

Hello Mark,

Having refreshed myself on Flagstaff's Heritage Preservation code, I believe there are some steps we should consider before moving to a large-scale archaeological monitoring effort that could potentially be prohibitively expensive for the proposed project. We recommend an initial identification effort to determine if the five isolated occurrences (IOs) represent a significant resource that we are not seeing on the surface. Our current findings do not meet the necessary SHPO or NPS guidance mentioned in the City code, which are reserved primarily for significant findings such as archaeological sites that could be eligible for listing on the city, state, or national register. Since Flagstaff does define what they consider to be a site, I consulted our state (ASM) guidelines, which I attached. There are several categories but for artifacts, a scatter becomes a site once 30+ artifacts of the same type or 20+ artifacts of different classes are found within a 15 m diameter area (page 2 of ASM manual).

The IOs recorded during our survey consist of six prehistoric ceramics within one meter area and one sherd and one informal flaked tool within one meter. Since the IOs recorded during our survey do not meet site criteria, identification testing as defined by the AZ SHPO, seems to be the appropriate next step in the process if one is desired. According to SHPO Guidance point 2 (attached), identification testing can be used to determine site boundaries or to identify if resources are a site when the geomorphic context is deep and subsurface features are highly possible (page 2 SHPO Guidance). These IOs, could fall into the latter category as there is visible soil depth in this area. SHPO recommends very limited testing using shovel tests and or augers (page 3 SHPO Guidance). During this testing we would be looking for intact subsurface features that would help us make further recommendations. Additional artifacts would not necessarily increase the significance of the IOs but would be noted. Since identification testing does not require a formal work plan or consultation with SHPO, we recommend shovel testing every 5 m in cardinal directions from the IOs within a 50 ft buffer of the IOs. This would equal approximately 12 shovel tests around each IO.

During this identification testing, 50 cm by 50 cm shovel test units would be excavated and all soil would be screened through ¼ in screen. Each test unit would be excavated to 50 cm below modern ground surface or to culturally sterile soil, whichever comes first. Once the shovel test is fully excavated, the side wall will be cleaned up and inspected for intact subsurface features. No artifacts or samples would be collected from test units or the surface. Any observed artifacts would be noted and recorded but placed back into the shovel test hole. If features are identified, they will be described, photographed, and geospatial data will be recorded. This data will be written up in a short report and submitted to you and the HPC for review and consultation on further steps, if features are encountered. Please let me know your thoughts and we can schedule a follow up conversation if necessary.

Regards,

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