

# implement the plan and monitor progress

## Overview

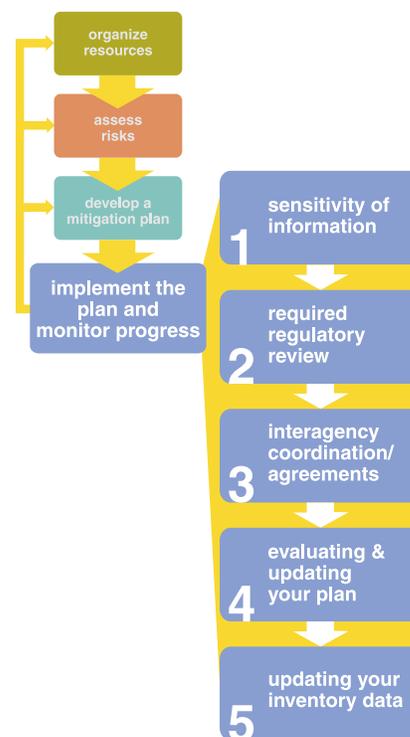
Implementation is the fourth and final phase of incorporating historic property and cultural resource considerations into the hazard mitigation planning process. The steps associated with this phase are described in detail in FEMA 386-4, *Bringing the Plan to Life: Implementing the Hazard Mitigation Plan*. Please consult this guide for basic information on implementing, monitoring, evaluating, and updating your mitigation plan. A number of considerations, however, pertain specifically to historic properties and cultural resources and form the basis for the remainder of the discussion:

- Consideration 1.** Sensitivity of information.
- Consideration 2.** Required regulatory review.
- Consideration 3.** Interagency coordination/agreements.
- Consideration 4.** Evaluating and updating your plan.
- Consideration 5.** Updating your inventory data.

These considerations are discussed in detail below.

## Consideration 1. Sensitivity of Information

In implementing the mitigation actions identified by your planning team in Phase 3, you should remember to include in the mitigation plan any cautions regarding information deemed sensitive for public disclosure. For example, disclosing the specific location of archeological sites, or details about certain cultural practices and traditions, or information on security systems used in the protection of historic properties and cultural resources could be detrimental and result in the destruction of the very resources your team is trying to protect.





*Damage to archeological sites at the Slack Farm.*

Photos courtesy of Kentucky Archaeological Survey

## Protecting Sensitive Locational Data

To avoid illegal removal of historic and cultural resource assets, it is important to protect specific locational data pertaining to archeological sites and/or suppress the description of a historic property's contents in public documents. However, sometimes protecting this information may not be sufficient, as the destruction of the Slack Farm site in Uniontown, Kentucky, illustrates.

Archeologists had long known about the Slack Farm site, which represented an important Native America Late Mississippian village, a community of wattle and daub houses where acres of maize, beans, and

squash grew at the confluence of the Wabash and Ohio Rivers from AD 1450 to 1650. Although relic hunters had periodically visited the site to illegally dig for artifacts, the Slack family had always turned these individuals away. This changed when Mrs. Slack died. In the late 1980s, the new owner granted access to looters who paid an excavation fee of \$10,000. With their rented tractors, the looters dug out graves, scattering bones and Late Mississippian pottery fragments. Today, the disturbed site sits as the looters left it.

NOTE: The desecration and destruction of over 400 graves at this site helped galvanize a coalition of Native Americans and archeologists across the United States, who called upon Congress to enact new legislation to better protect Native American human remains, funerary objects, and objects of cultural patrimony. This effort culminated in 1990 with the passage of the Native American Graves Protection and Repatriation Act (NAGPRA).

While your planning team must make decisions on a case-by-case basis regarding the release of sensitive information, your team should always consider the merit of providing such information in a general manner, i.e., without reference to sensitive details such as locations, security measures, dollar values, etc.

In the course of your team's inventory of historic properties and cultural resources, you may have documented and evaluated traditional cultural practices of a particular social group; in some cases, this information relates to spiritual beliefs that are very personal and sensitive. Your planning team should consult with social groups that have historic ties to your project area to ensure that the cultural practices you have learned about during your



inventory are not inappropriately treated in your hazard mitigation plan.

Your SHPO/THPO will be able to provide additional guidance on proper handling of sensitive information. These measures will help you to avoid unnecessary anxieties about placing your valued historic properties and cultural resources at further risk.

## Consideration 2. Required Regulatory Review

As noted in Phases 1 and 3 of this guide, a second consideration that will influence your planning team's activities during the implementation phase is the requirement for compliance with Section 106 of the NHPA. Any federally sponsored undertaking is subject to review under Section 106's implementing regulations, 36 CFR Part 800, "Protection of Historic Properties." (Federal sponsorship can take the form of review, permitting, funding, or other type of involvement.) These regulations require Federal agencies, along with their State, Tribal, regional, and local partners, to evaluate ways to avoid, minimize, or compensate for adverse impacts to historic properties listed, or eligible for listing, in the National Register. Adverse impacts can, in some cases, be offset by recordation, archeological data recovery, enhancement of GIS data, public interpretation and education programs, or remembrance and symbolic transfer ceremonies.

- **Public Interpretation and Education**

**Programs.** Design installations that interpret and explain historic resources offer one effective method to offset negative impacts to historic properties and cultural resources. These designs can include the following:

- Simple plaques and text panels;
- Installations and monuments that provide a creative visual interpretation of historic properties (Benjamin Franklin's house, shown here, is a good example); and
- Heritage trails and corridors that link a neighborhood, city, or region with multiple historic properties. These may also be used to enhance existing tourism and park-related initiatives.



*Franklin Court Ghost Frame, Independence NHP, Philadelphia, Pennsylvania.*

Photo courtesy of Independence National Historic Park





## Archeological Site Documentation in Pennsylvania

In 1999, flooding in Delaware County, Pennsylvania, severely damaged many buildings and structures, including a significant eighteenth-century stone house. Located next to a stream, this house had already experienced repeated flood-related damage. After determining that relocating the dwelling would not be feasible due to its large size and the complex engineering involved, the owners decided to have the house demolished.



So that future generations could learn about the house and its history, a detailed archival record was created. The archive included extensive large-format black and white photography, measured floor plans, a detailed written description, and a narrative history of the site. These materials were placed in a local repository.

Thus, despite the fact that a significant historic property was demolished, a complete historic record remains for the benefit of the community.



*Left: 18th century stone house before demolition, Delaware County, Philadelphia, Pennsylvania. Above: Archeologists excavating and documenting the Schoonmaker site. Delaware County, Philadelphia.*

Photos courtesy of URS Group, Inc., 2001

- **Remembrance and Symbolic Transfer Ceremonies.**

Remembrance ceremonies sometimes can be used by community members to honor the loss of a historic property, a neighborhood, or an entire community when these have been demolished or relocated as a result of a hazard mitigation project. This type of ceremony allows those affected by the loss to come together to share their grief in a dignified and appropriate way. Ceremonies such as these also are a way to mark the anniversary of an event that has touched many people.



Symbolic transfer ceremonies can also help communities effectively commemorate the loss of one place, while moving to a new location. In the case of one community that was relocated due to river valley flooding associated with the creation of a new reservoir, an extensive number of historic properties, including sacred sites, were lost. A service was held on the old site, and then on the new site, symbolically transferring and maintaining values from one site to the other.

Before implementing mitigation actions you identified in Phase 3, it is important that your planning team officially communicate with your SHPO/THPO regarding formal Section 106 compliance. Section 106 compliance involves conducting an alternatives analysis in consultation with your SHPO/THPO and other interested parties, in which different mitigation actions are evaluated for their ability to minimize impacts to historic properties or cultural resources. Section 106 regulations also require consultation with your SHPO/THPO, including providing them the opportunity to comment on your recommended actions. Failure to secure formal Section 106 compliance can jeopardize Federal funding, permits, or approvals, and even prevent project implementation.

If your planning team has carefully followed the recommendations contained in this planning guide, you will have worked with your SHPO/THPO when you applied the STAPLEE criteria to evaluate a variety of alternative actions. If so, your team may have accomplished much of the work required for complying with Section 106.

Your team should send a formal letter to your SHPO/THPO that carefully documents how your team has followed the recommendations contained in this guide. In writing the letter, your team should seek input from State and Federal environmental review staff involved in your planning effort. If the SHPO/THPO recommends additional work before formal Section 106 compliance can be completed, various sources of information can help you to reach compliance. These include recommendations from the SHPO/THPO themselves.

If regulatory review by a SHPO/THPO is required, and your project involves Federal assistance that will adversely affect National Register eligible or listed properties, a Memorandum of Agreement (MOA) between the Federal agency involved and the SHPO/THPO is required. If your SHPO informs you that an MOA



### **Section 106 Project Review**

Even if your community's historic properties are not listed in the National Register, the mitigation actions you recommended in Phase 3 for protecting these properties will nevertheless be subject to Section 106 review if they will be funded by Federal (e.g., FEMA) dollars or require Federal permitting. Federally assisted projects that involve certain types of historic properties that are hidden from view, such as buried archeological sites, are subject to Section 106 review due to their potential significance. Before implementation of mitigation activities that involve ground disturbance, your community may be required to make an attempt to locate these properties.

In addition to Section 106 review, your projects may also be subject to other State and local review under State historic preservation and/or archeological laws and regulations.



is required, it is not your responsibility to negotiate the MOA. You should speak with the appropriate Federal agency staff, who will coordinate and conclude the consultation process.

### Consideration 3. Interagency Coordination/Agreements

During implementation, your planning team will want to continue to coordinate closely with all of the partners with whom it has been working throughout the planning process. These include your SHPO/THPO, local or regional planning entities, local building officials, and others who have helped your team to develop its goals and decide upon mitigation actions up to this point. As you implement the plan, your team may discover other interested parties and groups with historic ties to your planning area who may not have been involved in the earlier planning activities. Although it is preferable to have included these parties on your team before the implementation phase, it is important that your team open up its planning process to include these new sources of input, even if it means your planning team must revisit earlier decisions.

It is a good idea to prepare an interagency agreement between or among the involved agencies. Interagency agreements allow for the streamlining of regulatory review by providing a formal framework for integrating planning activities that are required by both the hazard mitigation planning process and Section 106 review. Redundancies are thus eliminated. For example, public input that is required during both of these processes is useful for gathering information on what mitigation alternatives are supported by the community and stand a better chance of being implemented. Moreover, an interagency agreement can expedite much of the Section 106 review work required if local, State, or Tribal agencies involved in the general mitigation planning process have or hire qualified individuals to perform the review of the various mitigation projects your team has proposed. These staff or consultants could include archeologists, historians, or preservation planners.

Interagency agreements also provide an opportunity for formalizing the implementation of actions that minimize or compensate for impacts to historic properties and cultural resources, including spelling out the procedures to follow to balance historic preservation and mitigation needs.



#### **The Need for Interagency Agreements**

Your SHPO/THPO, as well as your funding agency, can help you evaluate when the use of an interagency agreement is most appropriate.



If your team chooses not to undertake a formal interagency agreement, there are many other ways in which you can encourage interagency cooperation. Just as your team has pulled together a multitude of interests to advise on mitigation planning for historic properties and cultural resources, you can continue to engage these interests throughout the implementation process. Activities in which you can interact with those who can inform and guide the implementation process include attendance or speaking engagements at seminars, brown bag lunches, or conferences about historic properties and cultural resource preservation or hazard mitigation planning. Regularly scheduled progress meetings are also beneficial.

By participating in such interagency activities, you will also be able to share your experiences with others facing similar collaborative challenges.

## Consideration 4. Evaluating and Updating your Plan

In implementing your hazard mitigation plan, your team will likely learn something new about your community's historic properties and cultural resources. This may include clarification on preservation priorities, new intelligence about governmental provisions for protecting these resources, differing perspectives on mitigation as embodied in other parts of the hazard mitigation plan, and, as mentioned above, what is truly effective or ineffective for mitigating damage to certain properties and resources.

For those projects whose implementation was not guided by the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, your planning team should carefully document the reasons why those standards were not used, and evaluate alternative actions that would employ these standards. You should also extend such planning to properties and resources that are similar to the ones targeted by these projects.

In the case of certain cultural resources, such as archives and collections, your team may wish to obtain feedback from a variety of professionals, including curators, as to their perceived effectiveness of mitigation efforts. Gathering specific information about the costs and successes of these efforts may be useful in your plan update. This information may also be useful to others who are contemplating development of mitigation plans with significant cultural resource collections and assets.



Your team will likely gain new knowledge about how your historic properties and cultural resources are viewed or administered. This new knowledge may include the introduction or revision of a State tax incentive for the rehabilitation of historic properties, which may provide additional opportunities for private developers not factored into your original plan. Socioeconomic changes may also transform the hierarchy of preservation priorities, so that certain priorities either become more pressing or lose some of their value. This, in turn, will influence the order in which implementation of mitigation actions should proceed. Shifts in development patterns that occur subsequent to the initial development of your plan may also have a dramatic impact on preservation priorities. For example, a recently suburbanized region may find that historic farmsteads, once plentiful, have become increasingly scarce and may seek to adjust its preservation priorities accordingly.

New technologies and new study data on historic properties and cultural resources may emerge during the course of implementing your plan. For example, newly developed regional archeological predictive models—not available when your plan was created—could assist in the identification and evaluation of this specific type of historic property. Your planning team may also identify new types of mitigation methods that result in better benefits for your community.

Armed with this new knowledge, your planning team will want to reassess its goals, objectives, and actions to determine the extent to which they are still applicable.

## Updating the Plan

After your planning team has evaluated implementation actions and identified new information that can affect future implementation strategies, you are ready to update the plan. Depending on the extent of the required changes, you may need to reformulate specific actions, objectives, or even goals.

In deciding on revisions, your planning team should draw upon the same consensus-driven prioritization methods it used earlier in the planning process, first and foremost being solicitation of public input. These methods are explained in greater detail earlier in this guide as well as in the other FEMA how-to guides mentioned throughout this document.





### Post-Disaster Recovery

An important part of your community's post-disaster response and recovery effort will be ensuring that historic property and cultural resource considerations are taken into account after a disaster, just as they were accounted for in the mitigation planning before the disaster. Your hazard mitigation planning team should work with the larger disaster response and recovery team, which, depending upon the extent of the disaster, may include FEMA, State, county, and local agencies to ensure that they are made aware of the major components of your mitigation plan for historic properties and cultural resources. Moreover, the locational data—particularly the GIS data—that you have amassed during your inventory of historic properties and cultural resources may prove to be extremely helpful to emergency response planners as they attempt to make important decisions about which historic properties it would be worthwhile to repair.

The post-disaster rehabilitation period offers an opportunity to acquire funding, through such programs as FEMA's Public Assistance Program, in the case of Presidentially declared disasters, that would not be available otherwise. With this infusion of funds, historic properties can be adaptively

reused to meet larger community goals, including tourism development or heritage education.

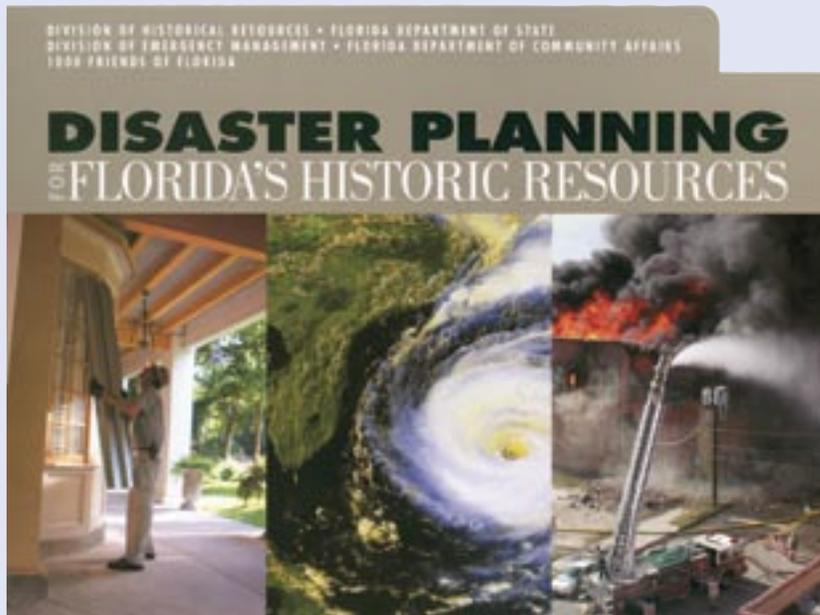
After a disaster event, some segments of the community may want to act quickly and demolish damaged buildings in order to show that progress is being made. This position can create conflict with others and the situation grows more complicated if the buildings are located in a minority neighborhood where residents have little voice in the decisions. Therefore, it is imperative that different community interests work together following a disaster event to make important decisions regarding historic properties.

Following a disaster, some community members may wish to erase any visible evidence associated with hazard-related damage. For example, damaged historic properties that are good candidates for repair may be needlessly targeted for demolition. On the other hand, some community members may be unwilling to part with historic properties that are so extensively damaged that their repair and rehabilitation would not justify the costs involved. Thus, your team may find itself encountering many of the same prioritization issues it experienced during the earlier phases of the mitigation planning process.



### A State Success Story

*Disaster Planning for Florida's Historic Resources*, prepared by the Florida Department of Community Affairs with assistance from the Florida Division of Historic Resources and 1000 Friends of Florida, describes steps for preparing emergency response plans for individual historic resources, expediting review of repair and reconstruction permits in the event of damage, and improving coordination between emergency management and historic preservation efforts within a community in order to reduce disaster-related damage and rebuild local economies. This guide is available at <http://www.dca.state.fl.us/fdcp/dcp/publications/historic.pdf>.



### Send Your Updated Survey to Your SHPO

Make sure you send a copy of your updated historic property surveys to your SHPO office for review/approval and/or inclusion in the State database. Determinations included in SHPO databases can be shared with FEMA and used more readily (in the event of multi-agency consultations) than local surveys not approved by your SHPO. Local surveys may also disappear or not be available in the event of a disaster.



## The Effect of Changing Perceptions on Your Inventory

Perceptions of which historic properties and cultural resources are significant can also change over time, and will affect your inventory. For example, a suburban neighborhood constructed after World War II, such as Levittown, may once have been regarded as ordinary, but now it has taken on a new level of significance. The accompanying photographs and information are illustrative of these “near history” resources.

**Arapahoe Acres, Englewood, Colorado.** Built between 1949 and 1957, this 33-acre postwar subdivision reflects the vision of developer-architect Edward Hawkins and site planner-architect Eugene Sternberg for a community of moderately priced small houses using modern principles of design. Breaking the ubiquitous grid of metropolitan Denver, the plan is distinctive for its curvilinear arrangement of streets, placement of houses on small uniformly sized lots to provide both views and privacy, and integration of landscape features, such as lawns, fences, hedges, shrubbery, and specimen trees, to organize space and give the landscape a flowing, sculptural quality.

Photographs of Arapahoe Acres are in a National Register publication entitled *Historic Residential Suburbs: Guidelines for Evaluation and Documentation for the Nation Register of Historic Places* (David Ames and Linda McClelland, 2002). You can download this publication from <http://www.cr.nps.gov/nr/publications/bulletins/suburbs/intro.htm> or <http://www.cr.nps.gov/nr/publications/bulletins/suburbs/part2.htm> for more information on how suburbs—even some built after World War II—can be nominated for listing in the National Register.



*1949 aerial view of Arapahoe Acres.*

Collection of Clyde Mannon



*Arapahoe Acres streetscape ca. 1950s.*

Barbara Frison

## Consideration 5. Updating Your Inventory Data

As your team evaluates the implementation of your mitigation plan for historic properties and cultural resources you will also want to develop a strategy for revising and updating your inventory data based on your evaluation results.

Although some level of update should occur at least every 10 years, certain circumstances, such as a surge in population growth or a serious disaster event, may warrant more frequent updates of inventory information. It may be worthwhile to update the inventory when the hazard mitigation plan itself must be updated: every 3 years for State plans and 5 years for local plans, if not before.





### Make Sure Your Data is Up-To-Date

Update your inventory data to reflect loss of historic buildings and structures.



Photo courtesy of 1000 Friends of Florida

Some historic properties may have been demolished since the inventory was last updated or other properties may have experienced a loss or gain of integrity as a result of alterations. Your cultural resources may have changed over time as well. Archives of important information may have been acquired by an institution or museum. This type of new information is essential to include in updates of the inventory and plan.

Lastly, other planning data may have been revised, which may have an impact on your historic properties and cultural resources inventory. For example, expansion of floodplain boundaries, whether due to more detailed study or actual infrastructure projects, should be integrated into your inventory. Such changes would affect not only your inventory, but your risk assessment of historic properties and cultural resources.

As part of your implementation process, your team will want to develop a strategy for updating your information about historic properties and cultural resources. Other planning initiatives may also be in need of updated information. Your local or regional planning office and SHPO/THPO may help your team identify potential resources and/or other planning groups in need of updated information. Consider the advantages of sharing information, resources, and costs with other project partners.



### Windshield Surveys

If your community has a large number of historic properties and cultural resources, or your team lacks the resources to undertake a detailed update of your entire inventory, your team should consider alternate methodologies for updating the inventory. These include a baseline windshield survey (see page 2-15), which uses representative concentrations of historic properties and cultural resources, or a phased approach, in which highest-priority resources are updated first.





afterword

# afterword

**Y**our planning team has accomplished a challenging and worthwhile task—integrating historic property and cultural resource considerations into the hazard mitigation plan. Following the four-phase planning process for hazard mitigation planning, as discussed in the core four guides of this how-to series, you gathered the necessary resources and enhanced the planning team to include experts and interested citizens to help you identify the historic properties and cultural resources in your Tribe, State, or community that are vulnerable to hazards. With the help of this guide, you were able to develop a preservation hierarchy that you then used to estimate losses as part of the last step in preparing your risk assessment. Based on this loss estimate, you identified hazard mitigation actions and an implementation strategy that will allow your Tribe, State, or community to build upon its unique sense of place while reducing risks from hazard events and positioning historic properties and cultural resources as economic building blocks for future development. As you obtain additional resources, you will be able to refine your historic property and cultural resource inventory and risk assessment data, updating this information as required by DMA 2000 for review and approval to continue your eligibility for FEMA-funded pre- and post-disaster programs.

Now with your hazard mitigation plan in hand, your Tribe, State, or local community can access non-traditional technical and financial resources, opening up new possibilities for effective preservation of neighborhoods, properties, and artifacts. Because of your planning team's efforts, future generations will experience a safer future while your Tribe, State, or community retains its valuable heritage and cultural assets, all of which help create its unique sense of place.





# appendices