

2015 PROCEDURES AND REPORTING STANDARDS FOR CULTURAL RESOURCE CONSULTANTS CONDUCTING PROJECTS UNDER A CRUP PERMIT FOR THE COLORADO NORTHWEST DISTRICT, BUREAU OF LAND MANAGEMENT

Effective April 1, 2015, and until further notice, the following procedures and reporting standards will govern permitted work conducted in the Grand Junction, Colorado River Valley, White River, Little Snake, and Kremmling Field Offices.

I. PROCEDURES

- A. **Pre-fieldwork check-in:** Consultants must schedule a check-in with the BLM archaeologist at the field office (FO) where field work 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 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 either 1) have already been notified to submit a blanket field work authorization to conduct surveys within the field office area or 2) 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. Not eligible sites that have been discharged from management do not require revisits during inventory and evaluation, however, the FO archaeologist may 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 outdated or incomplete will be re-recorded with a full set of new forms.
- F. **Specific to project surveys associated with the oil and gas (O&G) industry:**
 - 1) Recent 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. 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" (WOIM2003-147).
 - 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. After you've reported your results the BLM FO archaeologist will contact SHPO to obtain the OAHP documentation number for the survey or limited results report for inclusion on the written report.

The BLM will provide you with an OAHF documentation number. 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 and Recording

The BLM Cultural Resources Handbook (Revised March, 2011) 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 field offices:

- 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 makes no reference 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, random event and is properly designated as an isolate, or b) A ceramic pot bust regardless of the number of sherds that remain.
- 3) 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 OAHF 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, or are available at http://www.blm.gov/co/st/en/BLM_Programs/cultural_resources.html.
- 4) 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.
- 5) Determination of archeological site boundaries is required. If a site is discovered within the survey area but the site boundary extends outside the survey area, the entire site should be 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.
- 6) 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 OAHF 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.
- 7) **Collection** of the following is expected in the Field Office 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. 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 OAHF 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 archaeologists know what is being curated at the Museum 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).

- a. Collection is not permitted on **private land** unless otherwise authorized by the private landowner in a written agreement.
- B. Please check with OAHF and use the most current OAHF forms for sites and isolated finds. Do not change the format of the OAHF 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 OAHF form instructions and the National Register Bulletins from the National Park Service to inform completion of the forms in full.
- C. **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.
- D. When assessing condition and threats to the resource on the OAHF 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.
- E. Hard datums are no longer 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 field work.
 - 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 field work.
- B. Legal Locations/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 site localities 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. Disturbance or intrusions including but are not limited to: previous mechanical disturbance or vegetation manipulation, trash dumping, artifact collect 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 CRIR number (assigned with the fieldwork authorization) and the OAHP document number in the **title** of the report and the upper right header of site forms and Ifs, and somewhere on each map.

2) **Draft Report** requirements

- a. One electronic version or one double-sided unbound copy of the draft Cultural Resource Inventory Report (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 CD containing survey area and site and/or IF boundaries (check with FO archaeologist to see if they would prefer an e-mail instead). GIS shapefiles should be submitted unless otherwise requested. This information will be reviewed by the BLM FO archaeologist and must contain the attribute and metadata information as required by SHPO in the attached *BLM –Colorado Digital Data Specifications Guide*.
- d. These 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 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.

2) **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 field work, unless an extension has been granted in consultation with the BLM Archaeologist.

- c. Submit three hard copies of the final report and forms (double-sided is required, except the 1:24,000 maps which should remain single sided) and one e-mail or CD containing final shapefiles with survey and site/IF location.
- d. At the OAHP suggestion we are now requiring consultants to send an e-mail with the **PDF files of the survey report and site/IF documents**. If a project is too large to send by e-mail or through a secure website, a CD containing these files will suffice. These files will ultimately be utilized by SHPO to place the electronic documents on to the Compass database for easier retrieval by authorized cultural resource professionals.

Helpful links

BLM Cultural Resource Use Permit information (includes links for Fieldwork Authorization Request, Handbook of Guidelines and Procedures for Inventory, Evaluation, and Mitigation of Cultural Resources, Digital Data Specifications Guide, and field office contacts):

http://www.blm.gov/co/st/en/BLM_Programs/cultural_resources.html

OAHP survey and inventory forms and instructions:

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