

## STEP TWO: IDENTIFY HISTORIC PROPERTIES

### B: Site Forms and Site Numbers

All cultural resources more than 50 years old in the APE need to have a site number and be included in the report. Site/property forms and Smithsonian site numbers are key to recording, documenting and tracking cultural resources. The CRIS form is used for all property types, the Historic Property Record is best used as a supplement to the CRIS form, but can be used independently, for structures in urban settings or Historic Districts. When requesting site numbers from Montana SHPO for inclusion in your inventory report please complete site form and email in to our office early in your report writing.

State Smithsonian system numbers must be obtained from Montana SHPO, following completion of a site form, and a 7.5' Quad map showing the site location. These forms are submitted as PDF's through email or the State of Montana - File Transfer Service via ePass. Contact SHPO for instructions. Site forms may only be submitted electronically in PDF format. If you submit the site form electronically, then you MUST submit the final form electronically along with a single sided paper copy for archives. Following BLM and other industry standards SHPO also requires shapefiles of site boundaries with the site form PDF. Shapefiles are also required with inventory reports (both digital and hard copies) for inventory areas and APE if different. To ensure that all site form submittals meet the Montana SHPO information needs the Principal Investigator should be certain that all site forms are filled out completely prior to requesting site numbers and that they use the appropriate MT SHPO fields.

The Smithsonian system is a nationwide registry system consisting of three parts: state number + county two-letter designation + consecutive number. It is often referred to as a Smithsonian trinomial or smith number for this reason. The state number for Montana is "24." Examples of Smithsonian numbers for properties in Montana include 24YL0001 (Pictograph Cave) and 24DL0290 (Anaconda Smoke Stack). Sites or properties in Montana that have been assigned Smithsonian trinomials, range from single buildings/sites to neighborhood districts made up of many different houses.

Very briefly, SHPO guidance (see SHPO Planning Bulletin #3) provides that the following do not require a state Smithsonian number and site form:

1. Cultural resources less than 50 years old, unless they are of exceptional significance;
2. Cultural resources without definable locations; and
3. Individual artifacts or features that are part of a larger and numbered whole.

In addition to applying numbers to individual properties or sites, we recommend that Smithsonian numbers be applied to bounded historic districts, because these are collections of components, which may possess added significance as a whole with some thematic tie (common site type, age etc.). A rationale for bounding the district, even if minimally defined by landform should be explained. Linear sites and features crossing county lines present numbering problems because Smithsonian numbers are county specific. Our solution is that the segments of a larger inter-county whole receive distinct county numbers. Cross-reference the other known county Smithsonian numbers on each site form. Linear sites should be recorded in their entirety to avoid future duplication of segment numbering and to facilitate assessment of the complete property. Significant features of identifiable distinction such as major laterals or dams on irrigation systems or CCC retaining walls along highways should be given unique numbers in addition to a number for the entire property. When your APE includes only a segment of a larger whole the larger whole should be recorded and numbered initially by historic context and location, even if the detailed description, photos etc., occur only for the segment in the APE.

As in the past, we continue to recommend that precontact archaeological surface artifact scatters of five or more non- diagnostic prehistoric objects located within 50 meters of each other be recorded as a site. Should two or more diagnostic artifacts be located within 50 meters of one another we recommend that they be recorded as a site. Even minimal artifact scatters located with some feature of other cultural activity (for example a hearth or tipi ring) should be recorded as a site. Single features such as rock art panels should be recorded a site, while single isolated features such as historic- era field rock piles that do not appear to be over 50 years old do not warrant a site



number (though they should be described in the report narrative). Features such as precontact hearths or cairns should be recorded as a site and given site numbers unless they are included as part of a larger, bounded and numbered whole.

Historic debris scatters with ten or more objects located within 50 meters of one another should be recorded as a site, though if any items are diagnostic or appear to be associated with some feature, the number can be less. All historic features including isolated prospect pits outside known districts warrant a state number. However, if several pits are located within 100 m of one another or are located on the same landform and all appear to date from approximately the same period (based on vegetation growth or other indications) a single site number will usually be appropriate.

A paleontological locality recording form compatible with the existing CRIS database system is now available (see Appendix 12). We recommend such localities be recorded and assigned Smithsonian numbers.

Isolated Finds (IF) or Isolated Artifacts (IA) warrant state numbers only very rarely (e.g. Early Period points). They should however be recorded and described in the inventory report. Isolated Finds (IF) should be recorded on an IF Form and included with site forms in inventory reports (see Appendix 3: Recommended Isolated Find Form). Isolated Find locations should also be plotted on the project/survey map.

### Confidentiality

Under the Archaeological Resource Protection Act (ARPA) of 1979 (U.S.C.470) release of information concerning the nature and location of archaeological resources on federal lands is prohibited with very few exceptions (§9(a)). This restriction applies not only to release of information (for example, to consultants) but also to public disclosure (for example in NEPA documents or cultural resource reports produced by consultants). Site locations may not generally be disclosed on maps intended for public release, for example, EAs or EISs. As a result, if applicants or their consultants request SHPO File Search information for federal or tribal lands from SHPO, they should first receive permission and instruction from the appropriate agency or tribe on the use of that information. Similarly, under the NHPA Section 304, agencies have the responsibility to protect, and withhold as is prudent, information gathered in the course of their NHPA responsibilities. Confidentiality of information when gathered, or later requested, is further addressed at 36 CFR 800.4(a)(4) and .11(c). Heritage Properties are also protected from public disclosure when prudent in meeting the intent of the State Antiquities Act (M.C.A. 22-3-423(12)). See also National Register Bulletin 29, Guidelines for Restricting Information about Historic and Prehistoric Resources. SHPO will not release site location information if there is any question regarding its use or disclosure.