



Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

Memorandum

IDOT-ISAS Borrow Area Archaeological Review Process (4-17-15)

1. Construction Contractor submits Borrow Request (IDOT form #2289 “Cultural & Natural Resources Review for Borrow Areas” and associated documents - maps, ground-level photos, and landowner access agreement) to IDOT District Resident Engineer.
2. IDOT Resident Engineer or District Environmental Coordinator submits Borrow Request to IDOT Cultural Resources Unit (Kris McConkey), who reviews submission for completeness.
3. IDOT Chief Archaeologist (Brad Koldehoff) and ISAS Compliance Archaeologist (Claire Dappert) review submittal and determine if the proposed borrow area requires an archaeological survey.
4. If no survey is required, proposed borrow area is cleared for cultural resources.
5. If survey is required, Borrow Request is submitted by ISAS Compliance Archaeologist (Claire Dappert) to ISAS (Ronnie Hemrich).
6. ISAS Log# is assigned and Borrow Request is transmitted to ISAS Field Station.
7. ISAS Surveyors contact Construction Contractor to ensure four corners of the proposed borrow area are marked (with stakes or pin flags) and to schedule tillage or backhoe work, if needed. On-site meeting with Contractor is recommended to discuss precise project boundaries and to ensure that project boundaries are marked prior to beginning survey.
8. ISAS Surveyors must GPS the four corners, or in the case of irregularly-shaped tracts, the clearly staked boundary of the proposed borrow area. The survey must be completed by ISAS personnel under the supervision of ISAS staff meeting the Secretary of Interior Standards for Archaeology.
9. ISAS Surveyors must consider surface visibility in relation to landform position when selecting appropriate investigation methodology(s) (i.e. pedestrian survey, shovel testing, mechanical stripping). For example, is the proposed Borrow Area located on a ridge next to a stream, an eroded landform, or is it in a floodplain with the potential for buried sites? If the latter, then the Phase I should include deep testing.

10. **If no site is identified**, Surveyor immediately reports results to ISAS Statewide Supervisors (Brian Adams and Tom Loebel) via email/phone, who immediately report results to ISAS Compliance Archaeologist (Claire Dappert), IDOT Chief Archaeologist (Brad Koldehoff), IDOT Cultural Resources Unit (Kris McConkey) via email and phone. *****The email must include a copy of the IDOT Borrow Request.***
11. ISAS Surveyors **do not** communicate potential determinations of “clearance” to Construction Contractors, Landowners, or IDOT district staff because the final determination is made by the IDOT Cultural Resources Unit. If the ISAS Surveyor is directly asked for survey results, the ISAS Surveyor should tell them to contact the IDOT Cultural Resources Unit (Kris McConkey, kristine.mcconkey@illinois.gov, 217-782-4771).
12. **If a site is identified**, the ISAS Surveyor must immediately consult with ISAS Statewide Supervisors (Brian Adams and Tom Loebel). Impacts to sites deemed potentially eligible for listing on the National Register of Historic Places (NRHP) must be avoided. The ISAS Surveyor should attempt to delineate the site limits and instruct the Contractor to avoid the site.

However, if the site appears to be ineligible for NRHP listing, such as an isolated find or minor artifact scatter, or is located on an eroded landform, the site can be further investigated (tested) to confirm it is not eligible for the NRHP. In such cases, the Contractor must provide the necessary heavy equipment.

13. **If no potentially NRHP eligible cultural resources are identified during testing**, the ISAS Surveyor immediately reports the results to ISAS Statewide Supervisors (Brian Adams and Tom Loebel) via email/phone, who immediately report results to IDOT Cultural Resources Unit (Brad Koldehoff, Claire Dappert, and Kris McConkey) via email/phone. *****The email must include a copy of the IDOT Borrow Request.***
14. **If potentially NHRP eligible cultural resources are identified during testing**, the ISAS Surveyor must consult with ISAS Statewide Supervisors (Brian Adams and Tom Loebel). Impacts to the site/features must be avoided. In consultation with Statewide, an appropriate testing plan will be devised to confirm if deposits are cultural and to establish their affiliation and material content. If testing suggests the deposits are NRHP eligible, the ISAS Surveyor must inform the Contractor of the need to avoid the site and ISAS Statewide Supervisors must inform IDOT Cultural Resources Unit (Brad Koldehoff, Claire Dappert, and Kris McConkey) via email/phone that cultural resources have been

found that ISAS considers NRHP eligible, in addition to recommendations for impact avoidance.

ISAS surveyors retain the discretion to direct contractors to an alternate borrow location, provided it is within the same landowners property, for immediate testing.

15. **If Contractor wants NRHP eligible resources removed** to clear borrow area, or portion thereof, the ISAS Statewide Supervisors must inform IDOT Cultural Resources Unit (Brad Koldehoff, Claire Dappert, and Kris McConkey) via email (or phone). ISAS will then develop a time and cost estimate for submission to the Contractor in coordination with IDOT Cultural Resources Unit.
16. **If impacts to NRHP deemed eligible site are avoided**, ISAS Surveyor immediately reports results to ISAS Statewide Supervisors (Brian Adams and Tom Loebel) via email, who immediately report results to IDOT Cultural Resources Unit (Brad Koldehoff, Claire Dappert, and Kris McConkey) via email/phone. *****The email must include a copy of the IDOT Borrow Request.***
17. When ISAS survey results are emailed to IDOT Cultural Resources Unit, the IDOT Resident Engineer is notified of Cultural and Biological review results.
18. ISAS Surveyor completes an ASSR and submits to ISAS Statewide Supervisors (Brian Adams and Tom Loebel) for review. Compliance language in ASSR references **Illinois State Agency Historic Resources Preservation Act of 1990** (20 ILCS 3420), **NOT** Section 106 of the National Historic Preservation Act of 1966. (In unusual circumstance where the mitigation of NRHP eligible sites was performed it would be completed under the Programmatic Agreement for the Mitigation of Adverse Effects to Illinois Archaeological Habitation Sites Between the Illinois Department of Transportation and the Illinois State Historic Preservation Office (signed 10/25/05).
19. Final ASSR (three paper copies and one CD) is submitted by ISAS (Ronnie Hemrich) to ISAS Compliance Archaeologist (Claire Dappert). Compliance archaeologist (Claire Dappert and IDOT Chief Archaeologist (Brad Koldehoff) review and submit ASSR to Illinois Historic Preservation Agency for concurrence.
20. Concurrence letter is emailed by IDOT (Brad Koldehoff) to ISAS (Ronnie Hemrich).