

**STANDARDS AND PROCEDURES FOR CULTURAL RESOURCE
CONSULTANTS CONDUCTING CULTURAL RESOURCES
MANAGEMENT PROJECTS FOR THE GUNNISON FIELD OFFICE**

Effective **November 1, 2014**, the following procedures and reporting standards will govern the conduct of CRM work for the Bureau of Land Management (BLM) – Gunnison Field Office (GFO) and will remain in effect until further notice. These procedures are adapted from Standards & Procedures (S&P) statements of other BLM Field Offices and Forest Service District Offices, the BLM Handbook of Guidelines and Procedures for Inventory, Evaluation, and Mitigation of Cultural Resources, and the Colorado Office of Archaeology and Historic Preservation's (OAHP's/SHPO's) guidelines for reporting and data management. An effort has been made to maintain consistency between offices in order to provide a more standardized approach to cultural resource inventory and reporting across agency boundaries. There are a few differences, however, and it behooves the contractor to review these carefully.

This BLM-GFO standards and procedures statement does not supersede or modify inventory and reporting requirements established in the National Historic Preservation Act (NHPA), the Archaeological Resources Protection Act (ARPA), the Native American Graves Protection and Repatriation Act (NAGPRA), BLM Instruction Memoranda, or other legal authorities. It is designed to augment, streamline, and update certain standards and procedures set forth in the OAHP's Colorado Cultural Resource Survey Manual and the BLM's Handbook of Guidelines and Procedures for Inventory, Evaluation, and Mitigation of Cultural Resources. These two sources should be consulted directly for any and all topics not addressed in this document.

I. PROCEDURES

- A. **Pre-fieldwork check-in:** Consultants must schedule a check-in with the GFO archaeologist 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. **Fieldwork Authorizations:** Before conducting a file search, consultants will either 1) already have a blanket field work authorization to conduct surveys within the GFO area or 2) will need to submit a fieldwork authorization request for the individual project.
- C. **Files search:** 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. 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. Legal location searches on COMPASS that exceed the one mile radius will be accepted.
- 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 1) they were not originally completed to current standard, or 2) they are older than 20 years. There is some flexibility on point 2, depending 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.
- F. **Post-fieldwork:** After completion of fieldwork, please email the GFO archaeologist to report on the findings of the fieldwork. After you've reported your results the GFO 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 OAHP documentation number. Please provide the following information in your post-fieldwork email to the GFO archaeologist:

- 1) County or Counties the project occurred in
- 2) Type of finding (positive or negative)

- 3) Working Title Report
- 4) The BLM GFO CRIR number assigned to the project.

II. RECORDING STANDARDS

A. Site/Isolate Distinction

The BLM Cultural Resources Handbook (Revised Oct. 1, 2007) identifies the definitions for site and isolate to diminish the arbitrary aspect of past criteria (e.g., 5 flakes define an isolate, six flakes define a site) and, instead, place reliance on the professional judgment of the consultant. The following is the criteria for recording cultural resources in the GFO:

- 1) A *site* is the locus of previous (50 year age minimum) human activity at which the preponderance of evidence suggests either one-time diagnostically interpretable use or repeated use over time, or multiple classes of activities. For example: a) Isolated thermal features such as hearths are to be designated as sites, even though they may represent a single event, due to the interpretable function of such utilization and the potential for chronometric and economic data recovery; b) Single element rock art panels are to be designated as sites due to the interpretable nature of such an event and the potential diagnostic value of the motif; c) Isolated human burials; or d) Loci exhibiting ground stone and flaked stone in association.
- 2) An *isolate* refers to one or more culturally modified objects 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) **NRHP Eligibility:** Consultants are expected to make a well-documented, good-faith recommendation to the GFO archaeologist on whether or not sites are eligible for nomination to the NRHP. Limited testing is allowed as part of a BLM Class III inventory for determining NRHP eligibility but investigations should not exceed three square meters of the site's surface. The "Need Data" determination should be applied sparingly and only in those cases where both surface evidence and documented limited testing (e.g. soil or trowel probes, shovel testing, etc.) yield ambiguous results.
- 4) 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 OAHHP Prehistoric Component Form. These can be found at dargnet.org. All historic mining features and structures will require a Mining Resource Component Form. This is used in place of the OAHHP Historic Component Form. These are available from the GFO archaeologist.
- 5) If there is *any* uncertainty regarding the site/isolate distinction, or uncertainty about areas to be surveyed, the consultant must contact the GFO archaeologist to discuss the salient issues prior to completing OAHHP forms and assigning Smithsonian numbers. Final decision is the GFO archaeologist's responsibility. The Field Office may discuss any variance from state procedure with the SHPO as needed. Additionally, if a site is discovered within the APE but the site boundary extends outside the APE, the entire site should be recorded.
- 6) The GFO maintains a **no-collection** policy under normal circumstances. Extraordinary finds (e.g., ceramics, figurines, textiles, basketry, arrow shafts, and Paleoindian projectile points) must be immediately reported (by phone or email) to the GFO archaeologist, who will determine whether or not collection and curation of the artifact(s) is appropriate. Common diagnostics (e.g., most projectile points, datable cans, buttons, coins) should be measured, photographed and/or sketched, thoroughly described in the field, and left on-site. Collection is not permitted on private land unless otherwise authorized by the private landowner in a written agreement.
 - If an archaeologist's ongoing research would benefit from the CRM consultant's collection of specific artifact types during their current work and collection is permitted under the consultant's Cultural Resource Use Permit, the CRM consultant is encouraged to contact the GFO archaeologist for an exception to the general no collection policy. Such an exception is likely to be granted for the sourcing of obsidian artifacts, the thorough analysis of Native American ceramics, blood residue or pollen analyses for lithic artifacts, dendrochronological or 14C dating, or other types of intensive laboratory analysis.
 - When artifacts are collected for intensive analysis, the initial inventory report must disclose

each collected artifact's accessioning number, its temporary storage location(s), and its intended Federally-approved repository for long-term, post-analysis curation (typically the Anasazi Heritage Center in Dolores). An addendum to the report or a separate report including the results of the artifact analysis must be submitted to the GFO.

- Reports should have a section that details any items collected during the project so that the Field Office archaeologists know what is being curated annually.
- No paleontological resources may be collected under a cultural resource permit unless the remains are in an archaeological context (e.g., fossilized bone in a hearth, artifacts made from fossil material). In this case, however, a paleontologist should be consulted

B. The most current OAHP forms for sites and isolated finds will be used. 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).

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. Adequate photography documentation is very important in ARPA cases.

III. REPORTING STANDARDS

A. **Timeline:** Unless otherwise identified in a contract Statement of Work, all survey reports must be received by GFO within 30 days following the completion of fieldwork. Extensions may be granted for large surveys with complex findings. 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. Extensions may be granted and interim reporting requirements waived by the GFO archaeologist under extenuating circumstances.

B. **Drafts:** For positive-results surveys or projects covering 160 or more acres, **only one copy** of the **draft Cultural Resource Inventory Report (CRIR)** and **one** stapled copy of the **site/IF forms** should be submitted unless otherwise requested. These documents must have final versions of the maps and tables, photocopies of any photographs as they will appear in the final report and site/IF/locality forms. The correction of minor errors may be informally reported to the author(s) at the discretion of the BLM reviewer. Reports with major errors will be returned. Errors often occur when consultants fail to carefully review the report and supporting documents. 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 the failure to follow OAHP procedures, recording and reporting standards, errors in location information, maps not at a scale of 1:24,000, lack of logical follow through with site evaluations and recommendations, or continual spelling and grammatical errors that make the report difficult to read. Please pay special attention to the accuracy of any site/locality/IF data that will be **entered into OAHP's Compass** database. 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.

- For projects reported with **OAHP's Limited-Results Cultural Resource Survey Form**, the CRM contractor may submit **two copies** of a final draft report and associated forms, accompanied by the data CD. Correction of minor errors may be handled informally at the discretion of the BLM reviewer. Reports with major errors will be returned.

C. **Report Content:** Reports and documents are expected to be professionally written with a minimum of factual, technical, typographic, and grammatical errors. Report authors should look to OAHP's "Colorado Cultural Resource Survey Manual" for guidance on report content. At a minimum, the GFO expects positive results reports to contain the following elements or their equivalents: title page, table of contents, "**Cultural Resource Survey Management Information Form**," introduction, environment,

cultural history, previous work, statement of objectives, research design, field methods, site/IF definitions, results, evaluations, management recommendations, summary, conclusion, references cited, and applicable site/locality/IF forms. Some elements may be combined under a single report section, where appropriate. Limited Results reports should use the Limited Results Form provided by the OAHP.

- D. **Site Forms & Maps:** Accurate legal and UTM locations will be required for each cultural resource on the appropriate form and *will not* be presented anywhere in the report narrative in any form.
- All site plan maps will be drawn to scale and will include at a minimum: datum, identified tools, features, and any recent disturbances or intrusions to the site (including but not limited to: previous mechanical disturbance, trash dumping, artifact collector piles, unauthorized excavation, off road vehicle activity, livestock impacts) in addition to a north arrow, scale, title, and legend.
 - The GPS unit used for site recording and its accuracy will be included in the report narrative and on the site/IF forms. All reported UTM locations must be in the appropriate Zone and in **NAD 83**.
 - Clear, readable copies of the project area and site/isolated find location must be plotted on USGS Topographic maps at **1:24000 scale** and include the entire section within which the project/site/IF is plotted, including as much of the surrounding sections as possible. Pasting exported map images into an electronic text document may distort the true printed scale – please avoid this error.
- E. **GIS Data:** A File Geodatabase containing survey area, site features, and site boundary feature classes, will be provided on a CD with the final report. Additional digital data specifications for BLM Colorado cultural projects can be found at:
http://www.historycolorado.org/sites/default/files/files/OAHP/Programs/OAHP_Digital_Specs_Handbook.pdf

Site and Survey PDFs

Please include the survey report and the site forms (with their associated components such as maps, etc.) for your project as PDFs with your GIS data on the CD. These files ultimately will be utilized by SHPO to place the electronic documents on to the Compass database for easier retrieval by all cultural resource professionals. Please set dpi to 300 or higher.