

MICHIGAN

STATE HISTORIC PRESERVATION OFFICE

INSTRUCTIONS

FOR

SECTION 106

CONSULTATION

WITH SHPO

FOR SINGLE-FAMILY HOUSING

REHABILITATIONS



Link to submission portal: [Single-Family Housing Rehab/Demo Section 106 Consultation Request \(smartsheet.com\)](https://smartsheet.com)

SHPO will no longer accept demolition requests by Housing Rehabilitation Inventory Card because it does not account for archaeological sensitivity. Demolition requests for single-family residences has a separate form. Please see our website for guidance: michigan.gov/shposection106.

Before you Submit

If your rehabilitation program is targeting a specific neighborhood or geographic area, you may want to coordinate a survey with SHPO to expedite the review process long term. Your program funding may cover costs for survey and identification work. For more information on coordinating surveys, visit the [Historic Resources Survey](#) Program webpage.

How to complete the inventory form:

The form is essentially a digital version of inventory card SHPO previously required. Most categories are self-explanatory, but there are some important things to know.

- **Municipal unit is not the same as mailing address.** For example, a property may have a mailing address of Jackson, but be located in Summit Township.
- If you do not know the exact year of construction, you may add a circa date. If you really have no idea, just leave it blank.
- The funding source section must be completed. Projects that do not identify a **federal** funding source will not be reviewed.
- Photographs can be uploaded into the form from your computer by clicking on the photo icon. Photos should show the façade or principal elevation with minimal obstructions. Projects cannot be reviewed without sufficient photographs.
 - o Please note that the online portal allows you to submit additional photos. Upload additional photos that you feel will be useful, (i.e., documentation of additional elevations, historic features, extensive damage, alterations, etc.).
- If there are multiple materials present, such as a mix of vinyl and wood siding, please select as many that apply.
- If known, please include a narrative scope of work.
- Additionally, if the project is scoped, you may attach relevant documents such as building plans and product specifications.
- *****Including additional photos, scope of work, product information, building plans, and property history up front may expedite the review process*****

How to submit through the online portal:

The online portal eliminates the need for mailed response sheets. Complete all information as directed. Sections marked with a red asterisk are required and the system will not accept a submission without completion. The form will typically remember previous entries, so once information is entered, it should be easy to repeat for future submissions.

1. Include the number of sites you are submitting. SHPO often receives dozens of requests in the same submission, so it is important to see that the number of requests matches the number of forms.

2. Include the contact information for the respective federal agency. SHPO is required to consult with the responsible federal agency, and we cannot review a project without that information.
 - a. If the project is a HUD-funded rehab additional fields will automatically open to add the Responsible Entity information.
 - b. The HUD grant should specify who the Responsible Entity is, if you do not know, contact your HUD representative.
3. You must indicate if there is a state agency involved with the project.
 - a. If a state agency is involved, you must include which agency and their contact information.
 - b. If the state agency is the Michigan Department of Health and Human Services (MDHHS), then an additional option will allow you to select if the project affects a child with an Elevated Blood Level (EBL) for lead.
4. Include contact information for the applicant.

There is a box for additional information you find pertinent. ***Including property history, additional photos, scope of work, product information, and building plans may expedite the review process.***

Note: a detailed property history may include information such as historical owners or residents, architect, builder, and neighborhood development. The SHPO suggests that the following resources be considered:

General Resources

- City or county assessor's offices
- Colleges and universities, particularly those whose faculty are interested in local history
- Local historians
- Local historic district commissions
- Local historical societies
- Local, regional, or state libraries
- Long-term property owners and neighbors

Specific Resources

- City directories
- City atlases and plat maps
- County and local histories
- Deed records
- Property abstracts
- Tax records
- Sanborn maps

5. Upload the forms. You can drag and drop them or browse for files. You may also upload additional photos. If submitting additional photos for multiple projects, be sure they are clearly labeled. A photo log is suggested, especially if there are multiple photos for each building. Note there is a 30MB limit.
6. If you require a copy of the submission for your records, please check the box "Send me a copy of my responses" and include your email address.
7. Note: It is important that all attachments and forms are clearly labeled, especially if submitting multiple documents at a time. **File names may not contain any special characters or punctuation besides the period/dot before the file name. Dashes and underscores are acceptable; all other special characters or punctuation must be avoided.**

After Submission

A SHPO Historian will respond to your project via email. The email is the official record of consultation. **SHPO is not the office of record for this consultation, it is the responsibility of the Federal Agency and Responsible Entity to save this correspondence.**

Types SHPO Responses, and What they Mean

By law, the SHPO has 30 days to respond after receiving information. If additional information is requested, the clock starts over once information is received. A SHPO historian will assess the information submitted compared to records on file and known historic contexts to determine whether the property is listed in the National Register of Historic Places (NRHP) or meets the Criteria of Eligibility for listing in the NRHP. If either is the case, then the property is historic. If the property is not listed and does not appear to meet the Criteria, then it is considered not historic.

Not Historic:

For properties that do not appear to meet the criteria of eligibility, the SHPO historian will provide this opinion via email, and consultation is complete- ***unless the scope of work changes from rehabilitation to demolition.***

More Information:

The SHPO historian may require more information to make a finding of eligibility or effect. They may respond and ask for additional photos, streetscape images, and historical information on the property. When more historical information is requested, please also send the proposed scope of work for the project to expedite the review once additional information is received. Providing these details at the time of submission may expedite the process and eliminate the need to request additional information. For some projects it may be beneficial to hire a qualified professional. A list of qualified historians and architectural historians known to work in Michigan can be found on our [website](#).

Historic:

If a property is historic, then the SHPO historian will request: additional photographs showing elevations of the building not included in the initial consultation, a narrative description of the work being performed, product information/cut sheets, and any relevant building plans/specifications. Submitting this information in advance with the inventory form may expedite the review.

After reviewing the project specifications, and any additional information requested, SHPO will issue an opinion of effect in a formal letter. Letters will be attached to email responses. Hard copies will be mailed on request.

SHPO may find that the project will have No Adverse Effect on historic resources, in which case consultation is complete.

SHPO may find that the project will have a No Adverse Effect with Conditions, meaning the effect will not be adverse provided certain conditions are met. If the agency agrees with the conditions, they must sign the concurrence form and return it to SHPO. **Consultation is not complete until the concurrence form is signed.** If the agency does not agree to the conditions, then consultation continues.

SHPO may find that the proposed work will have an Adverse Effect on historic properties, in which case the federal agency, SHPO, consulting parties, and the Advisory Council on Historic Preservation, must come to an agreement on how to mitigate or minimize effects. Adverse Effects are rare and usually avoidable.

If the scope of work changes after being reviewed by SHPO, consultation must be reopened to consider the effects of the newly proposed work.

If SHPO asks for more information or asks for concurrence on a finding, and the project is subsequently canceled, please notify the SHPO historian for the project.