

2000 CTA FALL MEETING
Friday, October 27th
2-4 pm
League City, Texas

The 2000 CTA Fall Meeting will be held in conjunction with the Texas Archeological Society's Annual Meeting in League City, Texas. The CTA meeting will be on the afternoon of Friday, October 27, 2000 starting at 2 pm.

Meeting Agenda

- Registration: 1:30 pm*
- Call to Order: 2:00 pm*
- Approval of Minutes: Spring 2000 Meeting (as published herein)*
- Announcements*
- Officer's Reports*
 - President*
 - Immediate Past President*
 - Secretary-Treasurer*
 - Newsletter Editor*
- Standing Committee Reports*
 - Governmental Affairs*
 - Contractor List*
 - Public Education*
 - Multicultural Relations*
 - CTA Web Page*
 - Membership*
- Special Committee Reports*
 - Accreditation and Review Council*
 - Archeological Survey Standards*
 - Anti-Looting Committee*
- Old Business*

New Business

- Proposed 2001 Budget*
- Nominating Committee for 2001 Elections*
- Proposed Outreach Award*
- Late Historic Sites Initiative*
- Curation Policies Initiative*
- ROPA/Certification Update*
- Preservation Trust Fund*
- Report on TAAM*
- THC Announcements*
- Other New Business*

Adjourn: 4:00 pm

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Presidents' Forum

David O. Brown

Though I've yet to preside at a CTA meeting, it's been a busy past few months as president. The new THC policy on Disposal, Deaccession, and Destructive Analysis was dumped on me only moments after closing the spring meeting and it has been a continuing source of concern and effort at two Antiquities Advisory Board meetings and a THC-sponsored public meeting. I've been to a Steward's Advisory Board meeting and a meeting on the possibility of sponsoring yet another unmarked graves protection bill. At the same time, we have geared up one new committee, the CTA Anti-Looting Committee, while several of the old ones have continued active discussions during the summer.

I can't say that all these activities have generated positive results. Many have just been more rounds of seemingly endless and fruitless discussion. We have no consensus on a burial bill, no final disposal policy statement, nor have we really accomplished anything concrete in working to stop looting. Yet I'm still encouraged by the results to date and feel that the efforts have been generally production. And whatever the outcome, we are at least confronting some of these issues rather than ignoring them. So rather than taking on some coherent theme in this president's commentary, I'm going to discuss a few of these diverse activities that the CTA executive board members have been working with this summer.

Disposal, Deaccession, and Destructive Analysis: The so-called 3D policy has been the hot-button topic of the last several months generating at times very animated and even heated discussion among archaeologists. It is serious enough to occupy almost half of this newsletter and we have invited several people to add their comments. This forum seems like a good idea and we hope to try it with some other important issues in future editions of the newsletter. My own views on the policy are presented in excruciating detail in a later section of this newsletter and I won't repeat them here. Suffice it

to say that I see the discussions on this policy as an example of the positive ways in which the CTA can and does affect THC policy. If there were no other reason for this organization to exist, this would be more than enough. But I also see in the solution that I have proposed an excellent opportunity for the CTA to continue self-regulation of various archaeological activities in the state, best exemplified in the original CTA guidelines and the ARC accreditation process. The THC doesn't have the time or staff to do everything in this respect and it only makes sense for us to get involved. The alternative is that the THC simply tells us what to do without consulting us. I prefer that the CTA write or at least participate in the writing of standards and such. These issues are much too important to be left to just a small handful of overworked people at the THC.

Burial Bill: A meeting was held in Austin on June 5th to discuss the possibility of submitting a new burial bill during the next legislative session. Predictably, the general tenor of the community was pessimistic. Most people who attended did not feel that any bill had a chance to emerge in the current climate. Unfortunately, the assembled group could not even reach a consensus on how to proceed and somewhat disappointingly, the meeting seemed to heighten the sense of discord and hopelessness as participants bickered amongst themselves or drifted away before the conclusion. It does not augur well for any new attempts in the near term, perhaps not just this session, but for many years to come. The single ray of hope was the possibility that between the THC and various state and federal agencies, it may be possible to expand the jurisdiction of the existing burial legislation. But the odds are not good, and there is a sense that this effort won't be widely supported. Worse still, the THC convened the meeting without inviting any representatives from the Native American community or other minority communities who might be critical allies in crafting and supporting such an effort. It may have been an oversight but it smacks of the exclusionary attitudes that archaeologists have held in the past. Fortunately, Bobby Gonzales from the Caddo tribe did show up and offer some much-needed perspective on the efforts.

Stewards: The most important issue in the area of THC Stewards had been the question of stewards

working in professional activities. The consensus of the Stewards Advisory Board meeting, held in Austin on June 5th, was that this is counter to the original concept of the program and not in the best interests of the THC or the stewards themselves. It was decided that any steward who accepts full-time archaeological employment for a period longer than three months should recuse themselves temporarily from their position to avoid any perception of a conflict of interest. This is a reasonable policy. We invite those stewards who are working full time to become members of the CTA, and in fact should look into the possibility of inviting all stewards to join the organization. I have discussed this possibility briefly with the THC and they have brought it up with the stewards but there has been no decision yet. Although it does not appear to violate the stewards charter, it's not clear if they want to join or how that would work. Also, since the stewards are not technically employed as archaeologists, if the CTA wanted to increase its membership base by inviting interested stewards to join, we might have to create a special membership category and/or alter the by-laws slightly. Nonetheless, the importance of fostering closer communication with stewards as well as increasing our membership might warrant a special membership category for people who are volunteering extensively in archaeology. If the stewards are interested, we will discuss this possibility at the fall meeting.

Anti-Looting: The CTA Anti-Looting committee is an informal committee that was created at the spring meeting. The co-chairs, Todd McMakin and Joe Labadie, have presented a statement elsewhere in this newsletter and I don't want to steal their thunder. But I do want to commend them for tackling a very difficult issue, one that at least one archaeologist stated that we were wasting our time being involved in (partly because it requires a full time effort which CTA committees cannot really devote). But I feel that any effort in this arena is a good one. It will take all the help we can get to stop looting, and if the committee makes a difference with just one or two sites, or with just one or two people, then we're that much better off. Hopefully, we can coordinate this committee's efforts with ongoing efforts in state, federal, and avocational sectors.

Public Education: I have served on the Public Edu-

cation committee for several years and feel that it is one of the areas that professional archaeologists really can and should make a difference. With all the increased fanfare in this area in recent years, I am still concerned that we do too little. Overall, I think that CRM should be more weighted to public education than scientific results in the long run. This is particularly true since professional archaeologists seem to be identified with whatever might be judged negative about archaeology and/or whatever unfortunate association we have with widely suspected environmental regulations. We need to continue to reach out to everyone, from school kids to interested adults to looters, and tell them what archaeology really is and why it is important to protect sites. To this end, we have come up with a new initiative to reward people involved in CRM who dedicate special efforts to public outreach. Karen Harry, co-chair of the committee, presents the details of our proposed outreach award in the committee news.

Curation Policy: As I have said elsewhere in this newsletter, the 3D policy is not really the enormous problem that the propagation of complex rules would suggest that it is. A much more difficult and controversial problem will be deciding what to save and what to throw away as repositories become increasingly filled in the very near future. Some estimates have us filling up all available space in the next 25 years. Since it easily takes 25 years to build a major facility, we should start thinking now about what is the appropriate direction to go in and make suggestions to the state and to the appropriate facilities. I intend to convene a task force to start talking about this question. With some luck we could come up with guidelines for future curation priorities. Or maybe we'll throw up our hands and run away from it. In any case, it figures to be a tough issue but the time is ripe now to start and we will welcome any help on the matter.

Historic Sites Initiative: Not long ago, the THC indicated that late historic sites are as a group not generally considered eligible for the NRHP. While such sites may not have the intrinsic value of Paleoindian sites, or even of Spanish Colonial sites, many CTA members who consider themselves historic archaeologists, myself included, find this position extreme. It is possible for such sites to yield important data

that may not be found in historic records. And the exclusion of any general class of sites, whether it be burned rock middens, East Texas sandy mantle sites, or late historic sites, seems to us to be counter to the spirit if not the letter of the National Historic Preservation Act. Under the leadership of Jon Lohse, we have formed a small discussion group and are writing a brief rebuttal to this position that will hopefully be published in the THC newsletter.

Survey Standards: One of the worst CTA failures of recent years was the survey standards initiative. After years of trying to develop comprehensive standards for the various regions of the state, the THC decided to adopt a generic, oversimplified policy that in no way reflects the CTA efforts. We have not yet given up the fight in this area. The committee is still looking into this matter, trying to gather information from other states on what is being done there. We expect to present this information at the fall meeting, as discussed in the committee report by Marianne Marek, survey standards committee chair.

The CTA probably won't be totally effective on all these fronts, but most of the areas demonstrate the potential for a united body of archaeologists to meet the challenges of our profession. The CTA can be a useful organization that serves its members and serves Texas archaeology. But we need help. We need ideas and energy and enthusiasm and commitment. If everyone can give a little time to some of these and other areas where we can make a difference, then we'll contribute a lot more to Texas archaeology than just pipeline surveys and flake counts. Think about it. See you in Houston in October.

Committee News



The Public Education Committee *Karen Harry, Co-Chair*

Proposed Award for Public Outreach

The Public Education Committee is establishing an annual award to recognize firms, agencies or institutions that advance public awareness and appreciation of archeology, and that foster public support for the preservation and protection of archeological resources. The purpose of this award will be to encourage contract archeological firms and their clients to include outreach efforts in cultural resource management projects.

Nominations can be submitted by any CTA member, but must be received by February 1 of each year. The Public Education Committee will review the nominations and select the firm, agency, or institution to be recognized. Recipients of the award will be presented with a framed award of certificate at Spring CTA meetings.

Additional details concerning the creation of the Public Outreach Award will be presented at the Fall meeting.

CTA Web Committee Report
Sue Linder-Linsley, Chair

The Web Committee has a new member J. Bryan Mason from the Center for Ecological Archaeology at A&M. The CTA web pages have undergone some significant up-dating. There are a lot of new links between pages. We have tried to lessen the need for multiple up-dates on information that changes frequently by linking to one common page that has the current officers, etc. Some of the pages that have been up-dated include the home page, FAQ, Links, Membership and Renewal Form, and Membership Committee page. Additions to the web site include the new Multicultural Committee page and student member information page. The proposed text of the Disposal, Deaccession and Destructive Analysis Policy was made available to members through the web site.

Our cumulative statistics for the web site through August 1, 2000 show that the site has been visited 22,963 times with an average 109 hits per day. These account for 2525 visitor sessions or an average of 12 per day that last about 15 minutes each. There have been 1095 unique visitors and of those 319 have visited more than once. The Contractors list has been visited 425 times. Remember to check your information on the member page http://www.c-tx-arch.org/cta_membership/CTAmembers.html and send up-dates and corrections.

CTA Membership Committee Report
Karl W. Kibler, Chairman

The CTA Membership Committee at the request of CTA President David O. Brown recently conducted a poll of firms on the CTA Contractor's List and government agencies to see what percentage of their archeological or cultural resources staffs are CTA members. The results of this survey (as of June 2000) are below (Table 1), and I would like to thank all of those individuals who took the time to answer and return the questionnaire. In many ways these data are difficult to assess and compare, particularly between in-state and out-of-state firms. For instance, companies based outside of Texas may have a large percentage of their staff fully devoted to projects outside the state, and therefore there may be no interest or incentive for these employees to be CTA members. One surprising result of this survey is the lack of CTA members at firms and government agencies in the El Paso area. Another surprising result is the greater percentage of CTA members at government agencies on average than at contract firms (56% vs. 31%) though this difference is not so daunting if out-of-state firms are not figured into this comparison (56% vs. 45%). Regardless I think we can all agree that CTA can be stronger and more successful if a greater percentage of the archeological staffs at firms on the contractor's list are CTA members, and I would encourage all CRDs to encourage your staff members to join CTA.

The Membership Committee has also completed a student's page for the CTA web site (though the last time I checked [August 11th] it had not been posted). The web page provides students with information regarding cultural resource management or CRM archeology; such as how and why it works and exists, what kinds of employment opportunities exist, and how to prepare oneself (education- and skill-wise) for a career in CRM archeology.

Table 1. Who Are CTA Members**Contractors/Institutions % of Archeological Staff**

American Archaeology Group no response
 Anthony & Brown Consulting 100% (2 of 2)
 Antiquities Planning and Consulting 100% (2 of 2)
 AR Consultants 50% (1 of 2)
 Archaeology Consultants, Inc. 100% (1 of 1)
 Archeological and Environmental Consultants 100% (2 of 2)
 BHE Environmental, Inc. 14% (1 of 7)
 Big Country Archeology 100% (2 of 2)
 Brazos Valley Research Associates 100% (1 of 1)
 Burns & McDonnell, Inc., Houston 100% (1 of 1)
 Cedar Valley Environmental Services 100% (1 of 1)
 Center for Archaeological Research, UTSA 45% (5 of 11)
 Center for Big Bend Studies, SRSU 50% (1 of 2)
 Center for Ecological Archaeology, TAMU 100% (4 of 4)
 Cultural Resource Consultants, LLC no response
 Deep East Texas Archeological Consultant 100% (1 of 1)
 Earth Search, Inc.* no response
 *out of state firm

Contractors/Institutions % of Archeological Staff

Geo-Marine, Inc. 50% (3 of 6)
 R. Christopher Goodwin & Associates, Inc.* 2% (1 of 58)
 Hicks & Company 38% (3 of 8)
 Historical Preservation Associates* 20% (1 of 5)
 Horizon Environmental Services 100% (1 of 1)
 Richard Hubbard no response
 Lone Mountain Archeological Services, Inc. 20% (1 of 5)
 Moore Archeological Consulting 17% (1 of 6)
 Panhandle-Plains Historical Museum 100% (2 of 2)
 Paul Price Associates, Inc. 33% (1 of 3)
 PBS & J, Texas 32% (6 of 19)
 Prewitt and Associates, Inc. 79% (11 of 14)
 PRIAM 100% (2 of 2)
 SWCA Inc. 50% (2 of 4)
 Texas Archeological Research Lab, UT-Austin 55% (6 of 11)
 TRC-Mariah, Austin 80% (3 of 4)
 TRC-Mariah, El Paso 0% (0 of 16)
 Weir Enterprises 100% (1 of 1)
 Wendy Lopez and Associates 14% (1 of 7)
 Contractor/Institution Average 32% (70 of 222)

Government Agencies % of Archeological Staff

U.S. Army Corps of Engineers, Galveston 0% (0 of 3)
 U.S. Army Corps of Engineers, Fort Worth 20% (1 of 5)
 Department of the U.S. Army, Fort Hood 60% (3 of 5)
 Department of the U.S. Army, Fort Bliss 0% (0 of 3)
 National Park Service, Big Bend NP 50% (1 of 2)
 USDA-National Forest Service (Texas) 43% (3 of 7)
 Texas Historical Commission 69% (9 of 13)
 Texas Department of Transportation 64% (7 of 11)
 Texas Parks and Wildlife Department 82% (9 of 11)
 Texas General Land Office 50% (1 of 2)
 Adjutant General's Department, Camp Mabry 100% (1 of 1)
 Texas Water Development Board 40% (2 of 5)
 Lower Colorado River Authority 100% (1 of 1)
 Government Agency Average 55% (38 of 69)

Accreditation and Review Council (ARC)

Patricia A. Clabaugh, ARC Chair

State Accreditation in Context

The Accreditation and Review Council (ARC) was in full operation this summer. ARC initiated its first accreditation field review for the Museum of Anthropology at Texas Tech University (TTU). This inaugural review establishes an important achievement in ARC's mission to bring to current standards the care and management of archeological collections in the State of Texas. The Council will not deliberate on this field review until early fall during the next ARC business meeting. This newsletter article affords an opportunity to bring the CTA membership up to date on where we are and where CTA is likely to go with this accreditation program.

As mentioned in the January newsletter (Vol. 24, No.1:9), for the past 25 years, CTA has been privileged to have had a few individuals that took on state curation issues. Particularly noteworthy are Eileen Johnson (Past ARC Chair) and Carolyn Spock (ARC Secretary-Treasurer). These two individuals continue to persevere in this ARC program and our profession is the better for it. The present Accreditation and Review Council also includes four equally devoted professionals who, along with their employers full support, laboriously work to promote this effort: Karen Gardner (Prewitt and Associates, Inc.), Laura Nightengale (Texas Archeological Research Laboratory), Susan Baxavanis (Museum of Anthropology at Texas Tech University), and myself (Chair, Patricia A. Clabaugh) (Center for Ecological Archaeology at Texas A&M University). Together, and with the support of CTA, we are finally realizing ARC's mission. For those institutions that have taken on the role of curatorial stewardship, and for those who want to begin taking on that role, the ARC program is committed to providing support as a service to the State of Texas.

The high professional standards of the Museum of Anthropology at TTU and its director Dr. Eileen Johnson are well known, making this first review relatively straightforward (from a procedural standpoint), yet logistically complex. For example, many of our most experienced field reviewers are former students

and/or employees of that institution. This conflict-of-interest restricted the field team selection process by narrowing our choices. Also, deliberation on this application is being done with a smaller than usual ARC team because Ms. Baxavanis, whose conflict-of-interest cannot be resolved, is both an ARC member and the applicant museum's Collections Manager. One important consideration was that both Dr. Johnson and Ms. Baxavanis would necessarily be present at this field review because of their roles as museum staff. ARC members and past-President Doug Boyd discussed these complexities on several occasions and every effort was made to assure that the Museum of Anthropology at TTU was treated like any other museum applying for accreditation.

Fortunately, two very knowledgeable colleagues without a conflict-of-interest (whose names are withheld to respect the applicant institution's privacy) were available and formed the inaugural field team. Since the ARC program is strictly a voluntary effort, to serve as a field reviewer is a commitment that deserves recognition. Travel arrangements, documents' assessment, detailed checklists, and a tight deadline on the final report are just a few of the inconveniences to which our reviewers are subjected. On behalf of CTA and ARC, I want to thank this field review team for their initiative, seeing this field review through in a professional and timely manner.

Both the reviewers and the applicant institution reported back to ARC on the field process itself, in an effort to help us identify ways to increase effectiveness and efficiency. One anticipated criticism from the reviewers was the volume and complexity of ARC documentation. Based on this, we are working to improve the organization of the documents and field checklists so as to reduce confusion and redundancy. Also, we are going to convert our data entry screens to facilitate easier input. Our reviewers found that they needed more pre-field review time for documents assessment. ARC will work toward simplifying the review process by taking a critical look at how this first review was handled, and then convey what we have learned in upcoming training sessions.

That there were no major obstacles to overcome with this first review is not really surprising, given the years of laying groundwork toward that end. With the pas-

sage of time and a few more field reviews under our belts, the accreditation process will become less daunting for all of us. ARC is looking forward to receiving other accreditation applications. There are several small museums and repositories that have indicated they will submit ARC applications in the not too distant future.

CTA's endorsement of state accreditation is already recognized nationally as timely. Lately, there have been concerted efforts by the Texas Historical Commission to bring curation issues into the forefront. There have been several opportunities for interested parties to participate in discussions about collections management and to have a voice in how curatorial decisions that are made today will affect the way the archaeological record is preserved for the future. Curation is coming into its own, not only for practical reasons but because of our fiduciary responsibility to the public at large. If the intent is to preserve archaeological sites, then caring for collections generated through public archaeology is a necessary extension of those preservation efforts.

CTA Survey Committee Report
Marianne Marek, Chair

The survey committee has come up with a working outline/questionnaire to summarize the survey standards in other states. We have divided the state guidelines between ourselves and are currently in the process of filling out our summaries. Once we have completed our summaries, we will review all of them and attempt to put together a recommended survey standard for Texas. This recommendation will be presented to the members at the fall CTA meeting. A copy of our questionnaire is provided below.

Council of Texas Archeologists
Survey Standards Committee

SUMMARY OF STATE SURVEY STANDARDS

State:

- 1. Does the state define qualifications for a professional archeologist?**
- 2. Are permits or scopes of work required before work can start?**
- 3. Are there any requirements for background research?**
- 4. When is backhoe trenching/geomorphology required?**
- 5. Are there any requirements for the number of trenches per area?**
- 6. Are there any requirements for the number of shovel tests needed to adequately cover an area? Or requirements for the distance required between shovel tests?**
 - a.) for linear surveys?**
 - b.) for area surveys?**
- 7. Are there requirements for the size and depth of shovel tests?**
- 8. Are there requirements for transect widths?**
- 9. List any other survey requirements from this state that you find useful.**

Governmental Affairs Committee Fall Report

Eric A. Schroeder, Chair

Since the Spring meeting there has been several issues in the governmental affairs arena that have taken place. On the federal level, the President signed the Historic Preservation Fund (HPF) Reauthorization into law. The HPF reiterates the commitment of the federal government to transfer \$150 million dollars per year into the HPF account from the receipts of the Outer Continental Shelf drilling program. In addition this law reauthorized the Advisory Council, and enables the National Trust to receive grants from the Department of the Interior. Another federal action worthy of mention are amendments to Section 110 of the National Historic Preservation Act. The first of these amendments require that federal agencies follow a more hierarchical order in decisions that affect historic properties – mainly the use and demolition of historic buildings. The second such amendment covers any undertaking subject to Section 106, for which a federal agency has not entered into an agreement pursuant to regulations issued by the Council. Basically this amendment clarifies that federal agencies must carry out the Section 106 process pursuant to regulations issued by the Advisory Council, and all such decisions made must be documented in a manner consistent with those regulations. This amendment specifically prevents federal agencies from circumventing the Section 106 process by requiring them to consult with State Historic Preservation Officers, Tribal Historic Preservation Officers, and other consulting parties.

At the state level there are a couple of things that you should be aware. One is the new and improved unmarked burial bill (S.B. 1445). Under this proposed bill, it is considered a Class C misdemeanor for a person to knowingly disturb an unmarked human burial or to buy, sell, or trade human remains or funerary objects. The bill states that if an unmarked burial is discovered, all activity in the vicinity of the find must cease and the county sheriff or the state archeologist must be notified. In addition this bill also contains language that requires professional archeologists to report any discovery of human remains to the state archeologist within three days of their discovery. Within 15 days after the state archeologist has been notified, the professional archeologist

must report the cultural and biological characteristics of the remains to the state archeologist and recommend temporary disposition of the remains for purposes of analysis. This bill if enacted by law does not require private landowners to notify the state archeologist, but it is implied that they must comply with the protection and preservation of the remains or they may face criminal penalties. All members should take some time and notify their state representatives regarding their support for this bill, and/or provide recommendations of how to make it better.

Other activity of interest is a proposed policy involving the disposal, deaccessioning, and destructive analysis for state held-in-trust collections. The policy, as originally written, states that any decision regarding the disposal, deaccessioning and destructive analysis is solely the responsibility of the commissioners of the Texas Historical Commission. The primary objections to this policy have been in regards to its centralized implementation by the THC. Most of the professional community argue that this policy should remain decentralized and believe such decisions should be left up to the investigating archeologist working under a research design that is submitted and approved by a delegate of the THC. As a result of this outcry, the policy has been redrafted and is due to be voted on during the next meeting of the Antiquities Advisory Board. Members should address any comments regarding this policy to the Texas Historical Commission, The Antiquities Advisory Board, P.O. Box 12276, Austin, Texas 78711.

Multicultural Relations Committee

Alston V. Thoms, Co-Chair

Texas' Ethnic Diversity and Heritage Issues

Two issues have been aired by members of the committee and will be discussed at the upcoming CTA meeting: (1) commemoration of Texas' Native American heritage with a monument on the Capitol ground, as has been done for the State's Anglo-American heritage, and is proposed for its African-American and Hispanic heritage; and (2) support from diverse communities for passage of unmarked graves protection legislation in Texas.

Glenn Goode wrote a letter to the Austin American-

Statesman (published June 29, 2000) in response to an editorial about a need to dedicate remaining space on the Capitol ground to two monuments that proclaimed contributions made by Hispanics and African Americans to Texas history. He averred that Texas Indians also deserve a monument “for living in this land for 12,000 years, for giving the state its name, and for enduring with dignity a horrendous campaign of ethnic cleansing.” Margaret Howard brought the letter to the attention of the Multicultural Relations Committee. We discussed how CTA might become involved in establishing a monument in recognition of the many contributions made by Indians, but we also noted that Texas Native Americans should be the primary sponsors of such an effort. CTA’s roles might include helping to raise awareness of this issue among Native American communities and other stakeholders, get a sponsor(s), pass a bill to build a monument, and raise funds to do it.

This summer, members of the Multicultural Committee also attended a THC-convened meeting to discuss ways toward protection of unmarked graves in Texas. There was agreement among those attending that passage of protective legislation was not likely this session and for it to happen at all will require greater public awareness of a need for such legislation. Several ideas were presented on this often contentious issue, including a need to find a specific issue likely to grasp public attention. Toward that end, THC has already begun an effort, though the media and in conjunction with the Caddo people, to spotlight on-going and widespread looting of burial sites on Federal land and elsewhere in East Texas.

At various times during the last couple of years, members of the Multicultural Committee have also discussed holding workshops to explore how widely-held concepts of honoring and respecting burial places can serve to increase recognition of Texas’ multi-ethnic heritage and land-use history. An important objective would be to identify effective pathways that minimize conflict between public and private interests while insuring protection for unmarked grave sites. Workshops could build on work already carried out at various conferences and workshops sponsored by the Texas Department of Parks and other organizations to address environmental protection issues with private landowners. Support for protec-

tive legislation is likely to come from African-American, Hispanic, Native-American, Anglo-American, and other ethnic- or heritage-based organizations, as well as cemetery associations, legal, legislative, and archaeological groups in Texas who share their concerns.

Anti-Looting Committee

Todd McMakin and Joe Labadie, Co-Chairs

We are pleased to announce that the Anti-Looting Committee has now been selected and is presently considering ways to address some of the concerns that have been expressed by CTA and TAS members. The committee presently includes Joe Labadie, Todd McMakin, Mark Denton, Patricia Mercado-Allinger, Dan McGregor, Cheryl Huckerby, and Dan Prikryl. David Brown has been instrumental in organizing the committee and has provided valuable insight for our discussions. Anyone who feels that they would like to join this committee can contact Todd McMakin at 903-566-6998 or by e-mail at Todd.McMakin@TPWD.state.tx.us.

The Anti-Looting Committee will meet for the first time during the TAS annual meeting in October. In the interim, the committee has discussed the possibility of starting an e-mail discussion/information exchange service for government agencies, contract firms, and others to join and discuss ongoing concerns. Ideally, this discussion list would be a place for agencies/firms to discuss ongoing attempts to combat looting, including legal cases that are/have been taken to court. This will be discussed in more detail in October. However, anyone who is interested in joining this list, either as an individual or as an agency/firm can e-mail me at the address given above.

We have also been considering the educational aspect of the anti-looting issue. Some of the individuals in the committee are planning to present educational displays at the archeology fairs in October. We are still trying to decide on a central theme or slogan that can be used to tie these displays together.

Many of us were lucky enough to monitor the recent looting discussions on the TX-Arch-L discussion

group sponsored by the TAS. Joe Labadie went through these discussions and highlighted some of the concerns. The suggestions from the list generally fall into just a few categories: public education, landowner relations, legal remedies, and advocacy by local/regional/state organizations.

1. Public Awareness programs: Archeology Fairs that have a central theme of site loss and looting. Target regions where problems are the greatest rather than going to places that are merely close to home.
2. Local archeological societies and stewards could get the preservation message out by talking, meeting, and working with local looters and try to make avocational archeologists out of them.
3. Professionals, stewards, and designated members from local societies need to talk more with local landowners about things such as vandalism, trespassing, and legal solutions that specifically address problems unique to different ranches.
4. Archeologists, TAS, STAA, and others need to write articles on vandalism and site loss targeted for local newspapers where the problems are occurring. Need to get on local talk-show radio programs which deal with local issues.
5. We need to publish more of our archeological field investigations, and target publication distribution to the areas where the work was done.
6. We need to emphasize resource ethics when we do school or youth programs at the local level.
7. Underwrite the expenses to publish looters excavations with an end goal of making them avocationalists. Professionals and for-profit archeologists could write grant proposals, the looters could excavate, and both would help with report writing.
8. Target rancher education through attendance at stockshows, rodeos, and other agricultural-based county, state and federal programs.
9. Conduct local archeological site vulnerability assessments to prioritize what sites are most threatened by erosion, looting, or development.
10. There seems to be two very different approaches to dealing with looters: 1) talk to the looters with an objective of getting them to change their evil ways; 2) find them, catch them, and prosecute

them. The true course is somewhere in the middle.

11. Legal approach to the problem. Ask the TX AG for a ruling on what laws apply to site preservation and then distribute the information to every judicial district in the state.
12. Contact the IRS concerning rules pertaining to the selling of artifacts and unreported income.
13. Propose new legislation to close existing loopholes
14. Conduct local/regional law enforcement agency education programs on what the applicable laws are that protect cultural sites on private and public properties
15. Conduct local education programs for lawyers, judges, sheriffs, and JPs on the Texas Penal codes and how they apply to preservation and the looting of cultural properties.
16. TAS, or some other group, could organize and underwrite a professional speakers bureau (similar to AIA) that could speak throughout the state on site preservation
17. Conduct local training programs for law enforcement folks on ARPA investigative techniques and the preparation of evidence for court.

We think that the members of the CTA Anti-Looting Committee are in a unique position to recommend some basic goals, define a few realistic objectives, and set in motion a course of action that could then be introduced and implemented on a statewide basis through the many existing archeological networks. As individuals who work with resource protection issues on a daily basis, we need to make a personal decision: do we continue to sit back and complain, or, do we stand up and make a commitment to change things for the better? It is our goal to work with the newly formed TAS Anti-Looting Committee and with the archeological community at large to determine the best plan of action for the Committee.

Minutes of the Spring 1999 CTA Meeting April 21, 2000

President Douglas Boyd called the meeting to order at 9:13 am at Camp Mabry, in Austin, Texas. Approximately 59 members were in attendance.

As the first order of business, Doug called for approval of the minutes of the Fall 1999 meeting as they appeared in Volume 24(2) of the *CTA Newsletter*. A motion was made and seconded that the minutes be approved. The motion carried unanimously.

Announcements: President Boyd thanked Shellie Sullo-Prewitt of Camp Mabry for arranging the accommodations for the meeting. Shellie provided some information concerning walking tours of the Camp, location of a cafeteria, and information about the Camp museum.

Doug also thanked HEB for donating \$30 towards the cost of the food for the social/picnic to be held at the conclusion of the meetings. The picnic will begin at 3:30, at the conclusion of the ceramic symposium, and will run until 8:30. All food and beverages are being provided by CTA, and Doug reminded everyone that the legal drinking age in Texas is 21.

Officers' Reports

President's Report: Doug briefly reviewed CTA's role and involvement with the Antiquities Advisory Board. The President of CTA is a non-voting member of the THC Archeology Committee of the AAB, and a voting member of the AAB. The next AAB meeting is scheduled for May 3, 2000 in San Antonio, which David Brown will attend as the new CTA President.

President Elect's Report: President Elect David Brown thanked Doug and the other officer's for their contributions to CTA. As President, he plans to continue working on public education initiatives, including encouraging students to participate in CTA.

David also plans to re-assess CTA's committees, and also possible set up an ad hoc committee to focus on anti-looting measures and initiatives, which would interact and coordinate with other agencies, such as the Texas Historical Commission and Parks and Wild-

life. He asked if anyone present would be interested in working on such a committee and received four volunteers (Mark Denton, Ruth Marie, Todd McMakin, and Pat Mercado Allinger).

David mentioned CTA's ongoing participation in the national Council of Councils program. Unfortunately he was not able to attend the recent meeting at the Society for American Archeology annual meeting in Philadelphia, but is communicating with others who were able to attend. He also informed the membership that CTA is participating in a newsletter exchange program with other councils, allowing us insight into what is occurring in other states.

Secretary-Treasurer's Report: Secretary-Treasurer Karen Gardner presented the 2000 Income and Expense Report which showed total income for the year to date to be \$4,788.51 and total expenditures to be \$2,786.34. The checking account has a balance of \$6,662.96 and the Money Market account has a balance of \$8,159.19. A Money Market account has been established for the Scholarship Endowment Fund, with a current balance of \$3,514.14.

Karen also presented the final financial information for 1999, with a total income of \$8,568.01 for the year and total expenditures of \$7,295.39.

As part of the Secretary-Treasurer's report, Karen recommends that the CTA consider using part of the Money Market account to purchase a CD. This issue will be discussed under New Business.

Doug Boyd recommended that the By-Laws be reviewed to see if any changes needed to be made to reflect the changed dues schedule, based on a calendar year rather than from spring meeting to spring meeting.

Newsletter Editor's Report: Newsletter Editor Robyn Lyle thanked everyone for their continued support and timeliness in providing her with information for the newsletter.

Standing Committee Reports

Governmental Affairs: President Boyd gave the report for this committee, which focused on the need for members and someone willing to serve as Chair.

He asked for volunteers to serve on the committee, and received two (Ruth Marie and Eric Schroeder). Doug emphasized the importance of this committee in maintaining communications with various agencies, and in providing information to members on issues that could affect the archeological community. Mark Denton pointed out that there were issues that would be coming up in legislature, such as the unmarked graves bill, which makes the existence of this committee important if we're going to have a voice. Pat Mercado Allinger also mentioned that at least one of the committee members should be based in Austin, in order to be able to attend meetings and present testimony, if asked.

Ethics and Standards: President Boyd recommended that, after years of discussion and debate, the Ethics and Standards committee be disbanded. The motion to disband the Ethics and Standards committee was made and seconded, and discussion called for. Alston Thoms wondered how grievances would be handled if the committee were no longer in existence. Discussion followed concerning the limits of CTA's ability to handle grievances and liability issues. Mark Denton said CTA should continue to encourage members to join ROPA, which has a mechanism for handling grievances. He also felt that at some point in the future CTA may require membership in ROPA. Margaret Howard pointed out that we can't assume everyone in CTA will meet the ROPA qualifications. Marianne Marek asked if there was anyone else that individuals with grievances could go to other than ROPA, for which no one had an answer. Further discussion resulted in the suggestion by several members that the President and Executive Board handle any grievances and any necessary mediation. Margaret Howard suggested that the motion be amended to allow for this. Mark Denton said there would still exist the potentials for liability issues, a solution to which was suggested by Tim Perttula, who recommended that CTA look into liability insurance for the Executive Board. He said the Texas Archeological Society had recently purchased liability insurance, at a cost of approximately \$1,000/year. Pat Mercado Allinger suggested that we check with other state archeological councils to see how they handle the issues. David Brown felt that a more informal approach to handling grievances would be more appropriate, and that given the small num-

ber of grievances that CTA has ever received, the liability insurance would probably be excessive. After additional discussion on the same issues, Steve Black called the question, pointing out that the membership has been over these same issues many times, and always without definitive answers. Doug called the question, all were in favor, and the motion to disband the Ethics and Standards Committee was put to vote. There was one dissension with the rest of the membership being in favor.

Contractors List Committee Report: The new Chair of the Committee is Amy Holmes, who said that the Committee has sent out renewal forms to each of the contractors on last year's list. She also asked if anyone was interested in helping out with the Contractors List, to please get in touch with her. President Boyd asked if anyone was interested in helping Amy, and Robyn Lyle volunteered to serve on the Committee.

As a result of discussions from the fall CTA meeting, Sue Linder Lindsley mentioned that she had put together some ideas for the layout of the Contractors List, which she'll discuss with the Contractors List Committee.

Public Education Committee: President Boyd said the Chair Pam Wheat had to step down as chair, leaving the need for a new one. Steve Tomka volunteered to become the new chair and was gratefully accepted by Doug.

Doug said the committee has been contacting teachers' journals, and are finding out that there are very few articles on archeology in the journals. The committee is working towards having members write articles for the journals, in order to give teachers more information about archeology. Efforts are also proceeding on getting educational links and information on the CTA Web Page, which provide a resource to teachers on internet resources.

Nancy Kenmotsu mentioned a school work plan on the Ruben Hancock site that TxDOT contracted Prewitt and Associates to produce. Mary Black, who worked with PAI on this task, will be teaching teachers how to use this work plan at a workshop sponsored by the Smithsonian Institution. This workshop,

along with other sessions, will be held at Pioneer Farms in Austin on May 3 and 4, 2000. Mary's session is in the morning of May 3.

Multicultural Committee: Co-chair Alston Thoms gave a report on the reburials at Mission San Juan last November. Almost 100 remains were reinterred, with grave goods to be reinterred at a future date when analysis is complete. Alston said the committee will work closely with the Governmental Affairs committee to get information out to membership.

CTA Web Page Committee: Chair Sue Linder-Linsley reported the CTA web page has had approximately 5,000 hits since January of this year, with a lot of downloads of the newsletter, although there have been no downloads of the Contractors List.

Mark Denton said that the site looks very professional, and David Brown recommended that each committee get their information to Sue so she can remove the "under construction" labels. Committees without information on the page are Public Education, Multicultural Relations, and Governmental Affairs. Sue has been working with Pat Clabaugh on the information about the Accreditation and Review Council.

Sue also asked that members provide her with information about errors or mistakes as they find them so she can make the necessary corrections. She also asked that people pass on any links that they come across that can be reviewed and added to the page as appropriate.

Sue is working with the Public Education committee on outreach via the Web, pointing out that this is an easy way to provide information on a variety of issues. She said that there are any number of things that could be done as outreach, including training sessions of designing web pages, information and links for teachers about archeology and archeological issues. The information could be presented in different formats, including bilingual. Sue pointed out that the CTA web page is the best venue to have links that have been reviewed for content and appropriateness, with this information being available on the Public Education page. Sue has designed a public education icon for this, which can be used on other

sites as the link to the CTA site be recognizable as belonging to CTA wherever it is found.

Sue asked that if anyone was interested in working with her and the Public Education committee on these issues, to let her know. It was agreed, after brief discussion, that interested parties would meet over lunch.

Sue also mentioned that the CTA web page has a new address (www.c-tx-arch.org) and that we are no longer found on the THC web site.

Eric Morely asked about the possibilities of receiving the newsletter via email rather than a hard copy through the mail. This led into extended discussions of the merits of emailing newsletters, possible problems in formatting and transmittal, the problems with changing email addresses, and so forth. After input from Robyn Lyle, the out-going Newsletter Editor, and general membership comments, it was decided that the next newsletter would carry an announcement giving members the option of receiving a newsletter in the mail or going to the CTA web page and downloading one. Members choosing to download their newsletter would be sent a notification via email that the newsletter was available.

Membership Committee: President Boyd presented information about the Scholarship Endowment Fund, which was originated by the Membership Committee. Presently ~30% of the membership have made contributions to the Fund, and he encouraged all members to support, and continue to support, it. Secretary-Treasurer Karen Gardner provided a brief review of the status of the fund and how money is being generated. Currently, the Fund has received individual donations, corporate donations, and a donation from Linda Ellis and Pam Headrick who generously donated the proceeds from the sale of their products at the Fall meeting. Additionally, \$5.00 of each student membership goes into the Fund, and CTA makes a \$500 annual contribution. As of April 17, 2000, there is \$3,514.14 in a Money Market account established specifically for the Fund. The goal is to get the balance up to ~\$20,000 in order to establish a solid base and also to demonstrate our commitment when we begin to search for larger corporate donors, such as Dell and 3M. Doug encouraged

members to continue supporting the Scholarship Endowment Fund and also asked that companies consider corporate donations.

Karen Harry asked what the purpose of the Fund is, and Doug explained that while the details are stilling being worked on, the general purpose is to provide scholarship funds to undergraduate and graduate students each year. These scholarships would be designated for students working on projects or doing research that focused on some aspect of Texas archeology and related subjects. No scholarships have been issued as of this time, but CTA could begin to award them out of general funds as soon as the details are worked out, reviewed, and approved by the membership. Doug pointed out that small scholarships could be designated out of general funds to initiate the process, allowing the Fund itself time to grow.

Karen Gardner mentioned that she and Doug had consulted with a CPA, and that the procedure to set up the Fund as a charitable entity still needed to be determined before major fundraising for the Fund could begin.

Doug and David Brown will work with the Membership Committee to continue progress in setting up the procedures and guidelines for the scholarships.

Auditing Committee: The Auditing committee reported that the books had been received from the Secretary-Treasurer and that everything was accurate and up to date.

Special Committee Reports

Accreditation and Review Council: Chair Pat Clabaugh was not able to attend the meeting, but gave a report to Karen Gardner to present. The Council had another training session last November at Texas A&M University, which resulted in another 6 field reviewers. The Council has also received its first request for a field review from The Museum at Texas Tech University. ARC reviewed the Self-Evaluation Form on Wednesday, April 19, and is in the process of selecting field reviewers. The Council has established a membership rotation based on 5-year periods, is working on a new brochure, and is in the process of upgrading the ARC portion of the CTA web page. Additionally, ARC will be presenting

a symposium at the Third Conference on Partnership Opportunities for Federally Associated Collections, to be held in Austin in November.

Archeological Survey Standards Committee: Chair Marianne Marek reviewed the results of the survey standards questionnaire that was sent out with the dues reminder in January. The committee received six responses to the questionnaire, which indicated that the respondents agreed that standards were necessary and that those recommended by the CTA were a step in the right direction. Marianne reported that the committee felt that the standards also needed to take into account probability rather than just regional aspects, with more efforts focused on areas thought to have higher probability. Discussion followed on the problems of determining probability, the reliability of probability estimations, the problems of using soil surveys and geomorphic information in determining probability, and the problems of interpretation. General consensus of the membership was that while probability was something that needed to be considered, regional variations and differences were also very important.

The committee also contacted SHPO's in other states to see how these issues are handled. Many of the states supplied copies of their standards, which overall were based on state laws and Section 106 requirements. Marianne also indicated that a review of the standards showed that they covered many aspects other than survey standards, including personnel qualifications. Marianne also pointed out that compared to other states, the standards CTA proposed were by far the most lenient.

David Brown asked THC representatives how they felt about the survey standards and if they were getting any feedback. Mark Denton said that the THC hasn't received any serious complaints, with general feedback being that the required standards were low. One issue he said that has come up is with linear determinations. This led into discussion about the requirements and problems of linear projects, and the problems of developing linear requirements. General consensus was that linear standards do need to be developed, but at present there isn't a simple answer. Mark said the THC is taking linear surveys on a case-by-case basis. Mark also reminded the mem-

bership that the Survey and Standards Committee's first set of guidelines was very detailed and was soundly criticized by the general membership, with the result that the survey standards were revised to the current one-page format.

Doug Boyd recommended that the current committee get together with Mark Denton, Margaret Howard, and Ross Fields, all of whom were on the original committee, to review the issue of developing linear standards. Margaret Howard asked Mark Denton if people should be asked to send their comments on the current standards and linear standards to the THC. Jim Bruseth said that he felt it to be more appropriate that CTA deal with input and comments and come up with recommendations, rather than information going through the THC.

Andy Cloud volunteered to join the Survey and Standards Committee. This offer was quickly accepted.

Old Business: None was brought forward.

New Business: President Boyd introduced Aina Dodge, Nominating Committee Chair, who presented the nominations for Secretary-Treasurer and Newsletter Editor. For Secretary-Treasurer, Melissa Green and Eric Schroeder had agreed to be nominated. Doug asked for nominations from the floor for this position; there were no additional nominations. For Newsletter Editor, Marybeth Tomka and Susan Baxevanis had agreed to be nominated. Doug asked for nominations from the floor for this position; there were no additional nominations.

Aina Dodge and Mark Denton passed out ballots, while Secretary-Treasurer Karen Gardner reminded members that only those who were current, i.e. had paid their dues for 2000, were eligible to vote. After counting the ballots, the Nominating Committee passed on the names of the incoming Secretary-Treasurer and Newsletter Editor to President Boyd to announce. Melissa Green was elected as Secretary-Treasurer and Marybeth Tomka was elected to serve as Newsletter Editor. Doug thanked everyone who agreed to run for a position, and thanked the Nominating Committee for their efforts.

Doug then asked Karen Gardner to review her earlier suggestion to convert some of the CTA Money Market account into a CD. Karen reviewed the status of the Money Market account and recommended that, given the amount in the account and the stability of the regular checking account, that we take \$5,000 of the \$8,159.19 currently in the account, and purchase a CD to increase the return. Doug asked for a motion to move \$5,000 out of the Money Market account and into a CD, which was moved and seconded, and followed by discussion. Mike Quigg asked why CTA wasn't considering investing in a Mutual Fund (or Funds) which would have a much better rate of return. Karen responded that she had considered that, but it would be accompanied by a higher level of risk and, given the difficulty CTA often has in reaching a consensus of opinion, that it could be difficult to choose appropriate funds. She also indicated that she wasn't sure if opening more aggressive investment accounts would affect CTA's IRS status, and suggested that this be something the new Secretary-Treasurer checked into. Karen Harry suggested that CTA consider putting the money into a short-term CD while a Mutual Fund or Funds were selected. After additional discussion, Doug asked the membership for a general vote on whether we converted funds to a CD or invested in Mutual Funds. The membership was fairly evenly divided in support of each. After further discussion, Ruth Marie suggested that rather than a CD, funds be put into Treasury Bonds, which have a better return. Doug asked for a motion for a friendly amendment of the original motion reflecting this suggestion, which was moved and seconded. Discussion was concluded at this point with the majority of those present being in favor of doing something with the money rather than leaving it in the Money Market account. Doug called for a vote, which was unanimous in favor of transferring \$5,000 into Treasury Bonds. In the meantime, the new Secretary-Treasurer will work with Mike Quigg and Eric Schroeder to review the possibilities and options of investing in Mutual Funds. Doug said he and David Brown will also work with them in pursuing this option.

Texas Archeology Awareness Month Funding Request: President Boyd said CTA has received a request from Robert Hard of UTSA for \$200 towards their Archeology Fair. As approved by CTA

membership, there is \$600 available for the fairs, to be awarded on a first-come basis. UTSA will be sent a check for the \$200, leaving \$400 for any other applicants.

Preservation Trust Fund: Pat Mercado Allinger reviewed the availability of grants for various purposes that are available from the Preservation Trust Fund. More detailed information is available in the current newsletter. She also asked that if anyone is not receiving information on the Trust Fund, or receiving updates, to please let her know and she'll see that you are added to the mailing list.

Proposed Revisions of Guidelines: President Boyd asked Karen Gardner to provide a review of the current guidelines situation. We are currently out of printed copies of the Guidelines, although they are available on the CTA web page. Karen said that after discussion with Doug, it was decided that rather than reprint the guidelines immediately, that they be reviewed, revised as necessary, and then reprinted. Given the small number of requests for the guidelines (six in 1999, one in 2000), the lack of hard copies should not be a problem while the review is occurring. Karen offered to serve on a committee to do this review. David Brown suggested that an ad hoc committee be formed, and asked if anyone else was interested on being on the committee. Marianne Marek volunteered, and David recommended that anyone else who was interested contact Karen and Marianne. David also asked if the THC thought the Survey and Standards should be included in the guidelines, to which THC representatives agreed.

Bylaws Amendments: President Boyd asked for discussion of the proposed bylaw changes, which were outlined in the current newsletter. A motion was made to approve the bylaws amendments, it was seconded, there was no discussion, and the bylaw amendments were approved by unanimous vote.

Texas Historical Commission Announcements: Jim Bruseth also encouraged members to consider the Preservation Trust Fund. He also reminded members of the upcoming Antiquities Advisory Board meeting on May 3 in San Antonio at the Gunter Hotel. Mark Denton also encouraged people to attend the meeting, especially the Archeology Committee

meeting to be held that morning. He said that Larry Oakes is shifting discussions from occurring during the AAB meeting to the committee meetings, with the result that the majority of discussions concerning issues occur at the committee meetings rather than at AAB. Jim said that the THC is moving forward with policy statements for Held in Trust Collections concerning loans, destructive analysis, disposal and deaccessioning of collections. Jim said the THC expected to have a policy in place in several weeks. This led to a discussion of how policies could be in place if concerned parties have not had a chance to review the policies. Doug indicated that the issue of guidelines for permitted collections will have a huge impact, which was agreed with by the majority of the membership. Mark Denton said that currently the THC is dealing with collection issues on a case-by-case basis, but that they needed some sort of guidelines to work with. Nancy Kenmotsu said this was definitely a concern, given the cost of curating collections; she cited an example of a TxDOT project where THC refused her request to dispose of the parts of the collections that were determined to have no research value. As a result, it cost taxpayers \$20,000 to curate that collection.

David Brown asked who was writing the policy, and was told that AAB Chair Eileen Johnson was developing them in conjunction with a lawyer in the Attorney General's office. THC had not yet received the guidelines, but expected to receive them soon for review. Mark Denton emphasized that the idea of a policy was a good thing and was needed, and that it was possible that the policy would be voted on at the May 3 meeting. Both Doug and David asked if it would be possible to postpone this vote until people had a chance to review the policies and provide comments and input. THC said they did not think it was possible to postpone this, and that the issue was already on the schedule for the meeting. Doug then asked if it would be possible to get copies of the policy and was told that THC did not have them yet, but that every effort would be made to provide copies as quickly as possible. Lengthy discussion followed, with the overall concern being the impact of standards that were being presented without providing the archeological community an adequate opportunity to review. Doug asked for CTA support for David Brown, as CTA representative to the AAB

(with voting privileges) to strongly vote for tabling a vote on the policies until people are provided an opportunity to review the documents. This motion was made, seconded, and unanimously supported. Mike Quigg pointed out that if the AAB intends to act this quickly and in this manner on policy issues, that CTA needs to be aware of it and pay attention to who's on the AAB and what issues are on the agendas.

GPS Site Locations on the Atlas: Dan Julien announced that they are working on utilizing GPS locations for the Atlas, and asked for input from the membership on whose using GPS, pros and cons, experiences, problems with reporting data, etc. Doug suggested that Dan put together a questionnaire, which then could be mailed to the membership.

David Brown asked for a general show of hands to indicate who's using GPS, with approximately half of those present using GPS regularly and half not using it regularly or not at all. Common problems discussed included problems with datums and map coordinates, problems with the accuracy of older models compared to the new ones, problems with downloading data, and being able to take readings in different field situations.

At the conclusion of the GPS discussion, Doug asked if there was any other new business. Nancy Kenmotsu announced that Geo-Marine and the African American Museum would be having an exhibit on the Freedmen's Cemetery project at the State Fair in Dallas. This exhibit will also be on display for a year at the African American Museum and also might go on tour. Doug asked Nancy to provide this information for the next newsletter, which she agreed to do.

Chris Caran said that the second edition of *Soil Taxonomy* is available, which is an important resource for those interested in geomorphology. He said it is available in hard copy, CD, and also can be downloaded. David Brown asked Chris to provide this information for the newsletter, including the address for the site where the document is available.

Mark Denton mentioned that the THC Awards of Excellence are to be awarded on May 6, 2000. Included in the award honorees is Dee Ann Story, CAR/

UTSA for their efforts at Refugio Mission, and TxDOT, also for their efforts at Refugio Mission.

President Boyd asked if there was any other new business, none was brought forward. Doug thanked the membership for their support during his term as President and said he was greatly looking forward to being Past President. At this point he passed the gavel to the incoming President, David Brown.

David thanked Doug and the other Board members for their efforts, and said he was looking forward to serving as President and working with the newly elected Secretary-Treasurer and Newsletter Editor, and with Doug.

With no other business and no further discussion presented, President Brown adjourned the Spring 2000 Meeting at 11:29 am.

Articles and Updates



The CTA Forum

This is the inaugural version of a new feature for the CTA newsletter. We hope to address controversial issues that warrant discussion by the entire CTA membership and by all practicing archeologists in Texas regardless of their membership in this organization. In this issue the so-called 3D policies will be discussed. An introduction by CTA President David O. Brown on the proposed policy follows. A series of commentaries by various CTA members is then presented. The revised draft is presented below.

The Great Disposal, Deaccession, and Destructive Analysis Controversy

David O. Brown

One of the most important issues discussed at the past two Antiquities Advisory Board meetings was the new THC policy on Disposal, Deaccession, and Destructive Analysis of artifacts and other materials

collected under antiquities permits. The 3D policy, as it has come to be called, has been the source of much discussion over the last few months and could continue to be controversial until its final resolution. It is an important policy that has implications for archaeologists, archaeological projects, and curatorial facilities. Because of this importance, we have decided to devote a significant amount of space in this issue to its presentation and discussion. The version of the 3D policy document presented here is the most recently revised version. The discussion presented here for the 3D policy, which will hopefully remain more or less unchanged until the fall CTA meeting, is intended to sample some current opinions from the CTA membership and to serve as an introduction to a discussion which we hope to have during the fall meeting at South Shore Harbor.

History

A much different version of the 3D policy document came to the attention of the CTA only moments after the closing gavel of the spring CTA meeting in Austin. Some of the basic ideas in this policy had been discussed at several THC workshops with curation facility people held in Austin in 1999, but there were no follow-ups to these meetings. The document presented to us after the CTA meeting was primarily authored by Dr. Eileen Johnson of the Museum at Texas Tech and now a commissioner of the THC. According to her, the need for a policy to regulate the discard of artifacts had been originally pointed out by the THC staff and she had been instructed by John Nau, the chair of the THC, to draft such a policy.

This preliminary draft 3D policy document was reviewed and edited by the THC staff, which had been working separately on its own version of a disposal policy prior to the release of Dr. Johnson's edition. The CTA's initial efforts to distribute the revised policy document to its members were hampered by the slow wheels of state bureaucracy and the ongoing editing process which left us without a "final" version until shortly before it was presented at the May AAB meeting in San Antonio. Although we were able to put a version of the document on the CTA website, we never actually received permission to publicize

the link before the AAB. Fortunately, a copy surfaced on TXARCH-L a few days before the meeting and the THC did receive a number of comments from concerned archaeologists.

The revised document was discussed at the May AAB and THC Archeology Committee meetings by the committee/board members and there was public input at the AAB. A half dozen archaeologists suggested various changes in the then current version. Among the speakers at this meeting were Darrell Creel, Aina Dodge, and Nancy Kenmotsu. From the comments of the speakers as well as my own comments on behalf of the CTA, it became clear that the document was not completely acceptable to everyone and needed some revision. Thus, Dr. Johnson directed the THC staff to hold a public meeting to gather input.

This public meeting was held in June in Austin. By this time the document had been legitimately posted on the CTA website and distributed through TXARCH-L and a number of archaeologists sent comments to the THC, most suggesting changes with a few decriing the policy altogether. More than a dozen archaeologists showed up at the June public meeting. Most pointed out flaws in the document and recommended various changes, ranging from relatively minor revisions to drastic rewrites. Some of the comments warned of not rushing to pass this document, some complained about cloaking what would effectively become THC rules as a "policy," while others suggested that the policy implied more work for archaeologists, curators, and THC staff alike, with increased costs the result. At this time Margaret Howard presented her own version of a revised document which did clear up some of the more egregious problems. Jan Stokes, archaeologist with the Corps of Engineers in Galveston, and Susan Snow, archaeologist with the National Park Service at the San Antonio Missions, both pointed out that there were potential conflicts with federal policy in the case of collections which may be under dual federal and state jurisdiction.

The 3D document was once again on the agenda of the August 17th AAB meeting held in Austin. As before, a revised version was posted on TXARCH-L only a few days before the meeting. Although no

vote was scheduled at the AAB, several archaeologists voiced their opinions at the meeting. The version that was released just before this meeting did in fact address some of the deficiencies pointed out in the previous AAB meeting and at the public meeting in Austin in June. By this time, many people, including myself, had become quite concerned about the timing of the release of documents, initially after the CTA meeting, with revised drafts surfacing only days or hours before the public meetings which would review them. A number of those present at the August meeting expressed serious doubts about the handling of the process. Frustrated with drafts that seemed inherently flawed, with improvements coming only at the expense of clarity and simplicity, I suggested that the document, which by this time was suggested as THC rules rather than policy, be completely redirected, with the deaccession and destructive analysis policy being incorporated into the existing ARC accreditation policies, already accepted as the standard for future Held-in-Trust collections by the THC, and the disposal policy incorporated into the existing antiquities permit procedure. This idea was supported by several of the archaeologists present at the meeting. After some discussion, it was determined that it would be better to invite further discussion of the policies which should include members of the general archaeological community who are in fact the ones who will be most affected by the policy.

To resolve some of these issues, the THC hosted a workshop/meeting on September 8 in Austin with some of the AAB members (myself, Elton Prewitt, and Eileen Johnson) and several interested parties including Darrel Creel, new director of TARL, Pat Claybaugh, chair of ARC, Margaret Howard, Karen Gardner, and Dennis Price. Lawrence Oakes, Jim Bruseth, and Joe Thrash represented the THC. The THC staff and their legal representative Thrash explained why they felt it was necessary to present the document as separate rules and why it could not be rolled into ARC as I had previously supported. Working through various problems in wording, this workshop was successful in hammering out a document that was improved if still not perfect. The plan is to present this supposedly final version of the document at the October meeting of the THC as suggested rules and to open the period of public comment.

Archaeological Community Comments

The comments received on the 3D policy over the last few months have ranged from very minor revisions to calls for its complete elimination. While a few have disagreed with the basic tenets of the policy or questioned the need for it, most have accepted that at least in part, the concept is good and it is simply a matter of presentation and procedure. This latter group has varied the most, from changing a few words, to completely rethinking how the policies are organized, as I myself suggested at the August AAB.

The first group, those who have disagreed in large part with the whole process, has followed two lines of thought: that the THC does not in fact own or control the artifacts until they are accessioned and/or that the THC should not and perhaps cannot regulate the internal workings of museums and curatorial facilities. While this view may still have some supporters, the Antiquities Code does indicate that all sites on state lands are in fact state archeological landmarks, implying that all the materials from those sites do indeed belong to the state. Thus, while the state may not be able to directly regulate a non-state facility (recall that ARC was created by the CTA for just this reason), they can and probably should have some control over the recovered materials that they do in theory own.

Most of the comments have centered on aspects of procedure and document wording rather than on the theoretical basis for the policy. The disposal issue has been a particular sore point among archaeologists who often collect unidentified materials in the field and later discard those which do not turn out to be artifacts after washing and careful examination. In addition, many intentionally collected samples, such as shell or burned rock are routinely discarded after analysis. Many archaeologists have voiced concerns that they would be forced to curate these materials, or that increased paperwork to permit discard would delay and perhaps increase the cost of archaeological projects. Allowing the antiquities permit to spell out collection and discard procedures has helped to dampen this criticism, as has the THC staff assurance that this is not a secret attempt to force archaeologists to curate every rock and pop tab that

they dig up. Nonetheless, since archaeologists can rarely predict exactly what they will find, the potential exists for some extra time spent to justify unanticipated discard.

The early versions of deaccession and destructive analysis policies were criticized by museum and curatorial facility staff who see them as creating more work and as a potential interference in internal matters. Discussions and revisions to date have won greater freedom and flexibility in this regard, requiring only annual reports to the THC rather than an individual request for each item deaccessioned or analyzed.

As it Currently Stands

As the 3D policies have evolved, the procedures have become clearer and much more logical. After some of the initial fears were quieted through the review and revision process, the archaeological community has mostly come to accept that the THC feels these policies are necessary. Their final form is an ongoing discussion that will probably be addressed in further public meetings and should be opened for general discussion at the fall CTA meeting. Because the issue is a potentially important one, we have chosen to present some comments by CTA members who have shown interest and who have been involved in the document review process to date. These comments probably do not reflect the entire range of opinions, but they do show some of the different emphasis that has been placed on different aspects of the 3D policy. Hopefully, these statements will encourage other CTA members to consider the policies and come to the upcoming meetings and workshops and send their comments to the THC and the CTA. As I have said, this is an important policy that potentially affects many CTA members. Everyone should take notice and voice their opinion if possible.

My Own View

First, let me say that I unequivocally support the concept of these policies/rules. Having witnessed what I consider some abuses in the past, I am very concerned about the regulation of artifact and sample disposal. Conversations with curatorial personnel suggest that deaccession and destructive analysis

may be a lesser problem than pre-accession discard and there is certainly a reasonable argument for the THC to assert their rights in this matter. Nonetheless, while I agree with the policies in principle, I have been disappointed by and critical of the “rulemaking” process to date and I am still not fully convinced that the currently proposed mechanism (i.e., as THC rules) is the best possible solution. Furthermore, I am less than thrilled with the lack of any guiding perspective in the development of this policy. My opinion is that the disposal, deaccessioning, and destructive analysis policies are minor pieces of a much broader policy regarding Held-in-Trust collections that the THC lacks. It would seem more logical to develop the broader policy first, and then fit together the individual pieces into that overarching policy document. The actual approach, to dash off isolated components hoping that the final result will somehow form a coherent policy, seems to be somewhat random and reactionary rather than being guided by a thoughtful planning process.

Disposal is the policy that affects most archaeologists and most projects both in the field and in the lab. As noted above, all of us collect materials from excavations that turn out to be non-artifactual and are tossed upon washing and cataloging. Many archaeologists choose to catalog these materials and then note that they have been discarded, while others may simply toss tiny pieces of gravel or bits of clay that have accidentally found their way into the bag. In other cases, many of us intentionally collect certain items such as gravels, organic materials, or modern artifacts, with the intention of discarding them once the analysis is complete. Certainly with repositories around the state filling up quickly, no one wants to see pea gravels or cigarette butts showing up for curation. On the other hand, no one wants to write a letter to THC every time they toss away a rock. As I understand the policy crafted to date, it is not the intent of the authors to regulate these non-artifactual and/or accidental inclusions.

The policy does very explicitly intend to regulate, however, samples and artifacts that the archaeologist might want to discard prior to curation. Burned rock, shell, redundant soil samples, unidentifiable materials, and even redundant and non-diagnostic historic artifacts such as tiny fragments of window

glass can and should be discarded in certain circumstances. There is little current regulation of this process, and perhaps no general agreement on how it should be handled. Under the currently proposed disposal policy, most of these items could be discarded after analysis by simply stating this in the antiquities permit research design, assuming of course that the research design is approved by the THC. One potential danger is that the THC could decide not to approve research designs that choose to discard items that they are fond of. This could potentially lead to conflicts if overstuffed curatorial facilities choose not to accept materials which the THC has refused to allow to be discarded. Hopefully, however, we will all continue to be reasonable and this will not come to pass.

In working through this policy, we have struggled with the definitions of artifact, etc., trying not to regulate accidentally included pebbles, but making sure that intentionally collected rocks are not tossed without documentation. The distinction is not an easy one. More difficult still is the distinction between field and lab. Various draft versions of the disposal policy exempted all materials discarded in the field prior to removal to the lab. Since this would seem to give carte blanche to throw away anything, including diagnostic artifacts, as long as it were done in the field, it did not seem to be a productive distinction. When the discussion turned to whether we might actually be requiring the collection of everything, including the dirt from excavations, it was decided that the antiquities permit process was still the best way to solve this problem. The investigator is encouraged to define what will be collected at the site, and what may be discarded in the lab after analysis.

One important, but somewhat controversial late inclusion was the requirement that all discarded materials be noted as such in the catalog sent both to the THC and the curation facility. The discussion centered upon what level of inventory this would need and whether this might deter research collection procedures or raise project costs. Such a requirement could in fact cause serious problems in certain cases – imagine collecting samples for routine analysis from a large shell midden and then being asked to identify, weigh, and photograph each specimen discarded. That's fine with 20 shells – what about half a million

specimens? As currently written, the requirement for reporting such items is less restrictive – an inventory could be by weight or even volume (i.e., six boxes). But most archaeologists involved in the discussions have agreed that some degree of documentation is simply good archaeological practice.

Though museums and curatorial facilities do not make a regular practice of tossing things out, through the course of time some items must be deaccessioned for a variety of reasons, many of which are explicitly stated in the proposed deaccession policy text. While this is not a huge problem, there is little surprise that the THC would want to know when collections that it owns or controls are discarded or lost. All major facilities have some policy regarding deaccessioning and deaccessioned items or collections are generally carefully documented. As now construed, the rules would require that facilities notify the THC on an annual basis of such activities, requesting specific permission only under unusual circumstances. The requirements have been reduced significantly here, as has the corresponding cost in time and effort to the curatorial facilities.

Finally, some archaeological materials are destroyed through analysis, including soil and flotation samples as well as actual artifacts subjected to chemical and physical analysis. Presumably the data gathered from such analyses is moving us toward the ultimate goal of a better understanding of the past and we should all strongly encourage such activities rather than discourage them or make them more difficult. Mostly, there have not been enough artifacts destructively analyzed in the history of Texas archaeology to fill a few boxes, though obviously many soil and float samples have been processed and destroyed. Some of the discussions regarding this policy have centered upon reporting requirements, upon who can conduct such an analysis (an individual or in institution), and on who has the final say for approval (the museum or the THC). While some of this is simply a matter of bookkeeping, the institutional affiliation is an important question since it could limit who could conduct an analysis. Likewise, I would prefer to see the THC capable of overruling an institution that frivolously denied a legitimate researcher access to a collection for analysis, but I would equally worry about the THC vetoing an institution's approval of analysis

for political reasons.

It is important to note that the destructive analysis policy does not apply to analyses conducted prior to accessioning; as currently proposed, the policy only regulates requests to analyze materials already accessioned into repositories. I would fervently hope that the proposed policy never becomes a precedent to further regulate the analysis of samples prior to accessioning. Such regulation could quickly make ordinary scientific decisions subject to political scrutiny.

When all is said and done, I don't think that any of these issues are a serious problem at present. Museums are not throwing away large quantities of cultural materials from sites with good contexts, nor are people beating down the doors of institutions requesting to destroy unique artifacts. Most curatorial facilities would be happy to see more such analysis. As for discard, most people agree that with a few exceptions we are not throwing away significant materials. Although there is an obvious trade off in the discard of soil, rock, and shell samples, many facilities are simply not able to house the quantities we could easily generate if we are not selective. Nor are many sponsors willing to pay the bill for indiscriminate collection and curation of samples.

I think the greater problem is not what we throw away or destroy through analysis but what we keep, which is filling up our repositories at a much too rapid pace. The increasing cost of curation and the decreasing amount of space are issues that the archaeological community must deal with soon or be faced with serious problems. These critical issues are not really addressed in the proposed policies. As for what these proposed policies do regulate, I think there is a reasonable need. It is important for the THC to make policy statements regarding these issues and I expect that most members of the CTA accept this. The most recent edited version seems to be a much improved document, though there should be ample opportunity to make further changes before the proposed rules are set in stone. In the final analysis, however, I am still ambivalent about these policies, not so much because of what they say, but for what they don't say. For me, the apparent lack of a broader overall policy governing Held-in-Trust collections or

even a strategy for developing such a policy should probably be a higher priority than a quick fix for what seem to be at best only minor issues.

Comments by Margaret Howard

Although I wasn't initially convinced, I have come to believe that we do need to institute policies for disposal, deaccession, and destructive analysis on materials from State Archeological Landmarks, and from state, county, and municipal lands and waters in Texas. Although the proposed policies generally resemble current practice, they will guide researchers new to the state, and will set a baseline for practices that are likely to be modified in the future, given the impending crisis of space in the state's repositories. CTA has been in the forefront of this issue for the past 20 years and must continue to take a leadership role.

That said, how should such policies be drafted? Substantial and continuing input must be sought from communities that are actively involved in these practices: 1) archeologists conducting research under the Antiquities Code of Texas, particularly those in state agencies; 2) personnel from curatorial facilities holding collections generated under Antiquities Permits, and/or seeking accreditation from CTA's Accreditation and Review Council, and 3) archeologists from federal agencies and/or operating under federal law, who can define the extent to which state authority can be exercised without conflict with federal regulations. I encourage these constituencies to become directly involved in drafting the policies.

How should such policies be enacted? Existing policies must be expanded, made explicit, and exercised with greater vigilance. To support sensible collection and disposal of artifacts and samples prior to their placement in curatorial facilities, the research designs that accompany Antiquities Permit applications must contain explicit statements of research aims, collection and analytical strategies to achieve those aims, and disposal practices. Almost all of the objects and samples that are currently being disposed of meet one or more of the proposed criteria: they are either highly redundant, lacking in cultural or scientific value, and/or decayed beyond use.

The criteria and practices for deaccession and destructive analyses should be added to the Texas Historical Commission (THC) Rules of Practice and Procedure for the Antiquities Code of Texas. They also should be included by reference in the CTA Accreditation and Review Council standards, as applicable to collections generated under the Antiquities Code. As written, these policies generally represent the current practice of responsible curatorial facilities, although minor exceptions must be ironed out through public comment.

The role of the Texas Historical Commission (THC) in this process should be to solicit broad comment from all interested parties, and to modify the draft policies so they represent the current and responsible conduct of these activities. The general tenor of THC oversight by means of the policy should be that the agency exercises minimal vigilance over individuals and curatorial facilities that are operating in compliance with it, while directing the main efforts of its staff toward violations.

CTA must take a strong role in the development of these policies by providing input on draft versions through the president, committees, and comments from individual members. The ultimate result of thoughtful policy development will be for the archeologists and curators in Texas to continue to conduct business under mutually accepted policies, with the assurance that they are doing the best job that is presently possible to preserve and protect data from Texas archeological sites on public lands.

Comments by Nancy A. Kenmotsu

Decisions about disposal, discard and destructive analysis are of considerable import to all archeologists. Such decisions affect what will be available both to substantiate (or not) previous research and to perform future research. While I appreciate the time and effort that the Texas Historical Commission has spend trying to wrestle with these three issues, I remain concerned about the August 2000 draft of the 3D policy:

* Dr. David O. Brown recently noted that these issues can and should be explicitly included in accreditation agreements with curation facilities and/

or detailed in each Antiquities Permit. I fully agree. That is where they belong. They do not need to be separated out as individual policies.

* Input on the policy has not been sought from all stakeholders. Unless CTA members suscribe to TxARCH-L or have heard of the 3D policy by word of mouth, they have not had the opportunity to review, much less consider, the policy. Affected federal and state agencies have also not reviewed the policy.

* Memorandum of Agreement (MOU) are now a required part of the policies. MOUs individually require at least one year to complete and sign.

* The policy carries fiscal implications and implications for the work load of CRM firms and curatorial facilities. At least two federal agencies have stated that they have substantial collections that were obtained under TAC permits. If the THC pursues these policies, those federal agencies believe that the state will be imposing state law on them. Given the haste of pursuing this policy, it is not clear to me that the THC has had the time to adequately consider those issues.

* The policy requires that items discarded be “rendered unfit for further use.” How does one render unfit for further use such items as lithic flakes, sherds, whiteware, or a 1950s rusting bedstead?

* If a repository refuses to allow destructive analysis on items from their holdings, the request can be overruled by the THC. While I am sure that the THC would carefully deliberate such a request, do they have the right to overrule the decision?

Comments by Karen Gardner

The extensive debate and discussions that have resulted from the AAB/THC policies on disposal, deaccession, and destructive analysis are a definite step forward in addressing issues that need to be considered by the archeological community. Various members of the CTA, myself included, have at various times in the past tried to address collection management/curation issues (most recently a workshop at the 1997 spring meeting) with very little response

from other members. I feel that while examining the issues of disposal, deaccessioning, and destructive analysis is important, we also need to emphasize our responsibility to generate accurate records of our projects (field and lab records, photographs, maps) and our responsibility to curate this information, along with the artifacts, for future researchers. Archeological collections consist of more than just the artifacts recovered in the field, and the argument that “the report is curated, so why curate records” is an invalid one. A final report is just that, a report on what an individual/individuals feel the results of a project are; having curated records allows others to reanalyze the information, understand the background research and thought processes, and review the field and analysis methodologies used. A report documents the results of a project while the records document the process. In many senses, the written records are more important than the artifacts themselves, for this is where information about provenience, field conditions, and analytical observations are recorded. Without this information, a projectile point is just a projectile point. The time is appropriate for CTA to emphasize our responsibilities for the care of the collections, written, photographic, and artifactual, that are generated during the course of our projects. This involves not only being aware of our responsibilities to properly manage collections, but also making sure that the archeological community is aware of the types of field and lab records that typically should be kept, the types of photos taken, how to prepare collections for curation, and so forth. Archival supplies are very easy to obtain today and while more expensive, the costs are not prohibitive and we should be recognizing and ensuring that the use of these materials is a standard practice. Obviously, not every project is going to generate the same type and quantity of information, but there should still be basic standards for information recorded and curated. CTA spent a lot of time and effort on reviewing and developing survey standards, and it is appropriate that we put the same effort into determining minimal collection standards and trying to follow through with such standards. If we’re not going to be responsible to the archeological resources, and to the taxpayers who typically fund many of our projects, we shouldn’t be doing the work.

Comments by Darrell Creel

Many years ago, archeologists in Texas recognized the need to deal with curatorial issues and did so through the CTA (Guidelines and ARC process). More recently, the THC has attempted to determine where each HIT collection is actually curated and, commendably, is further attempting to gain control over the collections for which it is legally responsible. This is being done through the drafting of policies on disposal, deaccessioning, and destructive analysis (DDDA). Unfortunately, since most of us have not been given the opportunity to see revisions to the DDDA policies until at most a day or two prior to AAB meetings, we have been forced to react with too little time to think the issues through. At the last AAB meeting, I made public comments that, on reflection, should be reconsidered.

Assuming that necessary changes to wording and definitions will be made, I do not see any particular reason to oppose the proposed policies/rules, at least the parts dealing with deaccessioning and destructive analysis. Although we may consider them to be unnecessary for our day to day operation at TARL, we also recognize that the THC may have problems elsewhere that make a comprehensive set of policies and rules important. Indeed, as currently written, and again assuming that needed changes will be made, these policies/rules impose relatively little burden on curatorial facilities, certainly less than for federally owned collections.

There are several possible means by which the goals of these policies/rules could be achieved (as proposed, as Memoranda of Understanding, as part of the contract for curating a given HIT collection, or through the repository accreditation process). Perhaps the most important issue is determining which is the simplest and least time-consuming. At this point, the simplest way might well be to continue the process currently underway; but the different options should be carefully weighed.

Comments by Bob Hard and Marybeth Tomka

The staff at the Center for Archaeological Research are concerned about specific aspects of the revised

draft of the THC deaccession, disposal and destructive analysis policy. Our comment to the original version included a provision for a 30-day review of any request for deaccession, disposal or destructive analyses. This comment has not been addressed. The requirement that THC staff review each request puts an additional burden on their already overloaded schedules. If there is no time limit to the review, than that burden falls on the institution or contractor making the request. This is potentially problematic for rapidly moving contract projects, research, and graduate students who must follow rigorous schedules. Either way, this is a burden that may not be justifiable in light of some of the additional comments we wish to make.

Although we agree in spirit with the requirement that research designs include provisions for disposal of materials and/or the THC be petitioned to dispose of certain materials before curation, we believe that this requirement may create an atmosphere that encourages the reverse behavior. Unanticipated discovery of material whose research value may be unknown while in the field may not be collected for further examination or consideration for fear of them being forced to curate the material. For example, the unanticipated discovery of historic material of unknown age, discovery of potentially useful sediment samples, burned clay, or rock samples are examples in which the less risky and lower cost decision would be not to collect the materials. We do not believe that this is what has been intended.

Comments by Duane E. Peter

This policy deals with topics that are presently being addressed within the Department of Defense. The issues of deaccessioning and disposal are particularly of interest because of the need to efficiently manage thousands of cubic feet of collections. However, recent discussions at a meeting sponsored by the DoD Legacy Program and the Strategic Environmental Research and Development Program indicated that professional archeologists are hardly of a single mind regarding these topics. The subject of accreditation programs for curation facilities housing federal collections was also discussed. Texas was noted as the only state with an accreditation policy for museums housing state collections. The

perception is that the State of Texas is in a leadership position concerning the care and disposition of collections. Because of this perception, we must proceed judiciously so that the model we provide is one that will survive scrutiny in the coming years.

. . . disposal within a laboratory situation must be indicated in the approved research design or specifically approved by the THC prior to disposal. Such a process precludes the professional judgment of the Principal Investigator to dispose of elements recovered in the field, but subsequently judged to be of no relevance to the human occupation of scientific interest.

This procedure, as written, will prove to be burdensome to THC staff and researchers alike. It may also encourage Principal Investigators to make the decision that only those artifacts that they deem worthy of curation will ever be documented in the laboratory records.

. . . Although I understand the desire of curation facilities to loan artifacts to institutions rather than individuals, such a policy does not ensure that the researcher will be any more productive or compliant with guidelines. A major shortcoming in the text is that the term “institution” is not defined. Without a definition, there is an opportunity for the review authority to be arbitrarily selective in defining acceptable institutions.

In summary, the archeological staff members at Geo-Marine, Inc. feel that further serious consideration of this draft policy is essential prior to adoption. Particular sections of the policy are likely to be burdensome to researchers and THC staff alike. The disposal policy in particular would likely result in the curation of materials that would be of no interest to researchers or the public. Such an expenditure of time and money is hardly in the best interests of our profession or the taxpaying public that ultimately pays for curation. *Excerpted from letter to THC regarding the initial draft of the 3D policy*

Comments by Eileen Johnson

The authority of the State for held-in-trust collections is vested by law in the Texas Historical Com-

mission. The THC now recognizes its fiduciary responsibility for these collections, including public accountability and general management. Over the past couple of years, the THC has been striving to learn more about the condition and location of the State's archaeological collections. This endeavor includes the collections in the various curatorial facilities around the state and those never placed at a curatorial facility.

The Commission is working to develop a document that provides THC the basis for sound oversight of these collections. In essence, the THC needs a Collections Management Policy to guide the agency in carrying out its responsibilities and in partnering with the curatorial facilities that care for the collections. A collections management policy is a mechanism for public and legal accountability and a statement of standards applied. It outlines the relationship of the institution to its collections. Such a document is a necessary and positive step for the THC in accepting their responsibility and demonstrating good-faith effort in management.

The drafting of the disposal, deaccession, and destructive analysis policy is part of creating that broader management document. These three topics are tied together by legal issues and the authority to make such decisions regarding the State's collections. In order for THC to gain documentary control of these collections, knowing what the collections originally consisted of before coming to a curatorial facility, what the collections consist of on an on-going basis after placement in a curatorial facility, and being able to track the changes and reasons for those changes are critical. The policy provides a basis on which to monitor these activities and examine and evaluate THC's decision-making and use of due diligence in these matters for which they are responsible.

The draft policy currently under discussion is not meant to unduly burden the archaeological community, but rather to provide THC general management and monitoring of these three activities occurring within the State's collections. Timing on the availability of the drafts for comment has been unfortunate but was not intended to preclude comment from or discussion among the archaeological community. Extended discussion with and written input from vari-

ous archaeological community members and museum professionals have helped focus and revise the draft disposal, deaccession, and destructive analysis policy. That process continues in order to ensure that the adopted document promotes the best possible preservation and management of the State's archaeological collections.

Policy on Disposal, Deaccession, and Destructive Analysis for State Held-in-Trust Collections

September 11, 2000

a. Definitions. The following words and terms shall have the following meanings unless the context clearly requires otherwise.

1. "Accession" means formal acceptance of a collection and its recording into the holdings of a curatorial facility.
2. "Deaccession" means permanent removal of an object or collection from the holdings of a curatorial facility.
3. "Destructive analysis" means destroying all or a portion of an object or sample to gain specialized information. For purposes of this policy, it does not include analysis of objects or samples prior to their being accessioned by a curatorial facility.
4. "Disposal" means discard of an object or sample after being recovered and prior to accession.
5. "Recovered" means an object or sample has been removed from the site where it was found.
6. For the purposes of this document, "held-in-trust collection" means the associated set of objects, samples, records, or documents generated during investigations conducted on public lands or under public waters in the state of Texas under antiquities permits issued by the Texas Historical Commission. A collection may consist only of records or documents.
7. "Institution" means a curatorial facility, school or higher education, cultural resource management firm, or governmental agency.

b. General Policy

1. Pursuant to Texas Natural Resources Code sec.

191.091-092, all antiquities found on land or under waters belonging to the State of Texas or any political subdivision of the State belong to the State of Texas. The Texas Historical Commission (THC) is charged with the administration of the Antiquities Code and exercises the authority of the State in matters related to these held-in-trust collections.

2. Decisions regarding the disposal, deaccession, or destructive analysis of held-in-trust collections are the legal responsibility of the THC. Authority to deal with requests is delegated to the Executive Director of the THC. THC staff will seek commissioner approval on controversial or other requests deemed appropriate by the Executive Director of the THC.

3. Acceptable circumstances for disposal, deaccessioning, or destructive analysis are provided in the appropriate policy section. Exceptions to the policy will be considered by the THC on a case-by-case basis.

4. Under no circumstances will held-in-trust collections be disposed of or deaccessioned through sale.

c. Disposal Policy

1. This policy applies to objects and samples prior to accessioning that have been recovered from a site on public lands or under public waters under an Antiquities Permit issued by the THC.

2. Disposal of recovered objects or samples from a site on public lands or from public waters under an antiquities permit issued by the THC must be approved by the THC. Approval for anticipated disposal is by means of an approved research design at the time the Antiquities Permit is issued. The manner in which the object or sample is to be disposed must be included in the research design. Additional disposal not included in the approved research design must be approved by the THC prior to any disposal action.

3. The reasons for disposal include, but are not limited to, the following:

A. Objects that are highly redundant and without additional merit;

B. Objects that lack historical, cultural, or scientific value;

C. Objects that have decayed or decomposed beyond reasonable use and repair or that by their

condition constitute a hazard to other objects in the collection.

D. Objects that may be subject to disposal as required by federal laws.

4. Items disposed of after recovery must be documented in the notes, final report, and to the curatorial facility and THC.

5. The THC relinquishes title for the State to any object or sample approved for disposal. The object or sample must be divested in a suitable manner.

d. Deaccession Policy

1. Purpose

A. The THC recognizes the special responsibility associated with the receipt and maintenance of objects of cultural, historical, and scientific significance in the public trust. Although curatorial facilities become stewards of held-in-trust collections, title is retained by the THC for the State. Thus, the decision to deaccession held-in-trust objects or collections is the responsibility of the THC. The THC recognizes the need for periodic reevaluations and thoughtful selection necessary for the growth and proper care of collections. The practice of deaccessioning under well-defined guidelines provides this opportunity.

B. Deaccessioning may be through voluntary or involuntary means. The transfer, exchange, or deterioration beyond repair or stabilization or other voluntary removal from a collection in a curatorial facility is subject to the limitations of this policy.

C. Involuntary removal from collections occurs when objects, samples, or records are lost through theft, disappearance, or natural disaster. If the whereabouts of the object, sample, or record is unknown, it may be removed from the responsibility of the curatorial facility, but the THC will not relinquish title in case the object, sample, or record subsequently is returned.

D. Accredited curatorial facilities

i. Authority to deal with deaccessioning of limited categories of objects and samples from held-in-trust collections is delegated to a curatorial facility accredited by the Accreditation and Review Council (ARC) of the Council of Texas Archeologists through a contractual agreement. Annual reports will be submitted to the THC on these deaccessioning actions.

ii. If the THC determines that a curatorial facility has acted in violation of the contractual agreement and this policy, the contractual agreement will be terminated. From that date forward, the THC will review and decide on all deaccession actions of that curatorial facility concerning held-in-trust objects and samples. A new contractual agreement may be executed at such time as the THC determines that the curatorial facility has come into compliance with this policy. .

E. Curatorial facilities not accredited by the ARC shall submit written deaccession requests of objects and samples from held-in-trust collections to the THC.

F. Requests to deaccession a held-in-trust collection in its entirety must be submitted to the THC.

2. The reasons for deaccessioning all or part of held-in-trust collections include, but are not limited to, the following:

A. Objects lacking provenience that are not significant or useful for research, exhibit, or educational purposes in and of themselves;

B. Objects or collections that do not relate to the stated mission of the curatorial facility. Objects or collections that are relevant to the stated mission of the curatorial facility may not be deaccessioned on the grounds that they are not relevant to the research interests of current staff or faculty;

C. Objects that have decayed or decomposed beyond reasonable use or repair or that by their condition constitute a hazard in the collections;

D. Objects that have been noted as missing from a collection beyond the time of the next collections-wide inventory are determined irretrievable and subject to be deaccessioned as lost;

E. Objects suspected as stolen from the collections must be reported to the THC in writing immediately for notification to similar curatorial facilities, appropriate organizations, and law enforcement agencies. Objects suspected as stolen and not recovered after a period of three years or until the time of the next collections-wide inventory are determined irretrievable and subject to being deaccessioned as stolen;

F. Objects that have been stolen and for which an insurance claim has been paid to the curatorial facility.

G. Objects that may be subject to deaccessioning as required by federal laws.

H. Deaccession for reasons not listed above must be approved on a case-by-case basis by the THC.

3. Title to Objects or Collections Deaccessioned

A. If deaccessioning is for the purpose of transfer or exchange, THC retains title for the State to the object or collection. A new held-in-trust agreement must be executed between the receiving curatorial facility and the THC.

B. If deaccessioning is due to theft or loss, the THC will retain title for the State to the object or collection in case it is ever recovered, but the curatorial facility will no longer be responsible for the object or collection.

C. If deaccessioning is due to deterioration or damage beyond repair or stabilization, the THC relinquishes title for the State to the object or collection and the object or collection must be divested in a suitable manner.

e. Destructive Analysis Policy

1. This policy applies only to samples and objects from held-in-trust collections accessioned into the holdings of a curatorial facility. Destructive analysis of samples or objects prior to placement in a curatorial facility is covered by the research design approved for the Antiquities Permit.

2. A written research proposal must be submitted to the curatorial facility stating research goals, specific samples or objects from a held-in-trust collection to be destroyed, and research credentials in order for the curatorial facility to establish whether the destructive analysis is warranted.

A. Accredited curatorial facilities

i. Authority to deal with destructive analysis requests of categories of objects and samples from held-in-trust collections is delegated to a curatorial facility accredited or having provisional status by ARC through a contractual agreement. Annual reports will be submitted to the THC on these destructive analysis actions.

ii. If the THC determines that a curatorial facility

has acted in violation of the contractual agreement and this policy, the contractual agreement will be terminated. From that date forward, the THC will review and decide on all destructive analysis actions of that curatorial facility concerning held-in-trust objects and samples. A new contractual agreement may be executed at such time as the THC determines that the curatorial facility has come into compliance with these policies.

B. Curatorial facilities not accredited by the ARC shall submit destructive analysis requests of objects and samples from held-in-trust collections to the THC.

3. Conditions for approval of destructive analysis may include qualifications of the researcher, uniqueness of the project, scientific value of the knowledge sought to be gained, and the importance, size, and condition of the object or sample.

4. Objects and samples from held-in-trust collections approved for destructive analysis purposes are loaned to the institution where the researcher is affiliated. Objects and samples will not be loaned to individuals for destructive analysis.

5. If the curatorial facility denies a request for destructive analysis of a sample or object from a held-in-trust collection, appeal of the decision is through the THC.

6. Information gained from the analysis must be provided to the curatorial facility as a condition of all loans for destructive analysis purposes. After completion of destructive analysis, the researcher must return the information (usually in the form of a research report) in order for the loan to be closed. Two copies of any publications resulting from the analysis must be sent to the curatorial facility. If the object or sample is not completely destroyed by the destructive analysis, the remainder must be returned to the curatorial facility.

7. It is the responsibility of the curatorial facility to monitor materials on loan for destructive analysis, to assure their correct use, and to note the returned data in the records.

8. The THC does not relinquish title for the State to an object or sample that has undergone destructive analysis and the object or sample is not deaccessioned.

Reminder! This will be your last hard copy newsletter.

As was discussed at the Spring Meeting, this newsletter will be the last paper copy produced unless specifically requested by a member. With this effort we hope to reduce costs of mailing and the time needed from our volunteer officer's to get an issue of the newsletter addressed and mailed. The newsletter will appear on the CTA web site and be in portable document format that mimics the printed copy currently being produced. We do not want to exclude anyone who may not be comfortable with downloading and saving files from the Internet and ask those of you who still wish to receive a hard copy of the newsletter to fill out the form below and return it by December 1st. Please update your email addresses so that you will receive notification that the newsletter has been posted. *Editor*

_____ I wish to receive a hard copy CTA newsletter.

Name: _____

Address: _____

City, State, Zip: _____

TAS 2000
Texas Archeological Society 71st Annual Meeting
League City (Houston)
 October 27 through 29, 2000

Registration Form

Pre-registration *must* be received by September 22, 2000

Name(s) _____
 Address: _____
 City: _____ State: _____ zip: _____
 Phone - home: _____ work: _____ e-mail: _____

If registering prior to September 23, 2000:

Meeting registration _____ @ \$35 = _____ (includes Saturday morning continental breakfast)
 Full time student _____ @ \$10 = _____
 Luncheon Saturday afternoon (includes speaker) _____ @ \$25 = _____
 (Check here _____ if vegetarian meal required)
 Luncheon Speaker only _____ @ \$5 = _____
 Banquet Saturday evening (includes speaker) _____ @ \$35 = _____
 (Check here _____ if vegetarian meal required)
 Banquet Speaker only _____ @ \$5 = _____
 Table space for books or displays _____ @ \$25 = _____
 (Includes two chairs)
 Easel _____ @ \$15 per day = _____

If registering after September 23, 2000:

Meeting registration _____ @ \$45 = _____ (includes Saturday morning continental breakfast)
 Full time student _____ @ \$15 = _____
 Luncheon Saturday afternoon (includes speaker) _____ @ \$30 = _____
 (Check here _____ if vegetarian meal required)
 Luncheon Speaker only _____ @ \$8 = _____
 Banquet Saturday evening (includes speaker) _____ @ \$40 = _____
 (Check here _____ if vegetarian meal required)
 Banquet Speaker only _____ @ \$8 = _____
 Table space for books or displays _____ @ \$25 = _____
 (Includes two chairs)
 Easel _____ @ \$15 per day = _____

Total amount \$ _____

Make checks payable to **Houston Archaeological Society (HAS)**.

Mail checks and registration form to:

Etta Palmer

1403 Foster Lake Drive

Richmond, Texas 77469-9723

Phone (281) 342-0600

e-mail: jsp1779@argolink.net

TAS 2000
Texas Archeological Society Annual Meeting
 October 27 through 29, 2000
South Shore Harbour Reservation Form

(Please type or print)

Name: _____

Address: _____

City: _____ State: _____ zip: _____

Phone: _____

Arrival date: _____ Check-out date: _____

Room Type - Smoking: _____ Non-smoking: _____

King bed: _____ Double bed: _____

Rate is \$85 for one or two occupants

Reservations must be guaranteed either by a credit card or check for first night's room and tax.

Check enclosed: _____ Credit card number: _____ Exp. date: _____

Check-in time is 3:00 pm. Every effort will be made to accommodate guests arriving early.

Rooms may not be available immediately. **Check-out time is 12 noon.**

Please complete, sign and mail to:

South Shore Harbour Resort and Conference Center

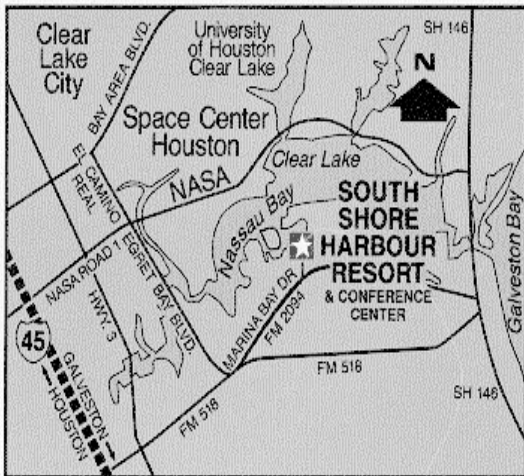
2500 Bay Shore Boulevard

League City, Texas 77573

Signature: _____

If you find it necessary to revise or cancel your reservations please call toll free 1-800-442-5005 or (281) 334-1000 within 48 hours of your arrival.

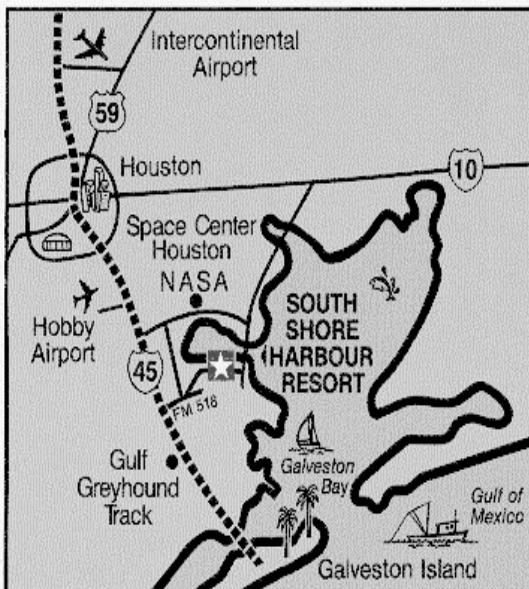
Please make reservations by October 6, 2000 to take advantage of the special TAS 2000 rate. Block rooms will be released after this date and reservations will be on availability at the regular rate.



*South Shore Harbour
Resort & Conference Center*

2500 South Shore Boulevard
League City, Texas 77573
(281) 334-1000
(800) 442-5005
Fax (281) 334-1157

Managed by Gal-Tex Hotel Corporation.



TAS 2000 SILENT AUCTION

The Texas Archeology Society’s Annual Meeting will be hosting its usual fundraiser – the SILENT ACTION on 27-28.October at the South Shore Harbor Resort and Conference Center in the Houston area. You are cordially invited to contribute an item of any size and value, archeology or non-archeology related to the Auction. The proceeds will go to the TAS Operation Fund that supports the daily operation of TAS and its activities such as education, public outreach and the general perpetuation of history/archeology.

It is a fun event with good-natured one upmanship! Books, bags, beads, exotics, pottery, and some ‘guess what’s’ are some of the contributions already received. Please ad your particular piece of treasure or trash to the bidding frenzy – and, please come and bid. Give something and take something!

You can send an item ahead or bring it to the Auction (Meeting) but please commit now. We will need your name, address, email (if you have one), what the item is, approximate value and when you plan to bring/send the item.

Contact: Beverly Mendenhall, P. O. Box 66525, Houston, TX 77266-6525, 713-522-6752 (messages), mendenhall_bev@hotmail.com

2nd Annual UTSA South Texas Archaeology Fair



Sponsored by
Center for Archaeological Research and the Institute of Texan Cultures of the University of Texas at San Antonio and the Southern Texas Archaeological Association

Saturday, October 7, 2000
10 am – 4 pm
Institute of Texan Cultures

**First Annual Anthropology Symposium : Power and Cultures at
Houston Museum of Natural Science**

Thursday, October 26, 3:00 - 7:00 pm

The first Annual Anthropology Symposium will present relevant topics on New World anthropology to members of academia and interested laymen. This year's topic, Power and Cultures, looks at how indigenous people are drawing on their cultural heritage to address contemporary issues. A panel discussion will follow the presentations.

Speakers

Wade Davis, Ph.D., "Harvesting the Rainforest: Native Contributions to Medicine"

Donald Frischmann, Ph.D., "Mexico's New Indigenous Drama and Literature"

Charlene Teters, Her presentation will focus on the appropriation and perpetuation of stereotypical imagery of Native Americans as presented in the PBS documentary "In Whose Honor? "

Susan McIntosh, Ph.D., professor of Anthropology at Rice University, will serve as moderator.

Power and Cultures has been organized by the Education and Collections Departments of the Houston Museum of Natural Science, with underwriting provided by The Favrot Fund. To reserve a complimentary ticket, call Dorothy Lippert, HMNS, 713 639-4659

Texas Parks and Wildlife recently was honored by the American Rock Art Association (ARARA) for its efforts to preserve rock art at Hueco Tanks State Historical Park with the Conservation and Preservation Award on May 28, 2000 in Phoenix. In conferring this award, ARARA acknowledged the enormous obstacles that TPW has overcome to implement the park's new preservation plan. Included in this plan are new policies for park visitation, efforts to document and restore (through graffiti removal) the rock art, education of the public, and incorporation of Native American perspectives into park management and interpretation. Despite its rich rock art heritage, the public has historically viewed the Hueco Tanks primarily in recreational terms. Over time, increasing unregulated visitation has resulted in escalating damage to the park's resources. Beginning in 1997 TPW initiated a series of aggressive management actions to preserve the park's cultural resources and to foster a greater appreciation of these resources by the public. Despite substantial initial opposition to the plan by some recreational groups, support for the policies is increasing as educational efforts expand.

EMPLOYMENT OPPORTUNITIES

The Austin office of **PBS&J** has openings for the following two positions:

Archaeological Technician: This entry-level position allows for hands-on experience in a variety of archaeological and cultural resource management projects. Duties include all aspects of fieldwork. Other duties may include supervised processing and analysis of prehistoric or historic artifacts, background research and basic report preparation. A bachelors degree in anthropology, archaeology or a related discipline is required, plus a minimum of 6 months field experience, including a college-level archaeological field school.

Senior Archaeological Technician: This entry-level staff position allows for hands-on experience in a variety of archaeological and cultural resource management projects. Duties include directing small field crews in all aspects of cultural resource investigations. Other duties may include analysis of prehistoric or historic artifacts, background research, report preparation and conducting independent investigations. A bachelors degree in anthropology, archaeology or a related discipline is required, plus a minimum of 2 years experience, including a college-level archaeological field school. An understanding of artifact analysis and cultural resources management and regulations are expected.

PBS&J, 206 Wild Basin Road, Suite 300, Austin, TX 78746-3343, Attn: Human Resources; Fax (512) 327-5653 or E-mail: prprice@pbsj.com

The Center for Archaeological Research at UTSA has positions open immediately for project archaeologists (Research Scientist Associate) at the M.A. and Ph.D. level.

Required Qualifications: Candidate should have demonstrated ability in archaeological fieldwork including directing archaeology crews, good writing and basic word processing skills, and experience in artifact analysis, report preparation and laboratory processing.

Preferred Qualifications: Candidate should have experience working with hunter-gatherer materials and lithic artifacts as well as Spanish Colonial archaeology and artifact analysis. Experience in Texas, southwest, plains, or northern Mexico material especially helpful. Also the candidate should have working knowledge of statistical analysis and PC computer programs, including database programs, MS Word, and Excel. Successful candidate must be able to work with people, and closely coordinate and integrate team efforts in archaeological field and laboratory settings.

Duties: The candidate will be responsible for directing and managing all aspects of an archaeological field and lab crew. Duties include personnel and equipment management, archaeological record keeping, transit survey mapping, archaeological mapping, artifact analysis, statistical analysis, report design, writing technical archaeological reports and publications. Must have an ability to interact and function in a culturally diverse setting and often in the public eye.

For more information contact: Robert Hard, Ray Mauldin, Cindy Tennis or Steve Tomka at 210-458-4378. For details concerning the RSA positions, visit the UTSA Human Resources web page at <http://www.utsa.edu/administration/hr/jobs/Research%20>

CTA Newsletter
Marybeth S.F. Tomka, Editor
c/o Center for Archaeological Research
The University of Texas at San Antonio
6900 North Loop 1604 West
San Antonio, TX

TO:

<p>Council of Texas Archeologists Membership and Renewal Form</p>	<p>Return to: Melissa Green, CTA Secretary-Treasurer c/o Geo-Marine, Inc. 550 East 15th Street Plano, TX 75074</p>
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- Address correction only (see below).**
 - I wish to join or renew my membership in CTA.**
 (membership is based on the calendar year Jan-Dec)
 - Contractors List \$ 100.00
 - Professional (annual income more than \$20,000 per year) 25.00
 - Professional (annual income less than \$20,000 per year) 15.00
 - Student (annual income more than \$20,000 per year) 25.00
 - Student (annual income less than \$20,000 per year) 15.00
 - Institution/Library (receive *CTA Newsletter* only, no voting privileges) 25.00
 - I would like to purchase a copy of the *CTA Guidelines* 7.50
- Total amount remitted to CTA** \$ _____

Name (please print): _____
Company/Institution: _____
Address: _____
City/State/Zip: _____
Phone: _____ FAX: _____ e-mail: _____