

Guidance on Considering 'M' Practices on Exhibit 1

Abstract

A recent submission of Negative Findings Reports (MT-CPA-8) revealed that field office personnel maybe spending too much time looking at practices that do not need a field review and then over documenting the results. Most of the issues revolve around the 'M' category of practices on Exhibit 1. This technical note will offer some guidelines on deciding if a practice needs a field review for cultural resources and then what level of documentation may be necessary. On reservations, the Tribal Historic Preservation Offices or cultural committees will determine the level of review (which may be greater but never less than the NRCS requirements).

Generally a practice is placed in the 'M' category when there is variability in how or where said practice may be installed, and based on existing surface conditions, the field office staff can make the decision as to whether an 'M' practice needs a field review.

Forestry Practices

The biggest consideration for forestry practices is how the practice will be implemented:

- If the practice involves heavy machinery, piling and burning, etc., then those areas should be examined especially if near a drainage or on a ridge top.
- If just hand cutting and dropping or chipping and spreading, then no field review is required.
- Generally forest practices on slopes 35% or greater do not require a field review. If you are aware of any outcrops, check to see if there is any quarrying activity. If mine shafts, just work around them. Do not spend a lot of time doing cultural reviews on steep slopes.
- Also not productive is walking huge areas covered with thick forest duff. Since the vast majority of NRCS's forest practices are in areas with a history of logging, walk existing roads, game trails, skid trails, and other places with surface exposure. Focus review efforts around natural water bodies and flat top ridges.

Fences

A general philosophy is that most fences will need some degree of review. Review areas:

- Where a path has to be bladed, then document as ground disturbing.
- If a backhoe will be used to install some types of post (e.g., railroad tie, concrete), document as ground disturbing.
- At least drive fence sections on ridges or along rivers, creeks, or other natural water sources. This level of review does not require documentation.

Documentation

Full documentation on a negative findings report consists of the MT-CPA-8, file search map, and plan map (1:24,000 scale) if not using an enlarged topographic version of the file search map. Remember that most (90 to 95%) of negative findings reports should be no more than 2 to 3 pages long.

At this time, the State Historical Preservation Office (SHPO) wants the exemptions documented for 'M' practices that do not get field reviewed as a way of monitoring the decision-making process. Therefore, these projects will require the MT-CPA-8. The date of inventory is not filled in but still need the name of the decision maker. Clearly need the practice and the reason a field review was not conducted (Exemptions 1 through 4 on Exhibit 1). A plan map is not needed but should include the file search map.

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