



# SHPO Position on The Roles of Archaeological Testing - FAQs



## SHPO Guidance Point No. 2 - The Roles of Archaeological Testing FAQs

SHPO periodically reviews our guidance points to make sure they are still relevant and helpful. Recently, we have had a few questions regarding archaeological testing and what terminology should be used in written documents. We have reviewed [SHPO Guidance Point No. 2 - The Roles of Archaeological Testing](#) (prepared in 2003 and available on the SHPO website) to see if an update is needed, and have decided that clarification via Frequently Asked Questions (FAQs) will provide sufficient guidance. **Please Note: These FAQs are intended to supplement the information provided in the original guidance point.**

SHPO recognizes *identification testing*, *eligibility testing*, and *Phase I data recovery* as appropriate terminology in reports and agreement documents.

### FAQs

1. *Question: I have a project in a major downtown area. There is a site boundary that was drawn in the 1930s. My research indicates that the site has been determined Register-eligible. Based on my research, I think the site is **larger** than the boundary as currently recorded. If we recommend testing outside of the official site boundary, is that considered data recovery?*

Answer: **No.** Testing outside of the currently recorded site boundary is considered **identification testing**. No agreement document is necessary while you are working outside of the officially recognized site boundary. However, an approved Monitoring and Discovery Plan needs to be in place to provide a detailed protocol for what steps will be taken if the site DOES extend into the testing area.

2. *Question: I have a project in a major downtown area. There is a site boundary that was drawn in the 1930s. My research indicates that the site has been determined Register-eligible. Based on my research, there has been prior ground disturbance and the site is likely **smaller** than portrayed. If we recommend testing within the site boundary as currently depicted, in an area where there is high probability that intact cultural deposits will not be found, is that **identification testing**?*

Answer: **No.** Testing within the previously recorded site boundaries, regardless of likelihood of finding intact cultural deposits, is **Phase I data recovery**. When you are working inside of the officially recognized site boundary, a phased data recovery plan (and in the case of a federal nexus, an agreement document [memorandum of agreement or programmatic agreement] if it is a Federal project) is needed.

3. *Question: I have a project in an area of thick forest with heavy pine duff. I know that when we survey, it is unlikely that sites will be visible. Can I perform identification testing?*

Answer: **Yes.** Identification testing using shovel tests or hand-dug units is a common practice elsewhere in the United States, where brush and foliage prohibit clear discrimination of the ground surface. However, the decision to employ this form of identification must be approved by the land-managing agency. If the agency supports

the use of testing for identification, SHPO will review the results of the identification testing. We do not need a work plan, but the methods employed should be clearly presented in the inventory report.

4. *Question: I'm used to calling Phase I data recovery "testing," like the original Guidance Point does. Why can't we still use that in reports?*

**Answer: Conflation of Phase I data recovery with testing creates confusion in the consultation process and unclear expectations of resultant work products.** Data recovery by its nature is exploratory, with the initial phase employed as a means of gathering information about a site to determine where buried features are in order to focus the subsequent (Phase II) data recovery efforts on areas that have the potential to yield the most information critical to answering one or more research questions. Data recovery is employed, in most cases, to resolve an adverse effect to a Register-eligible archaeological property. The treatment plan that is developed as a result of consultation is employed to guide resolution of adverse effects. A phased data recovery plan is much more involved than a testing plan, involving clear articulation of a research design and special analyses to address research questions.

5. *Question: Can you please summarize what work plans are needed for both types of testing and for Phase I data recovery?*

**Answer: Sure.**

- **Identification Testing:**

- SHPO does not require a work plan if identification testing is occurring in conjunction with inventory/identification efforts (note: testing for identification requires land managing agency permission). However, discussion of testing methods must be included in survey / testing results report
- A Monitoring and Discovery Plan is required for testing of areas within 250 ft of the site boundary (fully outside the reported site boundary) or within 50 ft of a projected prehistoric canal.

- **Eligibility Testing:**

- A testing plan must be prepared and reviewed by SHPO. Consultation on the results of the testing will determine whether or not the project proceeds to phased data recovery.

- **Phased Data Recovery:**

- Federal projects are subject to Section 106 and will require a Memorandum of Agreement or Programmatic Agreement. Non-mandated or State Act projects do not require an agreement document.
- A Historic Properties Treatment Plan is required that discusses Phase I and Phase II data recovery methods. Research questions that guide the data recovery methods are required.