



Doug Ducey  
Governor

# ARIZONA STATE PARKS & TRAILS

Robert Broscheid  
Executive Director



## State Historic Preservation Office Guidance for Section 106 Review of HUD/ ADOH Projects

### WHEN TO SUBMIT TO SHPO:

1. If a project involves modifications to a building or structure, a project must be submitted to SHPO for consultation review:
  - a. When a building / structure is over 50 years of age.
  - b. When a building /structure is located in a local, state, or National Register historic district.
2. If either of the following scopes of work are present, **SHPO consultation is required:**
  - a. NEW ground disturbance in an area of previously undisturbed ground.
  - b. Exterior modifications to a building / structure and the building meets the conditions in 1a, 1b. Some examples of modifications that REQUIRE consultation include:
    - New paint or stucco over existing masonry walls (never been painted or stuccoed)
    - Replacement of original windows or doors with new products.
    - Adding exit ramps / stairs.
    - New addition(s) to a building / structure (includes: porches, patios)
    - Changing the roof configuration.
    - Converting a garage to living space or enclosing a carport.

### NO SHPO CONSULTATION REVIEW IS NEEDED FOR THE FOLLOWING:

1. Refinance only
2. Interior or Exterior work on Manufactured Homes / Trailers
3. Interior work that has no effect to the exterior of the building. Some examples of interior work that **DOES NOT REQUIRE** consultation includes:

#### Interior building or structure maintenance:

- Removal of hazardous material (asbestos or lead abatement, such as, drywall tape, flooring mastic, floor tiles) within the building / structure.
- Repair / replacement of interior walls and / or ceilings.
- Repair / replacement of floor and / or window coverings.
- Repair / replacement of plumbing fixtures and / or kitchen equipment.

4. Exterior work that has no adverse effect to the building and would be routine maintenance. Some examples of exterior maintenance work that **DOES NOT REQUIRE** consultation includes:

#### Exterior building or structure maintenance:

- Painting of previously painted surfaces
- Removal of graffiti using gentlest means possible

- Replacement of a pane or two of glass in doors or windows with same visual reflectance product.
  - Repair / replacement of roofing material with similar product.
  - Repair, replacement, or installation of simple gutters and downspouts.
  - Repair / replacement of HVAC in same location without additional structure / plumbing. (or moved to ground mounted)
  - Repair / replacement of water heaters in same location.
  - Repair / replacement of plumbing fixtures and / or kitchen equipment.
  - Repair / replacement of electrical, communication, alarm, security systems in the same location.
5. Site work that has no effect to the exterior of the building. Some examples of site work that **DOES NOT REQUIRE** consultation includes:

**Parcel / yard maintenance:**

- Repair, replacement or installation of fencing using only hand tools.
- Repair / replacement of irrigation, water, sewer, gas or fire protection lines in the same trench (width and depth).
- Removal / replacement of small landscape products – no greater than 15-gallon horticulture container.
- Temporary installation of ramps for ADA access.

Please send initial consultation for each undertaking to [azshpo@azstateparks.gov](mailto:azshpo@azstateparks.gov).

Questions? Please feel free to email [mparisella@azstateparks.gov](mailto:mparisella@azstateparks.gov) (buildings) or [edavis@azstateparks.gov](mailto:edavis@azstateparks.gov) (archaeology).