

Beware of Archeaological Conditions of Development Sites



Pictured Above:
Pictures actual artifacts
found on the development site

Did you know that Illinois law requires a Historic/Archaeologic audit prior to construction of any project that involves State or Federal funding? As a matter of fact, it is getting more commonplace for some projects requiring any State permit to provide a full analysis as well. This means any project with municipal sanitary sewer service, which requires an EPA permit, may need to have an Archaeological Survey completed in the prior to construction start.

A development by the Perry Group, Ltd. in the Greater St. Louis area recently enlightened us on the potential impact of items as small as arrowheads on a proposed site.

Similar to an Environmental Audit, an Archaeological Survey studies the physical area for artifacts. Sub-surface investigations requiring individual borings and soil removal are common. After a site review by a qualified engineer, a report identifying possible located artifacts and recommended remedies is delivered to the Illinois State Historic Preservation Agency, which reviews the report and rules on the significance of any artifacts found. Rulings can range from complete clearance (no significant findings) to a formal remediation plan, which may include identification and removal of all artifacts located on a site. In certain instances, abandonment of a site is necessary.

Awareness is especially important in areas like the Kankakee River Valley region and other Illinois markets due to the historical prevalence of Indian tribes in these locales.

The best approach if you are planning a project that may be impacted by this State requirement is to check with the Illinois State Historic Preservation Agency to see if the site/area you are planning to develop is located in a high-risk area. If it is, we recommend contracting a qualified engineer early in the process. Phase One Audits are relatively inexpensive and will identify possible problem areas. The Phase Two Audit will specifically examine located artifacts and recommend mitigation plans. The State Agency is sensitive to the developer's plight and is very responsive in its review of the Audits and rulings on the engineer's recommendations. A list of qualified engineers can be requested by calling the Illinois State Historic Preservation Agency.

In the case of our senior housing development in the Greater St. Louis area, simple arrowheads found in the cornfield we were purchasing was evidence enough of possible significant artifacts. We ultimately were required to expose an area encompassing approximately one-acre at depths reaching as far as six feet in order to examine sub-surface deposits. This sub-surface investigation was predicated upon identification of several simple arrowheads located on the surface. In the end, no evidence of historical or archaeological significance was found and a Clearance Letter was generated by the Illinois State Historic Preservation Agency.

We were fortunate. The results could have been much different resulting in a significant liability. Besides the costs of the Audits, we only lost time. The lesson learned is to simply identify potential historic considerations early in the project and avoid possible costly repercussions of a historically significant site.