News in Review

Periodic Mailing from the South Carolina State Historic Preservation Office Review and Compliance Division May 2007

<u>Archaeology/Cultural Resource Reports Guidelines</u>

- 1. Cover Letters
- 2. Letter Reports
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1. Cover Letters

Reminder: When a Cultural Resource Assessment, Cultural Resource Reconnaissance, or Cultural Resource Survey report is submitted for review, the cover letter accompanying the report needs to include a clear statement as to why the report is being submitted. For example:

- the investigation has been requested by the client as due diligence;
- the investigation has been requested by the client in anticipation of applying for federal, state, or local permits, funding, licensing, etc. and, if so, state which agencies or local offices these will be;
- the investigation has been requested by the client who has applied for a federal, state, or local permit and, if so, state which agencies or local offices these are and the associated permit numbers;
- the investigation has been recommended by the State Historic Preservation Office;
- other reason, clearly stated.

Having this information helps us better prepare the language for our response letter.

2. Letter Reports

In an effort to streamline reports prepared for Cultural Resource Reconnaissance surveys and intensive Cultural Resource Surveys, we will now accept letter reports when:

• no archaeological sites, no isolated finds, and no above-ground resources are identified.

The letter reports are abbreviated versions of full reports. All letter reports still need to contain enough written documentation and discussion to:

- document the undertaking, the agency or agencies involved, the field personnel, and the goals and objectives;
- understand what cultural resources might be expected for the survey area;
- describe the documentary research and field methods used;
- present the results of survey and any recommendations.

The following graphic documentation is expected to accompany a letter report. This is the minimum graphic documentation expected; additional relevant material also may be provided. Include a north arrow, map scale, and bar scale:

- USGS topographic quad labeled with quadrangle name and with survey area indicated;
- project-specific map with relevant information indicated (e.g. transects, etc.);
- copies of historic-period maps consulted;
- other relevant maps (e.g. soil maps depicting high, medium, low probability areas, etc.).

For review, we will need only one copy of the letter report. Use of letter reports still requires the analysis and discussion of relevant data, and SHPO will request additional information if we are not able to

adequately evaluate report recommendations. If you are in doubt about the level of documentation necessary for a letter report, please contact the appropriate reviewer.

Once the letter report is accepted, we will need four copies on acid-free paper – one copy for SHPO, and one unbound and two bound copies that we will forward to the SCIAA. Digital versions on compact disk will not be necessary for either SHPO or SCIAA.

By standing written agreements with DHEC and SCDOT, we accept letter reports for intensive Cultural Resource Surveys performed for South Carolina Mining Act and South Carolina Department of Transportation projects when either no archaeological sites are identified or when only sites that are not eligible for the National Register are identified. Guidelines for South Carolina Mining Act survey letter reports are available at http://www.state.sc.us/scdah/hpmpsletreports.

3. National Register Eligibility Recommendations for Archaeological Resources

When making a negative or positive National Register eligibility recommendation for a resource at any level of investigation (Cultural Resource Reconnaissance, Cultural Resource Survey, Cultural Resource Evaluation), and regardless of whether a letter report is acceptable or a full report is necessary, please remember that a resource must be evaluated for eligibility in a context appropriate to that resource. So, when making National Register eligibility recommendations, we promote the use of contexts derived from relevant knowledge pertinent to the resources identified during a project, rather than use of lengthy, boilerplate, cultural narratives.

National Register Bulletin: Guidelines for Evaluating and Registering Archeological Properties (2000) provides guidance for addressing National Register eligibility in context. This publication is available at http://www.cr.nps.gov/nr/publications/bulletins or from our Office. We recommend reviewing this publication, in particular:

- pp. 20 22 Evaluating Properties in Context, especially The Importance of Small or Overlooked Sites:
- pp. 31 33 Important Information and Research Questions;
- pp. 35 42 Aspects, or Qualities of Integrity, especially pg. 36 "Significance + integrity = eligibility" and that assessment of significance precedes assessment of integrity. Also see pg. 38 for discussion concerning the eligibility of plowed sites.