

# Utah SHPO E106 Submission Requirements for Historic Buildings and Structures

Advances in technology and documentation requirements in Utah provide an opportunity to move from a paper-based compliance system to a digital workflow. The new e106 system allows for a completely digital SHPO consultative process. This initiative should yield significant time and cost savings to agencies, consultants, and private industry working in Utah by eliminating the need to print and mail SHPO records during the consultative process.

There are no more paper submissions and hard copy mailings for historic site forms, reports, agency letters, etc. for Section 106 compliance. You'll be asked to submit your materials digitally through the e106 system. If you haven't already, you'll will need to create an account in our system.

Submissions for historic buildings and structures will only be accepted in the formats specified below. Consultation and records delivery will be via our Utah SHPO online consultation system (e106). Submissions for compliance outside of this system are discouraged and require pre-approval from Utah SHPO staff. If you are unable to submit your records through the e106 system please contact Utah SHPO staff for guidance.

The two primary documents required for architectural (buildings and structures) submissions are the Agency Letter and the 106 Historic Site Form. You may also upload project reports, engineering reports, architectural studies, maps, etc. All records should be 'born digital', meaning the records are originally created and later submitted in a digital format without being printed and re-scanned. Digital creation without rescanning assures accurate digital text recognition. Any record being submitted that is not born digital, and was scanned, requires Optical Character Recognition (OCR) processing by the submitter. OCR allows full text searching of the record within our content management system. The document format should be PDF/A when submitting through the e106 system. The PDF/A format requirement is easily obtained with current Microsoft Word and Adobe Acrobat Pro products. Methods for generating a PDF/A using your chosen document software should be readily accessible in an internet search. If you have more than one PDF/A, please submit within a zip file.

As noted above, the two documents required for all Section 106 submissions for historic buildings and structures include an Agency Letter and a 106 Historic Site Form, unless an alternative form of submission is pre-approved with the Utah SHPO. Each site form will be constituted of one single file, with photographs embedded. One site form is required for each property within the

project's area of potential effect. If you have multiple property forms, please include them in a zipped file (the project name will be the file name), then submit. We'll ask that you name the site form file using the following convention:

AddressStreetNumber\_AddressStreetName\_City.pdf (e.g.  
123East\_AdamsStreet\_Ogden.pdf)

### Agency Letter

Please provide the following in the letter (submit letter in PDF/A form):

- Identification of the applicant and the agency/program involved;
- A detailed project description that specifies all project components;
- Project's location: specific address, a written description of the project's Area of Potential Effect (the APE is the geographic area within which an undertaking may directly or indirectly cause alterations to historic buildings or structures), and a map (optional) highlighting project area and properties within;
- Determination of Eligibility (DOE): Determine whether any properties in the APE are listed or are eligible for listing on the National Register of Historic Places. Properties already listed on the National Register are, of course, "eligible" and properties not listed are potentially eligible if they meet the following basic criteria: 1) are 50 years old or older and 2) retain integrity—retain most of their original appearance without major alterations;
- Finding of Effect (FOE): Written determination of the project's effect on historic properties. Effect refers to the impact the work being funded will have on the structure. Three common effects are:
  - No Historic Properties Affected: No historic properties are present within the APE, or only minor changes are being proposed that will not impact the character or architectural integrity of the building (minor repairs, painting, plumbing, electrical, etc.).
  - No Adverse Effect: More substantial work is being proposed (replacing windows or porches, changing walls, building additions, etc.), but the work meets the Secretary of the Interior's Standards for Rehabilitation.
  - Adverse Effect: Work is being proposed that will damage or diminish the historic integrity of the historic structure (work that does not meet the Standards—including the application of synthetic siding, incompatible additions, inappropriate door or window replacement, demolition, etc.).
  - Read the [Secretary of the Interior's Standards for Rehabilitation](#)

If you have additional documents (such as an architectural study, maps, engineering report, etc.) to submit as part of your consultation package, please submit in PDF/A format, and if there are multiple documents submit within a zip file.