

The Camera & Clipboard

Historical & Architectural Survey Newsletter



OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION
COLORADO HISTORICAL SOCIETY

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NEW PLANNING TOOL: COMMUNITY ASSESSMENT OF AVAILABLE RESEARCH MATERIALS FOR HISTORICAL & ARCHITECTURAL SURVEYS

Completion of historical & architectural surveys requires gathering both historical background and details about the architectural style, elements, and building changes over time. To meet the needs of both local communities and OAHp, there needs to be a balance between these two types of information on submitted survey forms. With some projects, however, the research process proves more difficult than anticipated. In some cases communities and consultants discover, in the midst of the research process for survey projects, sources are very difficult to locate or simply do not exist. Making this type of discovery in the middle of the project makes creating complete products challenging since existing schedules and budgets often do not allow the time and money to correct for a lack of available research materials.

Enter the “Community Assessment: Available Research Materials for Historical & Architectural Surveys.” This is a planning tool to assist local communities and their hired consultants when completing intensive-level historical & architectural surveys. The idea behind the Community Assessment is for everyone to go into a project fully aware of what research materials are and are not available.

The two-sided form prompts users to list the available research materials in the community, including:

- historic themes for the area
- previous survey results
- local ‘library’ holdings—the term library is in quotes because the types of research sources listed (written histories, newspapers, manuscripts, US Census records, city directories, cemetery indexes, obituaries, maps, photographs, clipping files, and oral histories) may or may not be located in the local library
- assessor’s office records
- long time residents willing to offer oral histories

Ideally, this form should be completed well in advance of starting an historical & architectural survey project. It is meant to help with planning a successful project. The answers regarding what is and is not available in the community may point to the need to engage in more work before an historical & architectural survey project even can be planned. For example, a community may decide to wait to apply for a grant to fund an historical & architectural survey and instead engage in efforts to gather oral histories or index local newspapers. Both of these pre-survey projects represent great ways for students or volunteers to get involved with the historical & architectural survey program. Such work can be initiated prior to the start of the fieldwork for a survey project but also may continue over time or while the survey is underway. The added bonus: completed newspaper indexes and oral histories prove useful for a wide variety of research projects, not just surveys. As such projects are completed it will be important to note their existence on the Community Assessment. This tool is intended to be a living document, continuously updated as more research sources become available.

The “Community Assessment of Available Research Materials for Historical & Architectural Surveys” is posted on the Preservation Planning Unit Resource Center (PPURC or “Perk”) portion of the OAHp website at http://www.coloradohistory-oahp.org/programareas/infoman/Community_Assessment.pdf

The activity that is the subject of this material has been financed in part with Federal funds from the National Historic Preservation Act, administered by the National Park Service, U.S. Department of the Interior. However, the contents and opinions do not necessarily reflect the views or policies of the U.S. Department of the Interior, nor does the mention of trade names or commercial products constitute an endorsement or recommendations by the Department of the Interior or the Society. Regulations of the U.S. Department of the Interior strictly prohibit unlawful discrimination in departmental Federally-assisted programs on the basis of race, color, national origin, age or handicap. Any person who believes he or she has been discriminated against in any program, activity, or facility operated by a recipient of Federal assistance should write to: Director, Equal Opportunity Program, U.S. Department of the Interior, National Park Service, 1849 C Street, Washington, D.C. 20240.

These activities are also partially funded by the State Historical Fund, a program of the Colorado Historical Society.

GRANT-FUNDED SURVEYS UPDATE

Issue 19 listed all of the awarded, ongoing, and completed grant-funded historical & architectural surveys. The list below features status changes over the past three months.

Certified Local Government Projects

Ongoing:

Boulder County – Intensive Survey of 50 sites in Town of Eldora - Historitecture

Greeley - Intensive Survey of 50 sites between 17th and 18th Streets and 6th and 8th Avenues- Kelly Courkamp

Lafayette – Intensive Survey of 11 sites within city limits – Preservation Publishing

Littleton - Reconnaissance Survey of 83 sites in Arapaho Hills subdivision- Diane Wray Tomasso

Loveland – Intensive Survey of 51 sites along West 5th Street – Cultural Resource Historians

Pueblo – Intensive Survey of 81 sites in the Northside neighborhood – Historitecture

Steamboat Springs – Intensive Survey of 50 sites within “Old Town” – Cultural Resource Historians

Steamboat Springs – Additional phase of intensive Survey within “Old Town” (50 sites) – Cultural Resource Historians

Westminster – Intensive Survey of 30 scattered rural sites in Jefferson County- Dawn Bunyak

State Historical Fund

Awarded:

Colorado School of Mines – Intensive Survey of 23 buildings on campus

Fort Collins – Selective Intensive Survey of 62 sites related to commercial and residential development from 1945 to 1967

Historic Denver, Inc. – Reconnaissance and Selective Intensive Survey (35 sites) in Kountze Heights neighborhood

Ongoing:

Carbondale – Intensive Survey of 20 Residential Sites – Reid Architects

Kiowa County – Countywide Reconnaissance and Selective Intensive survey (up to 50 sites) in three towns – Front Range Research Associates

Bayfield – Intensive Survey of 30 sites in commercial downtown - Nik Kendzioriski

Boulder – Comprehensive Reconnaissance and Selective Intensive Survey (104 sites) within 10 postwar residential subdivisions – TEC, inc.

Broomfield – Selective Reconnaissance and Intensive Survey (38 sites) – SWCA

Eastern Plains - Selective Reconnaissance and Intensive Survey (40 sites) in Baca and Phillips Counties - Colorado Preservation, Inc.

Florence – Intensive Survey of 62 sites as part of Small Town Survey Initiative – Front Range Research Associates

Fort Lupton – Intensive Survey of at least 90 sites in commercial downtown – Tatanka Historical Associates

Genoa - Intensive Survey of 40 sites as part of Small Town Survey Initiative – Front Range Research Associates

Gilpin County – Reconnaissance and Selective Intensive Survey (90 sites) in communities near the Moffat Tunnel - SWCA

Hinsdale County – Intensive Survey of at least 30 sites - Preservation Publishing

La Plata County – Comprehensive Reconnaissance and Selective Intensive Survey of 100 sites – Cultural Resource Planning

Larimer County – Intensive Survey of at least 85 sites in the Town of Bellvue – Tatanka Historical Associates

Meeker - Intensive Survey of at least 30 sites as part of Small Town Survey Initiative – Reid Architects

New Deal, Phase III – Intensive Survey in 11 remaining counties – Colorado Preservation, Inc.

Routt County – Intensive Survey of 26 sites in the Town of Hayden – Mountain Architecture Design Group

Silverton – Intensive Survey of at least 225 sites within National Historic Landmark boundaries - Silverton Restoration Consulting

Windsor – Intensive Survey of 45 sites in commercial downtown – Historitecture

Completed:

Aguilar – Comprehensive Reconnaissance and Selective Intensive Survey of 11 sites – Hoehn Architects

Aguilar project recap: Survey rookie and grant recipient Pat Romero remarked she “was most impressed with the great deal of research involved and completed by Hoehn Architects who... never failed to lose their enthusiasm for our small project.” Consultants Tim and Kris Hoehn noted, “We learn so much on every project, but on this particular one, we found the coal mining history of the area of particular interest.” The Hoehns also enjoyed researching Aguilar’s Prohibition era reputation as “Little Chicago” and noted the Antonio LoPresto Building/Arcade Hotel and Bar on Aguilar’s Main Street still features subterranean tunnels originally used to bring in “White Mule” liquor direct from the distillers.

Old Fort Lewis - Intensive Survey of 22 buildings on former college site – Cultural Resource Planning



MEMBERSHIP CHANGES ON BEST PRACTICE COMMITTEE

There is a lot of coming and going on the Best Practice Committee (BPC). Long-time members are leaving or finishing their service and the search for replacements is underway. Consultant Carl McWilliams and OAHP employee Heather Peterson both exited the Committee in April. The BPC has developed a slate of six nominees to fill Carl's grant-funded historical & architectural survey consultant vacancy. When this newsletter went to press the new member had yet to be chosen, but the group hopes to have the new consultant representative in place in time for the BPC's scheduled meeting in early July. Heather resigned her committee membership at the same time as her internal transfer from OAHP's Information Management department to the National and State Register program. Erika Schmelzer will take Heather's place on the BPC, joining the group in July and offering her insights about the historical & architectural survey process based upon her experience entering information from completed forms into the SiteFiles and COMPASS databases.

The group will be filling two additional vacancies in the near future. Lisa Schoch's term as a State agency representative will expire this month and the search for Jeff Overturf's replacement as the Federal Agency representative on the BPC will begin after his final meeting in October. The Committee will be developing a list of nominees for these agency vacancies. If you are interested in being considered, be aware new members should be able to attend quarterly meetings (January, April, July, and October) in Denver on the second Tuesday of the month and serve a 3 year + 1 meeting term. Also all candidates should possess considerable involvement with OAHP historical & architectural survey projects, a familiarity with current survey approaches and policies, and a willingness to share their opinions. Individuals who want to fill one of these two agency vacancies should contact Mary Therese Anstey via email. In addition to expressing your interest, please write a short paragraph describing your background and likely contributions to the group. All new members will be selected by consensus of the BPC.

The departures of Lisa and Jeff mark the last of the original members of the BPC. Since its formation in 2005 the group has discussed historical & architectural survey training needs, advised on revised directions for the Architectural Inventory Form (#1403), critiqued the content and format of *The Camera & Clipboard* newsletter, approved new CLG survey processes for

project review and monitoring, considered the creation of a professional organization for the historical & architectural survey community, and hosted a session at the 2007 CPI Saving Places Conference. Staff truly appreciates the contributions of all BPC members, both past and present.

REFORMATTED FIELD GUIDE NOW COMPLETE

Thanks to the diligent work of Koch intern Virginia Bennett, the reformatted version of the *Field Guide to Colorado's Historic Architecture & Engineering* is now available on the website(<http://www.coloradohistory-oahp.org/guides/fieldguide/fieldindex.htm>). This publication includes all of the entries which appeared in *A Guide to Colorado's Historic Architecture and Engineering, Second Edition* (2003) and any new styles or types added and featured in various issues of *The Camera & Clipboard* newsletter.

OAHP staff are proud of the revised document but freely acknowledge this field guide is not the definitive publication including details about all architectural styles and types eligible to the National Register of Historic Places. Architectural history is an evolving field subject to changes in interpretation and the 'discovery' of new styles and types. Hopefully consultants, agencies, students, and other users will find the guide useful in identifying, evaluating, and designating historical & architectural resources. However, they should not let the available entries restrict their fieldwork and assessments; identifying new styles, types or vernacular expressions should be part of all survey projects. It is through this process of identification and analysis that new entries are added to OAHP's recognized styles and types and become part of the *Guide*. As time allows staff will be creating new entries for existing special use types such as bridges and barns and adding to available architectural forms (such as the I-House entry which appears on page 5 of this newsletter).

Individuals interested in having a copy of the reformatted field guide can print a PDF of the publication from the OAHP website. Alternatively, you may request a starter kit which includes the complete field guide (plus postage) for \$11.00. Whether printing your own copy or purchasing a printed version, you will need to provide your own binder to hold the pages. As discussed in the previous issue of *Camera & Clipboard*, this format was chosen to provide field guide users with greater flexibility and the opportunity to collect additional relevant information within their personal binders.



WEBSITES KEY TOOL FOR HIRING CONSULTANTS

by Wade Broadhead, Planner- City of Pueblo

I am the Staff Planner for the Certified Local Government (CLG) Historic Preservation Commission in Pueblo. I just completed a search for a consultant to conduct a CLG-funded project to complete an historic context. Choosing a qualified consultant for your municipality's historic preservation project can be a tall order. While some cities have a long track record of historic preservation work and long-standing relationships with numerous consultants, others are new to the scene.

This recent search highlighted the fact many historical & architectural consultants have not taken full advantage of publicizing themselves on the World Wide Web. While there are other steps to take when searching for a qualified consultant (such as perusing OAHF's *Directory of Cultural Resource Management Agencies, Consultants and Personnel for Colorado* or seeking recommendations from communities where comparable projects have been completed), Google and similar search engines have become a default resource for quick and easy initial research. The key advantage of websites, from the local government perspective, is the time savings.

I am by no means a web expert, but the list below features those aspects of websites I found most useful during my recent consultant search:

Navigation - I liked those websites which featured logical, easy to locate, functional links which lead me directly to information about the consultant's previous experience and qualifications quickly.

Presentation - A well-organized, attractive website conveys an air of professionalism. City projects are used for planning purposes and having a well-written and attractive document for the public and policy makers is essential. The website is one way to judge how the bound report will look.

Current - I tried to determine if the website was up to date and included descriptions of the consultant's most recent projects. If the site was "under construction" or featured dated information, then I usually moved on to another site.

Substance - It was important for me to read about a consultant's previous experience in order to discern whether this professional could

accomplish my project. I looked to see whether a consultant had worked for cities similar to Pueblo and if they had completed either CLG or State Historical Fund (SHF) grant projects. For me a listing of each and every project the consultant had ever worked on was less important than details about specific experience, professional references, and samples of work. If the brush strokes were too broad and entries featured few concrete details, I searched for other websites.

Personality - This is a rather vague and multi-faceted criterion, but I think most local governments are looking for a consultant who is not only highly qualified but also personable. I want to hire someone who can translate the project findings into easy-to-read, concise prose suitable for a wide audience which includes planners, public policy decisions makers, and citizens alike. The consultant also will have to speak before the commission, city council, and various neighborhood groups; we want someone who is well-spoken and passionate about their work. Conveying personality in a website is difficult but may be accomplished with photographs from previous projects, links to downloadable reports and products, and references from other clients. Having this type of information available on the website made me more likely to follow up with a phone call to the consultant.

Consultants are not alone in trying to catch up with the capacity the Web now offers. Cities also are struggling to provide more information to our citizens through user-friendly and informative websites. Despite the challenges associated with developing a functional site and keeping it current, I encourage more consultants to consider developing a web presence. Hopefully this article has highlighted to consultants the potential of professional websites to reach a target audience of future clients who want to hire the best consultants to complete their preservation projects.

Wade has provided his opinions about websites from the client perspective. Now consultants are invited to offer their views. Do you have a website? Why or why not? What are the advantages and disadvantages of posting and maintaining a presence for your business on the World Wide Web? If you are interested in contributing to a future issue of The Camera & Clipboard (about websites or any other issue), contact Mary Therese Anstey.



NEW BUILDING TYPE: I-HOUSE

by Erika Schmelzer, Cultural Resource Historian/GIS Specialist-Architecture

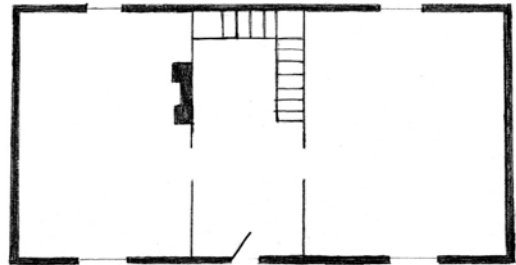
The term I-House was first defined in the 1930s following cultural historian Fred Kniffen's notation of the common recurrence of this building type in the "I" states (Iowa, Indiana, and Illinois). The earliest examples of the I-House were found in Iowa and its surrounding regions starting in 1840. At that time, in what was then the frontier, the I-House building type was most prevalent in rural areas. This building form moved westward with the expansion of both the railroad and pioneers (most notably from the Midwest) who came to settle the American West.

Derived from the hall-and-parlor plan, the I-House building type is clearly defined by its layout. It is two rooms wide, one room deep and is separated by a central passage. The I-House usually was constructed with a multiple bay façade fronting the road, giving the appearance of a larger house. Ambitious homeowners often added simple stylistic elements such as Victorian style porches or elaborate chimneys to enhance exterior appeal. The building type is most commonly depicted as a two-story dwelling but one-and-one-half story versions also exist.

Though typically found in rural locations, the occasional I-House can be spotted in urban areas and small mountain communities of Colorado. While I-Houses in the Midwest most often were constructed of brick, stone or wood, Colorado I-Houses are predominantly wood frame construction. Wood frame construction was prevalent in Colorado because lumber was readily available from railroad shipments. Colorado I-Houses also differ from those in the Midwest in terms of chimney position: in the Midwest the chimney is usually in the gable end but in Colorado most chimneys are centrally positioned. The majority of I-Houses in Colorado were built between 1875 and 1910. Few intact examples of pure I-Houses exist in Colorado; most have one-story additions on the rear. These additions often do not match the original style of the house, but rather reflect a particular architectural style from the era in which they were constructed.

Common elements:

- rectangular plan
- two rooms wide and one room deep
- gabled roof
- central passage
- lack of ornamentation



Typical floor plan of an I-House in Colorado. Drawing by Erika Schmelzer.



Kellogg Residence, Lake City (above) is a classic example of a two-story I-House with a lack of ornamentation. (Photograph by Grant Houston)



Harrington Ranch, Park County (left) is a one and one half-story I-House with a one story addition on the rear. (Photograph by Tom Simmons)



BUILDER BIOGRAPHY

By Chris Brennan, Masters in Architecture student, CU-Denver

SAMUEL HOFFMAN (1901-1959)

Samuel Hoffman was born in Polish Russia to Jewish parents in 1901. In the wake of the Bolshevik Revolution, 12 year old Hoffman immigrated to Canada. While in Canada Hoffman worked at a tannery and learned English. At age 22 he moved to the United States and began work at an automobile assembly line. The assembly line techniques he learned would be integral to Hoffman's housing construction business later in life. Also during this time Hoffman became a US citizen and began learning the plastering and cement finishing trades. In 1923 Sam Hoffman married his wife Ann and began building houses in Detroit.

After World War II the Hoffmans moved to Phoenix, Arizona, and started F & S (Father and Son) Construction on a \$20,000 advance from a home construction job. In 1948 Hoffman was hired by the Cottonwood Development Company to develop a square mile of land outside Aurora. The land, known as "Cottonwood Farm", produced sugar beets, alfalfa, potatoes, and grain. It also was a prime location to build housing for the thousands of veterans returning from World War II and service members stationed at nearby Lowry Air Force Base and Fitzsimons General Hospital. In fact, it was so popular that over 400 of the 700 new homes were sold before construction even began.

Hoffman, the self-described Henry Ford of the home building industry, utilized assembly line methods to develop the land and to construct the homes. Construction began on the Aurora development in December 1950. Teams of workers specialized in a single aspect of the building process, with some laying bricks while others worked on windows. This approach allowed for as many as 100 homes to be under construction at one time with an average of 12 houses being finished each day. This short building cycle made both construction costs and sale prices for Hoffman's houses much less than other homes in the area. The first homes he built in Aurora, known as the Deluxe Brick, were three bedroom 1625 square foot ranches with attached single car garages. A less expensive wood frame home with wood shingle siding, known as the Economy model, also was available.

In 1954 Hoffman had built 1705 homes and the Aurora subdivision, bounded by 13th and 6th avenues on the north and south and Peoria and Potomac streets on the east and west, was home to over 7000 residents. Initially it was named Hoffman Town (the Aurora newspapers referred to it as Hoffmanville), but a poll taken by the Civic Association in 1952 changed the name to Hoffman Heights. As early as 1948 Hoffman petitioned the City of Aurora to annex the new development, but some local Aurora builders, angered at his assembly line construction methods and high level of success, persuaded City Council members to deny Hoffman's petitions for annexation 51 times over a period of six years. Failure to obtain annexation meant homes in Hoffman Heights did not have access to city utilities.

Hoffman Heights possessed a strong community identity and Hoffman donated 11 acres of land for a new park and \$2500 in order to purchase new equipment for recreation. He also constructed Hoffman Heights Shopping Center located at 6th Avenue and Peoria Street in Aurora. This shopping center continues to serve the area today, with many of the original stores still in business. In addition to the shopping center, the residents taxed themselves to pay for a fire station which was staffed by volunteers. Littleton provided police protection and water and sewer service came from Denver. From 1951 to 1956 Hoffman Heights was a city unto itself.

In 1954 Aurora Town Attorney Leslie Gifford reviewed the annexation petitions Hoffman had submitted, determining the City Council's rejection invalid. As a result of Gifford's review Hoffman Heights became part of Aurora. Hoffman Heights' residents, however, no longer needed Aurora services and sued to overturn the annexation. The legal challenges proved fruitless and in 1956 Hoffman Heights officially became part of Aurora. These struggles made Hoffman Heights a true community, and because of this, it is said Hoffman liked this subdivision development the best of all his large housing projects.

Hoffman also developed subdivisions in other metro area communities; he helped to establish the City of Thornton. In 1952 Hoffman purchased 640 acres six miles north of Denver on North Washington Street with plans to build 5000 homes. On February 19, 1953, Hoffman announced the new community would be called "Thornton" after Colorado

Continued on page 7



HOFFMAN BIO, CONTINUED

Continued from page 6

governor Dan Thornton. Hoffman explained, "...Dan deserves the honor in view of his part in building the state of Colorado and his interest in adequate housing for its citizens." Governor Thornton on the other hand stated he would rather the suburb be named after someone else, possibly a famous Colorado pioneer. "I wouldn't like to see a town start out with a stigma like the name Thornton," the governor explained.

In Thornton Hoffman employed the same construction techniques used in Hoffman Heights. These new homes were two and three bedroom brick homes priced between \$8000 and \$11,000. They also featured "a new kind of brick," although Hoffman did not reveal the details to reporters. He recruited, with the help of her three brothers (who happened to work for Hoffman), movie star Jane Russell to help market the new community. She also decorated two of the model homes. Hoffman planned Thornton as a city unto itself from the start, with water from a well-reservoir system and specially constructed sewage facilities. Hoffman's F&S Construction erected a two-story brick administration building for construction operations during the project which he turned over to Thornton afterwards to use as a city hall.

Hoffman's companies, including F & S Construction, were the third largest homebuilders in the nation in 1954 with 2858 homes under construction. In addition to his projects in Aurora and Thornton, Hoffman finished developments in Cleveland, Chicago, Phoenix, and Albuquerque and had a millwork shop in Salt Lake City.

On October 13, 1959, Sam Hoffman killed his wife Ann and then himself in their home in Phoenix. Hoffman's son-in-law Sol Dichter served as the Denver area manager and continued his work in the metro area. His son, Jack Hoffman, was a successful developer in Chicago. Jack's son, Buz Hoffman, owns and operates the Lakewood Development firm in Chicago. Hoffman also had two daughters, Mrs. Lee Rosner and Mrs. Jean Dichter.

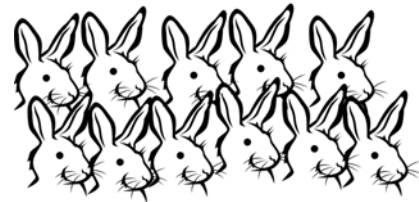


Current views of two typical Hoffman Heights "Deluxe Brick" homes: 1189 Racine Street and 1204 Quari Street in Aurora – images by author

REGISTER BOUNDARIES REALIGNED

Members of the National and State Register staff have adjusted the geographic areas they serve within Colorado in order to distribute more evenly the nomination and survey eligibility review workload. For more details about which member of the staff to contact regarding discussions of resources found individually field eligibility and National Register Historic Districts identified during historical & architectural survey projects, see the revised map at <http://www.coloradohistory-oahp.org/programareas/register/register.htm>. If you have already established a dialogue about eligibility issues for an ongoing project, continue to contact the staff member with whom you have been working. All new projects should follow the new staff assignments.

COMING ATTRACTIONS



The October issue of *The Camera & Clipboard* will feature a continued discussion of the topics presented in the article entitled, "The Resource is Not Eligible Because Many Similar Resources Exist": A Common Problem with Common Resources" which appeared in the April newsletter.



FORMS AND REPORTS QUICKEST ROUTE TO SECTION 106 REVIEW OF NA- TIONAL REGISTER ELIGIBILITY

By Amy Pallante, Compliance Coordinator

COMPLIANCE

ORN ER

The National Register of Historic Places is the nation's inventory of historic places worthy of preservation. This designation program is administered by the National Park Service (NPS) which is part of the U.S. Department of the Interior. The National Register Criteria for Evaluation, established by the NPS, identify the types of resources and areas of significance that will qualify properties for listing in the National Register. In the Section 106 process OAHP staff rely on the National Register Criteria in determining which identified properties within the Area of Potential Effects are eligible for the National Register of Historic Places [36 CFR 800.4(c)].

Fortunately, OAHP has designed guidance to assist consultants and agencies in providing the appropriate information to make National Register determinations. The first tool is the *Colorado Cultural Resource Survey Manual*, a publication designed around the 13 steps in completing any survey project. SHPO staff prefer consultants completing Section 106 surveys use the most recent version of this manual. The second related tool is the suite of site forms. These forms feature prompts to gather key information necessary for determining the National Register eligibility of a property. We **strongly** recommend consultants and agencies consulting with our office on a Section 106 project complete both a survey report and appropriate site forms, submitting all documentation to our office for review and comment. Agencies often express concern about the time it takes to complete historical & architectural survey work and are always looking for ways to either streamline or expedite the SHPO review of Section 106 projects. Our advice is always the same: if site forms are filled out appropriately and clear maps and photographs are provided, then staff are able to more quickly review the products. Submitting well-documented forms and reports saves time overall; when OAHP is able to review complete and accurate products staff can avoid writing a letter back to the agency requesting additional information or better pictures. Finally, unlike the agency (which is intimately familiar with their project area) and the consultant (who had the benefit of a site visit), the SHPO reviewer most likely does not know the surveyed property and is relying exclusively on the site form and survey report for information in order to comment on eligibility.

SHPO staff recognize the process of completing and submitting survey products can be challenging. The following recommendations are intended to help consultants and agencies avoid the most common pitfalls:

1. Submit all pages (including required attachments) of site forms and all sections of the survey report to the SHPO.
2. Double-check for consistency between the site forms and survey report; reading different information on the form and in the report only breeds confusion and likely will necessitate extra communication between OAHP and the lead agency in order to clarify.
3. Make sure the attached maps and photos relate to the surveyed property.
4. Submit clear photographic prints instead of photocopies of digital images.
5. Include a strong, well-documented history narrative on each site form.
6. Include a complete discussion of and justification for the significance of the surveyed property on each site form.
7. Make sure the discussion of integrity directly relates to the area(s) of significance for the property.

DID YOU KNOW? The determination of eligibility step of the Section 106 process is unique since this is the only place in the Section 106 process where the lead Federal agency does not make the final decision. If the lead Federal agency and SHPO do not agree on National Register eligibility, the lead Federal agency must obtain a determination of eligibility from the Keeper of the National Register. The Keeper's decision is final [36 CFR 800.4(c)(2)]. As with other steps in the Section 106 process, it also is very important to provide other consulting parties the opportunity to comment on the discussion of National Register eligibility.



BEHIND THE SCENES: SECTION 106 COMPLIANCE AND TRANSPORTATION

by Lisa Schoch, CDOT Senior Staff Historian

The completion of the Transportation Expansion Project (TREX) through Denver brought a collective sigh of relief to commuters who use Interstate 25 (I-25) on a daily basis. The \$1.67 billion project improved 17 miles of highway through southeast Denver, Aurora, Greenwood Village, Centennial, and Lone Tree and added 19 miles of light rail to the system. Construction started in the fall of 2001 and was completed in 2006. Although the project was completed on time and within budget, what most people remember are the traffic delays, closures, and the physical transformation of the roadway as old bridges were torn down and the highway footprint expanded. What commuters never saw was the effort to identify and evaluate historic properties along the corridor.

For all federal undertakings, the Colorado Department of Transportation (CDOT) must comply with Section 106 of the National Historic Preservation Act and Section 4(f) of the Department of Transportation Act, both of which address impacts to historic properties. Section 106 is a procedural law, involving the identification of historic properties and the evaluation of effects of undertakings to those properties. Section 4(f) is a substantive law requiring avoidance of historic properties if a there is a feasible and prudent alternative to the use of that property.

The evaluation of historic properties in the TREX corridor began several years before any ground disturbance took place. Field documentation of properties and historic research of the project area started in the fall of 1998 and a survey report was completed in early 1999. This historical & architectural survey resulted in the evaluation of some of Denver's most recognizable resources, including the Gates Rubber Company, the General Iron Works complex, Buchtel Boulevard, the Highline Canal, and the Valley Highway (I-25) plus sixteen of its bridges. Before commuters ever got stuck in TREX's bumper-to-bumper traffic, CDOT and the SHPO spent several years consulting on the National Register eligibility of resources and reviewing project-related effects.

The Section 106 consultation for TREX was not particularly lengthy or controversial, but was still challenging. One of the main issues: the eligibility of the Valley Highway, the 11-mile stretch of I-25 that runs through Denver. Built between 1948 and 1958, the Valley Highway was one of the state's first limited access freeways and represented the challenges associated with constructing a major transportation artery through commercial, industrial, and residential sections of the city. Both the SHPO and CDOT agreed the highway did not have sufficient integrity to qualify for National Register-eligibility, but found it eligible for the State Register. The consultation on the Valley Highway also raised a broader concern regarding the lack of recognition for the importance of highways as historic properties, a concern that ultimately prompted CDOT to develop a statewide historic highways context to address this issue.

Section 106 for TREX was completed in early 2001, with consultation re-initiated to account for a few resources not identified during the initial survey; effects to the City Ditch near Franklin Street were evaluated in 2002 and in 2005 work stopped so a segment of the exposed South Pearl Street Trolley line could be evaluated. From a Section 106 perspective, TREX had it all—it stretched through an older urban corridor, affected some of the city's more recognizable historic properties along I-25 (including the roadway itself), and illustrated how the process is flexible and often has to be re-opened even after construction is underway.

TREX is just one of many CDOT projects subject to evaluation under the Section 106 process. In the past few years historical & architectural surveys have been initiated for several projects, including Interstate 70 through Denver, I-25 through Colorado Springs, US Highway 36 from Denver to Boulder, and the New Pueblo Freeway. CDOT historians worked closely with SHPO staff to develop appropriate Areas of Potential Effects, discuss survey methodology, and conduct site visits for all of these projects. CDOT also involved additional consulting parties such as local historic preservation groups and county planning offices in the process. Given the dense urban settings along these transportation corridors, it is no surprise the larger projects identified hundreds of individual historic properties and proposed historic districts. While high-profile urban transportation projects tend to affect more properties and attract the most interest, there are dozens of minor projects throughout the state requiring equal consideration under Section 106. The Section 106 process does not discriminate by geographic location or the scope of the project. CDOT historians are as likely to find a National Register-eligible property along a remote stretch of State Highway 141 in southwestern Colorado as they are to find one along I-25 through Denver or Pueblo. All CDOT projects, small and large, are evaluated to determine if Section 106 consultation is necessary. So, the next time you're stuck in a construction zone, keep in mind before earth-movers hit the project, CDOT historians were hard at work behind the scenes.





**ASK THE
STAFF
by Les S.
Moore**

Dear Les:

I am new to survey work and am confused about how to complete Field 41 (level of significance) on the Architectural Inventory Form. If I think the site is eligible for the National Register, why wouldn't it have a national level of significance? Please help me understand.

Sincerely, Newbie in Naturita

Dear Newbie:

This is actually a common question. Many individuals confuse the level of significance with eligibility to a particular type of designation. Field 41 on the survey form deals with the level of significance, not eligibility.

One way to complete this portion of the survey form is to ask yourself in which context—local, state or national—the property achieved its significance. To make such an evaluation ask, “What important role has this resource played or theme does it represent in understanding: a) the local community’s history, b) the state’s history or c) the nation’s history?” For example, a neighborhood grocery store serving a community for 100 years would most likely have a local level of significance. The Governor’s Mansion (listed on the National Register) has a state level of significance. Camp Hale and Trail Ridge Road (both listed on the National Register) have national levels of significance, representing their key roles in training soldiers for national service in World War II and in allowing greater access within Rocky Mountain National Park.

Keep in mind the level of significance of the resource does not restrict eligibility. Properties with local levels of significance may be eligible as local landmarks, for the State Register or the National Register. In fact, approximately 85 percent of the resources listed on the National Register are significant at the local level. The national in the National Register program does not refer to where the property is significant but instead details the authority for the designation program. The National Register is the responsibility of the National Park Service and the Keeper in Washington, D.C. OAHHP administers the Colorado State Register of Historic Properties. Historic preservation commissions oversee the designation process for local landmark programs within communities where they exist. When determining eligibility it is crucial to assess the significance and integrity of the resource in terms of the eligibility criteria for each designation program.

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