



## **SHPO Guidance on Surface Artifact Collection During Survey/Identification Phase**

SHPO Guidance Point No. 7

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This document provides guidance on the issue of collecting surface artifacts from sites during the survey/ identification phase of an undertaking. Specifically, it is the State Historic Preservation Officer's (SHPO) opinion, based upon 36 CFR Part 800 and the Secretary of Interior's Standards for Archaeological Investigations, that surface collection affects a property's National Register-eligibility by altering its character-defining attributes; alteration of this type is an adverse effect, as per Part 800.5(2)(ii).

The SHPO has consulted with the Advisory Council on Historic Preservation (Council) (Matt Thomas, Council USDA liaison, personal communication with Ann Howard, October, 2006) on this issue; the Council agrees that, if the Agency has determined that a site is eligible for the National Register of Historic Places (National Register), then surface collection constitutes an adverse effect for which a Memorandum of Agreement is needed in order to delineate the process of consultation for mitigating the adverse effect.

For sites that lack eligibility determinations, we recommend that the Agency consider using techniques other than artifact collection, such as in-field artifact analysis by qualified researchers (that is, archaeologists with expertise appropriate to site and artifact types, such as historical archaeologists for historic archaeological sites/assemblages), to help evaluate eligibility; artifact collection during survey is expected to be a rare occurrence. However, for those instances when such data are needed and expertise in field analysis is impracticable, we offer the following guidance:

1. Generally, surface artifacts should only be collected in order to aid in the evaluation of a site's eligibility for the National Register. One exception to this guidance might be the collection of rare or unusual artifacts such as a Clovis projectile point; however, each agency should have a written procedure in place for specifying the types of artifacts (e.g., artifacts of extreme age or rare artifact class) and conditions (e.g., imminent loss of artifacts due to threats from looting, erosion, etc.) that qualify for this exception.
2. If the Agency decides that artifacts are going to be collected during survey in order to facilitate National Register eligibility determinations, then the Agency should develop written guidelines specifying standards for collection. The Agency's guidance should clearly define what factors foster the decision to conduct surface collection during survey. These written guidelines should be provided to archaeological consultants performing cultural resources inventories.

At a minimum, the following considerations need to be addressed in the Agency's guidance for surface collection during survey:

Pre-Survey Guidance:

- a. If the survey is part of a Section 106 undertaking, historic contexts should be used to develop a research design that specifies the types of artifacts that will be collected for a given property type. The survey's research design should be submitted by the Agency Official for review and comment by the SHPO and relevant Tribes prior to implementation.

Post –Survey Guidance:

- a. After the surface collection has been completed, the Methodology section of the survey report should clearly articulate the types of artifacts that were collected. Terms such as “diagnostic” or “unique” need to be specifically defined (i.e., temporally diagnostic artifacts, culturally diagnostic, technologically diagnostic, etc.).
- b. The Methodology section should also state the method by which these artifacts were collected (our office recommends that the artifacts be point-provenienced) and their locations shown on a site map.
- c. An inventory of the collected artifacts (types and quantities) should be clearly presented within each site's description in the survey report. The collected artifacts should be analyzed, and the analysis results should be discussed in the survey report. This discussion needs to specifically address how these artifacts were used to help evaluate individual site eligibility. It is also helpful if photographs or drawings of the collected artifacts are included in the survey report.
- d. The Agency should curate these artifacts according to the Secretary of Interior's Standards (36 CFR 79); this means that the facility in which these artifacts will be housed should also meet these standards. The curation facility should be identified in the Agency's cover letter to consulting parties.

In summary, collection of surface artifacts that are not unique or threatened during field survey should be reserved only for those instances in which National Register eligibility of a site cannot be resolved with in-field assessments. Agencies should have written guidelines that elucidate these situations for their land jurisdictions, as well as provide stipulations for the collection, analysis, reporting, and curation of all artifacts collected during surveys.

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