

**2021 PROCEDURES AND REPORTING STANDARDS FOR CULTURAL RESOURCE
CONSULTANTS CONDUCTING PROJECTS UNDER A CRUP PERMIT FOR THE COLORADO
NORTHWEST DISTRICT AND UPPER COLORADO RIVER DISTRICT, BUREAU OF LAND
MANAGEMENT**

Effective January 1, 2021, and until further notice, the following procedures and reporting standards will govern permitted work conducted in the Bureau of Land Management (BLM) Northwest District (NWD) (White River, Little Snake, and Kremmling Field Offices), and the Upper Colorado River District (UCRD) (Colorado River Valley and Grand Junction Field Offices and the McInnis Canyons and Dominguez-Escalante National Conservation Areas).

I. PROCEDURES

- A. **Pre-Fieldwork Check-In:** Consultants must schedule a check-in with the BLM archaeologist at the field office (FO) where fieldwork will be conducted. The check-in is to conduct the files search, discuss the scope of the project and the adequacy of the proposed survey, and to obtain a BLM project number. Scheduling the check-in may be done by phone or email. *Please allow at least a week's notice for scheduling.*
- B. **Files Search:** Consultants will need to submit a fieldwork authorization request for each project. The literature search must include both the OAHP database **and the BLM Field Office cultural resource files**, and a review of the GLO historic maps. GLO historic maps are expected to be accessed online prior to completing a files search at the BLM office. Additional historic literature review may be warranted depending on the files search findings, particularly in the case of historic linear resources. The files search must review at a minimum the results of previous work **within one-mile radius** of the project survey area boundary and serves to provide a background and interpretive context for the appropriate sections of the Inventory Report.
- C. Before any BLM gate keys or equipment can be released, a Department of Interior form 104 will be required. A decision as to whether this equipment will be given out will be determined on a case-by-case basis.
- D. Notification of when and where your crews are in the field may be necessary during fire season/emergencies.
- E. **Previously surveyed areas** must be re-surveyed if they were not originally completed to current standards. This determination will depend on the quality of the project, the possibility that the area has been surveyed numerous times with negative results, or for other reasons. Please consult with the BLM archaeologist to clarify areas that need re-survey.
 - 1. All previously recorded eligible or needs data sites within the project area must be revisited. The FO archaeologist may also request that not eligible sites be revisited on a case-by-case basis. A Cultural Resource Re-Visitation Form is sufficient unless the thresholds on the top left of the Re-Visitation Form have been met. Sites previously recorded on abbreviated or unofficial site forms or where information is out of date or incomplete will be re-recorded with a full set of new forms.
- F. **Project Surveys Associated with the Oil and Gas (O&G) Industry**
 - 1. Oil and gas program consolidation requires that all O&G projects completed within the CRVFO or GJFO be submitted to the CRVFO O&G archaeologist under the Energy Pilot Office. Fieldwork authorizations and file searches will still need to be obtained and conducted within the FO where the project is taking place.
 - 2. As a best management practice, a minimum of 40 acres will be inventoried for individual well locations, unless otherwise stated. Additionally, large block cultural resource inventory areas may be required for “entire lease or full field development areas based on regional research designs. Areas in which this survey policy has been and can successfully be applied include: (a) development areas with high cultural site density or unusual resource protection requirements; (b) areas in which long-term development or in-fill drilling will continue; (c) areas in which

repeated or cumulative impacts may occur; and (d) areas where rapid APD or Sundry Notice approval is an industry priority” (WO IM 2003-147).

3. Minimum 200-ft. wide corridor for O&G rights-of-way, unless otherwise discussed.

G. **Post-Fieldwork:** After completion of fieldwork, please email the appropriate BLM FO archaeologist to report on the findings of the fieldwork. The BLM will obtain and provide you with an OAHP documentation number for the survey or limited results report for inclusion on the written report.

Please provide the following information in your post-fieldwork email to the BLM FO archaeologist:

1. County or counties the project occurred in;
2. Type of finding (positive or negative);
3. Working report title;
4. The BLM CRIR number assigned to the project.

II. RECORDING STANDARDS

A. **Site/Isolate Distinction:** The BLM Cultural Resources Handbook (Revised March 2021) defines an *isolated find* as a physical location of past human activity consisting of one or very few artifacts in a location that is interpreted as not representing patterned human behavior, and a *site* as the location of activities or events, often used loosely to mean the same as cultural resources. Each field office is to explicitly define site and isolated find. The following is additional criteria for defining and recording cultural resources in the Northwest District and Upper Colorado River District:

1. A *site* is the locus of previous (50-year age minimum) human activity at which the preponderance of evidence suggests repeated and patterned use over time, or multiple classes of activities. Certain cultural resources that represent single activity use may be considered eligible for the NRHP and will be defined as sites. For example: a) Isolated thermal features such as hearths due to the potential for chronometric and economic information; b) Single element rock art panels due to the potential diagnostic and cultural value of the motif; c) Isolated human burials; or d) Loci exhibiting ground stone and flaked stone in association due to the potential of being open camps.
2. An *isolated find* refers to one or more culturally modified and transportable objects representing a single activity and not found in the context of a *site* as defined above. Note that this definition *does not refer* to an absolute quantitative standard for the site/isolate distinction. For example: a) A discrete concentration of flakes from the same material regardless of the number of artifacts present likely represents a single event and is properly designated as an isolate; or b) A ceramic pot bust regardless of the number of sherds that remain; or c) A find consisting of a prehistoric flake and two historic cans.
3. If there is *any* uncertainty regarding the site/isolate distinction, or uncertainty about areas to be surveyed, the consultant must contact the BLM FO archaeologist to discuss the salient issues prior to completing OAHP forms and assigning Smithsonian numbers. Final decision is the BLM FO archaeologist’s responsibility. The Field Office may discuss any variance from state procedure with the SHPO as needed.

B. Site Forms

1. Please check with OAHP and use the most current OAHP forms for sites and isolated finds. Do not change the format of the OAHP forms. It is preferred that all fields be completed, even if the field is not applicable (use “N/A” or “none”). Fields can be compressed or expanded as needed (e.g. rows in the artifact tables in the historic component form). Use the OAHP form instructions and the National Register Bulletins from the National Park Service to inform completion of the forms in full.
2. All wickiups, platforms, brush fences, or other similar aboriginal wooden or brush structures will require an Aboriginal Wooden Structure Component Form for *each structure* in addition to the OAHP Prehistoric Component Form. All culturally modified trees will require a Culturally Modified Tree Form, and historic well pads should be recorded with the BLM Historic Well Pad Component Form in addition to the Prehistoric or Historic Component Form. These can be requested from the BLM.

3. BLM Colorado has created BLM-specific linear site forms and a different way of recording linear sites. The first recordation of an historic linear site will require consultants to identify the entire length of the linear resource and conduct archival and other research to determine eligibility of the entire resource. Portions physically examined in the field are then recorded as segments of the main linear resource. Specific BLM linear forms are required for these recordings and can be obtained through the FO. Additionally, shapefiles should be created of the full resource (to the best of your ability) and for recorded segments and submitted with the final report.
- C. **Landscapes:** Certain geographic areas may warrant special consideration to address what could be considered a landscape of human activity. For example, some areas may exhibit a sparse but continuous presence of lithic debitage, others may have a number of isolated but related historic features (50+ yr.). When such circumstances arise, the consultant is required to devise, in consultation with the BLM FO archaeologist, alternatives to standard recording procedures prior to the completion of fieldwork.
- D. **Site Boundaries:** Determination of archeological site boundaries is required. Site boundaries should be compared with previously recorded sites to correct incorrectly plotted sites. If a site is discovered within the survey area but the site boundary extends outside the survey area, the entire site should be recorded or re-recorded. Field recording of linear resources (e.g. roads, trails, fences, etc.) must be recorded within the survey area, in addition to a minimum of 100 ft. outside the survey area. If there is question about land ownership issues or an outstanding circumstance when recording a very large site, please contact the BLM archaeologist to discuss next steps.
- E. **Use Allocations:** The BLM is required to consider use allocations for site management. Consultants are *strongly encouraged* to provide recommendations for use allocation for sites in the management recommendations portions of site forms and in reports. Sites can be assigned multiple uses if appropriate. See Attachment A or BLM Manual Section 8110.42 for the six types of use allocations to be used.
- F. **Collection** of the following is expected and permitted under the consultant's Cultural Resource Use Permit: 1) **Obsidian** – contractors are expected to collect a representative sample of obsidian debitage or tools located during survey for sourcing by the contractor (i.e., a 50-100% sample at sites and isolated finds containing 10 or fewer obsidian artifacts, and a minimum 30% sample size at sites and isolated finds containing 11 or more obsidian artifacts). 2) **All ceramics** – if ceramics are encountered, the field office archaeologist should be contacted to discuss collection options. 3) **Diagnostic artifacts, trade items, and unique, rare, or unusual items** should be collected if the project could damage, destroy, or put the artifact in danger of being collected, or if curation and further study of these artifacts could be beneficial due to their rarity (e.g. Paleoindian or Archaic projectile points). Both sides of these types of artifacts will either be photographed or illustrated as fine line drawings in the report and appropriate OAHP form. All photographs and illustrations will have an appropriate scale, and documentation of the artifacts will include measurements of length, width, and thickness. Reports should have a section that details the items collected during the project so that the FO archaeologists know what is being curated at the Museums of Western Colorado annually. If artifacts are collected from your project, include a table and paragraph discussing the items collected and their associated numbers (Field Specimen numbers for multiple collections from a single site are required in the report).
 1. Collection is *not permitted* on private land unless otherwise authorized by the private landowner in a written agreement.
 2. Partial or full destructive testing of any artifacts *must* be approved by the field office archaeologist prior to processing samples.
 3. *If collections are made, proof of receipt from the Museums of Western Colorado will be submitted to the FO within 180 days of the final report submission.*

- G. **A photograph with a scale included is required for every recorded feature** in addition to at least one site overview photo with horizon. Additionally, natural or human caused disturbances or vandalism specifically identified in the site form should be documented through photographs.
- H. When assessing condition and threats to the resource on the OAHP Management Data Form, *please provide evidence or an explanation for perceived threats to the resource within the condition narrative*. For example, most sites suffer from wind and water erosion due to the nature of exposure and geological processes, however, these processes may not be an imminent threat to the resource.
- I. Hard datums are not required to be placed on sites. Virtual datums are preferred and can be based on a permanent or semi-permanent feature on the site, such as a tree or boulder.

III. REPORTING STANDARDS

- A. Unless otherwise stated in a contract Statement of Work, all draft survey reports must be received by the BLM between 30 and 180 days following the completion of fieldwork, based on the scale of the project. Smaller projects should be submitted to the BLM within 30 days of the completion of fieldwork.
 - 1. Extensions beyond 180 days may be granted for large surveys with complex findings on a case-by-case basis. However, in such cases, a preliminary report of the results with identification of the findings, the NRHP evaluation for each site, and a project level site location map and a site sketch map of each site (copy of field map) must be received within the 30-day period. The due date for site forms and the final report will be negotiated on a case-by-case basis.
 - 2. For multi-year projects, a preliminary report must be submitted within 10 calendar days of completion of any episode of fieldwork.

B. Legal Locations and Maps

- 1. Accurate legal and UTM locations will be required for each cultural resource on the appropriate form. ***No site location or detailed descriptions of the nature and location of sites will be presented anywhere in the report, as they are confidential information.*** Site location data and maps with site location information are to be placed as an appendix to the report and must be removed from any report submitted to proponents or clients.
- 2. It is preferred that the SE corner and east section line will be used as an anchor for obtaining legal locations. If another corner is used, it must be referenced on the site/IF form.
- 3. All site plan maps will be drawn to scale and will include a scale bar and scale text, as well as, at a minimum: virtual datum, identified tools, features, photo points, topography, proposed disturbances, and any recent disturbance or intrusions to the site.
 - a. A virtual datum must relate to the UTM's listed in the Management Data Form, or locational data should be available on the plan map (e.g. UTM's of the datum noted on the map or a UTM grid around the page).
 - b. Disturbance or intrusions include but are not limited to: previous mechanical disturbance or vegetation manipulation, trash dumping, artifact collection piles, unauthorized excavation, off road vehicle activity, cattle trampling, trailing, or erosion. Each map key will relate specifically to each site plan map.
- 4. Only 8.5 by 11-inch maps will be accepted in the report and site forms (no folded large-scale maps), unless in unusual cases. For complex sites that require large-scale maps, one 8.5 by 11-inch overview map with additional, detailed inset maps are suggested as an alternative to one large map.
- 5. Please include the CRIR and OAHP project numbers in addition to any relevant data (e.g. site number, date, etc.) in the title of the map.

C. Historic Context and Research Results

- 1. The Colorado Historic and Prehistoric context documents can be used to provide a general framework of inquiry. More detailed discussion of context should take into consideration previous work in the project area and any available Class I overviews.
- 2. For surveys that record sites which result in a Positive Findings CRIR:
 - a. Briefly summarize the appropriate cultural history from the relevant Colorado contexts.

- b. Discuss the findings of previous work from the literature review, describe the expected results based on the context and previous work, and include the previous finds results in the report via narrative or table.
- c. Summarize how the current survey results relate to the context, previous findings, and expected results.
- d. Large-scale inventory projects, Class I overviews, testing, and data recovery require more discussion of their results.

D. Report Editing

1. General report requirements

- a. Consultants are required to use the *OAHP Colorado Cultural Resource Survey Manual* to verify the completeness of their reports prior to submitting draft reports to the BLM for review.
- b. Include the assigned BLM Cultural Resource Inventory Report (CRIR) number (assigned with the fieldwork authorization) and the OAHP document number on the title page of the report and in the upper right header of site and IF forms, and somewhere on each map.

2. Draft report requirements

- a. One electronic version or one double-sided unbound copy of the draft CRIR or Limited Results Report (check with FO archaeologist for the preferred type- may be dependent on project size).
- b. One electronic version or stapled copy of the site/IF forms (check with FO archaeologist for the preferred type- may be dependent on project size).
- c. One electronic submittal containing survey area and site and/or IF boundaries (check with FO archaeologist to see their preferred submittal method). GIS shapefiles should be submitted unless otherwise requested. If a linear resource or segment has been recorded, shapefiles of the segment(s), as well as the full linear resource (as located to the best of your knowledge) should be included as features in the site boundary shapefile. This information will be reviewed by the BLM FO archaeologist and must be formatted as required by SHPO in the most recent *BLM-Colorado Digital Data Specifications Guide*.
- d. Documents must have final versions of the maps and tables, and photocopies of any photographs as they will appear in the final report and forms.
- e. BLM will provide corrections of minor errors during the review. Reports with major flaws will be returned. Please carefully review the draft report and supporting documents including the use of spell-check to prevent delays from returning reports. The use of “boiler-plate” reports or forms that neglect to adequately address the changes in the environmental or cultural contexts from project to project is considered a major error. Other major flaws are: failure to follow OAHP procedures, recording and reporting standards, errors in location information, maps not at a scale of 1:24,000, lack of information to support recommendations of eligibility and effect, or failure to identify the specific criterion for eligibility. Repeated failure to perform to standards will result in a letter to the Colorado State Office to document failure to meet this condition of the Cultural Resource Use Permit and, if the BLM has funded the project, a letter will also be sent to the Contracting Officer to serve as documentation of past performance in the consideration of future contract awards.

3. Final report requirements

- a. After the BLM review, please provide the requested corrections to finalize the report. If any corrections cannot be made, please contact the field office archaeologist to discuss.
- b. Final reports are due within 180 days of the completion of fieldwork, unless an extension has been granted in consultation with the BLM archaeologist.
- c. Submit two hard copies of the final report and forms (double-sided is required, except the 1:24,000 maps which should remain single sided). Consultants are encouraged to use a secure company FTP site to upload the final electronic PDFs and shapefiles (non-secure methods such as email, Dropbox, Google Drive, and other non-secure file sharing programs are not

permitted). These files will ultimately be utilized by SHPO to upload the electronic documents to the Compass database. If it is unfeasible to provide the electronic data using online file sharing, BLM will accept encrypted USB flash drives, but will no longer accept CDs, unless specifically requested by the BLM archaeologist.

- d. **O&G projects conducted in the GJFO:** in addition to the copy sent to the Energy Pilot Office (CRVFO), send one final hard copy of the report, PDFs of the report and site forms, and shapefiles to the GJFO field office archaeologist.

IV. PROCEDURES FOR ARPA VIOLATIONS

- A. Unauthorized collection, excavation, or other recent or ongoing site defacement shall be considered an active crime scene. *Do not enter a crime scene* and report the suspected violation to the Field Office archaeologist or Law Enforcement Officer *immediately*.
 1. When an ongoing violation is observed, never approach the suspect(s). Contact the appropriate Field Office archaeologist or Law Enforcement Officer as soon as possible. Report vehicle descriptions and license plates if possible, to safely obtain such information.
 2. When a recent violation is suspected upon approaching a site, do not enter the potential crime scene. All disturbances/trash/vandalism should be treated as evidence and left in place and untouched. Report any findings to the Field Office archaeologist.
 - a. If the violation was identified upon site entry, exit the evident portion of the suspected crime scene along the same point of entry: minimizing one's footprints in the crime scene distinguishes between the suspect's footprints, which may be selected for making a caste.
 3. Provide a detailed description of the violation and accompanying photos taken from outside of the suspected perimeter of the crime scene. Include the estimated disturbance (e.g., "three looter's pits"), defacement description (e.g., "2019 inscription overlying prehistoric rock art panel"), and other suspected evidence (e.g., "UTV tracks, two sets of footprints, homemade screen, recent cigarette butts," etc.). If you inadvertently touch or disturb evidence this must be noted; handling of evidence may preclude certain objects from fingerprint analysis, or even inclusion in an ARPA case once provenience is compromised. All photos and notes are essential to the potential ARPA case and will be submitted as evidence.

Useful links

BLM Cultural Resource Use Permit information:

<https://www.blm.gov/programs/cultural-heritage-and-paleontology/archaeology/archaeology-in-blm/permits>

OAHP survey and inventory forms and instructions:

<https://www.historycolorado.org/survey-inventory-forms>

Attachment A: Use Allocation Definitions (taken from BLM Manual Section 8110.42)

Scientific Use:

This category applies to any cultural property determined to be available for consideration as the subject of scientific or historical study at the present time, using currently available research techniques. Study includes methods that would result in the property's physical alteration or destruction. This category applies almost entirely to prehistoric and historic archaeological properties, where the method of use is generally archaeological excavation, controlled surface collection, and/or controlled recordation (data recovery). Recommendations to allocate individual properties to this use must be based on documentation of the kinds of data the property is thought to contain and the data's importance for pursuing specified research topics. Properties in this category need not be conserved in the face of a research or data recovery (mitigation) proposal that would make adequate and appropriate use of the property's research importance.

Conservation for Future Use:

This category is reserved for any unusual cultural property which, because of scarcity, a research potential that surpasses the current state of the art, singular historic importance, cultural importance, architectural interest, or comparable reasons, is not currently available for consideration as the subject of scientific or historical study that would result in its physical alteration. A cultural property included in this category is deemed worthy of segregation from all other land or resource uses—including cultural resource uses—that would threaten the maintenance of its present condition or setting, as pertinent, and will remain in this use category until specified provisions are met in the future.

Traditional Use:

This category is to be applied to any cultural resource known to be perceived by a specified social and/or cultural group as important in maintaining the cultural identity, heritage, or well-being of the group. Cultural properties assigned to this category are to be managed in ways that recognize the importance ascribed to them and seek to accommodate their continuing traditional use.

Public Use:

This category may be applied to any cultural property found to be appropriate for use as an interpretive exhibit in place, or for related educational and recreational uses by members of the general public. The category may also be applied to buildings suitable for continued use or adaptive use, for example as staff housing or administrative facilities at a visitor contact or interpretive site, or as shelter along a cross-country ski trail.

Experimental Use:

This category may be applied to a cultural property judged well suited for controlled experimental study, to be conducted by BLM or others concerned with the techniques of managing cultural properties, which would result in the property's alteration, possibly including loss of integrity and destruction of physical elements. Committing cultural properties or the data they contain to loss must be justified in terms of specific information that would be gained and how it would aid in the management of other cultural properties. Experimental study should aim toward understanding the kinds and rates of natural or human-caused deterioration, testing the effectiveness of protection measures, or developing new research or interpretation methods and similar kinds of practical management information. It should not be applied to cultural properties with strong research potential, traditional cultural importance, or good public use potential, if it would significantly diminish those uses.

Discharged from Management:

This category is assigned to cultural properties that have no remaining identifiable use. Most often these are prehistoric and historic archaeological properties, such as small surface scatters of artifacts or debris, whose limited research potential is effectively exhausted as soon as they have been documented. Also, more

complex archaeological properties that have had their salient information collected and preserved through mitigation or research may be discharged from management, as should cultural properties destroyed by any natural event or human activity. Properties discharged from management remain in the inventory, but they are removed from further management attention and do not constrain other land uses. Particular classes of unrecorded cultural properties may be named and described in advance as dischargeable upon documentation, but specific cultural properties must be inspected in the field and recorded before they may be discharged from management. Consultants should discuss with the field office archaeologist the use of “Discharged from Management” as some offices use it for all not eligible sites and other offices only use it for sites that have been completely destroyed. *[Generally, the Colorado BLM does not assign all not eligible sites to “Discharged from Management.” This use allocation is used sparingly.]*