CHAPTER 7:
IDENTIFICATION OF HISTORIC PROPERTIES:

PHASE I ARCHAEOLOGY SURVEY

Cultural Resource Review During The Preliminary Engineering Phase

As a project moves forward from the PDP Planning Phase into the PDP Preliminary Engineering Phase, more project engineering details will be developed for any feasible alternatives and initial environmental field studies may then begin to be performed on the identified alternative(s). The regulations implementing Section 106 require a "reasonable and good faith effort" to identify historic properties in the Area of Potential Effects (APE) in enough detail to permit evaluation of NRHP eligibility and to begin evaluation of the nature and extent of potential effects on historic properties.

Guidance on meeting the "reasonable and good faith identification standard" has been provided by the ACHP. The regulations note that a reasonable and good faith effort may consist of or include "background research, consultation, oral history interviews, sample field investigations, and field survey."

Based on the level of potential environmental impacts, as documented in the PIP prepared during the Planning Phase, and following delivery of the Section 106 Scoping Request Form (Section 106 SRF) to ODOT-OES, a decision will be made by the ODOT-OES cultural resources staff regarding the level of cultural resource analysis needed on a project (see Chapter 4 for more on the Section 106 SRF). The strategy and scope of work for Phase I field survey is based on the information from the secondary source review and the conditions observed during Planning Phase field review. ODOT-OES will use the secondary source review information provided as part of the Section 106 SRF to develop the Phase I survey scope of work. ODOT-OES may conduct research to enhance that information after receiving the Section 106 SRF from an ODOT District office.

The results of the secondary source records check, the observed field conditions, and the Section 106 SRF are all used to develop the archaeological cultural context for a project's APE. The field survey strategy provides expectations for the identification of new cultural resources within the project's APE and the means for evaluating the identified resources for NRHP eligibility.

The Phase I survey reports must present sufficient and pertinent contextual information to apply the National Register Criteria to the identified cultural resources. Since the cultural context is the foundation on which all understanding of archaeological properties is based and on which all NRHP eligibility evaluations are made, the information must be concise, succinct, focused and appropriate.

For the purposes of this manual, "historic context" is used in reference to history/architecture surveys, analyses, and reports in Chapter 5 and Appendix D. "Cultural context" is used in reference to archaeological surveys, analyses, and reports in this chapter and Appendix E. It should be understood that "historic context" is very broadly defined in the NRHP guidance to apply to both historic and prehistoric resources. However, because "cultural context" is very commonly used in archaeological studies and literature, this manual will use that terminology in reference to archaeological surveys, analyses, and reports. The general references to and understanding of "historic context" and its referenced NRHP guidelines will apply to all cultural resource studies on ODOT projects.
Secondary Source Review For Phase I Survey Reports

During the Identification of Historic Properties step in the Section 106 process, the purpose of the secondary source review is twofold:

1. to compile information on previously studied resources; and
2. to collect sufficient data to characterize and predict the types and locations of sites which might be present in the APE

The secondary source review information is used to develop a cultural context against which archaeological resources will be evaluated using the National Register Criteria. The secondary source review completed in the PDP Planning Phase and the PDP Preliminary Engineering Phase brings all pertinent resource data, a summary of known resources, and a determination if resources exist in the APE into this step of the Section 106 process. All of that information will be incorporated into the Phase I report.

The secondary source review for a Phase I report must focus on the APE but must cover a broad enough area to develop and support the cultural context. Development of the cultural context for the APE will initiate at this time and will be carried forward for further refinement in the Phase I survey report. The cultural context provides the base that supports the cultural resource survey, documentation, and evaluations that follow.

Without an accurate and pertinent cultural context, it is impossible to make informed decisions regarding resources in and adjacent to the APE. A quality cultural context will also make an unusual or difficult-to-categorize resource much easier to understand and evaluate. When finalized, this section of a Phase I report should embody the secondary source review data, including any additional secondary source review data, and the cultural context for the APE.

The secondary source review information will be documented on an Archaeology Secondary Source Review Table that is keyed to the Secondary Source Review Map (Figure 3, Appendix K). This table is a summary of known information for understanding site types, for development of research design and for development of predictive models (if necessary). It should be completed for projects having five or more identified resources in the APE/study area. For more information on the archaeology tables, see Appendix E.

Conducting the secondary source review for the Phase I survey will satisfy the requirement in 36 CFR Section 800.4(a)(2) of reviewing existing information to help identify historic properties (i.e., those included in or eligible for inclusion in the NRHP) in the project's APE. This review for Phase I survey (in combining the records check data and the cultural context) is critical in the development of the survey research design. It will help determine the level of effort needed in the Phase I field survey to identify historic properties in the APE.

Developing Cultural Context and Assessing Potential For Effects On Archaeological Resources

In reference to the NRHP program, cultural context studies include three elements:

- Themes, trends, and patterns of history and prehistory.
- Description of current landscape, modern land use, and modern development.
- Environmental context (natural conditions, physiography, geography, topography, geology, etc.).

Researchers should identify the significant themes, events, subjects, or patterns in history and prehistory associated with the project APE. The cultural context should address the current setting by discussing the history of modern land use in the APE, the nature of current land use patterns,
and the types of disturbances or intrusions that may negatively impact archaeological sites found in the APE. The environmental context summarizes the natural conditions and the types of physiographic elements that are present. This information is useful for anticipating the types of cultural resources that may be present.

Cultural contexts should be concise summaries and be clear on why the context is relevant to the project APE. The cultural context should be clear on the chronological periods or time frames within which the identified themes, trends and patterns of history and prehistory are significant in an APE. The cultural context defines the types of resources that may be found in the APE or identifies the range of resources on any physiographic feature or region that may be present.

Multiple cultural contexts can apply to each project’s APE. In many cases, cultural contexts applicable to a project’s APE already exist in the literature and should be referenced or adapted to the specific project APE. Cultural contexts range from general to specific patterns, themes, or trends in history and prehistory, as well as range in applicability from national to local levels. Refer to the ODOT-OES Cultural Resource Section 106 Toolkit for regional and statewide context studies.

The NRHP emphasizes the importance of the development of contextual studies for planning, identification, evaluation, registration, and treatment of historic properties. The NRHP directs that contexts must identify the specific physical characteristics that each property type in an APE must possess (and the integrity that must be present) in order to be considered eligible for the NRHP. The cultural context for archaeology should address the National Register Criteria that apply to the themes, trends, and patterns of history and prehistory associated with site types in an APE.

Investigators should integrate the cultural context for a project into all summaries and discussions of significance. Previously recorded sites and previous decisions regarding eligibility should be evaluated against the context, and recommendations should be justified in narrative text by referring to all available data. To organize discussions, sites may be addressed by placing them within a particular (and valid) theme or themes. Archaeological sites should be identified within and relative to the cultural context developed for the project. Then sites may be appropriately evaluated within their contextual theme.

Development of cultural context will be based on the secondary source review information compiled for a project and must be appropriate for the project’s scope and APE. ODOT-OES is not requiring a cultural context to be developed on every project. It will be required on all projects being scoped for Phase I archaeology surveys in the PDP Preliminary Engineering and Environmental Engineering Phases. Development of cultural contexts is not required for projects during the PDP Planning phase.

Considerable information on how to develop contextual studies is available in the various NRHP publications that are available online at http://www.nps.gov/nr/publications/index.htm. However, the following statement from the NRHP very clearly states ODOT's position on the necessity of historic context development:

“The significance of a historic property can be judged and explained only when it is evaluated within its historic context. Historic contexts are those patterns or trends in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within history or prehistory is made clear” (National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation).

Also refer to the NRHP White Paper “The Components of a Historic Context”, for guidelines on the organization and components of a historic context summary.
Research Design

The research design is based on the records check and the cultural context. The research design outlines the objectives of the survey methods used, and expected results of the survey. Any deviations from approved typical investigative methods should be discussed with ODOT-OES prior to their implementation, and any deviations from the research design need to be explained and fully supported in the report. The development of archaeological research questions, beyond those that assist in meeting the goals of the Phase I Archaeology Survey, should be reserved for discussing why a Phase II Archaeology Survey is recommended or related to why a site is considered eligible.

Predictive Modeling for Archaeological Survey

Secondary source review documentation is provided in Phase I survey reports to guide and direct archaeological research design and field investigations. A variety of data treatments including background research, the development of hypotheses, and various other overviews, like predictive modeling, should be prepared in order to characterize a project area. ODOT requests that an appropriate level of field investigation be employed to collect data at a sufficient level in order to make cost effective cultural resource management decisions. Modeling strategies are recommended to reduce the amount of redundant information once significant resource types are identified and once accurate patterns of land use can be presented.

ODOT-OES has advocated the development and use of predictive modeling in Phase I archaeological reports and has included three models on its website for reference. Such models can improve our understanding of why certain kinds of archaeological sites occur in association with particular environmental conditions and to use this information to identify and help evaluate the NRHP eligibility of sites. Models can be used hypothetically during the Environmental Engineering Phase to predict possible involvement with archaeological resources. Models should be designed to discuss the known positions of archaeological resources on the landscape. Models should also be theme oriented or consider both site types and temporal data in addition to summarizing site placement. Models should be designed as an aid in prescribing the types of field techniques which should be employed across various habitats or on specific site types once they are found.

As a result, use of models may help determine that certain areas will not require intensive field investigation in order to:

1) document the particular environmental setting or the accuracy of the published environmental data;
2) locate environmental features that may have been the focus of aboriginal use; and
3) document historic archaeological resources (e.g., abandoned farmsteads or destroyed houses) as defined via the secondary source review.

Modeling can be used to demonstrate the need for more intensive field investigations across certain portions of landscape where a range of site types are common, where a more robust site type is found, or where particular unique site types have been reported. Modeling approaches help to eliminate redundant field investigations, build field strategies which compliment earlier investigations, and provide complimentary data to better interpret early findings. If an existing model is used, or if a new one is developed and used, the results of, and justification for, such use should be clearly discussed in the survey report in both narrative text and summarized in a table.
Phase I Archaeology Survey

The purpose of the archaeological survey is:

- to locate both previously identified and unidentified archaeological sites in the APE associated with the cultural context;
- to identify the characteristics which the sites must possess to be eligible based on cultural context;
- to identify whether the sites retain sufficient integrity to be representative of the cultural context;
- to determine if any sites require additional evaluation to determine significance; and
- to determine if any sites are affected by the project.

For projects in PDP Paths 2, 3, 4, and 5, Phase I Archaeology Survey is usually conducted in the area within the APE of the preferred alternative in the PDP Environmental Engineering Phase. This work will likely occur within the construction limits of the preferred alternative. The area surveyed, survey methods, and deliverables may vary depending on the scope of the project. For descriptions of survey sampling methods, refer to Archaeology Guidelines (OHPO 1994). In the PDP Process, it is a project management decision on the timing of the need for the results of Phase I survey.

Project managers should keep in mind that the winter months are typically not the best time of year to schedule archaeological fieldwork. The peak months of the crop growing season are also not optimal for archaeological fieldwork. However, monitoring field/crop conditions can be easily done so that the fieldwork can be done with minimal impact to project schedules.

Whenever questions arise over whether specific cultural resources need to be identified and recorded, or what information is appropriate for evaluating specific cultural resources, the Project Manager should request that the District Environmental Coordinator submit a Section 106 Scoping Request to ODOT-OES for scoping guidance (refer to Chapter 4). ODOT-OES may informally consult with the OHPO and the cultural resources consultant (if appropriate) in order to address questions and concerns about the resources.

Prior to conducting the Phase I field survey, the cultural context, results of secondary source review, and data from historic maps should be considered and incorporated into the Phase I survey report. The survey report should include a physical description of each property fifty years of age or older identified during the Phase I survey, locational information, background information on each property if available (i.e., historic atlas, 15’ USGS map, fire insurance maps, aerial map, county histories, etc.), and discuss the level of integrity of the properties relative to the cultural context.

On December 20, 2012, Ohio Governor John Kasich signed House Bill 458 into law. The bill contains language that revises Ohio’s current damage prevention law (ORC 3781.25-32 and 153.64). The new legislation, which became effective March 27, 2013, is designed to increase public safety by enhancing communications and cooperation amongst stakeholders.

By law, everyone MUST contact the Ohio Utilities Protection Service, 8-1-1 or 1-800-362-2764, at least 48 hours but no more than 10 working days (excluding weekends and legal holidays) before beginning ANY digging project. Please refer to www.oups.org for more information.

The survey methods employed during the Phase I Archaeological Survey will be documented and summarized in a Phase I Archaeology Survey Methods Table keyed to a Phase I Archaeology Survey Methods Map (Figure 9, Appendix K). The results of the Phase I Archaeology Survey will be documented and summarized in a Phase I Archaeology Resource Table and keyed to a Phase I Archaeology Survey Map (Figure 10, Appendix K). Cultural materials observed during the survey will be documented by provenience in a Cultural Materials Provenience Table. The Historic Buildings Citation Table will be used to document and organize the presence or absence of buildings shown on various historic maps and those results will be keyed to a Phase I Archaeology
Survey Map along with all other resources located and documented in the field (Figure 10, Appendix K).

All data recorded on tables must be analytically discussed in the report text as it relates to the historic/cultural context and NRHP significance of the identified archaeological resources. For more information on the archaeology tables, see Appendix E.

Use of a Phase I Archaeology Resource Table is optional for projects with five properties or less to investigate. This table has its greatest utility as an organizational tool on projects with large numbers of sites in the APE. It may be used on any project, but should be used on all projects that have quantities of data to organize. Contact ODOT-OES if there are questions/concerns about using the table.

The tables in this manual are tools to identify patterns and organize data. They are NOT meant to stand alone in a report; the investigator must discuss properties, results and conclusions in the report text, based on the context, photographs and data on the tables. The tables may be modified as needed to accommodate a project and the data being collected and analyzed.

Repetitiously occurring site types and their context should be summarized collectively and analyzed in the survey report. If recommendations are made for further work on specific sites, the recommendations must clearly state what information is needed to fully evaluate the site(s). Ohio Archaeological Inventory (OAI) designations must be included in the Phase I report as identifiers. The recommendations should include scoping information in the form of survey strategy to acquire the necessary field data, as well as an estimate of the cost and time needed. ODOT-OES (in consultation with OHPO if necessary) will make the final determination on which archaeological properties require further investigation to establish eligibility.

Investigators preparing Phase I survey reports must summarize the available information regarding the qualities and characteristics of the identified archaeological sites relative to the secondary source review and the cultural context. The Phase I survey should evaluate each resource using the NRHP criteria of eligibility to determine whether the identified sites can be considered eligible for the NRHP. If a site is recommended eligible for the NRHP, the survey report must identify the contributing characteristics of the property, recommend the appropriate boundary based on the property’s significance, and discuss any contributing and non-contributing components within the boundaries. The reports should be concluded with appropriate NRHP eligibility recommendations and/or justification for the need for additional Phase II investigation to determine NRHP eligibility. It is expected that the investigator will follow all applicable ODOT, OHPO, and NRHP guidelines and requirements when evaluating properties.

ODOT-OES and the OHPO will comment on the NRHP boundary recommendation and revisions will be requested if needed. ODOT needs historic boundaries for determination of effect and in the evaluation of use under Section 4(f). It should not be assumed that boundary determination is always a Phase II survey task. This is not a common occurrence for archaeological sites.

If recommendations are made for further work on specific sites (i.e., Phase II survey), the recommendations must clearly state what information is needed to fully evaluate the sites. The recommendations should include scoping information in the form of survey strategy to acquire the necessary field data, as well as an estimate of the cost and time needed. ODOT-OES, in consultation with OHPO, will make the final determination on which archaeological sites require further investigation to establish eligibility.

Sites recommended for Phase II investigation and sites not considered eligible must all be discussed in the text of the Phase I Survey report. Further work cannot be recommended if that work should have been included in the Phase I as a standard component of Phase I surveys. Since determination of a project’s effect on historic properties is an agency responsibility under 36 CFR Part 800, no Phase I survey report should ever discuss effect in any manner. ODOT-OES, on
behalf of FHWA and in consultation with OHPO, will make the effect determination on all projects. This will be documented in an Inter-Office Communication (IOC) addressed to the ODOT District office or in a formal consultation letter between ODOT and OHPO.

Depending entirely on project conditions, ODOT-OES and OHPO may at times agree to advance a project directly to Phase II survey or may decide to combine Phase I and Phase II level work. ODOT-OES and OHPO may consider situations where additional Phase I work may be done in order to advance a project without going to Phase II level work.

In addition, a Phase I history/architecture survey and a Phase I archaeological survey may be combined into a Phase I Cultural Resources Survey report on certain projects. That is a project management decision which will be based on a project’s schedule and other issues. As such, and because the Phase I surveys typically occur at different times under the PDP, this decision to combine into a single Phase I survey report should be made early in the Planning Phase (and in consultation with the ODOT-OES cultural resource staff) so that the work can be scoped and scheduled properly.

If, during a Phase I survey, a cultural resource consultant thinks they can determine NRHP eligibility (or non-eligibility) by performing some extra work on a property or properties, they should always first confer with the ODOT District and the prime consultant. After that, the cultural resource consultant should consult with ODOT-OES, which will bring OHPO into the conversation. Any such decisions will be made in consultation with project sponsors and the project management team before implementation in the field due to the possible impact to the project schedule, budget, and contract(s). ODOT-OES encourages this approach whenever appropriate if approved as a result of these consultations.

ODOT-OES is available for consultation if there is a question about an archaeological site or field research methodology. ODOT-OES can also bring in OHPO at any time for consultation on such issues.

An individual that has been prequalified by ODOT to conduct archaeological surveys must direct the Phase I Archaeology Survey.

Refer to Appendix E for archaeology report guidelines.

No Collection Strategy

It is ODOT’s intent to establish a practice of non-collection on Phase I archaeological surveys. It is understood that such a standard practice cannot be employed on all ODOT projects as an ‘industry standard.’ However, it is ODOT’s intent to determine when such a practice can be employed as a standard on Phase I surveys. It is generally agreed that there are certainly project situations where ODOT staff, the OHPO and the consultant community can employ no collection strategies effectively.

A number of these potential scenarios exist, including, but not limited to, the following:

- Projects with recurring low density lithic scatters confined to the plow zone – sites that would not be considered eligible for the NRHP for any reason.
- A determination in the field (between ODOT-OES, OHPO, and the investigators) that a site would need to proceed to Phase II evaluation and collection of artifacts could be deferred.
- Instances when artifacts are identified in disturbed contexts where no integrity remains that would support site eligibility for the NRHP.

Given the variety of situations in which a no collection strategy may be applicable, the determination to follow such a strategy could be considered as early as the scoping phase or as a result of the
archaeological Principal Investigator contacting ODOT-OES to suggest the strategy because of field observations. This latter situation would require consultation among ODOT-OES, the OHPO, project management and the project sponsor prior to implementation.

At this time, ODOT-OES has not yet developed a set of standard guidelines for the use of a no collection strategy. It is our intent to develop these guidelines as we conduct a series of pilot projects and work through the process with OHPO and our consultants working on ODOT projects. This way, our guidelines will be based on real project situations. Once this guidance has been developed, this manual will be updated and the guidance will be posted to the Section 106 Toolkit.

**Treatment of Human Remains**

Historic and prehistoric human remains are subject to protection under [ORC Section 2909.05](#) and [ORC Section 2927.11](#). As such, if previously unidentified human remains are discovered during survey, work in that portion of the survey will stop immediately. The remains will be covered and/or protected in place in such a way that minimizes further exposure of and damage to the remains.

The person in charge in the field (i.e., the Principal Investigator, Project Director, or Field Director) will immediately contact the ODOT-OES Cultural Resources Section and the ODOT District Environmental Coordinator. ODOT staff will notify local law enforcement and/or the County Coroner and FHWA. If the project has a US Army Corps of Engineers (USACOE) permit issued, the ODOT District Environmental Coordinator must notify the ODOT-OES Permits Section and the USACOE. ODOT-OES cultural resource staff will notify OHPO.

If the remains are found to be Native American Indian, a treatment plan will be developed by ODOT-OES and OHPO in consultation with FHWA and appropriate federally recognized Native American Indian tribes. FHWA and ODOT-OES will ensure that any treatment and reburial plan is fully implemented. If the remains are not Native American Indian, the appropriate local authority will be consulted to determine final disposition of the remains. Avoidance and preservation in place is the preferred option for treating human remains.

For Native American Indian human remains discovered on federal lands, the federal land managing agency will be responsible for consultation under the Native American Graves Protection and Repatriation Act of 1990 (PL 101-601). For skeletal remains discovered on property owned by the State of Ohio, ODOT will comply with Section 149.53 of the ORC. Under this section, the Director of the Ohio Historical Society shall determine final disposition of any discovered skeletal remains.

**Phase I Archaeology Survey Overview:**

**Level of Work:**
- Phase I Archaeological Survey (36 CFR Section 800.4(b) Identification of Historic Properties),

**Area of Work:**
- For PDP Path 2-5 Projects: Area within the APE of the preferred alternative recommended for Phase I survey (generally the footprint or direct impact area of the project).

**Survey Objectives:**
- Account for all sites in APE previously listed or found eligible for the NRHP.
- Account for previously surveyed areas.
- Identification of sites for avoidance consideration such as prehistoric or historic period burial sites.
- Discuss site formation processes.
- Collect sufficient data for development of cultural context.
- Identify archaeological resources within the APE and document their specific cultural contexts.
- Determine the eligibility of each archaeological resource for the NRHP.
- Discuss eligibility/non-eligibility of all sites.
- Discuss eligibility/non-eligibility repetitiously occurring sites as a group.
- Recommend archaeological resources that require additional investigation in a Phase II survey to evaluate their NRHP eligibility with supporting explanation and expected results.
- Summarize and refine the cultural context developed during the secondary source review.

Survey Methods:
- Refer to *Archaeology Guidelines* (OHPO 1994) for general field methods.
- Develop research design and clearly discuss and justify field methods in the text.
- Conduct a visual inspection of the APE to identify areas of disturbance and potential archaeological resources, and to aid in developing appropriate surface and subsurface sampling strategies.
- Photographs should provide sufficient information about resources being investigated. Refer to Appendix C and Appendix E.
- Determine and document areas of disturbance and areas of negative information.
- Conduct surface collection in interval transects in areas where the ground surface has been actively cultivated and visibility is greater than 50 percent
- Conduct surface collection, subsurface testing or other survey methods so that artifact and feature distribution data are tied to an established datum that can be referenced to project plans.
- Use Global Positioning Systems (GPS) devices meeting ODOT’s accuracy requirements during all Phase I field investigations to provide UTM coordinates for all field datums and site boundaries (NOTE: ODOT requires a GPS unit with GIS data collection capability and that is accurate within 1 meter).
- Survey according to existing predictive model or develop a research design in consultation with ODOT (Researchers may use the ODOT-OES predictive models).
- Consult with ODOT-OES prior to conducting any geophysical survey.
- Consult with ODOT-OES prior to conducting any geomorphological survey.
- Consult with ODOT-OES prior to changing field methodology due to field observation/conditions.
- Conduct deep testing to identify sites in areas of alluvium or colluvium that cannot be reasonably investigated by other excavation methods only after consultation with ODOT-OES.
- Never conduct Phase I fieldwork on NRHP listed properties without first discussing field strategy with ODOT-OES; ODOT-OES will bring OHPO into the conversation.

Deliverables:
- Phase I Archaeological Survey Report that meets ODOT and OHPO guidelines (which includes secondary source review/cultural context) with recommendations for or against eligibility and/or further work as appropriate; (project manager and DEC should reference the abstract and the summary and conclusions sections of this report for the archaeological site information in project APE); refer to Appendix E for report guidelines.

ODOT/Project Sponsor Responsibilities:
- ODOT District or the project sponsor will send property owner notification letter (and copy head of archaeological survey) at least 48 hours before field work is conducted.
- ODOT District ODOT or the project sponsor will provide project maps (e.g., electronic files, GIS shapefiles, waypoints, etc.) for recording site locations, survey methods and photograph key.
- ODOT-OES will provide comments on the NRHP eligibility of sites if needed prior to report submission.
- ODOT-OES and District will review report.
- ODOT-OES and District will provide recommendation/scope for next phase of cultural resource work.
- ODOT/FHWA will conduct all necessary tribal consultation.
- ODOT-OES will conduct all agency coordination and make all determinations of effect in consultation materials.

**When to Prepare OAI Forms**

Archaeological resources are electronically recorded through the OHPO’s on-line website on an Ohio Archaeological Inventory form. These forms constitute the searchable database used during the cultural resources records check for early decision making in the PDP planning phase. Consequently, their timely completion or revision is imperative in order to provide the most up-to-date and accurate preliminary information on known cultural resources in a project’s APE and for use in historic/cultural context development.

Inventory forms are subject to change and revisions are expected with the generation of new information about inventoried resources. ODOT expects completion of and submission of new or revised forms to OHPO via the online IForm application when the final survey reports (in electronic format) are submitted to ODOT. The OHPO website maintains a reserve pool of all inventory forms assigned to ODOT projects, which tracks the completion, submission and approval of those forms. Completed forms are not to be appended to the reports submitted to ODOT.

Both ODOT-OES and OHPO staff will jointly monitor OAI forms in the IForm system as part of the report review process. Inventory forms will have to be submitted to OHPO via the IForm application when final survey reports are submitted to ODOT.

All archaeological resources listed on the Phase I Archaeological Resource Table will require the completion of either an Isolated Archaeological Find form or the most current OAI form. Forms are designed to address recovered archaeological assemblages. As a result, many types of observed physical remains will need to be recorded (isolated finds, lithic scatters, etc.) within the impact area. They should also be used to systematically denote other forms of evidence related to past human behavior either reported to a field investigator or identified through secondary source review (i.e. prehistoric campsites, historic refuse scatters, early historic-era residential site, etc.).

Field investigation may result in the identification of potentially significant resources (i.e. burial mounds, earthworks, village sites, etc.) on adjoining land parcels. Any identified historically significant archaeological sites should be inventoried if the position of the resource might factor into the decision making process or in the selection of a design alternative. Inventory forms can be used to document sites that are directly related to human activity (i.e. mound construction, the establishment of a late agricultural village, remains documenting the use and development of a residential camp site) or used to summarize more indirect expressions of activity or the findings of archaeological inquiry performed across a more arbitrary area (i.e. the documentation of isolated prehistoric finds or lithic scatters randomly deposited across a broad area). A more detailed definition of site types and how to properly complete the OAI form is discussed in the OHPO Ohio Archaeological Inventory Form Instruction Manual (2007).

Section 106 and 36 CFR Part 800 do not require inventory of all evidence of human behavior but only to take the necessary steps to identify historic properties found within the project APE. Considering the potential for sites to include a wide variety of archaeological remains with varying densities and distribution patterns, as well as varying degrees of disturbed archaeological contexts, ODOT recognizes a level of acceptable loss. Even the most intensive sampling strategy will fail to identify all archaeological remains of past human activities in the project APE. For example, prehistoric and historic resources are commonly identified as scatters in plowed fields. The sampling strategy must be of sufficient intensity to recover plow zone assemblages which identify and represent patterns of past human activities.

Certain types of archaeological resources do not require the completion of an OAI form since they do not meet minimal standards for consideration as an historic property. For instance, mid to late 20th century surface artifacts, scatters, and isolated finds that are not associated with a NRHP
eligible or listed property should be considered modern trash and not collected, processed, or inventoried. However, they should be briefly discussed and the report can state they were not collected or reported as a site. A generalized list of the modern cultural materials expected to be found includes, but is not limited to:

- Modern machine-made glass: i.e. refreshment bottle glass, plate glass and automotive glass
- Modern alloy metal: i.e. bottle caps, tin foil, auto parts
- Rubber, plastic, coal, cinders, modern machine-made bricks
- Identifiable 20th century ceramic fragments
- Machine extruded drainage tile
- Modern electronic appliances: i.e. TV's, radios, washers, refrigerators, coffee makers, toasters, microwave ovens, etc.
- Modern abandoned cars, car parts and farm equipment.

Additionally, OAI forms are not required on the following:

- Modern structural remnants;
- Modern refuse deposits; and
- Assemblages from around continuously occupied residential and commercial buildings from the late 19th century through the end of the 20th century.

These resources can be better documented through historic research and some may require the completion of an OHI form. Other assemblage types are also considered non-significant and do not require an inventory or other in-depth treatment if the density and/or combination of particular artifacts does not suggest a function beyond modern farming practices (for instance, field drainage tile), road litter and/or modern refuse. Such interpretations are based on the association and correlation with an existing road and/or nearby mid-twentieth century structures. Artifacts from disturbed or re-deposited soils context should also not be collected and inventoried. However, they should be briefly discussed as found in disturbed context and the report can state they were not collected or reported as a site.

Those assemblages which appear to relate to a site abandoned or destroyed before the second quarter of the 20th century and not associated with an OHI documented standing structure would require further archaeological research and the preparation of an inventory form. Unique components found below levels of modern disturbance will require the completion of an inventory form.

Refer to Appendix F for guidance on artifact collection from private property, return of artifacts to property owners, and curation of artifacts.

Standing ruins and exposed structural features (canal elements, Iron furnaces, etc.) where architectural details can be examined are best inventoried on OHI forms. On the other hand, foundations examined and defined through traditional archaeological excavation measures are best recorded on OAI forms. Remnant structures (e.g. bridge abutments, brick streets, etc.) and objects (e.g. signs, etc.) should not be recorded on an OAI form unless they are a contributing element providing more perspective of a broader identified archaeological site. In such instances, they should be included and described as contributing elements on the OAI form for the larger site.

References:
Ohio Historic Preservation Office