MONITORING GUIDELINES

The State Historic Preservation Office (SHPO) occasionally recommends that an undertaking subject to Section 106 review be archaeologically monitored. Monitoring involves the on-site presence of an archaeologist when ground is being disturbed, who watches for cultural resources to be unearthed. The archaeologist must be authorized to stop construction if potentially significant cultural remains are encountered. The archaeologist should then consult with the lead agency and the SHPO to determine if the resource is significant and what further actions need to be taken. An archaeological monitor must meet the Secretary of the Interior’s Standards for an Archaeologist (36CFR§61, Appendix A).

Situations when monitoring may be appropriate:
1. Project is within a known archaeological or historic site or an area that has a high potential for cultural or human remains.
2. Cultural remains are suspected to be present below pavement or covered by thick overburden and difficult to discover through the usual methods of archaeological survey and testing.
3. An archaeological survey is not feasible due to time constraints, an emergency situation, or logistical difficulties in accessing the project area.

Disadvantages of monitoring over archaeological survey and testing:
1. If cultural resources are found during an archaeological survey, it may be possible to adjust the project footprint to avoid or minimize adverse effects. The options for project adjustment are more limited and difficult once construction has begun.
2. Putting the construction crew and heavy equipment on hold while cultural or human remains are being investigated can be expensive.
3. The archaeologist is under more pressure to rush documentation and excavation of cultural features during monitoring, increasing the chances of mistakes or omissions of data.

If the undertaking is likely to impact a site eligible for listing in the National Register of Historic Places, a formal monitoring plan should be negotiated by the lead agency and the SHPO.

Formal monitoring plans should address:
1. Identification of areas within the project that are archaeologically sensitive and need to be monitored.
2. The types of cultural materials expected. What would be considered a significant find?
3. Coordination procedures between the construction crew and archaeologist regarding work schedules.
4. Protocol for when cultural remains are encountered.
5. Protocol for when human remains are encountered.
6. Artifact curation agreement.
7. Timing and submission of a monitoring report.
If the potential for impacting a site eligible for listing in the National Register is moderate or unknown, then a formal monitoring plan may not be necessary. In this case, the general guidelines listed below should be followed:

**General monitoring guidelines:**

1. If cultural resources are encountered:
   a. Halt any construction work that may impact the cultural remains. May be able to re-direct construction activities to another area.
   b. Consult with lead agency and SHPO regarding the significance of the discoveries and further action to be taken.
   c. Follow agency and SHPO recommendations regarding documentation and data recovery of the material.

2. If human remains are encountered:
   a. Halt any construction work that may impact the human remains. May be able to re-direct construction activities to another area.
   b. Contact the Alaska State Troopers, lead agency, SHPO, and local officials.
   c. May need to have remains analyzed by a physical anthropologist to determine ethnicity.
   d. If human remains are Alaska Native and on federal land, then follow NAGPRA procedures. Otherwise, follow recommendations of local officials and/or descendants regarding reburial or other actions.

3. Artifacts and other materials must be curated at an accredited facility if the project is federally funded.

4. A color copy of the monitoring report must be submitted to the lead agency and forwarded to the SHPO whether or not cultural remains are encountered. The report should contain the following:
   a. Narrative description of the monitoring.
   b. Description of any cultural remains encountered.
   c. Completed or updated Alaska Heritage Resources Survey (AHRS) forms.
   d. Evaluation of sites for eligibility for listing in the National Register of Historic Places.
   e. Assessment of effect of the project on eligible sites.
   f. Map(s) of the project area indicating which areas were monitored and locations of sites and cultural features.
   g. Photographs (dated and labeled).

5. Professional Qualifications:
   a. Monitoring must be done by, or under the direct supervision of, a person or persons meeting the professional qualifications for an Archaeologist listed in the Secretary of the Interior’s Professional Qualification Standards (36 CFR § 61, Appendix A).
   b. The supervising archaeologist must be present at the job site for the duration of the monitoring program.

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1 At minimum, the monitor must have a Master’s degree in Archaeology or related field plus field experience in geographic area (i.e. Alaska or northwest United States).