

British Columbia Heritage Inspection Permit Guide for Impact Assessment Applications

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Province of British Columbia
Ministry of Natural Resource Operations
Archaeology Branch

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Introduction

This document assists professional archaeologists in filling out an application for a British Columbia Heritage Inspection Permit to conduct an archaeological impact assessment study. The guide is supplementary to the [BC Archaeological Impact Assessment Guidelines](#) (*AIA Guidelines*) and other Archaeology Branch [Bulletins](#) and [Guidelines](#) which set standards for permitted work and site recording. The *AIA Guidelines* is a broader document, addressing all phases of the archaeological resource management process, but contains important information pertinent to applying for permits and should be consulted in conjunction with this guide. Important connections to other documents are indicated. It should be noted that the *AIA Guidelines* are integral to the permitting process. Where this Guide and the *AIA Guidelines* differ, this document will prevail. If uncertain, then contact the Archaeology Branch for clarification.

Applicants should note that the branch has entered into specific agreements with some government agencies and First Nations. These agreements can affect the administration of permits, timelines and processes for submissions of applications and reports and other aspects of the permitting process. The [agreements](#) are found on the branch website. Applications should include reference to relevant parts of agreements that may apply to the proposed work (for instance, indicate awareness of report submission requirements in areas covered by Memoranda of Understanding with First Nations).

This guide follows the structure as the application form found on the Archaeology Branch [website](#). For each major section the guide states the principles of a good application followed by suggestions for applicants. In some instances content requirements are also stated, especially for more administrative aspects. The overall intent is to allow flexibility for applicants with a view to allowing and encouraging thoughtful, responsible and innovative methods for the conduct of cultural resource management in British Columbia while maintaining a baseline for quality of applications and the work they propose.

A good application demonstrates a thorough understanding of the proposed development, important cultural and environmental predictors of site locations within the study area and demonstrably efficacious methods for identifying and describing archaeological sites and any impacts to them that may arise from the development. Senior archaeological personnel will have proven abilities within their areas of responsibility. There will be adequate resources to conduct the work to an appropriate level and it will provide for the long term storage of collected materials and associated documentation at an approved facility.

Submitting Applications

Applications made by professional consulting archaeologists must be uploaded directly to the Archaeological Permit Tracking System (APTS). A guide to using APTS is included as Appendix A.

The Archaeology Branch often requires changes to applications before they are ready for distribution to interested parties.

- As external APTS users are unable to upload revised applications, these must be submitted by email to the branch project officer assigned to the file.
- Revisions should include the complete application in one electronic file, not just those parts with changes.
- Applications with major revisions will usually require agreement from proponent – either with a newly dated client signature block or by a supporting document such as an email.
- For all but the simplest revisions, it will assist in an expedited permit review if the revised application is sent as two files – one highlighting all revisions, and a clean version ready for referral. If this is not done, the entire revised application must be reviewed for additional changes

Location of Project

This section of the application identifies the location of a proposed project and associated archaeological field work in both written and mapped formats.

Study Area

The study area defined in the application includes all land that might be examined under the permit. For smaller projects the entire study area will be inspected. Larger developments may have portions of the study area with archaeological potential too low to warrant inspection.

“Blanket Permits”

Permits anticipating the ability to add new study areas after permit issuance are commonly referred to as “blanket permits” and are often used in the forestry, mining and oil and gas sectors. To provide First Nations an opportunity to identify potential infringements to aboriginal rights, the study area associated with a blanket permit application must be well defined. For example, the study area for a forestry company should be restricted to the operating area for that company instead of the identifying the entire forest district.

Blanket permits require that notifications are sent regarding the specific locations of work before field work is conducted:

- The application must indicate that notifications will be sent to the Archaeology Branch, First Nations and other relevant interested parties once the locations of additional work become known. These notifications require a written location, description and sufficient mapped information to be able to locate the project. This will require general, midrange and/or detailed maps.
- If applicants are unable to define the study area with sufficient rigour, then the application must also indicate that First Nations must be provided a minimum of 15 calendar days to respond to any notice of work before a field study is conducted. The notification must state that the intent of the comment period is to provide an opportunity to identify potential infringement to aboriginal rights and include the branch as an alternative contact for rights issues.

Some blanket permits applications also contain a provision to add a new proponent to the permit.

- As new clients are added to the blanket permit through amendment, these associated study areas must also be well defined.
- As above, an inability to rigorously define the study area will trigger the requirement for a 15 calendar day notice of work to provide First Nations with an opportunity to comment on aboriginal rights issues.

Written Description

Good location descriptions are clearly written, inclusive of the entire study area and presented in such a way that a reviewer can quickly place the study area within provincial, regional and local contexts.

Project location descriptions for large study areas will usually reference administrative units, such as a Forest District, and pertinent information that may limit activities within that unit, such as a Forest Licence or the named proponents' operating areas.

Project location descriptions for small study areas will include general information such as proximity and direction to major named features (*i.e.*: town, lake or river) combined with more specific information in relation to local landmarks or features.

Detailed location information can differ for private property and Crown land:

Private Property

- civic address including postal code
- complete legal description including land title district
- private parcel identification number(s) (PID)

Crown Land

- Tenure type and description (see the [British Columbia Archaeological Inventory Site Form Guide](#) Section 6, Tenure/Reserves)
- complete legal description including land title district, if surveyed land
- parcel identification number(s) [PIN], if surveyed land.

Legal descriptions are unique identifiers and may consist of a variety of formats derived from the type of survey or tenure system used to describe the location. Some examples are:

- District Lot 1345, Cariboo Land District
- Legal subdivision 10, Section 4, Township 16, West of the 8th Meridian, Peace River District
- Lot 2, DL 668, Nanaimo District, Plan 14352
- South Island Forest District, FL A011334, Cutblock 14H
- Cariboo Mining Division, Coal Tenure No. 204022, Tag P8888

Maps

A good map communicates effectively, includes only relevant information, is clearly understood in black and white, and retains clarity after being faxed. Maps are typically the most important method of identifying the study area, project location and development details.

A general location map and either a midrange or detailed development map are usually necessary. In many circumstances all three levels of mapping are needed. “Blanket permit” applications might include only a general location map showing a major administrative unit within which work will be confined. However, when specific development areas are included with these applications, a midrange and/or detailed map will be needed for each identified development area.

All maps must include:

- Base mapping scale, source and date;
- North arrow;
- Bar scale;
- Legend; and
- Clarity of information in black and white at low resolutions. Line and fill coding is necessary, colour coding should be supplementary.

General Location Maps

General location maps are required to place the project area in context with major topographic and cultural features. These maps include:

- 1:50,000 NTS base mapping or, for larger projects, 1:250,000 maps that include the 1:50,000 NTS map sheet grid and map numbers
- Project location clearly marked
- Important permanent landmarks plainly noted
- Point locations for nearby recorded archaeological sites but only if they provide necessary context for the application.

Midrange Maps

Midrange maps aid in determining the exact project location by referencing land marks not found on general location maps. Midrange mapping includes:

- Range of 1:5,000 to 1:20,000 base mapping
- Cadastral base mapping for urban applications
- Nearby landmarks clearly labelled
- Project location displayed as polygons, include impact areas if detailed mapping is not otherwise warranted
- Archaeological site location polygons in the immediate area of the project but only as necessary for supporting application text.
- Archaeological potential mapping that will be used, if available at a useful precision.

Detailed Development Mapping

The detailed map includes precise archaeological potential zones when available and locations of different types of field activities within the project area as anticipated at the time of the permit application. Detailed mapping includes:

- Base mapping scale of less than 1:2,000
- Detailed project area showing:
 - Types of activities
 - Impact areas indicating impact depths when known
 - Known archaeological site boundaries within or immediately adjacent to project area
 - Archaeological potential mapping prepared for project, if any.
 - Contours prepared for the development area, if available

2A. Scope: Development Type, Project Components and Development Schedule

This section of the permit application describes the source and timing of potential impacts to archaeological sites. **Good development descriptions** tie together the proposed development with potential impacts and set the stage for understanding the associated field work requirements.

Development Type

The development type is a general account of the nature and size of the proposed development and clearly identifies the proponent. For example: “AAA Logging Ltd’s proposed sawmill, including ancillary facilities, located within a 22 ha parcel of land”. Applications that involve more than one type of development sector (such as forestry and residential) are not allowed.

Project Components

This section should describe all parts of the project that have the potential to impact a protected archaeological site, including preliminary engineering studies and ancillary construction. Examples include:

- Underground utilities services and landscaping features (e.g., ponds, swimming pools, terracing), associated with residential developments;
- Borrow pits, workspaces, and access roads associated with oil and gas developments; and
- Geotechnical testing associated with large-scale industrial construction

Impact zones are described in terms of potential depth, magnitude of impact, and horizontal dimensions. Impact assessments may need the ability to assess a buffer zone outside the development area to facilitate site avoidance decisions by identifying areas where development boundaries can be safely moved. This is common with forestry cut blocks and linear developments.

Impact assessments must also consider indirect impacts related to the proposed project. For example, forestry related impact assessments may need to consider the effects of blow-down on protected CMTs; construction projects may result in erosion to land adjacent to the direct impact area; or any project located near the ocean may have an impact on intertidal resources.

The detailed development map is most important for this section. The project description can also be enhanced by engineering plans, photos and other illustrative materials:

Development Schedule

This schedule refers to the timing of development in contrast to the fieldwork and analysis schedule addressed in Section 5. This section must establish the relationship between the project planning and development activities and the proposed archaeological resource management work. All parties must be aware of these schedules and the need to ensure that resource management requirements can be formulated and implemented prior to commencement of land alteration.

2B. Scope: Type of Program and Methodology (Assessment Only)

Type of Program

Section 2B of the permit application requires applicants to classify their work in one of four program types.

- a) Inventory: usually regional or large scale inventories to develop an inventory of archaeological sites for use in future research or resource management. These inventories are only rarely associated with a specific development proposal.
- b) Assessment: the location, identification and assessment of archaeological sites within the subject area. A project is considered to be an assessment if the central goal is to provide data for formulation of site impact management recommendations. Assessments often include an inventory component and sometimes may have limited other activities if the objective is to identify site locations in order that they are avoided during development.
- c) Systematic Data Recovery: the systematic investigation and recovery of data as a strategy to mitigate the impact of development, normally follows from an assessment.
- d) Emergency Impact Management: action to mitigate unanticipated impacts on archaeological sites.

This section of the guide pertains to section 2.B.b (**Assessment**) and does not discuss the other program types.

Methodology

The methods proposed for conducting the impact assessment are a critical part of the application. **A good methodology** demonstrates an understanding of the relationship between study objectives, archaeological methods, the range of settings expected in the study area and anticipated impacts from the proposed development. The methods will be specific enough that the minimum level and type of work is clear. At the same time a good approach will retain enough flexibility to allow in-field responses to unexpected conditions and results.

Assessment purpose and expected approach to mitigation

It is important to formally state the purpose of the assessment and it can be useful to indicate the anticipated approach to mitigating identified impacts when such approaches may affect the level of effort. In both instances, the application must show how the methodology responds to these factors.

The purpose of an assessment is often in several parts and can include broader objectives and questions specific to a locale or region. Objectives of assessments are laid out in general terms in the *AIA Guidelines* (s.3.5); these can be referenced but usually there is little need to reiterate them in detail. Additional specific questions that the assessment seeks to answer should be provided in more detail – these questions tend to be dependent on the local setting, particulars of the proposed development or other nearby work that points to areas of enquiry. The application should illustrate the connection between the methods proposed and the general and specific goals of the work.

There are two common approaches to assessments that can entail different field and reporting methods. These approaches include finding sites in order to avoid altering them and to find sites in order to assess impacts that are likely to arise during development. Often the two methods are combined for complex permits and sometimes within one development proposal, where some parts are suitable for an avoidance strategy and other areas require a detailed impact assessment.

Assessment to ensure site avoidance

The inventory type of assessment is appropriate when project plans are flexible and avoidance of development related impacts to sites is the predetermined management approach. Site avoidance is a common mitigation strategy where there is room to move development boundaries, for instance many provincially approved subdivision proposals, crown land tenures and forest harvesting plans.

When this approach is appropriate, the field methods will focus on site discovery, site boundary delineation, and site recording. Section 2.B.b of the application should therefore emphasize the following subsections:

- Potential assessment
- Site discovery methodology

- Site boundary delineation
- Site recording

The inventory-to-avoid approach does not provide sufficient data to formulate alternative impact management strategies should avoidance not be possible. Where site management recommendations are needed, an impact assessment should be completed.

Assessment to manage impacts

An impact assessment is conducted when unavoidable conflicts have been or are expected to be identified between archaeological sites and the proposed development. In these instances the goal is to formulate a range of impact management strategies and resource management recommendations. After an impact assessment is completed, the results and recommendations are forwarded to the Archaeology Branch to determine a mitigative strategy. The main components of an impact assessment are site discovery (inventory), site evaluation, determination of significance, and identification and assessment of impacts. Section 2.B.b of the application for an impact assessment should address all subsections listed above in the inventory-to-avoid section as well as the following list:

- systematic surface collection design and methodology
- evaluative testing design and methodology
- significance evaluation scheme
- impact assessment scheme
- methods and techniques for data analysis

Archaeological potential assessments

All projects rely on an assessment of the likelihood for different types of sites to be located in different parts of the project. These assessments guide the methods that will be employed in the study area. For small projects there may be uniform potential for a limited variety of sites. For large projects or multi-project permits there will usually be a very wide range of possible site types and locations to be considered. Potential assessments can be informal decisions conducted during preliminary field work based on some standard criteria and a qualified professional archaeologist's experience. Potential assessments can also be formal project specific or regional studies that generate potential maps and reports describing methods.

In applications a **good description of archaeological potential** will clearly describe criteria for defining potential in the field and how the formal and informal assessments of potential will guide the selection of areas to inspect in the field, and the field methods that will be applied to different classes of potential encountered.

- If a formal assessment of potential (AOA) has been done that will guide the field work, the potential criteria should be summarised from the relevant report.
- If an AOA was conducted solely for the project in question and influences the AIA methods, the Archaeology Branch may request a copy of the report to review and in some instances may require a copy be appended to the permit application.

Pre-field potential assessment

The pre-field potential assessment section includes discussion of (a) method for selecting areas for assessment, (b) expected site types, and (c) archaeological potential zones. These comments should reflect the scale and scope of the development. These are explained below.

(a) Assessment Area Selection Method

Describe how the assessment area was selected. Discussion of the selection process provides a link between project plans, study purpose, and permitted activities. A description of assessment area selection will vary according to who has reviewed the proposed project and identified the need for archaeological study. Below are some common examples:

Provincial or local government agency reviews of development proposals can require an archaeological study. In this case include:

- the government agency name and wording of their requirement
- your professional opinion as to whether assessment area identified by the government agency is appropriate or should be revised
- the type of archaeological work necessary to adequately assess the project.

Sometimes **proponents review** and select developments for archaeological assessment based on industry guidelines or the results of previous archaeological work. Describe how developments undergoing archaeological assessment are selected using, for instance:

- particular Forest District AOAs or
- the [*OGC Guidelines for the Performance-Based Approach to Archaeological Assessment*](#), or
- summarise the recommendations resulting from previous archaeological work conducted for the subject area

Give your opinion of the type of archaeological work necessary to adequately assess the project.

Archaeological consultants reviews for a proponent or agency will also identify projects warranting assessment. This may occur before the permit application has been prepared, or during the life of the permit. When projects are selected this way, explain

- how the assessment area was, or will be, selected

- why the study is required, or criteria for establishing when they will be required
- include any supporting potential mapping for selected areas, or reference such mapping if it will be used for selection after permit issuance
- the type of archaeological work necessary to adequately assess the areas already selected.

“**Blanket permits**” may require a different description of methods that will be used for selecting or excluding areas for in-field assessment. They will usually overlap with one or more of the previous three categories so this description should provide the kind of information in the relevant categories. As these permits include work that is not yet identified by specific type, scale or location, the application may need a series of methods that would apply in different circumstances.

(b) Expected Site Attributes

Describe the types of sites that might be encountered within the study area in terms of site typology, size range, artifact density and common site indicators. Understanding these variables is critical to designing an effective, quantifiable site discovery methodology. These details should be based on real data derived, for instance, from an AOA, an earlier similar study to the one proposed, or an analysis of site inventory data. For some projects a table may be the best way to present this information. Site attributes should fit the study area; generic regional descriptions should be avoided unless sites are demonstrably homogenous across the region.

(c) Archaeological Potential Zones

Where the entire study area is not going to be examined equally, the application must indicate how the study area will be subdivided. Normally such subdivision is based on archaeological potential. Because it governs the level of effort applied in the field, potential must be described in detail. A map of the study area showing zones of potential should be included if available and useful at operational scales. Typically, archaeological potential may be characterised into high/moderate/low or potential/low-potential classification schemes. Include the criteria used to define each class of potential.

In-field archaeological potential assessment

The pre-field potential assessment will usually be refined in the field. Use this section to explain the kinds of field observations that will be used to revise the distribution of potential areas. The application should commit to include in the report a full description of decisions regarding in-field potential assessments which have influenced field inspection strategies.

Common Problem	Applications contain inadequate descriptions of criteria used to define potential and hence level of effort. For instance, criteria for archaeological potential are not local enough for adequate decision-making.
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Site discovery methodology

Site discovery refers to the location and identification of archaeological sites on the ground. In an assessment, site discovery methodology involves site survey. Site survey includes both surface inspection and subsurface testing. [Section 3.5.1](#) of the *AIA Guidelines* includes a detailed description of what constitutes **good site discovery methodologies** and should be consulted when describing these methods.

In general terms good site discovery methods will be rooted in the study objectives and specific questions being asked, clearly relate to the archaeological potential and be responsive to relevant variables such as environmental setting, type of previous disturbance, exposures of buried sediments, expected site size and density.

The level of effort for site discovery should be related to the potential of the area to contain sites, usually with the greatest effort in high potential areas and the least in low potential areas. Examples of exceptions include:

- small study areas, such as city lots, where a high level of effort over the entire area may be both appropriate and practical
- large projects in areas with unproven potential models where a sample of low potential areas must be ground-truthed if the model is to guide level of effort in the field.

Surface inspection design and methodology

This section of the application should describe specific strategies and clearly defined techniques for surface inspection. There are many ways to approach surface inspections; typically but not necessarily, they are systematic with regular spacing of transects and often with flexibility to diverge from a predefined pattern to inspect exposed sediments, patches of higher potential and so on. Transects may be judgementally placed for reconnaissance purposes to assess potential and the need, if any, for more intensive examination. In some environments, for instance forests with regular and frequent blow-down, transects may be designed to go systematically but without a fixed pattern from one patch to another of exposed sediment. More commonly transects are evenly spaced and sufficiently close together that crew will not miss important information found in places like exposed sediments or associated with small topographical features

Transects should be clearly described in terms of spacing, effective width (number of crew, spacing, and visibility expected), etc.

<i>Common Problems</i>	<ul style="list-style-type: none">• strategies for surface inspection are not appropriate for the permit or development type• undefined reference to “standard methods”• unclear or incomplete descriptions of technical methods; for instance transects, examination and documentation of exposures, etc.
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Subsurface testing design and methodology

The application must include a description of how subsurface tests will be conducted. Subsurface testing as a site discovery technique is usually conducted by shovel test and can be augmented by auger and/or probe. The use of heavy machinery to assist is appropriate in cases where there is thick or heavy overburden or hard surfaces. The limitations and appropriate application of such tools should be addressed in the application.

A subsurface testing strategy includes the distance or spacing between tests on transect lines, an estimation of the number of tests in areas of potential and a description of how shovel tests will be recorded.

The application should include the criteria used to determine whether deposits are disturbed or intact. Subsurface testing includes recording the stratigraphic description of each test. In some instances where stratigraphy is genuinely homogenous within a cluster of tests, then a single description may suffice for that cluster.

<i>Tips</i>	<p>It is desirable to set up the site discovery methodology to allow an evaluation of results for the report. In many instances a quantitative analysis of the results will be preferred, using variables such as:</p> <ul style="list-style-type: none">• Expected area of target site (m²)• Expected density of target site (objects/m²)• Area of a test (m²) (e.g., a 0.5 m x 0.5 m shovel test has an area of 0.25 m²)• Area of test location (m²)• Number of tests at each test location
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<p>Common Problems</p>	<ul style="list-style-type: none"> • Underestimating the number of tests needed to identify sites in areas of potential. • No provision for evaluating efficacy of methods. For instance analysing the confidence that can be placed in the test results when using a systematic survey sampling approach. • Commitment for subsurface testing only if surface exposures are absent. The presence of surface exposures does not necessarily preclude the need for subsurface testing.
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Site boundary delineation

For resource management purposes, exact site location is critical. Within the application, describe how site boundaries will be established, including the use of landforms (natural), surface observations of cultural materials and subsurface testing (observed), and/or study area margins (arbitrary) to define the extent of a site. Indicate how sites extending beyond the study area will be described. Describe how sites and any associated buffer zone will be flagged in the field, but leave flexibility in case you need to change methods without seeking a permit amendment – for instance if you run out of flagging of a particular colour, you want to be able to switch.

<p>Tips</p>	<ul style="list-style-type: none"> • Sites less than 100 m apart may be recorded under one Borden number but can be mapped as separate polygons if there is sufficient evidence showing that the intervening space does not contain archaeological deposits. • Bulletin 12, Defining Culturally Modified Tree Site Boundaries, contains information on determining site boundaries in specific circumstances.
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Site recording

The application must state that sites will be recorded to provincial standards using the [British Columbia Archaeological Site Recording Form](#).

Tips

- Read the [Site Recording Form Guide](#). It is kept up to date and is an essential document for recording archaeological sites.
- Read the *British Columbia Archaeological Site Inventory and the Provincial Heritage Register* [policy](#). This document organises all the forms and bulletins that apply to recording archaeological sites.

Site evaluative testing design and methodology

Evaluative testing is controlled excavation that uses established data recovery techniques. It provides more detailed data that can be used, for instance, to determine scientific significance or develop objectives for systematic data recovery. [Evaluative testing](#) is discussed as a component of site evaluation in section 3.5.2.1 of the *AIA Guidelines*.

Occasionally, evaluative testing is sufficiently intensive that development can occur under a site alteration permit without additional systematic data recovery under a site investigation permit.

Within the application, describe your evaluative testing methodology including specific techniques that you plan to use. Evaluative testing involves:

- Systematic excavation of one or more units (50 cm x 50 cm or larger) by stratigraphic or arbitrary levels.
- Recording the three dimensional provenience of all cultural items or other relevant materials observed within each excavation unit.
- Describing stratigraphic profiles and sediments.
- Recovery, cataloguing and analysis of all cultural materials. Within evaluative tests, all artifacts must be collected.
- Either bulk sampling by level/layer or column samples analysed in the lab are necessary to identify the smaller constituents of the site.
- Collection of fire altered rock (FAR) is not required, but it should be quantified.

Sometimes there may be the need to evaluate small, simple sites in more detail in a way that approximates and is expected to substitute for a small scale data recovery project. Such circumstances can include, for example, relatively simple sites where it is known that impacts cannot be avoided and where it is prohibitively expensive to make a return visit for further study. If such circumstances may occur, it would be prudent to anticipate this in the application:

- provide a method for calculation of an appropriate number of evaluative tests in different circumstances.
- commit to a level of analysis that provides for adequate preservation of the site by record.

<i>Tips</i>	<ul style="list-style-type: none"> • Evaluative testing may be unnecessary if: <ul style="list-style-type: none"> ▪ You are conducting an inventory to ensure site avoidance. ▪ Extensive shovel testing is sufficient to determine site significance or for planning mitigative data recovery.
<i>Common Problems</i>	<ul style="list-style-type: none"> • Applications do not include discussion of evaluative testing details, such as drawing profiles and describing sediments. • Confusion between shovel testing (site discovery, establishing site boundaries) and evaluative testing (determining scientific significance).

Collections

The application should provide for collection of artifacts identified during surface and subsurface inspections as well as evaluative testing. It should also provide for collection of other materials such as faunal remains, floral remains, dating samples and similar, especially from evaluative tests or important subsurface features that have been identified in exposures.

In some cases the Branch receives a specific written request from a First Nation not to collect artifacts and in these circumstances the collection protocol may be adjusted. If such a request is anticipated in the permit application, then the application should state that:

- a reduced collection procedure may be authorised, if the Branch receives such a request in writing and approves;
- minimally, diagnostic artifacts, sample artifacts required for laboratory analysis, artifacts that cannot be adequately described in the field, artifacts identified in controlled excavation units, and artifacts under threat of development or unauthorized collection will be collected.

This decision considers various criteria such as size of project, types of analysis required by the study and degree of impact expected and there may be collection requirements greater than the minimum outlined above.

Human Remains

The application should describe methods for addressing found human remains. Local First Nations' traditions should be considered in addition to sound archaeological practices. Generally, the methodological emphasis should be on

respectful treatment. Reference the Branch's policy on [Found Human Remains](#) and describe any additional plans for treatment of found remains.

Site significance evaluation scheme

The application must note how site significance will be evaluated. As detailed in the *AIA Guidelines*, there are several [significance criteria](#) used to evaluate archaeological sites. The most commonly used in British Columbia are scientific and ethnic significance, but public, historic, and economic categories can be applied as well.

Impact assessment scheme

The application must contain a method of determining impacts to the archaeological sites. *The BC Archaeological Impact Assessment Guidelines* discuss [impact assessment](#) in section 3.5.2.3 and include a framework of "level of effect" indicators in [Appendix F](#).

A complementary significance evaluation scheme for culturally modified trees can be found in [The Significance and Management of Culturally Modified Trees](#). This document was primarily designed for coastal CMTs, but is readily adapted to the rest of the province.

Methods and techniques for data analysis

The application must include the type and level of data analysis planned for recovered materials. A rule of thumb for determining the level of data analysis is that materials used to support the site significance evaluation should be subject to a higher level of analysis than material used for site discovery. Probe and some kinds of auger tests may not contain much information beyond the presence or absence of a site. Shovel tests and appropriately collected auger tests have greater control and require a descriptive analysis of matrices and recovered artifacts.

Shovel and auger tests and evaluative units that are used to determine site significance require a detailed laboratory analysis of all artifacts, faunal remains and floral remains and other bulk samples.

Areas requiring expertise vary from project to project. Some of the common categories are:

- Lithic Analyst
- Faunal Analyst
- Osteologist
- Conservationist
- Dating Laboratories
- Obsidian Sourcing

The individuals or laboratories responsible for conducting specialised analysis should be identified in the application.

<i>Common Problems</i>	Applications only commit to having a qualified professional conduct an analysis if an initial analysis by an unqualified person results in a high level of unidentified elements/fragments.
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3. Disposition of materials collected

There are four standard conditions of permit that govern the disposition of collected materials and associated documentation in a repository. These conditions require arranging for a secure repository, submission of relevant materials to the repository, prohibition of the sale or exchange of collections for financial gain, the need for consent of the Minister (through a permit or permit amendment) to transfer collections from the named repository to another and that the repository requirements of a permit persist in perpetuity. Therefore, permits that have “expired” may still be amended and reissued if the purpose is to change a repository.

Another condition of permit stipulates that the permit holder conform to all requirements of the repository, which typically may include standards for labelling objects, samples and records and catalogue formats both paper and electronic as well as inclusion of a copy of the permit report. Permit applicants should determine what these standards are as part of obtaining permission to use the repository.

Selection of an acceptable repository is becoming increasingly difficult as many museums and universities institute policies to manage their storage space and costs. The provincial preference is to first hold materials in suitable facilities locally, then regionally. If previous work has been done at a site, then the preference will usually be to keep the collections together, providing the older collections are in a suitable facility. When these preferences are not possible, the Royal British Columbia Museum in Victoria is considered the provincial repository. Out-of-province repositories will only be considered under exceptional circumstances.

There are several requirements for an acceptable repository:

- physical security for materials – dedicated facility, security systems, environmental controls, suitable storage units for safe long term storage

- long term financial security for the institution
- qualified curatorial staff able to manage all kinds of collections arising from permits
- willingness and ability to curate non-artifactual materials such as faunal remains and other samples
- willingness and ability to curate related documentation from each permit (notes, images, data)
- will provide access to collections by legitimate researchers
- institutional emphasis on stewardship rather than ownership

A list of repositories used in the past is available through the Archaeological Permit Tracking System (APTS). Not all of these are necessarily approved for use at this time or for all kinds of expected collections.

The application must:

- anticipate special handling and curation needs of wet site or other fragile materials
- ensure that the repository identified is currently accepting collections, and is an appropriate repository for the types of materials that are expected from the proposed study
- indicate that the repository has agreed to accept the anticipated materials from this study (the Branch may seek proof)
- include the museum contact person and contact information.

Temporary storage facilities and out of province analysis

Applicants must have suitable laboratory facilities for holding and analysing collected materials prior to delivery to the final repository. Where applicants anticipate conducting analysis in their own out of province offices, or where they expect to send materials to specialist laboratories outside of BC, then this must be provided for in the application for permit. The *HCA* requires that a permit be obtained to move protected materials from the province, and inclusion in the application will address that requirement.

4. Financial support

This section consists of the client contact information. Full contact information is required, consisting of their name, fax, email, phone and mailing address.

Protection of Privacy Note: If a proponent's address is different than the subject property and is not corporate or institutional, then provide only their name and city in the body of the application. Include their full contact information in the covering letter which is not distributed with the application.

5. Schedule of fieldwork and analysis

This schedule refers to the timing of archaeological field work in contrast to the development related schedule detailed earlier. The schedule must include field work start and end dates and report submission due date. The permit expiry date will be taken to be the final report due date.

<i>Tips</i>	Requests to extend the expiry date of permits should be submitted at least 30 days prior to the current expiry date. Thirty days is also preferred for reporting extension requests which are not processed as amendments. Any exceptions are to be discussed with the permit project officer.
<i>Common Problems</i>	<ul style="list-style-type: none">• Unrealistic schedule for completion of field work.• Unrealistic deadlines for report submission.• No date specified for completion.• Fieldwork scheduled for winter/snow conditions contrary to Bulletin 5: Winter Methodology for Oil and Gas AIAs.

6. Technical Personnel

This section is used to specify the field director(s), specialists responsible for analysis, and the size of the field crew.

Field director is an essential decision maker and thus the Archaeology Branch ensures that field directors have a demonstrated ability to act in that role on each project (see [Bulletin 17: Field Director Qualifications](#)). Therefore, provide a list of field directors that are most likely to work on this project. There is no need to provide names for supervisory staff who will not be acting as field directors.

Tips	Including the following statement allows you to add new field directors to a project without the need to amend the permit: <i>“Additional field directors may be added upon review and approval of the Archaeology Branch.”</i>
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Common Problems	Field director(s) are not clearly identified and/or under-qualified.
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It is also important that those responsible for specialised analysis have the education and experience in the relevant area. At this time the Archaeology Branch does not define minimum qualifications but expects applications to indicate that personnel with a demonstrated ability to conduct the work who have access to adequate facilities will be used. Names of individuals or specialist labs are often given, but it is important that the wording allow other similarly qualified individuals/labs to be used if the named ones are not available at the time of analysis.

Size of the field crew should be provided, and may be reviewed to ensure it is appropriate for completion of the proposed project within the defined schedule.

7. Previous permits held by applicant

It is not necessary to list each permit previously held unless they are very few. If no other permits have been held say so. If numerous permits have been held, it is acceptable to refer to “many previous permits” or “on file with Archaeology

Branch” or similar wording. In some instances it is advisable to single out previous permits held for similar work or that were in the immediate vicinity of the new study area.

8. Résumé

Résumés are required for new permit holders and field directors to determine whether they have a demonstrated ability to direct conduct the work specified in permits.

A résumé may be requested for any permit applicant. All permit applicants are expected to keep current résumés on file with the Archaeology Branch. Do not embed a résumé in this section; instead note that it is “on file with Archaeology Branch”

Privacy Protection Note: résumés will not be referred to external reviewers and requests to see them will be forwarded to the permit applicant.

Signature Blocks

It is preferred that the signature blocks occur at the end of the application. Ensure that all signatures include the date and place.

Consent to the use of Personal Information

This section only requires signing by private individuals, *i.e.*: those that are not representing corporations or other organisations when signing.

Permit Applicant’s Certification

This section must always be signed by the person named on the front of the application. The date in this section is included on the issued permit in order to identify and combine the application with the permit.

Client’s Certification

This section must always be signed unless there is no client, such as may occur with research or self-funded work.