



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

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Dear Cultural Resource Partner:

The Washington State Department of Archaeology and Historic Preservation (DAHP) staff have been receiving questions regarding expectations for completing the agency's Historic Property Inventory Form (HPIF).

As you are aware, HPIFs are completed and then submitted to DAHP so staff can evaluate the eligibility of resources for the National Register of Historic Places. The information provided on these forms are the basis from which the agency makes legally justifiable decisions under Sections 101, 110 or 106 of the National Historic Preservation Act per 54 U.S.C. 300101 . We also use these forms for reviews under Governor's Executive Order 05-05, and/or the Washington State Environmental Policy Act (SEPA). Therefore, having complete, accurate, and up-to-date information on each form is **essential** for DAHP to work effectively, efficiently, and consistently.

To respond to the questions we have received, DAHP has compiled some frequently asked questions (FAQs). Please note that we are currently in the process of updating our Standards for Cultural Resource Reporting to clarify these points. Look for the update within the next few months.

Q: Why and when does DAHP return HPIFs?

A: DAHP may return an HPIF in order to obtain more information, request clarification, or request completion of all applicable portions of the form. Most importantly, your conclusions, opinions, and assumptions should be stated in clear language and should reach a justifiable conclusion. Every evaluation should be provided in original language and not submitted with any cut and paste generic text.

When completing HPIs, please keep in mind that decisions made by the agency and its partners in project review processes will be based on *your* work. These decisions impact all parties involved in consultations, will set precedents, and often have legal implications. We are very cognizant of these effects and weigh them in our decision-making process. We strive to reach regulatory decisions based on the information provided by *you*. Therefore, to improve our ability to quickly review HPI forms and respond, we require the following information:

1. All applicable data fields, check-boxes, and pull-down menus completed. At least one clear photo showing two facades. Photos should be of recent date that show the property as it presently appears. Photos of notable features or materials are encouraged.
2. A succinct, concise explanation of the historic context(s) that the recorded property is being evaluated. In most cases this need not be more than a few sentences or paragraph at most.



3. A discussion of the resource's integrity. (DAHP has written an example NRHP evaluation, [which is available on our website](#), intended to emphasize the importance a discussion of integrity has on a resource's NRHP eligibility). This discussion only needs to be one or two sentences, but is the crux of all NRHP evaluations. Please reference all aspects of integrity considerations.
4. An evaluation of the resource's eligibility in accordance with NRHP criteria. Meaningful, defensible evaluations must be written for each resource. Given that each resource is different, statements of significance with boiler plate language may be returned.

HPIFs will be returned if they do not contain this required information.

Q: What is the expected level of effort for a “succinct, concise explanation of the historic context” of a historic resource?

A: The agency and its partners require enough information to make legally justifiable determinations of eligibility. The concept of what is “enough,” will depend on the resource type, the information available, and the scope of the project. We do not expect a complete ownership history. Rather, what is required is a demonstrable effort to identify historic owners and any potential historic association(s). In most cases, a desktop review of the following resources should provide enough information, when available and applicable:

- Historic maps (General Land Office, Sanborn, Metsker, topo, etc.)
- Genealogical records
- Census records
- Tax assessor records
- Newspapers
- Local histories (county or city websites, the Washington Secretary of State, HistoryLink, etc.)

You may find nothing, or you may find something that leads to more information in other locations. If you cannot find relevant information please document your research and state that on the form.

We are also requesting that you customize the historic context to the specific resource that is the subject of the HPIF. Almost all historic contexts should start with the decade at which the resource was constructed. Earlier dated historical information is only useful in your cultural resource report, which provides a historic background for the project area as a whole.

Q: What is the expectation of qualifications for personnel evaluating historic resources?

A: It is our expectation that personnel completing HPI forms and providing National Register evaluations of historic buildings meet the Secretary of the Interior's *Professional Qualification Standards for Architectural History and/or History*. This qualification includes coursework in architectural history and two years full time experience in research, writing, or teaching American Architectural History or a substantial contribution through research and publication to the body of scholarly knowledge in the field of American architectural history and/or history of the American West. The old saying “the right tool for the right job” is applicable to the cultural resource profession. Using a cultural resource professional with the appropriate qualifications, education, and professional background results in a



quicker and more efficient review process for all involved.

Again, we hope this transmittal will help clarify for you what the agency is looking for when we review HPIFs. These expectations are based upon the [Secretary of the Interior's Standards for Identification](#).

Also, keep in mind that we will be convening more in-depth trainings once the current WISAARD updates have been completed.

If you have any questions or concerns, please feel free to call or send an email.

Sincerely,

A handwritten signature in black ink, appearing to read "Holly Borth". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

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