GREAT CULTURAL RESOURCE REPORTS

or

How to Help your SHPO/THPO Reviewer Get It.

INTRODUCTIONS

Jason Allen

- Preservation Programs Bureau Chief, OR SHPO
  - In professional cultural resources management in 1998.
  - Field Archaeologist 1998-2012
  - MA Historic Preservation Planning 2004
  - Historic Preservationist 2004-2022
  - In private sector 2004-2012
  - At SHPO since 2012, over 6 years as regulatory reviewer, about 1 year as NR lead, and 6 years as Survey and Inventory lead (these all overlap).

INTRODUCTIONS

Briece Edwards

- Manager of the Tribal Historic Preservation Office of the Confederated Tribes of Grand Ronde
  - Over 30 years of professional archaeology
  - Cultural Resource policy specialist
  - Federal, State and Local partnerships on Culture and Community

INTRODUCTIONS

Christopher Bailey

- Cultural Protection Specialist at the Tribal Historic Preservation Office of the Confederated Tribes of Grand Ronde
- 6 years at the THPO
- 15 years in Youth Education programs

UP FRONT:

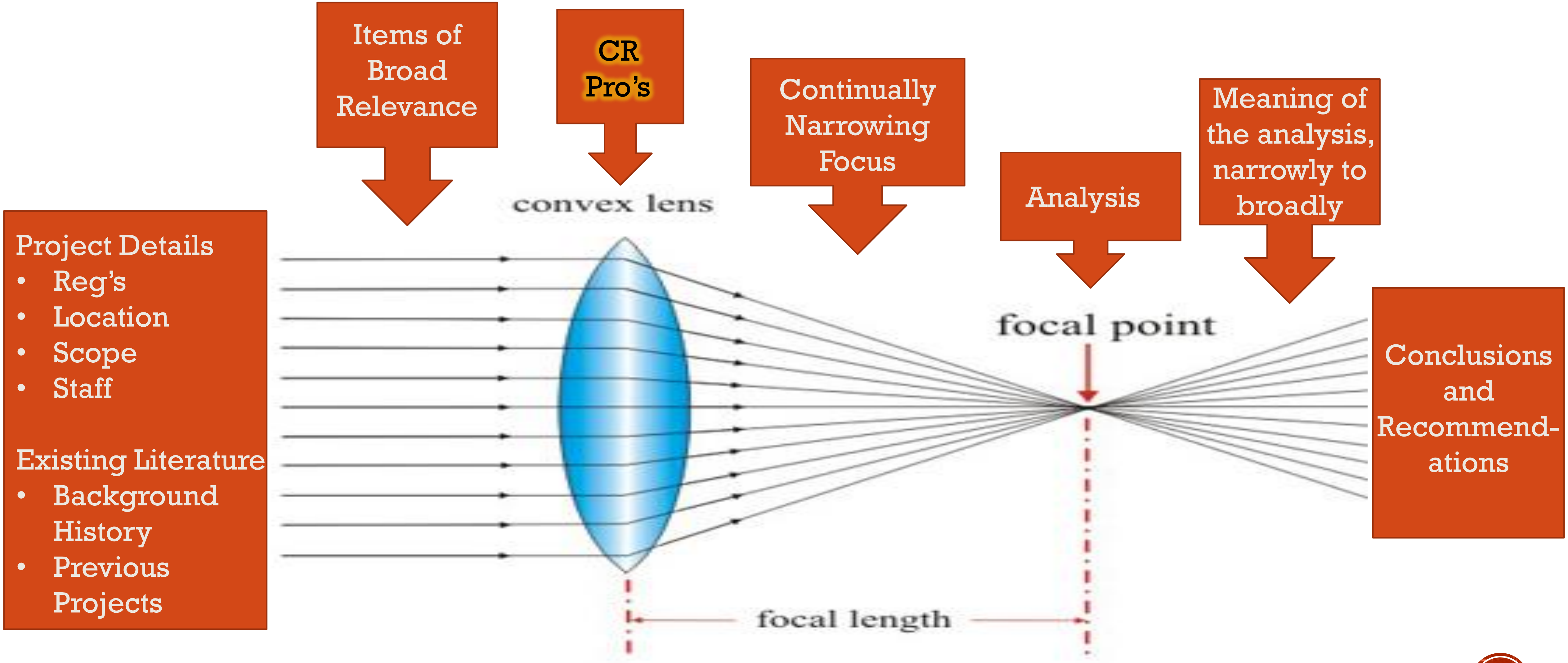
- No call outs – not looking vilify anyone. That said, these do flow from actual issues. You'd be surprised.
- There is a wide variety of reporting quality that we get. We appreciate the really good ones, and if that's you, THANKS!
- These are recommendations, NOT requirements, but they come from deep experience, and this is what seems to work BEST.
- Following these suggestions will not guarantee concurrence – you still have to make a compelling argument, based in best practice.
- Time for questions at the end…

WHAT MAKES A GOOD CR REPORT?

- Well organized, and readable
- Complete with all the information reviewers need, presented in a logical order
- Tailored to the Project at hand – cut-and-paste boiler plate can be ok, BUT:
  - Make sure it's right, and not repeating old, outdated, or inaccurate information.
  - Reserve boiler-plate for the high-level stuff
- Assertions are supported, and the source material cited is well – accessible
- Conclusions flow from the existing data, new data, and reasoned application of the regulation and criteria
- Statements of Fact are factual statements
- Knows its audience
  - Not all agency Project Managers are necessarily Cultural Resources Professionals
  - Your client should understand what the report is saying, even if they're a developer, or just a private property owner.
  - The SHPO is expert at PROCESS and implementation of the STANDARDS and CRITERIA, not necessarily the subject of your report – THAT'S YOU!

Jason's Lens Theory of Report Construction

(Don't overthink this, I just made it up)



SETTING THE TABLE – INTRODUCTORY ELEMENTS

This is sometimes called an **Executive Summary**, usually written by the Principal Investigator or Project Manager.

- **Acknowledgements** – Not just a thanks, but a message to future researchers – these people and resources were helpful.
- **Intro to the Project** – Briefly - Why? Who? Where? What? How?
  - Is this a compliance project? If yes, see next bullet. If not, what's the <u>purpose/goal</u> of the project? **WHY** is this project being done?
  - The details can come later, for example, as a setup for the methodology discussion.
- **Regulatory Setting** – What laws (if any) are we operating under? Is it federal? Is it state? Who is the lead state/federal agency?
  - Roles and procedures are similar, but different in important ways.
- **Project Staff** – **Who**'s doing what, and what are their qualifications?

WHERE IS THE PROJECT?

- Broadly, tell us about the area, then narrow the description to the immediate area, then to the project area.
- Boundary Explanation/ <u>Justification</u>
  - For Regulatory, this is the <u>Area of Potential Effect</u>
    - <u>Justification is CRITICAL. If you're the federal agency, relate this to the contractor. If you're the contractor, get it from the Agency.</u>
  - For non-regulatory, it is what it is – <u>but why</u>?
    - Relate it to the PURPOSE of the project. How does investigating this area fulfill the purpose?

WHAT IS THE PROJECT?

- Expand on the brief overview presented in the Introduction, and explain the HOW part of the undertaking – that is, how will the undertaking be achieved?
  - For example, will dozers be used? This may suggest things like recommended protection for vulnerable sites, protective buffers, etc.
  - Will fill be taken from off site for use in the project? That suggests the borrow area should be within the APE.

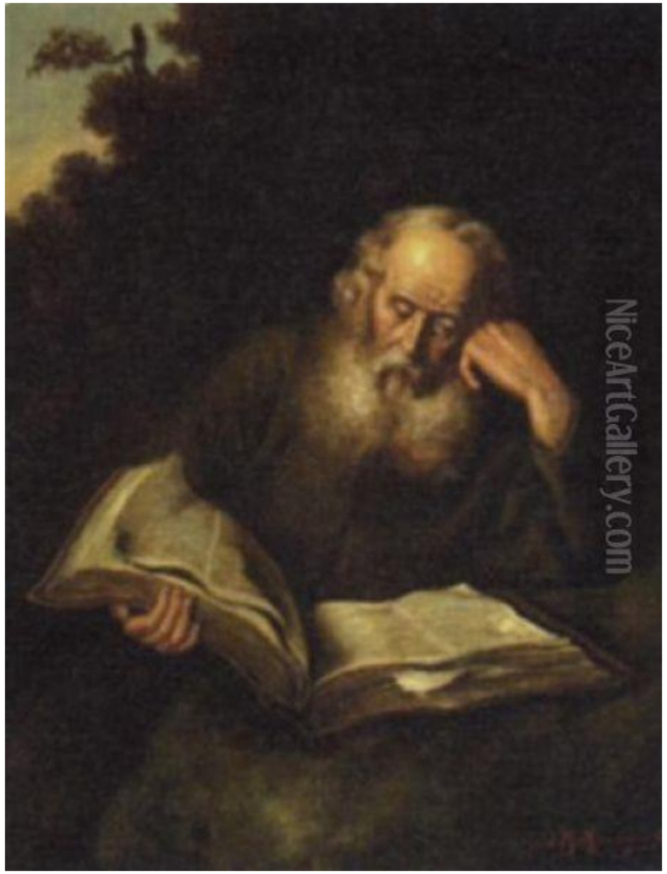
METHODOLOGY

- MORE than just an accounting of personnel tasks. This is HOW you perform the investigation.
- Describe your research approach and sources (literature, interviews, etc.)
- Describe your field approach.
- Describe field documentation standards
- Describe an obstacles or difficulties encountered during the execution, ESPECIALLY those that have some impact on the field RESULTS.

What you are describing is your Good Faith Effort to identify historic resources

- 36 CFR 800.4(b)(1) – *the agency official shall make a good faith effort…* consultants – **that's you** if your client is a federal agency!

LITERATURE REVIEW

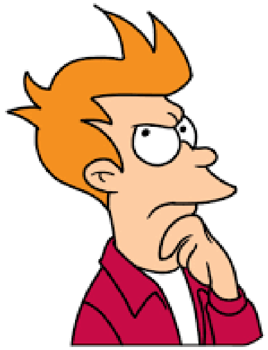


This is the summary what is already known, and is broken into two parts:

- Historic Contexts
  - A brief accounting of the <u>relevant</u> aspects of the history of the area, from broadly to narrowly. The most important thing to establish is the CONTEXT within which the resources you identify within your survey area are to be understood.
  - You <u>very well may</u> need to come back and expand this section if you find a resource you didn't anticipate before field work. If you discover an irrigation resource, this section should talk about the history of irrigation in this area. Remember, you're arranging things for READABILITY and COMPREHENSION, not as an linear accounting of the progress of the project.
- Previous cultural resource surveys in the area
  - This is a real fly-over section. Don't let it be. Read those other reports, they have something to say to you that may inform your analysis!

DATA SUMMARY (AKA, LISTS AND TABLES)

- This is the accounting of what you found during the field investigation.
- Take the time to ensure that your data are correct!
  - If you get the siding materials wrong, that can have an impact on the outcome! It'll also slow things down as I try to figure that out!
- Be sure to provide descriptions of anything that is important to know when we get to the next phase, analysis. Again, you may very well have to come back to this if patterns emerge in the analysis.
  - Example – if the analysis reveals that many houses have had windows changed to vinyl, be sure you come back and note which ones those were in the Data Summary.
- Organize the data in a way that well-supports the analysis.



DATA ANALYSIS (AKA THE FUN PART)

- List the data, group them together in different ways to see if they tell you different parts of the story.
  - Example:
    - you surveyed 20 houses
    - they are all from about the same time period – that's a development episode. District?
    - Seven of them look suspiciously similar – there may be an architect especially active here – could her master-work be here? Does the group say something about her signature style?
    - Every other house has a more recent house between it an the next one of its age. Episode of subdivision of properties – is a planning change in the historic period that caused this?
- Compare what you're seeing to what you expected – is it different? If so, why?
- Look for patterns – do a significant portion of the houses have vinyl windows? If so, that may suggest a recommendation later on. Do all the houses have a later added garage? That may suggest the question of "why?" and "does it matter?" in the recommendations.

CONCLUSIONS & RECOMMENDATIONS

- Spell it out for me when describing how you reached your conclusions, with reference to the data and analysis.
- Be sure you've directly answered the question you've been asked to answer.
  - Compliance Projects - eligibility and effect –
    - make sure you've covered all the eligibility criteria and integrity questions, and describe the nature of the effect, if there is one.
  - Non-compliance Projects - planning questions, other suggestions
    - Immediate question ("Is this historic district eligible?")
    - Longer-range questions ("How do we go about getting it listed?")
    - Other suggestions ("Consider becoming a CLG or Main Street community")
- Don't introduce new information in the conclusions of the report.
  - The report should build toward the conclusions and recommendations, and by that point should be fairly expected.

BIBLIOGRAPHY

- Everything you've cited should be in there.
- Make sure enough information is provided to help reviewers AND future researchers find the resource.

IN SUMMARY…

Everyone is happiest when the report is well-done.

1. Reviewer is happy because the findings of the report were easy to concur with. Questions are few, and finely-directed, rather than broad and complicated, and so quick to resolve.
2. The proponent is happy, because their project is moving forward.
3. Preparer is happy, because a job well-done means a happy client, and ultimately more contracts