



Consultant Usage for NCDOT Archaeological Investigations



The Programmatic Agreements (2000 – Section 106 for all Federal-Aid Projects and 2015 – Section 106 for Minor Transportation Projects) that we have in place between the HPO, OSA, FHWA and the USFS require NCDOT Archaeology staff to assume the Office of State Archaeology (OSA) role for oversight over specific steps in both the Section 106 process and relevant state statutes regarding archaeological sites and cemeteries in North Carolina.

1. Screening
2. Eligibility Determinations (with OSA review for eligible sites)
3. Effects Assessments (with OSA consultation)
4. Adverse Effects Documentation
5. Agreement Documents (MOA and Data Recovery plans)

Prior to submitting any projects for review by NCDOT's Archaeology (or Historic Architecture) Teams as outlined above Division staff, Central Project staff, or their consultants will review the proposed project scope and study area to determine if the project is exempt from further review by consulting the exemption list defined in Appendix B of the PA.

- Projects, which are certified as meeting the conditions and are exempt from further review, must be documented by the NCDOT project manager using the Programmatic Agreement Screening Checklist (Checklist) located in Appendix C of the PA.
- The Checklist shall be completed for every exempted project or, in some cases, for a batch of similar exempted projects.
- A copy of the signed checklist document will be placed in the project file and will be distributed to the parties of the PA, upon request.
- All other projects shall be submitted for review.

Typically we use one of our EAU on-call firms to undertake archaeological investigations after we have screened the project and determined that further work is required. We also use firms to complete some of the mitigation requirements/stipulations outlined in agreement documents. Depending on the projects location specialized field methods and artifact analysis may be required.

Archaeologists in our on-call firms meet the qualifications possessed by our in-house staff (Arch II). That is, they meet the Secretary of the Interior's standards for Archaeologist and must have experience conducting archaeological investigations in the Southeastern United States. They have Section 106 training as well as having specialized training as needed by NCDOT's Archaeology Team. An example of specialized training is our recurring lithic workshop that firms that work in the Piedmont must complete in order to work in that region.

In addition to feedback given on their draft documents, the consulting firms are also given a consultant review form with a full review of the process and deliverables promptly after completion of the scope of work. For most archaeological investigations this requires the Office of State Archaeology's full acceptance of all artifacts collected from a project.

Process for Archaeology Team Turn-Key Projects

Project submitted to ETRACS

- Assigned to NCDOT Archaeologist for review.
- NCDOT Archaeologist provides one of two forms to submitter; 1) No Survey, or 2) Survey Required.

If “Survey Required”:

- NCDOT archaeologist submits Scope of Work (SOW) to Archaeology Supervisor that may cover multiple projects.
- Supervisor assigns to on-call consultants based on workload and complexity of project and negotiates estimate with consultant.
- NTP issued by EAU administration.
- Consultant coordinates directly with NCDOT’s Archaeology Team on deliverables and schedule.
- NCDOT archaeology staff provide comments on draft reports, site forms and geo-spatial data.
- NCDOT archaeology staff accepts final deliverables.
- NCDOT Archaeologist prepares PA forms and sends to submitter; 1) No NRHP Eligible Properties Present, 2) No NRHP Properties Affected or 3) Archaeological Adverse Effect Form*.
- All projects where NRHP eligible sites are present but not effected must be forwarded by NCDOT Archaeology Team to OSA for review and comment.
- For projects where an adverse effect will occur NCDOT archaeologist and Archaeology Supervisor coordinate with the project submitter and consulting parties and prepares three documents; 1) Finding of Adverse Effects, 2) Draft MOA, 3) Final MOA.
- NCDOT Archaeology Supervisor may assign mitigation requirements/stipulations outlined in MOA to on-call consulting firm for completion. This often involves large-scale excavations after Right of Way acquisition and before construction.
- Artifacts are accepted for curation.
- NCDOT archaeologist prepares consultant review form.

*If an Adverse Effect Determination form is completed, this project is removed from the Programmatic Agreement and reverts to the “normal” Section 106 process.

Process for Usage of Division/Central Firms

Project submitted to ETRACS either by Division/Central staff or consultants

- Assigned to NCDOT archaeologist for review by Archaeology Supervisor
- NCDOT archaeologist provides one of two forms to submitter; 1) No Survey, or 2) Survey Required

If “Survey Required”:

- NCDOT Archaeology Team generates a SOW for Division if requested.
- Archaeology Supervisor provides SOW to Division/Central and discusses SOW requirements.
- Costs negotiated between Division/Central and Consultant with input from Archaeology Team if requested.
- NTP issued by Division/Central.
- Consultant coordinates directly with Division/Central on schedules for field investigations and report/site forms and other deliverables as applicable.
- Upon completion, Division/Central provides draft deliverables to NCDOT Archaeology Supervisor/NCDOT Archaeologist.
- NCDOT archaeology staff provides comments on draft reports and other deliverables to Division/Central.
- Division/Central ensures comments are addressed and provides final deliverables to NCDOT Archaeology Supervisor.
- NCDOT Archaeologist prepares PA forms as appropriate and sends one of the following to Division/Central; 1) No NRHP Eligible Properties Present, 2) No NRHP Properties Affected or 3) Archaeological Adverse Effect Form*.

- All projects where NRHP eligible sites are present but not effected must be forwarded by NCDOT Archaeology Team to OSA for review and comment.
- For projects where an adverse effect will occur NCDOT Archaeologist and Archaeology Supervisor coordinate with Division/Central, Consultant and consulting parties and prepares three sequential documents; 1) Finding of Adverse Effects, 2) Draft MOA, 3) Final MOA.
- NCDOT Division/Central may assign mitigation requirements/stipulations outlined in MOA to on-call consulting firm for completion. This often involves large scale excavations after Right of Way acquisition and before construction.
- Division/Central Consultant arranges for artifact curation through the Archaeology Team.

*If an Adverse Effect Determination form is completed, this project is removed from the Programmatic Agreement and reverts to the "normal" Section 106 process.