

CITY OF PHOENIX
GUIDELINES FOR ARCHAEOLOGY
(Revised Edition, 2025)



Petroglyphs in South Mountain Park and Preserve.

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New in This Edition

- Throughout the guidelines, **key points** have been noted in text boxes like this.
- A **flowchart** of the typical process for City-sponsored projects (survey, monitoring and testing) has been added for quick reference. See Appendix 1.

Acronyms

AAA Arizona Antiquities Act
ARHP Arizona Register of Historic Places
ASM Arizona State Museum
CLG Certified Local Government
CRM Cultural Resources Management
CAO City Archaeology Office
MOA Memorandum of Agreement
NRHP National Register of Historic Places
NHPA National Historic Preservation Act
SVM S'edav Va'aki Museum
PA Programmatic Agreement
PRF Payment Request Form
SHPO State Historic Preservation Office

Key Definitions

Feature – A component of an archaeological site that is non-portable and cannot be collected, such as a pit house, canal, or roasting pit. These nonrenewable resources require detailed documentation in order to address their information potential.

Qualified archaeologist – An archaeologist who retains and is listed on an Arizona Antiquities Act permit.

Sensitive Area – An area of the City that contains or may contain buried archaeological resources. The City identifies sensitive “quarter sections” as legal locations that are known to contain one or more archaeological sites.

Site – A location of past human activity that may contain buried archaeological resources such as features and artifacts, and must be protected.

Note: All CAO forms cited in this document can be found either in an appendix or on the City Archaeology website (www.phoenix.gov/archaeology)

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1. Introduction

These guidelines provide the procedures for conducting archaeology within the City of Phoenix (City). Protocols herein are designed to comply with, be consistent with, and to complement federal and state historic preservation laws and policies, as well as the City Historic Preservation Ordinance (Zoning Code Section 802(A)).

These guidelines are intended for use by:

- Project managers with City departments
- Private entities working for, or within the City
- Individuals and organizations involved in archaeological projects undertaken on City land, that use City funding, or that require City approval (building permits, utility permits, re-zoning, etc.)

The role of the City Archaeology Office (CAO) is primarily to assist City departments with being in compliance with the City's Historic Preservation Ordinance and other applicable laws and regulations. A secondary role of CAO is to assist Cultural Resource Management firms as they work with City Project Managers to conduct appropriate archaeological mitigation measures. CAO also has the role of assisting private developers who are receiving building permits or zoning stipulations from the City Planning Department with requirements concerning archaeology.

The CAO is within the Parks and Recreation Department and is located at S'edav Va'aki Museum (SVM). They can be reached at 602.495.0901 or archaeology@phoenix.gov

Note: To help understand this process, a flowchart of the typical process for City-sponsored projects (Appendix 1) has been added for quick reference.

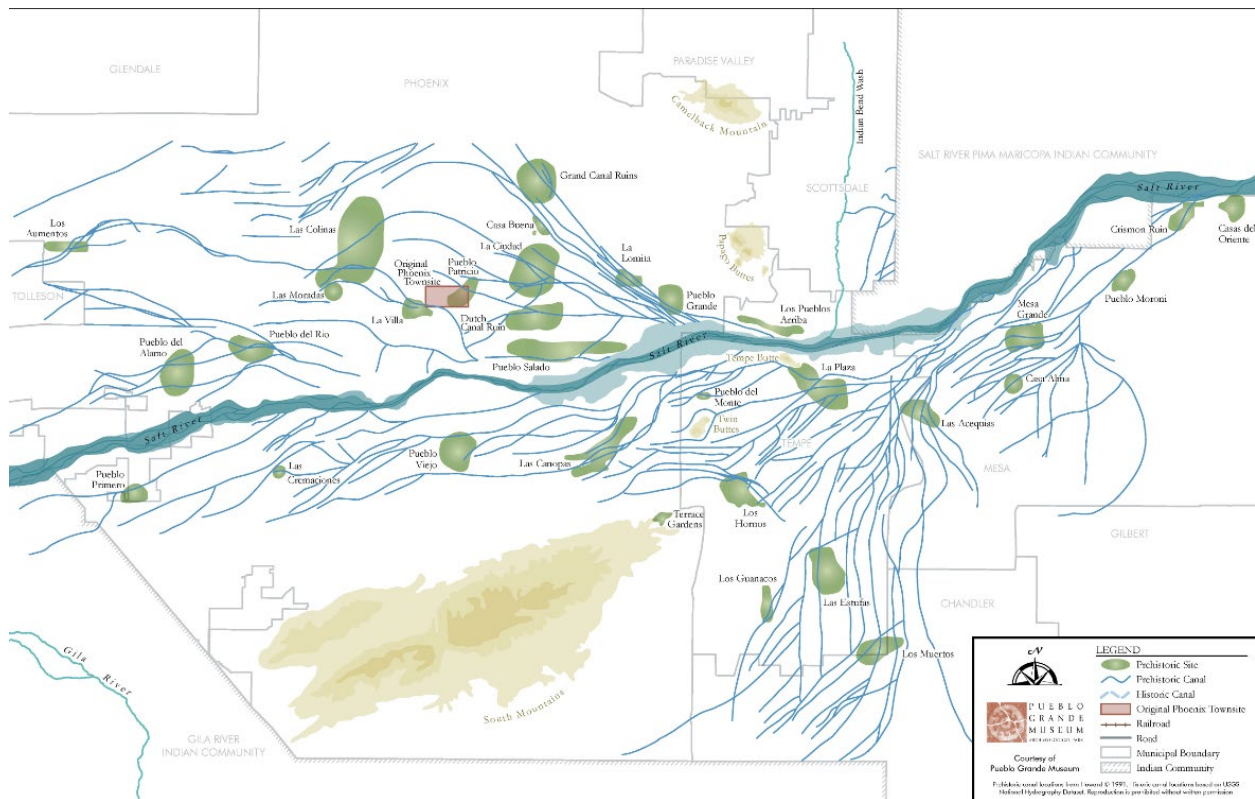
There are more than 1,000 archaeological sites and at least 65 historic districts within the City's boundaries. The earliest archaeological sites in Phoenix date from the prehistoric Archaic period (more than 3,000 years ago); however, the largest and most numerous sites are associated with the Hohokam archaeological tradition (ca. A.D. 1 to 1450). Sites in the downtown area also include historic-age properties from the Original Phoenix Townsite (established in 1870). Archaeology is a discovery process; therefore, this timeline can be extended with new discoveries.



Hohokam pit house floor with broken plain ware pottery vessels in Phoenix.

Several Native American communities regard Hohokam archaeological sites and resources as ancestral O’Odham, because they are part of their original homelands. The O’Odham people who reside at the Ak-Chin Indian Community, the Gila River Indian Community, the Tohono O’Odham Nation, and the Salt River Pima-Maricopa Indian Community, are descendants of the prehistoric people who lived in what is now central and southern Arizona and northern Mexico, and they consider these resources to be sacred places. Other tribes also have cultural connections to the Phoenix and lower Salt River Valley area.

The Hohokam archaeological tradition flourished for more than a millennium in the Salt River Valley, creating beautiful crafts and building earthen and adobe architecture. Archaeological excavations conducted since the 1880s reveal that these villages contain domestic structures (pit houses and above-ground adobe rooms), cooking and storage pits, canals, water reservoirs, trash mounds and middens, platform mounds, ballcourts, and cemeteries. Often the features are distributed across the site in a pattern, with the cemeteries located near clusters of domestic structures. Cemeteries at large Hohokam villages can contain dozens, even hundreds of human remains.



Hohokam village sites, prehistoric canals, and the Original Phoenix Townsite, along the Lower Salt River Valley. (Image courtesy of S'edav Va'aki Museum; prehistoric canal locations from Howard ©1991)

Numerous prehistoric canals are buried throughout the City, totaling hundreds of linear miles. The excavation of Hohokam canals has informed us about prehistoric hydraulic engineering, prehistoric environment, and relationships between villages on common canal systems. Therefore, canals should be investigated using the most up-to-date field and analytical techniques.

In addition to archaeological sites, historic properties called Traditional Cultural Properties (TCPs) also are present within the City. These TCPs can be prehistoric shrines, mountains, petroglyphs, or other significant features associated with local Native American groups. The South Mountain Park and Preserve is recognized as a TCP by the Gila River Indian Community and the Salt River Pima-Maricopa Indian Community.

Also buried within the downtown area of Phoenix are the remnants of the early history of the City, including the Original Phoenix Townsite and 19th-century additions. The study of these historic resources contributes valuable information to our understanding of the early Phoenix community and therefore should be documented or data-recovered (professionally excavated) whenever it is anticipated that development and construction will have impacts on them.

Archaeological resources are buried under asphalt streets and parking lots, playgrounds and golf courses, and even in people's backyards. The City's mountain preserves also contain numerous

locations where traces of past human lives are present. These archaeological resources are fragile and non-renewable. Increasingly, the rapid pace of development in the Salt River Valley has the potential to adversely affect the City's archaeological resources. The CAO is dedicated to recording, preserving, and documenting the City's heritage. When archaeological resources cannot be preserved through avoidance, impacts must be mitigated through documentation and data recovery excavations.

Archaeological investigations are required for development projects in Arizona when there is state or federal funding, permitting, or licensing or when on city-owned land. Burial laws (ARS 41-844 and 41-865) within the Arizona Antiquities Act (AAA) strictly regulate the removal and disposition of human remains and associated funerary objects on state-owned or state-controlled lands and private properties, respectively. State-owned lands include county and municipal land.

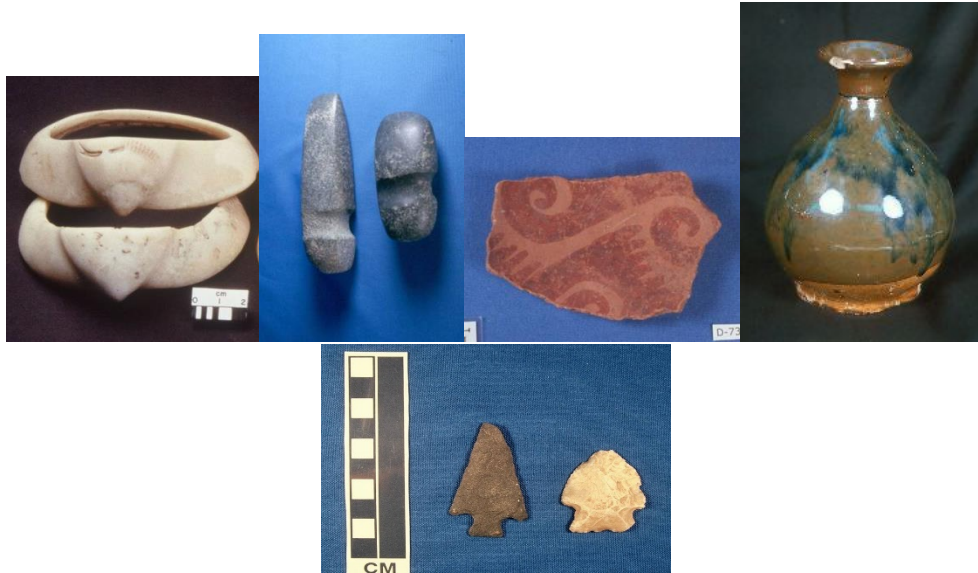
Archaeological investigations are required for development projects in Arizona when there is

- State or federal funding
- Permitting
- Licensing

2. Definitions of Archaeological Materials

There are different laws that apply to archaeological materials. These include:

Arizona and National Historic Preservation Acts: Archaeological resources are defined in the United States as being 50 years or older and having the potential to have historical significance according to criteria established for listing on the Arizona or National Register of Historic Places (A/NRHP). Under Section 106 of the National Historic Preservation Act (NHPA), archaeological sites are considered to be "historic properties" if they are eligible for the A/NRHP. See [Section 106 definitions: https://www.achp.gov/sites/default/files/regulations/2017-02/regs-rev04.pdf](https://www.achp.gov/sites/default/files/regulations/2017-02/regs-rev04.pdf)



From left to right: marine shell bracelets, stone axes, red-on-buff Hohokam potsherd, Chinese rice wine jar.
Bottom: Archaic projectile points.

Arizona Antiquities Act: Archaeological specimen means any item resulting from past human life or activities, which is at least 100 years old [Note: 50 years is the criteria for the State and Federal requirements] including petroglyphs, pictographs, paintings, pottery, tools, ornaments, jewelry, textiles, ceremonial objects, weapons, armaments, vessels, ships, vehicles, and human skeletal remains.

Links to Useful Resources

Information about compliance with historic preservation and archaeological resource requirements under state and federal law can be found in these locations:

The Arizona State Historic Preservation Office (SHPO): <https://azstateparks.com/shpo/>

The Arizona State Museum (ASM) Cultural Resource Management services web page:
<https://statemuseum.arizona.edu/crm>

The City of Phoenix Zoning Code:
<https://www.codepublishing.com/AZ/Phoenix/?PhoenixZ08/PhoenixZ08.html>

City of Phoenix Historic Preservation Plan:
https://www.phoenix.gov/documents/archaeology/pdd_hp_pdf_00185.pdf



Hohokam pit house structure and *horno*, archaeological site in downtown Phoenix.
(Courtesy of S'edav Va'aki Museum, City of Phoenix).

3. Regulatory Context

The protection and management of archaeological resources occurs at three levels of government on City lands: Local, State, and Federal. These are described below.

A. Local

The City Zoning Ordinance, Chapter 8, Section 802 (A) acknowledges the potential significance of archaeological resources within the city:

It is hereby declared as a matter of public policy that the protection, enhancement, and preservation of properties and areas of historical, cultural, and archaeological and aesthetic significance are in the interests of the health, prosperity, and welfare of the City of Phoenix.

Section 802(A.) of the City Historic Preservation Ordinance states that that the City's policy is:

- a. To encourage identification of the location of both prehistoric and historic archaeological resources,
- b. To assist with the preservation of these resources where applicable, and
- c. To encourage recognition of the fact that the archaeological resources found on public land are the property of all citizens and are not private property.

In addition, the City has been designated by the Arizona SHPO as a Certified Local Government (CLG), which requires that the City:

- Maintain a historic preservation commission
- Enforce state and local preservation laws

- Provide for public participation in its activities
- Enact the City's historic preservation ordinance



Park ranger observing prehistoric agricultural terrace.

Phoenix hired their first City Archaeologist in 1929 and continues to take archaeology very seriously. In order to comply with the City Historic Preservation Ordinance, the archaeological review process has been a requirement since the early 2000s.

The City Parks and Recreation Department has a Field Operation Procedure titled *Field Operation Procedure Requiring Archaeology Assessments* (FOP 16.1).

B. State

The AAA (ARS 41-841 *et seq.*) prohibits disturbance of archaeological and paleontological sites on state-owned or state-controlled lands in Arizona. It requires a permit for exploration of archaeological sites, and it protects human remains on state and municipal (ARS 41-844) lands, and on private lands in Arizona (ARS 41-865).

The Arizona Historic Preservation Act (AHPA [ARS 41-861 *et seq.*]) requires the identification and evaluation of potential project impacts on prehistoric and historic archaeological resources for state-funded or state-permitted projects (Arizona State Legislature). The SHPO, under the AHPA, has the responsibility for determining archaeological site eligibility for listing in the A/NRHP.

C. Federal

The National Historic Preservation Act (NHPA) established policies and processes that regulate the management of federally funded, licensed, permitted, or approved “undertakings.” [Section 106](#) of the NHPA outlines a review process that involves a series of steps in which archaeological sites are identified, their significance determined, and impacts to them formally evaluated. Each step of the Section 106 process occurs in consultation with relevant agencies and entities. The Section 106 process requires a review period of 30 days for affiliated Native American Tribes, SHPO, local governments, the public, and other parties with a demonstrated interest in the

Note: When reviewing the flowchart in Appendix 1, add approximately 30 days to each procedural step for Section 106 consultation for federal undertakings to provide their comments and input.

Section 106 consultation can be in person and in writing via letters and emails. Tribal governments are sovereign nations and those who do not have National Park Service-designated Tribal Historic Preservation Offices do not need to comply with our consultation timelines.

Section 106 requires that a formal agreement document (MOA or PA) is executed for projects that will have an adverse effect on a historic property (defined as any archaeological or historic site that is eligible for inclusion in the NRHP). The Arizona SHPO must be consulted regarding archaeological reports and must be a party to all federal agreement documents in Arizona.

Whenever a City project involves state or federal land, funding, or approvals, a City representative must coordinate with the appropriate state or federal agency as part of the process. There may be required procedures for that agency. All correspondence with agencies and tribes pertaining to archaeology must come from the CAO unless otherwise approved by CAO.

4. CAO Functions

The CAO is dedicated to recording, preserving, and documenting the City’s heritage. It has the following functions:

- a. Review proposed projects for impacts to archaeological resources and provide recommendations for compliance with applicable regulations and policies.
- b. Review and assist with all proposed archaeological interpretive materials for City-sponsored projects.
- c. Serve as liaison with Native American Tribes for cultural resources concerns and for compliance with ARS 41-844 and 41-865.
- d. Support City Project Managers to comply with applicable archaeological regulations, ordinances, and policies.

- e. Serve as liaison with CRM firms for developing scopes of work, reviewing fee estimates, and issuing notices to proceed.
- f. Manage citywide on-call archaeological services contracts.
- g. Assist private developers with archaeological compliance associated with zoning stipulations and building permits.
- h. Serve as liaison with the Arizona Archaeological Society, Phoenix Chapter.
- i. Develop and maintain appropriate CAO procedures and policies for the treatment of cultural resources.
- j. Serve as steward for Pueblo Grande Ruin and Irrigation Sites, Phoenix's only National Historic Landmark, including overseeing the ruins stabilization by the SVM Mudslingers and providing input and guidance on infrastructure and interpretive projects.
- k. Serve as liaison with the Arizona Site Steward Program for Phoenix.
- l. Serve as technical resource for S'edav Va'aki Museum exhibits and programs.
- m. Conduct professional quality archaeological research and prepare publications.



Partially excavated *horno* (roasting pit) from Phoenix Hohokam site.

5. City Departments

Thirty-eight different City Departments and Offices work with the CAO to ensure that archaeological resources are properly managed. These are:

<ul style="list-style-type: none"> • Office of Arts and Culture • Aviation • Budget & Research • City Auditor • City Clerk • City Council Office • City Manager's Office 	<ul style="list-style-type: none"> • Information Technology • Law • Library • License Services • Mayor's Office • Municipal Court • Neighborhood Services
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<ul style="list-style-type: none"> • Communications Office • Community & Economic Development • Convention Center • Equal Opportunity • Office of Environmental Programs • Finance • Fire • Government Relations Office • Homeland Security & Emergency Management Office • Housing • Human Resources • Human Services 	<ul style="list-style-type: none"> • Parks & Recreation • Planning & Development • Police • Public Defender’s Office • Public Transit • Public Works • Retirement • Street Transportation • Sustainability Office • Water Services • Youth & Education Office • Volunteer Phoenix
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Note: All development projects on City property that involve construction activities that will disturb the ground surface more than two inches in depth and more than two-square feet in area must be reviewed by the CAO for potential impacts to archaeological resources.

This includes most Capital Improvement Projects such as City buildings, parks, streets, water and sewer lines, residential rehabilitation using federal funds and police and fire stations/facilities. Furthermore, Phase I Environmental reviews also include archaeological site record searches.



Broken clay censer (vessel) from Hohokam site in Phoenix.

In addition, certain private developments that receive City permits are reviewed for archaeology. These include City rezoning cases, some utility permits for right-of-way access within City Streets, and other projects that undergo City planning review, including those of the Planning & Development Department (PDD).

6. CAO Project Management

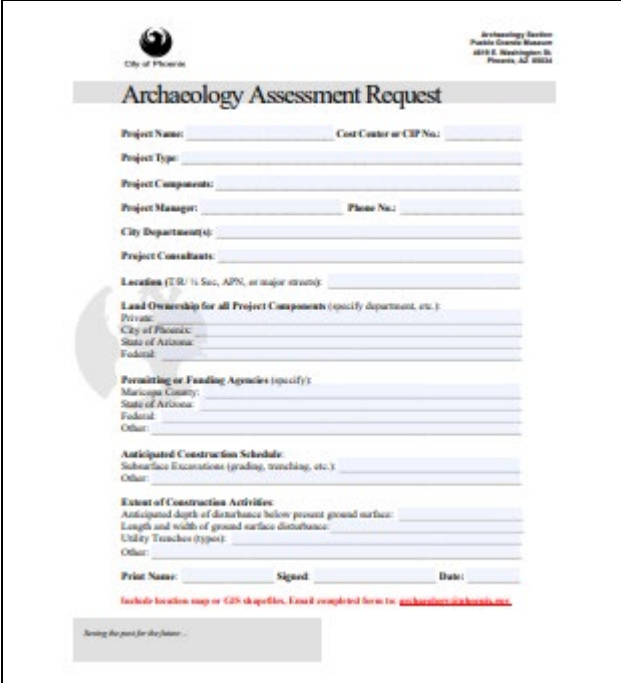
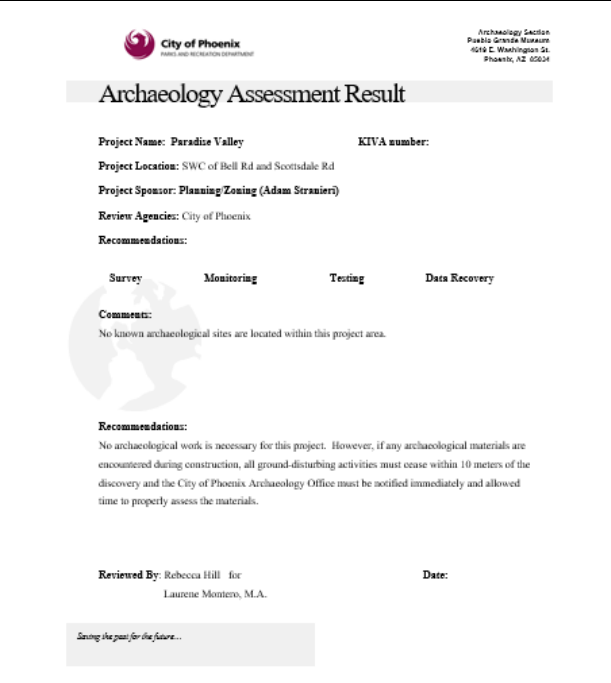
Note: All City-sponsored projects that will result in ground disturbing activities *must* be reviewed by the CAO.

To initiate an archaeological project an [Archaeology Assessment Request form](#) must be filled out by the project manager for the following types of projects:

- Located on City land
- Sponsored by the City
- Private development projects undergoing City planning review

The Archaeology Assessment Request form identifies essential information needed for evaluating the project, its potential impacts on archaeological sites, and determining applicable requirements and entities who must be involved in the review of planning documents and archaeological reports.

Note: A map or ArcGIS shapefile showing the specific location, full extent, and major cross streets of the proposed project area, with its boundaries clearly marked, must accompany the Archaeology Assessment Request form. **The Archaeology Assessment process can take between 2 and 4 weeks to complete.**

 <p>Archaeology Assessment Request</p> <p>Project Name: _____ Cost Center or CIP No.: _____</p> <p>Project Type: _____</p> <p>Project Component(s): _____</p> <p>Project Manager: _____ Phone No.: _____</p> <p>City Department(s): _____</p> <p>Project Consultant(s): _____</p> <p>Location (T.R. 1/2 Sec, APN, or major street): _____</p> <p>Land Ownership for all Project Components (specify department, etc.):</p> <p>Private: _____</p> <p>City of Phoenix: _____</p> <p>State of Arizona: _____</p> <p>Federal: _____</p> <p>Permitting or Funding Agencies (specify):</p> <p>Maricopa County: _____</p> <p>State of Arizona: _____</p> <p>Federal: _____</p> <p>Other: _____</p> <p>Anticipated Construction Schedule:</p> <p>Subsurface Excavations (grading, trenching, etc.): _____</p> <p>Other: _____</p> <p>Extent of Construction Activities:</p> <p>Anticipated depth of disturbance below present ground surface: _____</p> <p>Length and width of ground surface disturbance: _____</p> <p>Utility Trenches (types): _____</p> <p>Other: _____</p> <p>Print Name: _____ Sigant: _____ Date: _____</p> <p><small>Include location map or GIS shapefile. Email completed form to: archaeology@phoenix.gov.</small></p> <p><small>Setting the past for the future...</small></p>	 <p>Archaeology Assessment Result</p> <p>Project Name: Paradise Valley KIVA number: _____</p> <p>Project Location: SWC of Bell Rd and Scottsdale Rd</p> <p>Project Sponsor: Planning/Zoning (Adam Stranieri)</p> <p>Review Agencies: City of Phoenix</p> <p>Recommendations:</p> <p>Survey Monitoring Testing Data Recovery</p> <p>Comment:</p> <p>No known archaeological sites are located within this project area.</p> <p>Recommendation:</p> <p>No archaeological work is necessary for this project. However, if any archaeological materials are encountered during construction, all ground-disturbing activities must cease within 10 meters of the discovery and the City of Phoenix Archaeology Office must be notified immediately and allowed time to properly assess the materials.</p> <p>Reviewed By: Rebecca Hill for _____ Date: _____</p> <p>Laurene Montero, M.A.</p> <p><small>Setting the past for the future...</small></p>
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Example Archaeology Assessment Request and Archaeology Assessment Record forms.

Archaeological projects undergo several phases, including:

- Initiate and plan as a result of a proposed development or improvement project
- Implement in stages that may involve fieldwork and laboratory analysis
- Technical reporting and CAO review
- Curate the archaeological materials for permanent curation at an authorized repository

Note: Archaeological discoveries also occasionally occur during construction and must be properly addressed while construction is ongoing.

Projects that are reviewed by the CAO are documented on an Archaeology Assessment Result Form. The form details the result of the assessment and CAO's recommendations concerning the need for additional archaeological investigations, when appropriate.

All archaeological monitoring, testing, or data recovery excavation projects must be preceded by a treatment plan that is approved by CAO. **Review of treatment plans can take between 15 and 30 days to complete.** The citywide general monitoring and discovery plan and general treatment plan can be used for most projects (with written permission where applicable), but the general treatment plan requires preparing an addendum work plan that must be reviewed and approved by CAO.

All archaeological investigations must result in a written report describing what was done and what was found. Those reports are reviewed by CAO staff, with the review results provided on a Report Review Form. Report reviews can take several months to complete. **Large scale data recovery reports can take 4 to 6 months to review.**

After the final report for an archaeological investigation has been approved by CAO, sponsoring departments, and agency reviewers, archaeological materials collected from City projects, as well as all associated documentation, are submitted for permanent curation to the S'edav Va'aki Museum Archaeological Repository. SVM serves as the repository for all archaeological projects conducted on City property. Materials submitted to S'edav Va'aki Museum for curation must follow the guidelines described in the [S'edav Va'aki Museum Archaeological Repository Guidelines](#). Archaeological materials on City land are protected by the AAA.

Note: It is illegal to collect artifacts located on City property without proper authorization and without an AAA permit from the Arizona State Museum.

7. Archaeology for Private Development Projects on Private Land in Phoenix

Most private development projects on private land that seek building permits or rezoning from the City, will require an Archaeological Assessment from the CAO. When the CAO is requested to review these types of projects, we follow the same standard industry guidelines for archaeology (e.g. excavation sample percentages and site file searches) as prescribed in [SHPO](#) and [ASM](#) guidelines.

Note: Non-standard or innovative approaches to testing and data recovery must be proposed by a qualified archaeologist holding a blanket AAA permit and approved by CAO *before* receipt of a treatment plan seeking CAO review and acceptance.

For private survey or testing projects that are part of due diligence and are not yet requesting building permits or rezoning, it is important to note that if these guidelines are not followed, the resulting report may not be accepted by CAO at such time when a building permit or rezoning is requested.

The CAO will approve use of the City's general monitoring and discovery plan (MDP; available on website) and general historic properties treatment plan for archaeology (general treatment plan), but a request or notification via email must be made and an addendum work plan is required for the general treatment plan. If seeking a burial agreement from the ASM it is important to ask ASM if use of the City's MDP or general treatment plan is acceptable.

The CAO will not approve use of the citywide burial agreement for non-city-sponsored or non-city-administrated projects.

Note: CAO completes Archaeology Assessments for the City Planning Department and for private developers. In both cases, **the CAO is required to charge fees for this work.**

8. Types of Archaeological Investigations Conducted in the City of Phoenix

There are six different types of archaeological investigations that are conducted in the City, which are listed below and described in more detail in the following sections.

- A. Archaeology Assessment
- B. Cultural Resources/Archaeological Survey
- C. Archaeological Testing (Trench Testing)

- D. Data Recovery/Mitigation
- E. Archaeological Monitoring
- F. Petroglyph Recording

Note: A qualified archaeologist must be able to retain an AAA permit.

A. Archaeology Assessment

- A review of site records and files by the CAO at S'edav Va'aki Museum and on AZSITE pursuant to Chapter 8 of the Phoenix Zoning Ordinance. (Note: other records and sources may be consulted in addition, as necessary.)

The CAO conducts more than 20 **Archaeology Assessments** per week. Archaeology Assessments are requested using an Archaeology Assessment Request form and are documented in an Archaeology Assessment Result form. Both these forms are available on the City Archaeology web page. Sometimes archaeological consultants complete assessments or Class I inventories that must be approved by the CAO.

B. Cultural Resources/Archaeological Survey

- A physical examination of a project area by a qualified archaeologist walking systematic pedestrian transects across the property.
- Surveys conducted on City land must be completed under an AAA blanket permit.

Cultural Resources/Archaeological Survey may be requested for areas within the City that contain bare ground (undeveloped, agricultural, or other lands that provide surface visibility) and for which there is insufficient information in SVM and ASM records to evaluate potential project impacts. Archaeologists must contact the CAO and examine the City's site files prior to conducting archaeological surveys for City projects or for private projects that are undergoing or will undergo City planning review. Archaeological survey, documentation of cultural resources, and reporting must follow the guidelines set forth in the [Arizona State Museum Archaeological Site Recording Manual](#) and [SHPO reporting standards](#).

C. Archaeological Testing (Trench Testing)

- Subsurface examination of a project area through systematic backhoe trenching.
- A sample of between 1.5% and 3% or a backhoe trench through the center of a linear project is usually appropriate.
- The Arizona SHPO recognizes several different types of testing. See *SHPO Position on The Roles of Archaeological Testing* on the SHPO website.

Archaeological Testing (Trench Testing) is usually required when a project will have impacts within a known archaeological site, but where the extent and integrity of the buried archaeological resources are not known. All projects in which testing is recommended must be conducted under an approved testing plan or addendum (plan) to the COP General Treatment Plan. An AAA Project-Specific Permit from the ASM is required to undertake testing inside the boundary of an ASM-designated archaeological site unless it is located on private land. See the [ASM CRM Services](#) web page for additional information. Testing methodology must follow current professionally accepted guidelines for Arizona, including those of the COP General Treatment Plan (1.5% - 3%). Recently, supplementing test trenching with wide shallow trenches (called “strip trenches”) has become favorable as a means of providing plan views of less deeply buried or more ephemeral archaeological features.



Archaeologist evaluating test trench wall to prepare profile illustration.

D. Data Recovery/Mitigation

- Extensive excavation of selected portions of an archaeological site usually using a combination of backhoe stripping, trenching, and hand excavations and usually under a AAA project-specific permit.
- The goal of data recovery is to retrieve and report important information from the site as mitigation for anticipated impacts.
- Construction can proceed after CAO approval of an end-of-fieldwork report following data recovery. Approval by other agencies may also be required, as appropriate.
- A technical report that addresses artifact and data analyses and interpretation must also be completed and approved. This can take as many as 1 to 2 years to complete depending on the size of the project.

Data Recovery excavation is a more thorough examination of buried archaeological sites designed to recover significant information to better understand the past. All data recovery work must be completed under an approved treatment plan or an addendum work plan to the

[COP General Treatment Plan](#) (and an AAA permit unless on private land). The treatment plan must identify appropriate research themes, questions, field and analyses methodology, protocols, and an appropriate sampling strategy for addressing research themes (because most projects do not excavate entire sites). The number and sample size for excavating features will vary for each site and each project depending on the site, the types of features present or anticipated to be found, the types of impacts to the site from construction activities, and other factors.



Data recovery excavation of a prehistoric stone axe in a pit.

Note: Human burials are the single exception to the sampling process because all human burials must be located and disinterred from a property before construction can proceed. (Refer to applicable Burial Agreement.)

In addition, when human burials are discovered, a specific protocol—as specified in the Burial Agreement—must be completed before the individual can be disinterred by a qualified archaeologist.

Finally, excavations of canals during data recovery (or testing and monitoring) must include cross-section profiles of the canals, sediment samples inside and outside the canals, chronometric samples when available, and efforts to locate and document associated elements or features such as canal repair, headgates, turnouts, reservoirs, and fields.

E. Archaeological Monitoring

- A qualified archaeologist must be present to observe construction excavations and has the authority to stop excavations in the event of a discovery.
- Monitoring may also occur during building demolition, in lieu of or prior to testing and data recovery (in specific situations), or following testing and data recovery.
- Monitoring requires an AAA permit if located on city land and within the boundaries of an ASM-designated site.

Archaeological Monitoring may occur:

- Before testing and data recovery

- In lieu of testing and data recovery, or
- Following testing and data recovery

Monitoring is usually conducted for building demolitions in sensitive areas prior to testing and data recovery. It is conducted in lieu of testing and data recovery when proposed construction activities are shallow (generally less than 3-feet deep) and narrow (generally less than 2-feet wide) or limited to utility trenches in areas where testing and data recovery would be logistically challenging (major arterial roads, etc.). However, the decision as to whether to monitor or test is also based on the archaeological site that will be affected and our knowledge of the types, depth, and density of buried archaeological features at the site. Monitoring is also conducted following testing and data recovery in the portion of a site that was not subjected to data recovery or when it is determined that human remains may still be present in the project area.

F. Petroglyph Recording

- Documentation with freehand sketches, scaled drawings and photographs should be done by an archaeologist trained in rock art recording, using a manual such as the South Mountain Rock Art Project Field Manual or other guiding document.

Petroglyph Recording Petroglyphs may be considered traditional cultural properties (TCPs) or contributors to TCPs. Petroglyph recording may be conducted for research purposes, in advance of addressing vandalism issues, or when development is to occur at the edges of and into rocky areas. Several comprehensive petroglyph recording forms are available in Arizona and a set of these forms should be completed. It is critical that petroglyphs are considered within their cultural and environmental context. The CAO requires that petroglyph recording also document all associated archaeological features such as trails, clearings, artifact scatters, rock shelters, cooking features, rock rings or rock concentrations, structures, check dams, etc. In addition, the surrounding environment must be recorded including the presence of water sources, edible and medicinal plant species, the viewshed (e.g., views to the distant horizons), and prominent natural features on the landscape.



Prehistoric petroglyphs.

9. Treatment of Ancestral Human Remains and Associated Belongings

The CAO is committed to the sensitive and respectful treatment associated with all matters concerning the discovery, disinterment, handling, and repatriation of human remains. We honor Native American requests that prehistoric human burials be treated with respect and dignity at all times (see Appendix 7). Our language and behaviors concerning human remains in archaeological contexts must be consistent with that of *any* human burial. For example, our behavior should match that used in association with a modern grave site or cemetery. For purposes of discussion and reporting, the ASM repatriation office should be consulted for guidance on appropriate mortuary-related terminology.

In order to be in full compliance with Arizona State laws relating to the disposition of human remains, the City has a citywide burial agreement with the ASM and several Native American Communities with affinal claims to the Hohokam archaeological tradition. The Salt River Pima-Maricopa Indian Community is the lead affinal group concerning repatriation issues for all Phoenix projects north of Baseline Road. The Gila River Indian Community is the lead affinal group for City projects located south of Baseline Road. In addition, the Hopi Tribe has affinal ties with the Hohokam archaeological tradition and therefore has requested to be consulted for all City projects that are known or are expected to contain prehistoric human remains. Furthermore, there are other tribes who also have affinal claims to the Phoenix region and should be consulted when appropriate.

Phoenix's citywide burial agreement may only be used for City-sponsored projects. City-sponsored projects may include federally funded, state-funded, or City-funded projects on City or private lands. Projects with sponsors other than the City will require separate burial agreements.

Note: Permission must be requested using the Burial Agreement Request Form on the [pueblogrande.com/City Archaeology](http://pueblogrande.com/City_Archaeology) webpage. The form must be sent to archaeology@phoenix.gov, signed by the City Archaeologist, and forwarded to the ASM Repatriation Coordinator.

Burial discoveries must be inspected by a bioarchaeologist or physical anthropologist in situ to determine if the burial is human. Often, in the City, animal bones, including dogs, horses, cows, and pigs have been suspected to possibly be human and have had to be inspected by a qualified bioarchaeologist or physical anthropologist. When bones are determined to be human, and the project is city-sponsored, it is the responsibility of the CAO to contact the Burial Coordinator of the ASM and the appropriate Tribal contacts. Prehistoric animal burials are treated the same as human burials.

When unanticipated human remains are encountered on property owned by the City, one of the City's consulting firms with annual services contracts with the City can assist in the identification and/or removal of burials. The project sponsor is responsible for the cost of this identification and/or disinterment of human remains and associated funerary objects.

Note: When human burials are discovered through trenching, stripping must be undertaken for a radius of 10 meters from the individual to discover additional burials since human burials typically occur together in cemeteries at Hohokam sites.

Email correspondence is considered part of the public record, and therefore discussion of human burials must be limited in email correspondence. Specific protocol for correspondence and updates for projects that anticipate human burial disturbances must be developed with CAO prior to the inception of fieldwork.

For private development projects, the archaeological consultant shall be responsible for obtaining and implementing the Burial Agreement but must also notify the CAO when human remains are encountered.

10. CAO Report Submittal Procedures

The City Archaeologist administers all archaeological services for City projects in consultation with the appropriate project manager. Consequently, all decisions concerning archaeological reports submitted to the City, whether prepared by a consultant or a sub-consultant, are under the oversight of the City Archaeologist.

The submittal procedures are broken into the following sections:

- A. Draft Reports**
- B. City-Sponsored Projects**
- C. Data Recovery Project Reports** for information specific to data recovery projects.
- D. Survey and Monitoring Project Reports**
- E. Phoenix's HUD-Funded Program**
- F. Final Reports**

Note: Sections A and F apply to all reports and sections B through E outline details specific to those types of reports.

All report submittals must be accompanied by a cover letter or email with the following:

- Project name
- Brief description of project activities
- Cost center number (if applicable)
- SVM number
- Any requests concerning the report (e.g., “please review this report and provide us with comments;” or “this is the final, revised version of the report ...”)

In addition, please provide the names of any individuals or agencies that also have received the report at the same time, if appropriate. These names can be listed as “cc: ...” on the bottom of the cover letter.

A. Draft Reports

All initial draft reports are to be submitted electronically (if under 50 pages) to the following three entities for review before they are submitted to any other individuals not working for the City or for other government agencies. The exception is the ASM, who may be sent reports for concurrent review, but with approval from the City Archaeologist.

- CAO
- Archaeology@phoenix.gov
- Project manager for City projects

Note: Repeated delays in report submittal will result in a lower score during the firm’s annual and/or project specific evaluation unless there is a legitimate reason and the CAO and project manager agree to the delays.

All draft reports shall have the day, month and year of the draft on the title page of the report.

It is standard protocol for sub-consultants who submit a draft copy of their reports for review to their clients to concurrently submit a copy of the report to the CAO.

It is standard protocol for consultants who are working for a nonprofit or private company doing business with the City to submit their reports to the CAO and, if applicable, City contact at the same time as they submit the report to their clients. The CAO will inform the consultant of any necessary changes or revisions and will copy the project manager.

Report revision requests will be submitted to the author’s company with a summary form for all report types that are reviewed by the CAO (see below). City project managers will submit their review comments separately.

In most instances, the consultant shall submit one copy of the draft report to the CAO and one copy to the project sponsor for review, unless otherwise instructed.

B. City-Sponsored Projects

All reports for City-sponsored projects must be submitted according to the established schedules as determined by the contract or task order specifications or by the CAO and the project manager. Maintaining report submittal schedules is critical to the timely completion of the overall projects and will be closely monitored by the CAO, who must be kept informed of any delays in report submittal.

C. Data Recovery Project Reports

Consultants preparing budgets for larger projects must budget for a technical/format editor who can oversee the necessary formatting for publication; the budget also shall cover the costs of printing **50 copies of the report preferably published or joint-published as a S'edav Va'aki Museum Anthropological Paper.**

For Larger Data Recovery Projects: Reports for data recovery projects that have substantial findings will be published or joint-published in the S'edav Va'aki Museum Anthropological Papers publication series.

Data Recovery Final Reports

For data recovery reports, it is the consultant's responsibility to prepare the final report as ready for printing and publication as a S'edav Va'aki Museum Anthropological Paper or as a joint publication with SVM; a searchable PDF copy must be submitted to the CAO for curation and for future printing.

D. Survey and Monitoring Project Reports

Reports prepared for surveys and monitoring projects that are **"no findings"** should be submitted as drafts for City review within two weeks of completion of fieldwork, unless other arrangements are made with the City Archaeologist.

Small projects that discover archaeological features that do not require specialized analyses shall be submitted within four weeks of completion of fieldwork.

Note: Deviations from these schedules must be approved by the CAO and the project manager.

E. Phoenix's HUD-Funded Program

For the Phoenix's HUD-funded program the consultant will be required to provide multiple copies of all report submittals for consultation to meet the requirements of the PA for the City's HUD-funded program. These consulting parties include the SHPO, other agencies as appropriate, and Native American tribes who have an affinal claim to prehistoric archaeological sites in the Phoenix region (refer to the Government to Government Consultation toolkit on the SHPO website).

F. Final Reports

No-Finding Reports One digital and one hard copy of final reports that have no findings shall be submitted to the CAO, with one copy submitted to the project manager.

Reports with Features Reports that describe archaeological features that have been newly identified and/or excavated will require multiple copies, the final number of copies will be determined by the CAO and the project manager, or will be specified in the task order or notice to proceed.

For All Final Reports Project area shapefiles must be submitted to the CAO with the final report copies. If there are any updates to site boundaries, those shapefiles must be submitted as well.

Important Notes About Submittals

- Final reports shall have the month and year on the title page.
- If the report is **perfect-bound**, please place an abbreviated title, author's last name, and year of publication on the spine.
- It is the on-call consulting firm's responsibility to provide Tribes with copies of final reports when work is completed under an ASM Burial Agreement or the citywide burial agreement.

11. CAO Site Records Management

The CAO maintains its own site records and files for archaeological sites located within the City. These site records are on file at SVM.

All projects undertaken on City property, or as a requirement of a City permit, must request a site file examination from the CAO unless otherwise agreed upon with the City Archaeologist. Individuals who wish to use the City's archaeological site records should submit a Site Record Access form and shapefiles, or a map of the project area and study area to archaeology@phoenix.gov

This form must be signed by the requester to signify acknowledgment of the sensitive nature of the site information and agreement to submit a copy of all reports that make use of site information to the CAO.

The CAO reserves the right to restrict the specific location of certain sites if deemed necessary for the protection of the site ([A.R.S. 39-125](#)). Site locations are restricted information that should not be made available to the general public. For planning purposes, property owners, or their designated agents, may be provided with the results of their Archaeological Assessments, but only as they pertain to their property and the immediate surrounding area (no more than one-half mile radius of the property).

Note: Prior to providing property owners, agents, and project sponsors with sensitive cultural resource location data for project planning, management, and avoidance/protection, confidentiality agreements will be prepared and executed between CAO and the requesting entity.

All verified archaeological sites that are present within the City should have an ASM site number. Archaeological consultants working on archaeological sites within the City that have other site numbers (PG, T, etc.) must obtain an ASM site number and fill out an ASM site card for that site if archaeological resources are encountered. Consultants shall submit a copy of these site cards to CAO for the City's site files, as well as to the ASM.

12. S'edav Va'aki Museum Archaeological Repository

SVM may act as a repository for professionally conducted archaeological projects both inside and outside of the City limits. These requests for repository agreements will be evaluated on a case-by-case basis through a joint decision by the SVM Curator, SVM Administrator, and City Archaeologist.

The Archaeological Repository is managed by the SVM Curator who supervises the Collections Section (Collections) of SVM. Collections staff work closely with and follow the guidance of the CAO and ASM.

The CAO and the Archaeological Repository both operate out of the Museum, but they are separate offices with different requirements.

Note: All projects for which the CAO has recommended archaeological activities should obtain a repository agreement from SVM.

For more information go to:

[https://www.phoenix.gov/documents/collections/SVM Archaeological Repository Guidelines 2025.pdf](https://www.phoenix.gov/documents/collections/SVM%20Archaeological%20Repository%20Guidelines%202025.pdf)

Or email: svmcollections@phoenix.gov

13. CAO Fieldwork Protocol

Because the fieldwork portion of an archaeological project is a critical component of all investigations, it is essential that the CAO be kept up to date on the fieldwork schedule, status, and results. Therefore, the following protocol is required for all archaeological contractors/consultants:

1. Once an archaeological consultant is hired, or assigned a project, the consultant must contact the CAO to request a site file check (see Request for Access to Site Records form on website) and obtain a SVM project number.
2. Notify CAO via email when the fieldwork portion of a project is initiated and provide the anticipated field schedule.
3. Provide regular updates through brief weekly progress reports via email for the duration of fieldwork, and quarterly reports via emails while the analyses and report preparation phases are underway. Project team members to be included on the email will be identified at the outset of the project either in the notice to proceed or other instructions.
4. Notify the CAO via email when significant archaeological features are identified during fieldwork operations. The CAO may wish to visit the project to inspect the materials that have been discovered.
5. Keep a clean excavation site. Do not let trash accumulate in trenches or other excavated features.
6. Notify CAO via email when the fieldwork is completed.
7. Restrict access to ongoing archaeological investigations. In general, all visitors must have permission from the CAO prior to visiting ongoing City archaeology projects. Under no circumstances should a member of the public be given unsupervised access to an archaeological investigation. All public tours of archaeological excavations shall be coordinated through the CAO.
8. Never speak to the media about City Archaeology projects without written permission from the CAO. Additionally, the CAO will also contact the appropriate City Public Information Officers prior to speaking with or meeting with the media. (See Appendix 4 for our media policy and guidance on human remains sensitivity concerns.)
9. The City requires that the Occupational Health and Safety Administration (OSHA) safety standards be followed at an excavation site at all times. Consider the safety of workers as well as visitors. All archaeological excavation projects should develop a safety plan that follows OSHA standards. A copy of this safety plan must be kept at the excavation site and field crews should be made aware of it.
10. Never provide detailed information on archaeological investigations to city staff without permission and guidance from the CAO.
11. Archaeologists, consultants, contractors, and sponsors must behave professionally and respectfully at all times when conducting work on archaeological sites within the City.



Archaeological excavations conducted prior to construction of CityScape.

APPENDIX 1

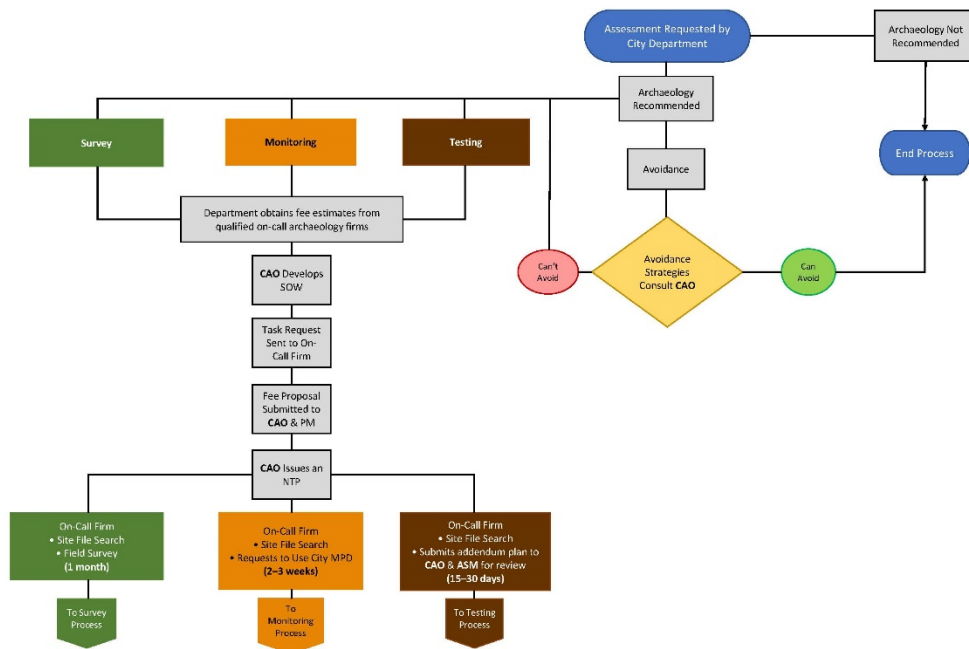
Flowchart for City-Sponsored Process for Archaeology Projects* †

This appendix has three parts that correspond to the following processes:

- Survey
- Monitoring
- Testing

Each process starts the same way:

Typical Process for a City-Sponsored Project on City Land* †



*Where federal funding or other federal approvals are involved, the consultation and review process will involve affiliated Tribes, the SHPO and the lead federal agency.
 †For private development projects on private land, ASM would only be involved for burial agreements and SHPO would not be involved.

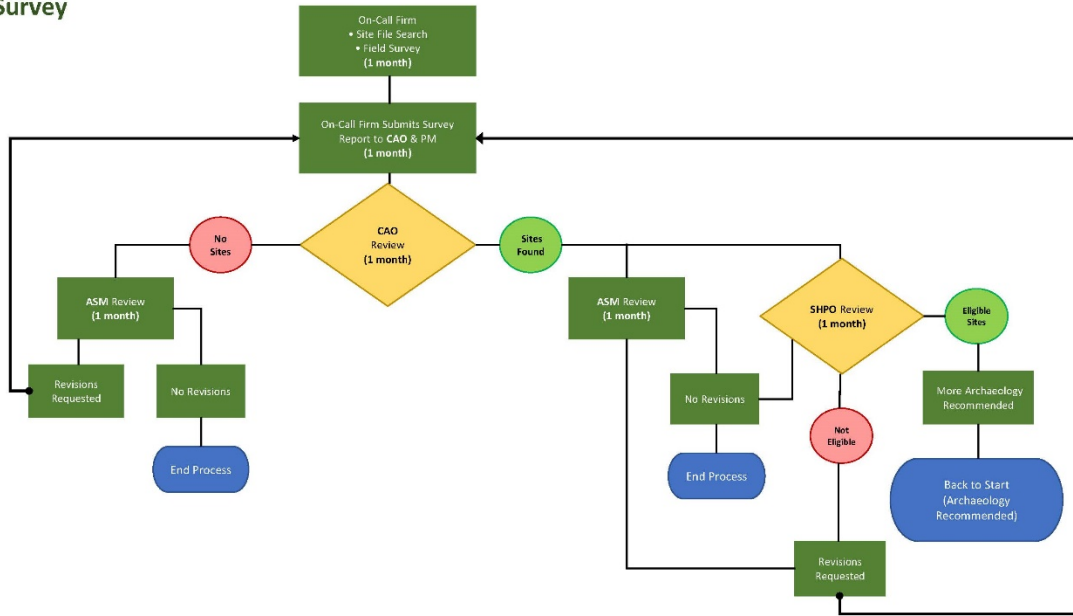
This will be repeated at the outset of each process. The flowcharts for survey, monitoring and testing follow on subsequent pages. Full-scale, printable versions of these flowcharts are available on the CAO website.

*Where federal funding or other federal approvals are involved, the consultation and review process will involve affiliated Tribes, the SHPO, and the lead federal agency.

†For private development projects on private land, ASM would only be involved for burial agreements and SHPO would not be involved.

Typical Process for a City-Sponsored Project on City Land* †

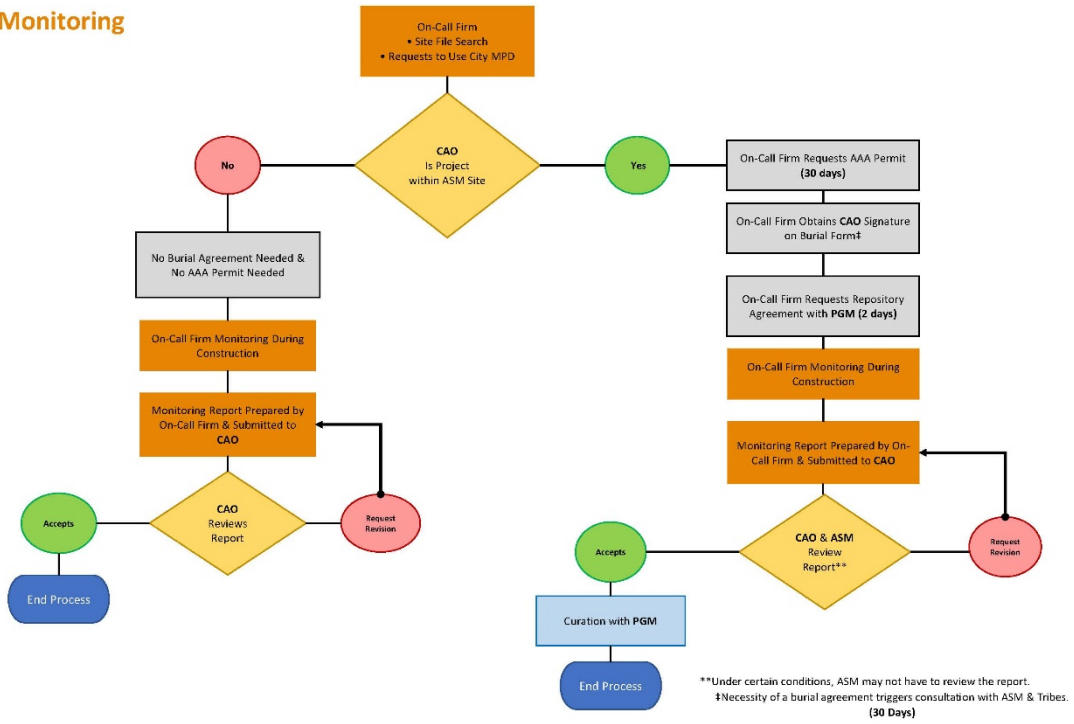
Survey



*Where federal funding or other federal approvals are involved, the consultation and review process will involve affiliated Tribes, the SHPO, and the lead federal agency.
 †For private projects on private land, ASM would not be involved.

Typical Process for a City-Sponsored Project on City Land* †

Monitoring



*Where federal funding or other federal approvals are involved, the consultation and review process will involve affiliated Tribes, the SHPO, and the lead federal agency.
 †For private development projects on private land, ASM would only be involved for burial agreements and SHPO would not be involved.

APPENDIX 2

City Manager Memorandum Citing Importance of Environmental Requirements



City of Phoenix

To: Executive Team
Department Heads
Function Heads

Date: November 16, 2016

From: Ed Zuercher
City Manager 

Subject: COMMITMENT TO ENVIRONMENTAL EXCELLENCE

The City of Phoenix is committed to environmental excellence. City employees can further our success in this area by incorporating environmental considerations into everyday decisions and actions. Working together, we can remain a leader in environmental protection and sustainability.

The City's diverse operations are subject to many environmental regulations, with which we strive to fully comply. We provide training to employees so they understand the requirements applicable to their job and expect managers to be responsible for maintaining environmental, health, and safety compliance. While we always seek to be cost-effective and efficient, we must never allow operations to lapse into non-compliance.

The City aims to improve air quality, water quality, energy and ecosystems; to reduce greenhouse gas emissions; to eliminate waste; to support research and development of technologies that minimize the environmental impacts of our operations; to educate employees to be accountable for environmental stewardship; and to inspire public awareness in support of environmental sustainability.

The Office of Environmental Programs' (OEP) mission is to advance environmental protection by promoting sound environmental policies and practices through leadership, education, and regulatory assistance. I expect departments to collaborate and cooperate with OEP to implement these policies and programs.

Environmental protection is the responsibility of management and every employee. As we perform our daily jobs, we should ask ourselves how we can act to improve the Phoenix environment, and encourage our employees to do the same. We should consider the environment as an integral part of our planning and policy decisions. I am counting on you to join me in securing environmental livability for future generations.

APPENDIX 3

Archaeological Consultant Invoice Procedures and Payment Request Form

In order to assist in the efficient tracking and management of project budgets, all invoices for archaeological services conducted under the City of Phoenix on-call archaeological consulting services contracts must follow these procedures. Failure to do so may result in delayed payment.

1. Invoices must be submitted electronically along with the City Archaeology Section Payment Request Form (PRF; see website).* to the Project Manager and others identified on the Notice to Proceed and cc'd to the City Archaeologist and Contract Associate Archaeologist.
2. Invoices must be accompanied by a cover letter with a brief description of the services provided, the City of Phoenix department for which the services were performed, the period of services, the City of Phoenix project number or Cost Center Number, the Purchase Order Number, and the SVM Number.
3. The archaeological consultant shall, upon approval from the project manager, submit the invoice, PRF, and cover letter to Invoices@phoenix.gov for payment.
4. Questions about outstanding invoices must be directed to the Project Manager for that project; if the results of that inquiry are not satisfactory, then the City Archaeology office must be contacted (602.495.0901; Archaeology@phoenix.gov).

***Note:** Some City of Phoenix departments will require using their own PRFs.

APPENDIX 4

Media Policy for Disturbance to Ancestral Human Burials

The Phoenix Metropolitan area is cultural landscape that contains buried archaeological resources that represent thousands of years of occupation. Native American communities, such as the Gila River Indian Community and the Salt River Pima-Maricopa Indian Community, claim cultural affiliation with the prehistoric cultures who inhabited these archaeological sites. Human burials are frequently discovered during construction and other ground-disturbing activities within the City of Phoenix.

The state of Arizona Antiquities Act (A.R.S. 41-844 and A.R.S. 41-865) and its implementing regulations require that the treatment and removal of human remains be done in a respectful and sensitive manner. Native American communities in Arizona have stated that the public should not be allowed to view human remains during their excavation, and that photographs or video film are strictly prohibited.

If the news media or curious bystanders appear at an archaeological site where human remains are being removed, they should be referred to the CAO. They should not be informed that human remains have been found.

In order to ensure that the human remains are not observed by anyone other than the archaeologists who are working at the site and by City or State officials, the area around the human remains must be secured with a fence and cloth should be placed on the fence to prevent the public from viewing their removal. Any cloth placed on the burial itself must be unbleached muslin cloth.

According to the Arizona Public Records Act (ARS 39-125), the City can refuse to provide information to the public about the location of human burials and other sensitive cultural resources in order to protect them from vandalism.

All prehistoric human burials discovered within the City of Phoenix should be reported to the CAO (602-495-0901). For more information about the State burial laws, contact the ASM Burial Coordinator. For more information about City projects, contact the City of Phoenix Public Information Office (602-262-7176).

APPENDIX 5

City of Phoenix, Citywide Burial Agreement

Note: This document is in the process of being updated by the Arizona State Museum Repatriation Office.

BURIAL DISCOVERIES ON CITY OF PHOENIX LANDS FOR PROJECTS CONDUCTED BY THE CITY OF PHOENIX

This agreement is intended to facilitate compliance with A.R.S. §41-844 and A.R.S. §41-865 on projects initiated and conducted by the City of Phoenix, and on property held by the City of Phoenix. The terms of this agreement will be interpreted and implemented in a manner consistent with terms, definitions, and principles provided in A.R.S. §41-844 and 41-865, Rules revised November 20, 1991, and current Guidelines issued by the Coordinator, ASM.

Tribes claiming affinity with native cultural traditions in the City of Phoenix are the Gila River Indian Community (GRIC), the Ak-Chin Indian Community (Ak-Chin), the Salt River Pima-Maricopa Indian Community (SRPMIC), the Tohono O'odham Nation (TON), Zuni Pueblo (Zuni), the Hopi Tribe (Hopi), and the Fort McDowell Mohave-Apache Indian Community (Fort McDowell). These groups will be referred to collectively in this document as the Tribes. The SRPMIC represents these tribes, with the exception of the Apache, in cases north of Baseline Road and the GRIC represents them south of that line. Fort McDowell is responsible for consultations regarding Apache Remains.

I. DISCOVERY OF REMAINS

A. Projects Expected to Discover Remains

1. The Coordinator, ASM; the Tribes; and the City of Phoenix agree that when the City of Phoenix plans archaeological or other undertakings believed likely to discover Remains, the Coordinator will be notified.

The Coordinator will consult the SRPMIC or GRIC, Fort McDowell, and the City of Phoenix to assess whether a project-specific agreement is needed, or whether work should proceed under the terms of this general agreement. Fort McDowell will determine whether the project area is known to them as one likely to contain Remains associated with the Apache cultural tradition. If the Coordinator

considers this likely, further consultation will include Fort McDowell.

2. If it is decided that a project will be administered under this agreement, the City of Phoenix will notify the Coordinator prior to initiating fieldwork (in individual phases, if appropriate), and will notify the Coordinator that the agreement has been activated by an initial discovery. After that initial discovery, individual burials will not require notice to the Coordinator. Instead, a letter indicating total numbers of burials and confirming compliance with the terms of the agreement will be submitted to the Coordinator within 30 days of completing compliance with the terms of the agreement (normally, the time at which remains are repatriated to the appropriate tribe).

The Coordinator will be notified and will initiate consultation regarding individual cases in which cultural association is uncertain or is known to be of a tradition not claimed by the Tribes.

B. Unexpected Discoveries

The Coordinator, ASM; the Tribes; and the City of Phoenix agree that the following provisions and procedures will apply in any case of inadvertent and unexpected discovery of Remains as a consequence of a City of Phoenix undertaking or on City of Phoenix property:

1. When remains or objects that may be subject to A.R.S. §41-844 or 41-865 are discovered, the City of Phoenix is authorized to undertake limited additional excavation and examination to assess whether the materials are within the protected classes of remains and objects, prior to notification of the Coordinator and claimants.

2. If the City of Phoenix and its contractors are unable to determine whether materials are Remains protected under the statutes, the Coordinator will be notified and will make this determination, with the assistance of specialists as needed.

3. The City of Phoenix will notify the Coordinator (if not already consulted) and the SRPMIC or GRIC of the discovery within 24 hours of confirmation that the discovery falls within the protected classes. If the Remains are of Apache origin, or are not clearly identifiable as belonging to a cultural tradition other than Apache, Fort McDowell will also be notified by the City of Phoenix.

4. If it is determined that the Remains represent a cultural tradition not claimed by the SRPMIC or GRIC or Fort McDowell, the Coordinator will undertake notification and consultation of appropriate parties.

5. If efforts to contact the SRPMIC or GRIC, Fort McDowell, and the

Coordinator are unsuccessful, and Remains are endangered by human or natural action, the City of Phoenix is authorized to proceed with removal of the Remains to a local laboratory for their protection. Written notice of this action must be provided to the SRPMIC or GRIC, and to Fort McDowell when there is reason to believe that the remains may be Apache in origin, and to the Coordinator within 3 days of removal.

II. TREATMENT AND DISPOSITION OF REMAINS

The following provisions for the treatment and disposition of Remains reference the SRPMIC or GRIC. However, when Remains are of Apache origin "Fort McDowell" will be substituted for "SRPMIC or GRIC" in all provisions below.

Unless otherwise agreed between the City of Phoenix, the Tribes, and the ASM Coordinator, the treatment and disposition of Human Remains shall be as follows:

1. All discovered Remains shall be treated with respect and dignity in order to avoid any unnecessary disturbance of Remains, separation of Human Remains from their Associated Funerary Objects, or physical modification of Human Remains.
2. Whenever possible, Remains will be protected in place. The SRPMIC or GRIC will be consulted regarding whether the security of the location is adequate.
3. If avoidance and protection of Remains is not possible, removal will proceed according to the following provisions:
 - a. Representatives of the SRPMIC or GRIC shall have the opportunity to be present during the excavation of the Remains. The City of Phoenix will provide to the SRPMIC or GRIC an opportunity to examine the Remains prior to removal and to conduct traditional activities, if this is feasible without delay that would endanger those Remains.
 - b. Remains will be excavated in accordance with the provisions and standards of the Arizona Antiquities Act and implementing Rules, and of Guidelines current at the time of the discovery.
 - c. Remains and associated objects may be transported to an archaeological laboratory within the Phoenix metropolitan area (including incorporated cities adjacent to Phoenix) for archaeological inventory and description. Under no circumstance will Remains or associated Objects be taken out of the State of Arizona. Transport of Remains will be minimized.
 - d. No destructive analysis of Human Remains shall be permitted except with written authorization of all claimant Tribes, with a copy of their authorizations to the Coordinator.
 - e. Photographs of human remains may not be taken under any circumstances. Photographs of burial locations and of Associated Objects can be taken and can be used in publications with permission so long as no human remains are visible in the photograph. However, SRPMIC and GRIC prefer that sketches

of Associated Objects be used instead of photographs. No human remains may be used in public displays.

4. Representatives of the claimant Tribes shall be afforded the opportunity to review all artifact collections and records resulting from activities of the City of Phoenix and their contractors in order to identify funerary or Sacred Objects. If such objects are identified, the Coordinator will be notified by the Tribes and consultation regarding their treatment and disposition will be initiated.
5. Copies of all publications arising from archaeological activities in the project area shall be provided to the Coordinator, ASM, and to the Tribes by the City of Phoenix. An inventory of all Remains repatriated shall be submitted to the Coordinator within 30 days of repatriation.
6. The location of the discovery of Remains that are to be protected in place will be protected to the extent allowed by law, and will not be included in any public or professional publications having an unrestricted distribution.
7. All Tribes reserve the right to participate in further planning and implementation of activities, including reburial, under this agreement, after notice to the SRPMIC or GRIC, or Fort McDowell when the Remains may be Apache in origin.
8. The City of Phoenix will turn over to the SRPMIC or GRIC all Remains of relevant cultural affiliation that are removed from the project area. Remains may be temporarily inventoried and stored in local archaeological laboratory facilities, but will be made available to the SRPMIC or GRIC for repatriation within a specified period after completion of fieldwork, to be negotiated between the SRPMIC or GRIC and the City of Phoenix in each case.
9. An inventory and report of Remains encountered and their disposition (including inventory of remains and associate objects and maps and photographs, as specified in the Rules implementing A.R.S. §41-844 and 41-865) will be submitted to the Coordinator and to the Tribes by the City of Phoenix.

II. DISPUTE RESOLUTION

All disputes shall be resolved in accordance with ARS §41-844 and 41-865 and the procedures set forth in the Rules implementing that statute and Guidelines current at the time of the dispute. Such disputes shall not interfere with or delay ongoing archaeological or construction work in the project area. If the nature of the dispute does not involve issues of cultural affiliation, the dispute will not delay repatriation of Remains.

APPENDIX 6

City of Phoenix Archaeology Report Format Requirements

The CAO has established a minimal set of requirements for the composition and formatting of an archaeological report submitted for a City of Phoenix archaeological project. All reports should adhere to SHPO and ASM reporting guidelines.

The following format structure is based on SHPO standards and in most cases should be used for reports submitted to the City of Phoenix. This format includes several report components:

- Cover
- Title Page
- Abstract
- Acknowledgments
- Table of Contents
- Report Introduction
- Project Setting
- Cultural Setting
- Site Files and Records Search
- Research Questions
- Field Methods
- Project Results
- Summary and Recommendations
- References Cited

All final reports shall include ASM site numbers, which must be assigned to all newly discovered sites or to previously known sites that did not have ASM site numbers. In some cases, the ASM site card may need to be updated in order to revise site boundaries or include additional information about the site. Maps must be included in the report which show the project area within the City of Phoenix; all sites that are described and their ASM site numbers; and the locations of archaeological trenches, monitoring, and data recovery activities. Reports also shall use archaeological feature terms and definitions that have been established by the ASM (see [ASM's Archaeological Site Recording Manual](#)).

Report Cover

All final archaeology reports with substantive results (data recovery reports with features, etc.) must have a cardstock cover with spiral or other binding. Reports less than 50 pages in length can be stapled or clipped. The report title and "Prepared for City of Phoenix" must be identified on the cover along with the SVM Number.

Title Page

The title page should include the following information:

- Project Title
- Report Author
- Submitted By
- Prepared For (City Of Phoenix and Department)
- City Project Number
- SVM Project Number
- Date

Additionally, identify “draft #” on the title page for all reports to be reviewed (except for some small reports with no findings).

Abstract

Reports must contain an abstract that follows SHPO guidelines, but must also identify the repository of project materials.

Acknowledgments

It is important to acknowledge all individuals who have assisted with the planning and/or implementation of a City of Phoenix archaeology project.

Table of Contents

All reports more than five pages in length should include a table of contents.

Introduction

The introduction should include the following information:

- Brief summary of what was done
- For whom it was done (client and review agencies)
- Applicable project numbers (SVM number, City project number, etc.)
- Regulatory context
- Permit number
- Dates of fieldwork

If work was done under a treatment plan (e.g., City’s Monitoring and Discovery Plan, General Treatment Plan, or project-specific plan), the plan must be properly referenced. It is the consultant’s responsibility to find out from the project manager which, if any, federal and/or state agencies are involved in the project.

Project Setting

This section should include:

- Legal description of project area (Township, Range, Section and USGS 7.5’ Topographic Quadrangle)
- Characteristics of the local and regional landscape
- Geology and geomorphology
- Vegetation

- Modern and historic impacts to the natural landscape

When appropriate, a statement should be included in this section that evaluates the reliability of an archaeological survey if the ground is obscured by vegetation or development or has been disturbed by construction or other activities.

Cultural Setting

Brief summary of prehistoric and/or historic culture history relevant to the project area should be included with the goal of presenting a cultural context in which to evaluate and interpret potential archaeological data recovered during the project. This summary should include brief discussions of classic works, as well as up-to-date data and/or hypotheses that are relevant to the project area. The cultural setting should provide the foundation for the research questions to be presented later in the document.

Site File Searches/Records Checks

All consultants working on projects located within the boundaries of the City of Phoenix must request a SVM site records check **from the CAO** before any documents are prepared for that project. A SVM Request for Access to Site Records form must be filled out and emailed to archaeology@phoenix.gov along with a georeferenced map or shapefiles for the project area and study area.

At that time CAO will assign a SVM project number to the project for tracking purposes.

Note: The SVM number must be present on the cover and title page of all documents and on all project correspondence.

Use of the site files is restricted to landowners developing property within the City and their authorized agent or consultant. It is required that the AZSITE system also be checked, and other agency records (ADOT Portal, ASM Archaeological Records Office [ARO], Bureau of Land Management General Land Office [BLM GLO] maps, Maricopa County Aerial Photos, etc.) that may be relevant. Any discrepancies that are found at different institutions concerning site location, size, or other characteristics should be mentioned in this section of the report and illustrated on the map displaying previously recorded cultural resources.

Each report must present background research data in accordance with the *SHPO-ASM Interim Guidance Regarding Survey Report Standards* (June 12, 2019). The CAO requires four UTM's be plotted around the boundaries of the background research area on the map. For projects subject to only the City's ordinance, only those archaeological sites present within a one-half mile radius of the project location must be plotted, but the boundaries of those sites must be fully displayed even outside the background research area (no partial site boundaries).

Previously conducted projects that occurred within the current project area boundaries must be depicted on the background research map and be discussed in the text.

Research Questions

All reports that involve excavation, both testing and data recovery, must have a discussion of the relevant research questions for the project. These questions must be placed within the cultural context for the project area, but can also include simple questions such as:

- Where is the site boundary located?
- Is a prehistoric canal located in the project area?

Also include a discussion of the data requirements and methods used to answer the research questions.

Note: The SHPO has published a series of Historic Context reports that are useful for identifying the appropriate prehistoric and historic contexts.

Field Methods

Reports shall include:

- Detailed description of all field work undertaken
- Methods used
- Any problems that may have influenced the results generated by the methods used
- Any deviations from the treatment plan must be addressed and explained.

Project Results

This section should consist of a detailed description that includes these topics:

- Archaeological findings
- Significance and Arizona/National Register of Historic Places eligibility of findings
- Descriptions (including age where possible) for all features and diagnostic materials
- Comprehensive table of features found with information about associated artifacts and specimens.
- For historic sites, a table providing dates of manufacture for all diagnostic artifacts.
- Photographs, profile illustrations, and plan view illustrations of identified features

Testing and data recovery projects that involve trenching should include representative profiles in the report. All trenches in which archaeological features are found should have a profile in the report. These profile illustrations must match or reflect the text descriptions of geological and archaeological features.

The locations of all archaeological features must be identified on a plan view map(s) of the site or portion of the site investigated. All features should be assigned feature numbers. All areas investigated through surface collection, trenching, stripping and hand excavation must be identified on the plan map(s).

Summary and Recommendations

This section should consist of a brief summary of what was done and what was found.

Any recommendations for further investigations, or not, should be made in this section. Any recommendations for further investigations must justify why additional work is appropriate. Projects located on state or federal land must address the eligibility of the archaeological sites for nomination to the ARHP and NRHP, respectively.

References Cited

All references cited in the text, in tables, or in figure captions must be listed in the References Cited section at the end of the report. It is important to use current or recent references whenever applicable.

APPENDIX 7

Archaeological Discovery Procedures

The following protocol applies to discoveries of archaeological materials encountered during all construction activities within the City of Phoenix. These materials include concentrations of sherds (pottery fragments) and bones of any kind.

1. Once a discovery is made, all construction activity within a 10-meter diameter surrounding the discovery must cease until a professional archaeologist has examined the materials. Safety tape or barricades should be placed around the discovery area to ensure it is not disturbed. Construction activities at other portions of the project area may continue.
2. The construction inspector or designated person of authority must immediately contact, during working hours (7:00 am to 5:00 pm, Monday through Friday), the City Archaeology Office: 602.495.0902; 602.534.1573; Archaeology@phoenix.gov). If the discovery is made after normal working hours, the inspector can leave a message and wait for the City Archaeologist to return the call.
3. The City Archaeology Office is responsible for contacting a qualified professional archaeological consultant, who retains a blanket Arizona Antiquities Act permit, to inspect the discovery area as soon as possible (usually the same day). The archaeologist will release the discovery location to the contractor once an inspection has been made and the discovery has been properly documented and evaluated and approved by the City Archaeologist. If human remains are found, the archaeologist must implement the citywide burial agreement protocol and then excavate the human remains in accordance with the citywide burial agreement. This excavation may take two to three days and may require assistance with heavy equipment (pavement removal, stripping overburden, etc.) from the contractor.
4. There will be no photography of any human remains and excavation will be shielded from the public with cloth covering.