

Memo: Archaeological Investigation Assistance Program for Residential Construction

To: Deadwood Historic Preservation Commission

From: Historic Preservation Office Staff

Date: August 5, 2026

Subject: Proposed Program to Fund Archaeological Investigations Required for Appropriate Residential Construction within the National Historic Landmark District

Purpose

Staff recommends the creation of an Archaeological Investigation Assistance Program to help property owners meet City review requirements for ground-disturbing residential construction within Deadwood's National Historic Landmark District. The program would fund qualified archaeological investigations when such work is required as part of the guidelines adopted by Historic Preservation Commission and City Ordinances. This program is also intended to support compatible housing development while protecting archaeological resources that contribute to Deadwood's historic significance.

Background and Need

Deadwood's historic preservation review process requires review and approval before exterior work or building-permit-related projects proceed within historic districts, and the Historic Preservation Commission evaluates undertakings using adopted local guidelines, the Secretary of the Interior's Standards, and applicable state and local requirements. Because Deadwood is a National Historic Landmark community with significant below-ground cultural resources, new residential construction may require archaeological investigation before approval or construction can proceed.

For many residential property owners, the cost, timing, and technical complexity of archaeological work can become a barrier to appropriately designed housing. A targeted assistance program would make compliance more predictable, reduce delays, encourage early coordination with the Historic Preservation Office, and ensure that archaeological investigations are completed by qualified professionals using accepted standards.

Program Recommendation

Staff recommends the Deadwood Historic Preservation Commission establish an Archaeological Investigation Assistance Program as a preservation-funded incentive for eligible residential projects. The program would pay for or reimburse eligible archaeological investigation costs required by the City as a condition of project review, provided the proposed construction is consistent with adopted historic preservation guidelines and advances compatible residential development within the National Historic Landmark District.

Program Objectives

- Protect archaeological resources that contribute to Deadwood's National Historic Landmark significance.
- Support compatible residential construction on vacant or underutilized lots.
- Reduce financial barriers for property owners required to complete archaeological investigations.
- Improve predictability in the project review and permitting process.
- Ensure investigations are conducted by qualified archaeological professionals and documented for the City's archaeological records and repository.
- Encourage early consultation with Historic Preservation Office staff before design, financing, and construction schedules are finalized.

Eligibility

Eligible applicants would include owners of residentially zoned or residentially proposed properties located within the National Historic Landmark District where the proposed project involves new residential construction and where archaeological investigation is required by the City as part of review under applicable ordinances, guidelines, or approval conditions.

Eligible projects should meet the following minimum conditions:

- The project must be located within the City of Deadwood's National Historic Landmark District.
- The proposed work must involve new residential construction, including single-family, duplex, accessory dwelling, additions, auxiliary structures, or other residential forms deemed appropriate by the Planning and Zoning Commission and the Historic Preservation Commission.
- The applicant must submit a complete Project Approval or Certificate of Appropriateness application, as applicable.

- The need for archaeological investigation must be identified by Historic Preservation Office staff, the Commission, or another applicable reviewing authority.
- The applicant must agree to allow professional archaeological work, documentation, curation, and reporting consistent with City requirements.
- The project must not have commenced ground disturbance before program approval unless expressly authorized by the Commission.

Eligible Costs

Program funds may be used for reasonable and necessary archaeological costs directly tied to the required investigation, including:

- Background research and records review.
- Preparation of an archaeological scope of work or research design.
- Field investigation, testing, monitoring, or data recovery required for the project.
- Laboratory analysis, cataloging, artifact processing, and temporary conservation needs.
- Preparation of professional reports, site forms, maps, photographs, and recommendations.
- Curation preparation and transfer of artifacts and records to the appropriate City repository.
- Coordination with City staff, reviewing agencies, and the applicants.

Program funds should not be used for general construction costs, design fees unrelated to archaeology, delays caused by applicant noncompliance, work performed before written authorization, or mitigation required because of unauthorized ground disturbance.

Funding Structure

Staff recommends a Direct City Procurement program for the professional services. The City would retain a qualified archaeological firm under an approved scope of work, contract, and pays for the archaeological work directly. This would provide the greatest consistency, quality control, and administrative oversight.

Staff recommends the direct City procurement for at least the first three years of the program. The Commission would establish an annual program allocation and perhaps a per-project cap, with authority to approve exceptions for projects of unusual archaeological sensitivity or public benefit.

Program Administration

The Historic Preservation Office would administer the program on behalf of the Commission. Staff responsibilities would include reviewing applications, determining whether archaeological work is required, reviewing or approving scopes of work, coordinating the State Historic Preservation Office, monitoring project progress, reviewing deliverables, maintaining records, and presenting funding requests or final recommendations to the Commission as required.

Applicants would remain responsible for submitting complete project applications, coordinating site access, avoiding unauthorized ground disturbance, incorporating archaeological findings into project planning when necessary, and complying with all Commission conditions of approval.

Application and Review Process

1. **Pre-Application Consultation:** The applicant meets with Historic Preservation Office staff to discuss the proposed project, anticipated ground disturbance, and potential archaeological concerns.
2. **Project Application:** The applicant submits the applicable Project Approval or Certificate of Appropriateness materials, including site plans, construction drawings, grading information, utility plans, and any known prior disturbance information.
3. **Archaeological Determination:** Staff evaluates whether archaeological investigation is required and identifies the appropriate level of work.
4. **Funding Approval:** Staff prepares a funding request, scope, and estimated cost for Commission review or administrative approval if delegated by policy.
5. **Investigation:** A qualified archaeological professional completes the approved work before construction or during construction monitoring as required.
6. **Reporting and Curation:** The consultant submits final documentation, recommendations, and curated materials consistent with City standards.
7. **Project Clearance:** Staff confirms that archaeological requirements have been satisfied according to the rules, regulations and guidelines and coordinates any remaining preservation review conditions.

Professional Standards

All archaeological work funded through the program should be completed by qualified professionals meeting applicable state and federal professional qualification standards. Work should be consistent with the Secretary of the Interior's Standards, South Dakota

historic preservation requirements, City ordinances and guidelines, and the City's archaeological repository and documentation procedures.

Recommended Program Safeguards

- Require written authorization before any reimbursable or City-funded archaeological work begins.
- Limit funding to investigations required for eligible residential construction.
- Require applicants to provide access agreements and avoid disturbance until clearance is issued.
- Allow the Commission to deny or reduce funding for projects involving prior unauthorized work.
- Require final reports and artifacts to be submitted before final program closeout.
- Reserve the Commission's authority to impose project conditions if significant archaeological resources are identified.
- Review program outcomes annually and adjust funding caps, eligibility, or procedures as needed.

Implementation Timeline

Step	Action	Target Timing
1	Commission review of draft program framework	Month 2-3
2	Staff preparation of application form, policy guidelines, and standard scope templates	Month 3-5
3	Commission adoption of program policy and funding allocation	Month 5
4	Consultant procurement or creation of an on-call qualified archaeologist list	Month 5-6
5	Program launch and applicant outreach	Month 6
6	Annual evaluation and recommended adjustments	After Year 1

Proposed Motion

Move to direct Historic Preservation Office staff to prepare policy guidelines, application materials, funding procedures, and consultant procurement recommendations for an Archaeological Investigation Assistance Program to support eligible residential

construction within the Deadwood National Historic Landmark District, and to return those materials to the Commission for consideration and adoption.

Conclusion

The proposed program would align preservation compliance with community housing goals by helping property owners complete required archaeological investigations before appropriate residential construction proceeds. By funding professional archaeological work through a clear and accountable process, the Commission can protect Deadwood's below-ground cultural resources while encouraging compatible reinvestment in the National Historic Landmark District.