, a district "possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development." A historic district may be located on one property (such as a farm) or consist of several properties (a residential neighborhood). A historic district may contain resources related to one function (a mill or factory complex) but may also include resources that encompass several interrelated activities (an area that includes industrial, residential, and/or commercial resources).

A historic district evaluation must consider the individual components as well as how those components relate to each other. Considerations should include spatial layout, land use patterns, transportation systems (roads, paths, sidewalks, etc.), associated infrastructure (culverts, street furniture, historic lighting), and other built environment resources such as buildings or structures. Keep in mind that open land can be an important characteristic of a district, particularly in rural historic districts.

When evaluating potential historic districts, survey reports should provide a historic context, description of components of the potential district, a proposed boundary for the district (written and on a map), and photographs of representative resources within the district along with photographs of streetscapes within the district. The photographs submitted should be keyed to a map of the district. If a potential historic district's boundary extends beyond the undertaking's Area of Potential Effects (APE), the survey report should still provide sufficient historical context to evaluate the district as a whole and to understand its significance to adequately evaluate the effects of the undertaking to the historic district as a whole.

Evaluating Farms

In addition to the guidelines noted above for districts, farm evaluations require some additional information. Information should be provided on the age, historic use, and alterations of the farmhouse and all outbuildings, where possible. A photo of the farmhouse, every outbuilding, and landscape features should be included, where possible. The location of these resources should also be shown on a property map with photos keyed. The property history and context should include information on past and current agricultural production, land use, and acreage. Note any non-extant buildings where known. Additional guidelines on evaluating and documenting rural historic landscapes may be found in National

Register Bulletin 30.

Evaluating Cemeteries

National Register Bulletin 15 defines cemeteries as "a collection of graves that is marked by stones or other artifacts or that is unmarked but recognizable by features such as fencing or depressions, or through maps, or by means of testing." Cemeteries can be eligible individually, as a contributing resource to a larger property (such as with an associated church or within a farmstead), or within a historic district. Cemeteries must meet Criteria Consideration D to be eligible individually. They do not need to meet Criterion Consideration D if they are they are eligible in association with a church and the church is the focus; they are eligible under Criterion D for information potential; or they are eligible as part of a historic district but are not the focal point of the historic district. To meet Criteria Consideration D, cemeteries must be eligible for one of the following reasons: persons of transcendent importance, the basis of age, its design, association with events, and/or information potential. Read National Register Bulletin 15 and National Register Bulletin 41 for more guidance on evaluating cemeteries and applying Criteria Consideration D.

To adequately survey a cemetery for a Section 106 architectural survey report, the report should include:

- Photographs of the cemetery and its features
- An aerial map with the cemetery marked
- An approximate percentage of historic graves (50+ years old) vs. newer graves (less than 50 years old)
- Any notable funerary art or, whether any vegetation or landscape features appear to be associated with graves
- Information as to whether the cemetery was formally planned or follows known characteristics of any cemetery topologies, such as the Rural Cemetery movement or memorial gardens design
- Information on the physical distribution of graves, particularly whether the historic graves are clustered in one area or spread throughout the cemetery. If graves are clustered in recognizable sections, please indicate that on an aerial map.
- Information on whether the cemetery is associated with early settlement of an area, an important event, or persons of transcendent importance, or whether the cemetery is associated or was historically associated with a church or community.

Please note that many cemeteries in Tennessee include unmarked graves, particularly early cemeteries and those historically associated with African American communities. A lack of grave markers does not always negatively affect integrity as their absence often reflects different cultural marking traditions, historic socio-economic inequality related to wealth disparities or racial segregation that may have limited access to markers, or simply a lack of maintenance where markers have deteriorated, fallen, or sunken. Surveyors should carefully examine the cemetery for evidence of alternative marking techniques, such as vegetation or fieldstones, or the presence of grave depressions or fences that may indicate possible burials. Historic maps, written documentation, or community members may be able to provide additional information.

Evaluating Infrastructure/Utilitarian Resources

Historic infrastructure represents important but broad resource types that have historically been underrecognized within the National Register of Historic Places. Historic utilitarian resources often formed the foundation on which modern American life has been built. They include, but are not limited to, resources related to the creation or transmission of power; transportation systems for people and goods; water and sewer systems; and/or the maintenance of such systems. Utilitarian resources must be given serious consideration for National Register eligibility, just like any other resource.

Because of their unique designs and historic roles, utilitarian resources sometimes require different evaluation methods. Many are linear resources that typically have replacement materials. Common examples include railroads, roads, or pipelines. Replacement materials on these types of resources are considered normal maintenance so an eligibility determination should focus on other aspects of integrity, notably location (alignment), design (type, width), setting, association, and feeling.