

MITIGATION OF CULTURAL RESOURCE IMPACTS WITH HABS DOCUMENTATION IN CALIFORNIA.

HABS, HAER or HALS mitigations are one facet of a comprehensive CEQA mitigation strategy for adverse impacts to historical resources identified in environmental documents.

BACKGROUND:

Documentation of historic resources can be one way to mitigate impacts to significant properties. The three programs administered by the Heritage Documentation Programs (HDP) department of the National Park Service (NPS) are the gold-standard of documentation policies. The archival film, drawings and reports are stored and made available to the public by the Library of Congress (LoC). The three programs are called the Historic American Buildings Survey (HABS), the Historic American Engineering Record (HAER), and the Historic American Landscapes Survey (HALS). There are many ways to document resources with digital photography, movies, text, illustration, laser scanning, infrared photography, virtual reality, drone photography and activities that haven't even been invented yet. While most documentation activities can be used to share the memory of a site, only documentation for HABS/HAER/HALS meets the *Secretary of the Interior's Standards for Architectural and Engineering Documentation* (SISAED). HABS/HAER/HALS documentation meets the SISAED because it follows three basic requirements: large-format field photography/measuring, archival document production and lifetime storage, not just one or two of the three. While it may appear that doing a partial HABS, HABS-Like, or Diet-HABS documentation using digital photography or storing the artifacts locally would be sufficient, in order for the mitigation to be a public benefit for future generations, the entire HABS procedure must be followed. Counterintuitively, making only one copy of a HABS/HAER/HALS documentation for the Library of Congress and donating it to the National Park Service through their informal donation policy is less expensive than distributing multiple copies locally to places that cannot adequately store or make the documents available to the public on the Internet. What follows is an example of mitigations that would meet the *Secretary of the Interior's Standards for Architectural and Engineering Documentation*.

HISTORICAL DOCUMENTATION:

Require the project sponsor to document the RESOURCE NAME and its context by following one of the historic American documentation programs (HABS/HAER/HALS). This documentation

shall include large format photographs, historical report and drawings (if applicable) as outlined below, developed in consultation with the LEAD-AGENCY.

LARGE FORMAT PHOTOGRAPHY:

Photographic documentation of the RESOURCE NAME shall be prepared to the Historic American Buildings Survey (HABS/HAER or HALS, see Notes) standards. Photography shall be completed prior to ASAP (this should take place as soon as possible before the resource or its context are visually altered). Photographs should include multiple views of the RESOURCE NAME context views of the



Bixby Bridge HAER-CA-2297 photography, Big Sur California. Photo by Stephen Schafer

site, significant facades, views of significant interior spaces, and detail views of specific character defining features. Overgrowth, refuse, obstructions and board-up plywood shall be removed by the project sponsor prior to photography for a clear view of the resource. The HABS standards will require large-format, black-and-white, film photography, with the original negatives having a minimum size of 4"x5". The photographer must be familiar with large format architectural photography and documentation of historical resources in accordance with HABS guidelines. Digital photography, roll film, and retouching of images are not acceptable. Sufficient views shall be taken to thoroughly document the resource to HABS, HAER or HALS level 1, 2, or 3 standards (choose appropriate level from HABS guidelines) in consultation with the architectural historian. Photographs must include a photo index and photo key-maps. A draft laser copy (or digital PDF) of the finished survey formatted to the photo index is required for review by the LEAD-AGENCY prior to final archival printing.

**Photography best practice: Provide pertinent details such as: "Include the stone retaining walls, interior woodwork, context views with adjacent buildings, decorative elements, etc.;" consult a historian qualified in architectural history for assistance.*

PHOTO DUPLICATION: (if necessary)

Historical photos and documents of the RESOURCE NAME in the public domain shall be copied on large format film (4"x5" or larger) to Historic American Buildings Survey (HABS) standards. Photographic copies will be made of relevant historical images and documents if appropriate. Photographic copies must be included in the photo index and be identified and labeled using HABS standards.

**Duplication best practice: When the historic image is readily accessible from an archival repository or library do not include a large format copy in the "formal" documentation, simply reference the location in the report's Sources of Information section. Historic documents not in the public domain should be scanned and used in the Historical Report.*

MEASURED DRAWINGS: (if necessary)

Significant existing historic drawings of the RESOURCE NAME if available, shall be reproduced full scale on vellum to HABS guidelines. In the absence of adequate archival drawings, an architect, meeting the Secretary of the Interior's Professional Qualification Standards for Historic Architecture, shall produce full-size measured drawings of the building's plan and significant exterior elevations. Overgrowth and board-up plywood shall be removed by the project sponsor prior to fieldwork to facilitate measurement by the measuring team.

**Specific drawings, including process drawings, obliques or other variations may be needed for level 1 HABS/HAER/HALS; consult an architect qualified in historic architecture for assistance.*

HISTORICAL REPORT:

In consultation with the LEAD-AGENCY, a historian or architectural historian, meeting the Secretary of the Interior's Professional Qualification Standards, shall assemble historical background information, drawings, maps, and historic photographs relevant to RESOURCE NAME and its setting to HABS historic report standards. The historic report will be formatted to HABS/HAER/HALS "Guidelines for Historical Reports".

ARCHIVING:

One copy of the final historic report, drawings, photographs and negatives shall be donated to the HABS/HAER/HALS division of the National Park Service for transmittal to the Library of Congress. Duplicate archival laser-copies of the report, drawings and photographs shall be submitted to LEAD-AGENCY, LOCAL-LIBRARY and/or REGIONAL INFORMATION CENTER and/or HISTORICAL-SOCIETY, ETC.

**When appropriate, duplicate laser copies of surveys should also be submitted to special repositories or archives such as: Tribal Centers,*

Railroad, Aerospace, or Maritime Museums, regional information centers, etc. This ensures the documentation becomes a useful mitigation through public benefit and widespread accessibility. Additionally, the project sponsor may want a duplicate copy. The archival laser copies may be bound as print-on-demand books for easy accessioning into collections.

NOTES:

Proper Program: Insert HABS, HAER or HALS, into the mitigation text as needed; all three programs have similar archival and transmittal guidelines for prints, negatives, report and drawings. Resources in contexts being altered, buildings changing uses, being altered or demolished, should be documented to HABS level 1 or 2 while resources being restored or retained unaltered may be photographed to HABS level 3, the lowest level, as appropriate. If the cultural resource you are mitigating is a building or complex of buildings use HABS.

If the resource is a bridge, ship, tunnel, road, mine, technology, water conveyance, transmission line, railroad, launchpad or other engineering structure the proper documentation program would be the Historic American Engineering Record (HAER).

If the resource is a cemetery, garden, vista, statue, public art, park, ethnic landscape, agricultural landscape or golf course, etc., the proper documentation program would be the Historic American Landscapes Survey (HALS).

Mitigation Schedule: Photography of the resource must be undertaken as early in the process as possible before any changes occur to the resource or context. The measured drawings also require access as early as possible for field teams to measure the site. The fieldwork must be complete before any alterations occur on the property, post production and finalizing the report, drawings and photographs prints can happen later. Proof of submittal and receipt of donated reports by HABS shall be submitted to the lead agency and should be tied to Certificate of Occupancy or similar. (HALS may use prior to the start of any ground disturbance).

Proper Header: To avoid confusion, if the documentation is not sent to the National Park Service collections do not use the HABS/HAER/HALS title numbering or header (HABS-CA-XXXX is NOT acceptable); use a title like: Historic Building Documentation of X. Only documentations officially received by HABS/HAER/HALS may carry the HABS/HAER/HALS title and numbers.

ADDITIONAL INFORMATION:

**Preparing HABS/HAER/HALS Documentation - Transmittal Guidelines available at:*

<https://www.nps.gov/hdp/standards/Transmittal.pdf>

**HABS/HAER/HALS Documentation Frequently Asked Questions available at:*

<http://www.habsphoto.com/Asset.asp?AssetID=21634&AKey=E4VXE478>