



OAS staff members (l to r) Steve Post, Wolky Toll, Tim Maxwell, and Steve Lakatos proudly display their SAA award in Salt Lake City, Utah. (Blue shirts are in this year)

## MNM Office of Archaeological Studies Receives Award for Educational Programming

Salt Lake City, Utah, April 1, 2005—The Museum of New Mexico's Office of Archaeological Studies (OAS/MNM) has been selected by the Society for American Archaeology to receive their 2005 Excellence in Public Education Award. This award is conferred annually for outstanding achievements by individuals or institutions in the sharing of archaeological knowledge and preservation issues with the public. Since 1991, OAS has been a leader in exploring and identifying effective ways to share archaeology knowledge with the public, including with audiences not otherwise predisposed towards archaeological research and preservation.

The Society for American Archaeology (SAA) is an international organization dedicated to the research, interpretation, and protection of the archaeological heritage of the Americas. With more than 7,000 members, the Society represents professional, student, and avocational archaeologists working in a variety of settings including government agencies, colleges and universities, museums, and the private sector. SAA's annual meeting attracts more than 3,000 archaeologists from around the world. For more information on the Society for American Archaeology and its annual meeting, visit its website at [www.saa.org](http://www.saa.org).

OAS invests time and effort in matching archaeological resources to different community needs and interests. They engage the public at, among other venues, county fairs, shopping malls, and at regional events such as the *Festival of Cranes* at the Bosque del Apache Wildlife Refuge, *Alamogordo Earth Day*, and the *Inter-Tribal Ceremonial* at Gallup. OAS piloted an archaeology program for *Santa Fe Girls, Inc*, targeted at middle school-aged girls and, in working with the *Santa Fe Public Schools* Indian Education Program, has developed after-school science and math enrichment lessons that explore the scientific foundations of traditional lifeways and technologies. More recently, OAS has conducted archaeology tours for youth and adults in substance-abuse recovery programs that are designed to help rekindle pride in traditional knowledge and accomplishments.

Through such flexible customized programming OAS shares archaeology information with traditional museum and academic audiences as well as with smaller, often neglected groups such as Pueblo elders, artists, and home schoolers.

OAS archaeologists believe that archaeological knowledge complements the traditional histories and beliefs of the region's native peoples. OAS laboratory specialists have worked with traditional religious practitioners to identify ritual materials when supplies were depleted and when elders have died and knowledge of plant sources has been lost. Staff have also applied archaeology's science to investigate pottery firing and locate new resources for the needs of the Native American artistic community. OAS furthermore expands its educational impact exponentially by providing resources and expertise to local, state, and federal institutions engaged in archaeology education. Among many examples, they have an ongoing role in supporting the efforts to train staff, docents, and volunteers at the *Museum of Indian Arts and Culture*, *New Mexico State Monuments*, and *Bandelier National Monument*. OAS efforts have also expanded across the border into neighboring Mexico where staff have shared Southwest prehistory in classrooms in cooperation with the *Museo de las Culturas del Norte* in Nuevo Casas Grandes, Chihuahua. In sum, through their educational tours, lectures, artifact displays, and direct assistance, OAS helps to generate an appreciation for the richness of the cultural heritage of New Mexico. This is important because the archaeological record is fragile, it warrants respect, and it requires special care.

Chuck Hannaford, director of the OAS program, emphasizes that his most important mission is to serve the outlying counties in New Mexico: "Museums are generally accessible to residents in the urban centers, but rural schools and community groups don't have that opportunity. We can provide a great service by bringing archaeological presentations to schools or local museums, meeting with hundreds of students through the course of a day." For further information on the Office of Archaeological Studies at the Museum of New Mexico, or for background on OAS archaeology education activities, contact Tim Maxwell at 505-827-6343 or [tmaxwell@lvr.state.nm.us](mailto:tmaxwell@lvr.state.nm.us).

## NMAC Geomorphology Workshop

Dave Kirkpatrick and Meade Kemrer

The NMAC Geomorphology Workshop was held on March 12 and 13, 2005 at the Las Cruces District Office, Bureau of Land Management. Twenty-five archaeologists came from northern, southeastern, and southwestern New Mexico and west Texas to participate in the classroom lectures and hands-on field trip.

NMAC would like to thank Jim Talent and John Thacker, Las Cruces District Office and David Simons, State Office, for their assistance in the success of this workshop. In addition, NMAC appreciates the support of, Lone Mountain Archeological Services (LMAS) for their contributions to the workshop.

Dr. David Kuehn, geoarchaeologist with LMAS, provided an excellent overview of principles of geomorphology beginning with an introduction and basic concepts. This was followed by mini-lectures on

- Principles of Geomorphology and Geoarchaeology: Introduction and Basic Concepts
- Principles of Geomorphology: Alluvial Environments
- Principles of Geomorphology: Eolian Environments
- Principles of Sedimentology: Sediments and Soils
- Principles of Stratigraphy: Bedding, Bedforms, Superposition, Correlation, Conformable and Unconformable Contacts
- Site Formation Processes and Paleoenvironmental Reconstruction
- Geoarchaeological Field Methods

The second day involved the on hands-on inspection of a trench cut exposing the profiles of two sand dunes with a low velocity drainage between the two dunes. Participants were able to observe the relationship between the depositional conditions in the dunes and the erosional features of the drainage.



David Kuehn (center) pointing out stratigraphic and depositional characteristics of sand dunes and the low velocity drainage between the dunes (Photograph by Meade Kemrer)

During the opening of the second trench prior to the workshop, a charcoal and fire-cracked rock feature was discovered. The backhoe was working in a previously excavated trench, containing prehistoric-age soil was thought to be cultural sterile. Sand slumping, collapsing the original trench wall exposed the cultural feature, resulting in a discovery situation. Coordination between BLM and the Historic Preservation Division allowed workshop participants to observe the feature. The discovery of the feature, located at the base of the soil unit, possibly Archaic in age, demonstrated the importance of geomorphologic studies at archaeological sites in sand dune landforms.

Each participant received a certificate that recognized their participation and completion of the workshop plus 3 days of field time credit to apply to their experience in the BLM Southwest permit area.

## New Mexico Archeology Has a New Home

Tim Maxwell and Chris Turnbow, NM Department of Cultural Affairs

After many years of trying, the Museum of New Mexico has received funds for the construction of a new archaeological collections storage

facility and offices for archaeologists. Tentatively called the Center for New Mexico Archaeology, the new building will house the Archaeological Research Collections (ARC) of the Museum of Indian Arts and Culture/Laboratory of Anthropology as well as the staff and laboratories of the Office of Archaeological Studies (OAS). To help build legislative support for the new building, the Bureau of Land Management indicated its willingness to transfer about 30-acres near Santa Fe to the Museum of New Mexico regents. Final negotiations on the transfer are still pending.

The collections have been stored in inadequate conditions for over 20 years and last year suffered damage from a 50,000 gallon flood. Now, the collections are in the old State Archives and Records building, but that building is scheduled to become the new state Film Museum sometime in the future. ARC is also expected to run out of room in that facility in 2-3 years. In 2003, the State of New Mexico sold the building that held the collections and is still the home of the OAS. The new structure will therefore solve some immediate housing problems.

The BLM land transfer will also aid the Museum of New Mexico over the next 100 years. Collections are growing in its four museums but there is little room to expand storage. Offsite storage facilities can be built on the outlying land, saving money and helping set a trend that many museums across the country will have to follow.

In 2004, the OAS requested and received \$25,000 from the legislature for planning money and MIAC/Lab initiated discussions with the BLM for the land transfer. This year, the legislative leadership recognized that the need for a new archaeological facility was of statewide concern and developed a funding plan. Governor Richardson's support came through the help of many people, notably NMAC, the Museum of New Mexico Foundation, and the OAS Friends of Archaeology, and numerous Museum of New Mexico supporters. Stuart Ashman, Secretary of the Department of Cultural Affairs, of which the Museum of New Mexico is a division, says, "The Center for New Mexico Archaeology will ensure a permanent home for the state's archaeologists and the researchers and work crews that support them. Ultimately, the center will also guarantee a safe haven for the state's archaeological artifacts, the signposts of our history and pre-history. In a state that depends so much on history and culture to support tourism, education and quality of life, properly safeguarding our past is crucial," said Ashman. "Both the Legislature, led by Santa Fe lawmakers, and the Governor deserve credit for their foresight in supporting this project."

## New FCC Programmatic Agreement Empowers Feds, Weakens SHPO

Tom McIntosh

A highlight of the New Mexico Heritage Preservation Alliance's "Preservation Pilgrimage" held in Taos April 7-10, 2005, was a half-day, no-fee workshop, that focused on the Nationwide Programmatic Agreement of March 2005 (NPA) that provides new rules for Section 106 compliance on Federal Communications Commission (FCC) undertakings. The program faculty included Phil Young, Planning Section Chief and Section 106 reviewer at the NM HPD; Amos J. Loveday, Historic Preservation Officer for the FCC; and John Clark, a Washington, DC lawyer specializing in environmental regulation of communications towers and infrastructure, and Executive Editor of Communications Environmental and Land Use Law Report and the Tower Law Sourcebook. Changes to the National Historic Preservation Act (NHPA) Section 106 review

process on FCC-related projects may be cause for alarm among historic preservationists.

The NPA excludes from the Section 106 review process “certain” FCC undertakings, “streamlines and tailors” the process for “other” FCC undertakings, and gives the FCC “sole authority” to determine what activities undertaken by the Commission or its Applicants constitute Undertakings within the meaning of the NHPA” (Section I). In light of the current debate in the US House Subcommittee for National Parks (Subcommittee) over proposed amendments to Section 106 that seek to limit the effectiveness of NHPA, similar changes already approved by the National Committee of SHPOs (NCSHPO), the Advisory Committee on Historic Preservation (ACHP), and the FCC, and implemented in the NPA, offer a stern premonition of calculated efforts to compromise the intent and effect of the National Historic Preservation Act of 1966.

The process that led to the NPA began five years ago with a requirement of the Regulatory Flexibility Act of 1980 to review the Section 106 process as it applies to undertakings licensed by the FCC. After seeking public comment in a “Notice of Proposed Rulemaking” (June 9, 2003), the NPA was approved in September 2004 and became effective March 7, 2005, post-dating by two years the enactment of the Programmatic Agreement for the Collocation of Wireless Antennas (Collocation Agreement) that exempted certain tower and antenna collocations from the Section 106 review process.

Regulations now mandated by the NPA include additional telecommunications exclusions from the Section 106 review process, a shift from local to federal avenues of Tribal notification (Section IV), increased emphasis on public participation in the consultation process (Section V), and a shift in power from SHPO to the US Department of the Interior in the determination-of-eligibility of historic properties (Section VI). Much of the assault on NHPA centers on bold differences between the rhetorical definition of “Historic Property” (Section II), and the specific “working” definition of “Historic Property” (Section VI).

Specific exclusions from the Section 106 review process of FCC regulated communications facilities specified in the NPA (Section III) include:

1. enhancement of existing towers that does not include collocation or “substantially” increase the size of the existing communications tower as defined in the Collocation Agreement of 2001;
2. construction for the replacement of an existing tower as long as the size of the footprint and tower height is not “substantially” increased;
3. construction of any “temporary” (24 months except for facilities related to national security) communications tower, antenna structure, or related facility;
4. construction of facilities (tower or antenna) less than 200 feet in height on commercial/industrial property that is not located within the boundaries of or within 500 feet of a Historic Property;
5. construction of facilities in or within 50 feet of the outer boundary of a right-of-way designated by a Federal, State, local, or Tribal government as an area for the location of communication towers, transmission facilities, distribution lines, and associated structures, providing the towers are not located within the boundaries of Historic Properties; and

6. construction of a “facility” in any area previously designated by the SHPO/THPO as having “limited potential to affect Historic Properties”.

While all exclusions are alarming and should be held to narrow interpretation, among the most bothersome is the exclusion of facilities less than 200 feet in height, which applies to the construction of virtually all broadband communications towers and antennas. Excluding from the Section 106 review process of telecommunications facilities in “any area previously designated by the SHPO/THPO as having limited potential to affect Historic Properties ” also lowers the bar for a strong preservation mandate.

Repositioning of Tribal Notification (Section IV) and an increase in the level of public participation (Section V) in the consultation process is a major change mandated by the NPA. The FCC now recognizes its responsibility under a “Statement of Policy on Establishing a Government-to-Government Relationship with Indian Tribes” dated June 23, 2000, to carry out consultation with any Tribe or Native Hawaiian Organization (NHO) that attaches cultural significance to a Historic Property within the “direct” (footprint of undertaking) or “indirect” (this radius varies with height of tower) Area of Potential Effect (APE).

For the archaeological contractor and the SHPO, this means less work on the task of Tribal notification. The FCC has set up a voluntary Tower Construction Notification System (TCNS) that allows the archaeological contractor to provide details of the proposed FCC undertaking to an internet-based notification system maintained by the FCC, and by which the FCC then takes care of all Tribal notification. The TCNS is conveniently located online in the NPA Training Module (<http://wireless.fcc.gov/siting/npa.html>).

While Section IV effectively removes the “burden” of Tribal consultation from the SHPO level and places it on the federal level, Section V requires the Applicant to identify and notify (in consultation with the SHPO) all other concerned parties such as historic preservation societies, museums, governmental entities, and individuals. Indeed, historic preservation consultation is a two-way street that should include local entities that are subject to potential adverse effect, and historic preservation compliance professionals who work on the local level.

A major change in the NPA that will affect historic preservation and the way Section 106 archaeologists do business includes an implicit redefining of the phrase “Historic Property” within direct and indirect APEs (Section VI). While a rhetorical definition of “Historic Property” offered in Section II of the NPA is “any prehistoric or historic district, site, building, structure, or object included in, or *eligible for inclusion in* [my emphasis], the National Register maintained by the Secretary of the Interior...,” a more delimiting but applicable definition of “Historic Property” is implicit in Section VI which removes from National Register eligibility all previously unlisted historic properties. Sound familiar?

Section VI specifies procedures for the “Identification, Evaluation, and Assessment of Effects” on historic properties within the direct and indirect APEs. Here, a procedural definition of “Historic Property” is offered and the underlying intent of the NPA is realized. Section VI of the NPA limits identification of eligible historic properties to:

1. Properties listed in the National Register;
2. Properties formally determined eligible for listing by the Keeper of the National Register;

3. Properties that The SHPO/THPO certifies are in the process of being nominated to the National Register;
4. Properties previously determined eligible as part of a consensus determination of eligibility between the SHPO/THPO and a Federal Agency or local government representing the Department of Housing and Urban Development (HUD); and
5. Properties listed in the SHPO/THPO Inventory that the SHPO/THPO has previously evaluated and found to meet the National Register criteria, and that are identified accordingly in the SHPO/THPO Inventory” (NPA 2005: Section VI. D).

Notably, the phrase “potentially eligible for nomination” is absent from the rules for determining and evaluating Historic Properties. The new NPA provisions for revised eligibility standards of historic properties and for the shift in power from SHPO to the Secretary of Interior in the determination-of-eligibility process, represents an alarming *coupe de gras* for historic preservationists.

The theme of removing all historic properties not already listed on the National Register or in the process of being nominated to it, is echoed in the current proposed amendments of the federal House Subcommittee that seem to focus on redefining the NHPA so it no longer impedes the “progress” of land development. The Subcommittee values the NPA because it exemplifies ways of working around problems of Section 106 compliance in the face of exponential industrial development and associated siting requirements. Eliminating the hundreds-of-thousands of unlisted (undiscovered) eligible historic sites from the Section 106 review process certainly seems to have the potential to speed things up on the land development front; but the cost to heritage preservation will be devastating, not to mention the political costs associated with precedence, and the empowerment of anti-preservationists.

Equally troubling and applicable to today’s Subcommittee debate on NHPA amendments, is a provision that allows the applicant to “at any time choose to submit the matter, together with all relevant documents, to the Commission [FCC], advising SHPO/THPO accordingly” if the SHPO/THPO disputes a finding by the applicant (or consultant) of “no adverse effect,” and a mitigation agreement cannot be reached between the Applicant and the SHPO/THPO (Section VII). This language effectively removes the SHPO/THPO from the determination-of-effect process, replacing with FCC authority.

Additional shortcomings of the NPA include the absence of language that addresses the up-and-coming broadband industry which falls in the “under 200 feet” tower-height exclusion, absence of language that addresses compliance for the removal of obsolete towers, and language that speaks to the enforcement of Section 106 mandates on out-of-compliance facilities. But these shortcomings seem of little concern to pro-development politicians who are pleased with the NPA because with it they have provided an intact foundation for current and future amendments designed to weaken NHPA compliance.

Increasingly, historic preservation professionals find themselves disempowered in the Section 106 process by arguments that purport to allow increased individual rights (ie: empowering applicants to object to and stop the National Register nomination process). In reality, these arguments remove power to regulate from the local and state level (which theoretically reflects the will of the majority of local individuals), and place such power in the federal arena.

NHPA is now taking blows on the chin that could soon alter not only the intent of, but also the business of, cultural resource management. It is highly important therefore, that all concerned advocates of strong historic preservation laws stay informed with legislative news that may effect them, and communicate openly and frequently with their legislators. The FCC website offers links to the new NPA and the Collocation Agreement of 2002, a good training module, the TCNS, daily news updates, and a variety of information and contacts concerning the new NPA.

## **The Safford Symposium: Recent Research on the Prehistoric Archaeology of the Safford Basin**

Arizona Archaeological Council Fall Meeting October 28-30, 2005

Sponsored by the Arizona Archaeological Council and Eastern Arizona College

The Arizona Archaeological Council and Eastern Arizona College are pleased to announce that the Fall 2005 AAC Meeting will be held on the campus of Eastern Arizona College in Thatcher, Arizona on October 28-30. After decades of sporadic interest by professional archaeologists, the past 20 years have witnessed the Safford Basin of the Gila River and its tributaries become the focus of a number of archaeological projects. The Safford Symposium will feature presentations about these projects, field trips to important sites in the area, and hands on examination of local artifact types and materials. Long regarded as peripheral to the developments in the Tucson, Salt/Gila, and Tonto Basins, the Safford area is gradually revealing a prehistory that was complex, dynamic, and integral to cultural developments in the greater Southwest. The AAC invites papers, posters, and presentations on the recent prehistoric research on the Safford Basin. Papers will be presented Friday October 28 and Saturday October 29, and will be 20 minutes in length, although multiple papers from a single project will be considered. Field trips are in the planning stages, but are tentatively to be held throughout the weekend, with most on Sunday October 30. Abstracts should be 100-200 words. Slide projectors and digital projectors will be available. A laptop with PowerPoint will be available for presentations on CD or USB removable media, or a personal laptop may be used but Apple/Macintosh are incompatible. Please submit abstracts in Word or WordPerfect formats to: David Purcell, Four Corners Research, 175 North Pawnee, Flagstaff, Arizona 86001, [dpurcell@infomagic.net](mailto:dpurcell@infomagic.net).

## **Current Research: Four Corners Research**

David E. Purcell and David H. Greenwald

During 2004, DMG Four Corners Research, Inc. (Four Corners Research) of Tularosa, conducted a number of projects throughout New Mexico. Two of these are significant for the findings that resulted: investigations at the site of Fort Conrad in Socorro County; and the Maverick WUI Survey on the Lincoln National Forest.

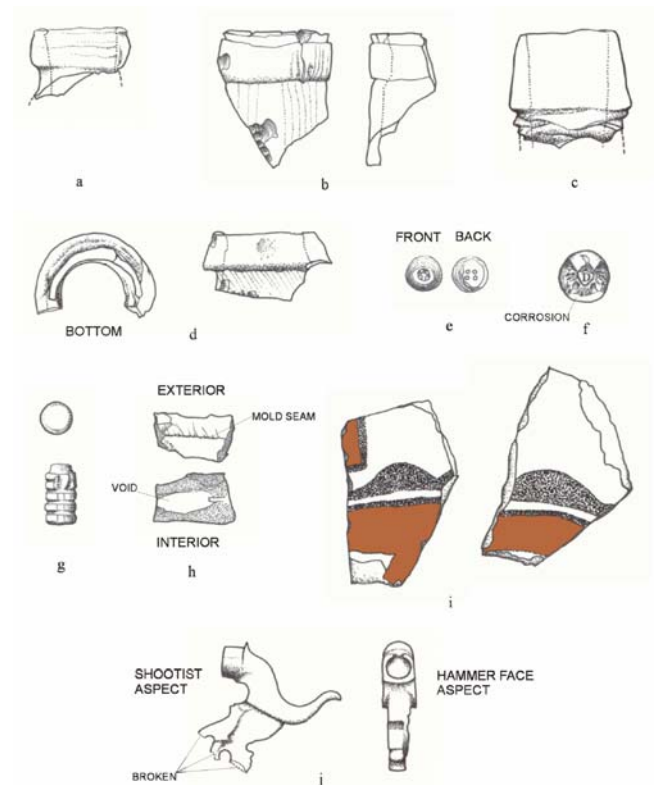
During June 2004, Four Corners completed archival studies and detailed mapping, recording, and metal detector investigations at the site of Fort Conrad (LA 4464). Fort Conrad was constructed by the U.S. Army on the middle Rio Grande south of Socorro, sited on the Camino Real at the north end of the Jornada del Muerto. Fort Conrad was garrisoned by the 1<sup>st</sup> and 2<sup>nd</sup> Dragoons and 3<sup>rd</sup> Infantry from September 8, 1851 to March 31, 1854, when the post was abandoned in favor of the new Fort Craig, built ten miles to the south on the

recommendation of Col. Joseph K. F. Mansfield, whose 1853 inspection of Fort Conrad was highly critical of its condition and location. The project, conducted on private land under contract to the U.S. Bureau of Reclamation, Albuquerque Office, was undertaken as a Section 110 inventory to update the only previous recording of this site in 1971 by John P. Wilson and Pat Beckett. The project was directed by David E. Purcell, focusing on documenting the nature and extent of archaeological remains of the fort and conducting archival research in support of a National Register of Historic Places eligibility recommendation. Significantly greater numbers of artifacts were identified than had been expected: all surface artifacts were plotted with handheld GPS units and analyzed in-field, and all visible structural remains were mapped and described in detail. Complete metal detector surveys of two features were undertaken, with each metal target excavated as a trowel probe and identified; almost all of the targets were square, machine-cut iron nails found less than 10 cm below the surface. Our analysis of the project results focused on explaining discrepancies among the observed archaeological evidence, Mansfield's 1853 map of the fort, and a purportedly contemporaneous narrative description presented in F. Stanley's 1961 "The Fort Conrad, New Mexico Story." We are confident that the site is that of Fort Conrad, however, based on the recovery of the hammer to a percussion cap "box lock" firearm and a Dragoons uniform cuff button of a type issued 1851-1884. Fort Conrad holds a significant place in the history of New Mexico Territory and the United States not only for its archaeological remains, but for its role as a prototype of frontier forts used during the Indian Wars. Although considered a failure at the time, lessons learned from Fort Conrad led to the successful development of Fort Craig. The results of this project have been reported in a technical volume to the BOR, Albuquerque Office, and in a presentation to the Second Fort Craig Conference, held in early November in Socorro. The proceedings of this meeting are to be published by the BLM.

During the months of July through September, Four Corners Research inventoried approximately 5520 acres in the Lincoln National Forest, Smokey Bear Ranger District for the Maverick Wildland Urban Interface forest thinning project, recording 470 isolated occurrences and 78 archaeological sites, including 1 previously recorded site. The project, sponsored by the USDA Forest Service, was located southeast of Ruidoso Downs, New Mexico, south of US Highway 70 and north of the Mescalero Apache Indian Reservation south of the Rio Hondo. Of the new sites evaluated as part of this project, National Register eligibility status has been recommended for 23 sites based on surface and trowel probe evidence and integrity. All sites were essentially found to be in good condition, with no evidence of substantial erosion or vandalism.

Site density ranges between approximately 1 site per 25 acres and 1 site per 50 acres through this area, increasing in density from south to north. This moderate-to-high site density appears to correspond to areas of exposed chert outcrops and residual surface debris that has originated from chert outcrops within the limestone bedrock. However, activities associated with these sites were not limited to procurement and reduction of chert raw materials alone; components observed within site assemblages suggest that in addition to quarrying and flake production, hunting, retooling, and exploitation of wild plant resources were undertaken by prehistoric groups, perhaps as combined activities by task groups. Much of the evidence observed within the Maverick WUI project area reflects temporary, ephemeral activities. In addition to lithic resources, observations made during the field efforts indicate that acorns and pinyon nuts readily occur on the ridge tops and upper slopes, and could have been easily procured in concert with lithic procurement activities. Access to this area of exploited chert raw material is not clearly understood,

although site density is highest in the far northern portion of the project area, suggesting that groups entered this area from the north, visiting from sites located farther north in the Rio Hondo Valley. Regardless of how the ridge top was accessed, very little evidence was found to suggest prehistoric groups spent much time in the canyon bottoms, other than the rock art site and two rock shelters. Few locations within the project area offer environments favorable to farming. Ground stone artifacts were identified as isolated occurrences and as part of site assemblages, but occurred in low frequencies, suggesting that native plants, and possibly small game animals, were processed as part of the subsistence strategies of the peoples periodically occupying this area.



Diagnostic artifacts observed at Fort Conrad: hand blown bottle finishes - (a-d); shell button - (e); uniform button - (f) FS130 (collected); spent bullet - (g) Record 228 (collected); clay pipe stem fragment - (h); historic pueblo pottery (post-occupation) - (i); and, "box lock" percussion cap firearm hammer - (j) FS 223 (collected). Illustrations by David E. Purcell.

The Maverick survey area contains a temporally diverse set of archaeological resources that extend from the Middle Archaic to the late historic periods. The majority of historic materials appear to represent activities limited in scope and temporal duration and are probably the remains of short-term campsites. Prehistoric sites were frequently associated with the exploitation of lithic raw materials. In addition to the exploitation of the readily available chert sources, prehistoric sites exhibit evidence of functioning as hunting campsites at which tool production and maintenance occurred. The frequency of informal tools at these sites suggests that numerous natural resources were also being exploited as part of the subsistence regime. Only one site (AR 03-08-01-674) has an extensive ceramic assemblage. Based upon the site size, artifact density and artifact types, this site may have served as a more substantial upland base camp. This site also contained a probable Plainview point, which was point-provenienced and collected from the site. Based upon the surface context of this artifact, it is more likely to have been a curated tool by the Jornada Mogollon site occupants.

Four Corners Research completed a detailed technical report on the project findings. Specific topics of interest, such as settlement patterns and the large rock art panel within the project area, may be the focus of presentations at upcoming conferences, such as the 2005 Pecos Conference and 14<sup>th</sup> Jornada Mogollon Conference in October 2005.

## Comments on New State Regulations

Steve Townsend, Townsend Archeological Consultants

Section 4.10.15.12 of the draft state regulations regarding archaeological survey states "the recording shall be performed under the supervision of an architectural historian, historian, or historic architect listed in the SHPO directory (4.10.8.11)". Undoubtedly this wording was placed in the draft regulation with the idea of increasing the quality of the recording of the built environment. That is a commendable goal. However the wording appears to overlook a number of underlying factors, which may explain why some archaeologists will be bothered by its implementation. This article attempts to articulate some of those concerns. The article takes the perspective that the above-stated wording goes too far, and in its implementation will be extreme and inflexible. This article discusses permitting issues, grandfathering, the conduct of cultural resource management projects, the ambiguous nature of the "built environment", the fuzzy boundaries between archaeology, the built environment and cultural landscapes and finally, the cost factor. The perspective presented here is that there is a continuum between archaeology and the historic record, and in many situations the two cannot be easily separated. Not should they be.

There is an entire draft regulation addressing the various kinds of permits archaeologists in New Mexico can, or must obtain (see draft regulation 4.10.8). Note that the qualifications for the historic architects, architectural historians and historians is strictly based on academic achievements and experience. There is no permitting requirement for those specialties. Note also that qualification for listing on the SHPO directory (sub-section 4.10.8.11) mention degrees can be in a closely related field. One wonders what closely related fields might be if archaeology is not one of them. Perhaps what is implied is closely related fields, except archaeology. Whatever the meaning of the wording, what is clear is that archaeologists are not considered to be capable of recording the built environment without having someone tell them how to do it. What it also clearly says is someone who does not have to obtain a permit will supervise someone who must apply for and obtain a permit. In addition the permitted individual, or party, as a principal investigator, is responsible for the quality of the supervision they are receiving. This is an absurd predicament.

Of further concern is the fact that, short of going back to school and obtaining a graduate degree in one of the approved fields there is no way experience will ever allow an archaeologist to reach the level of self-supervision. There is no stated grand fathering mechanism. Also, certification programs such as the program in regionalism at the UNM School of Architecture and Design will not meet the requirement, as it is not a degree-granting program. In fact the draft wording discourages people from enrolling in such programs. There is no practical goal to be reached through the effort.

Note that while architectural historians, historians and historic architects must have 2 years of experience with the southwest; there is no requirement for experience in working within the constraints of cultural resource management projects. No one will dispute that academic research and cultural resource management have

fundamental differences. There are definite time and financial constraints on the latter that, for better or worse, influence the manner in which cultural resource management is conducted. Therefore bringing on an expert in the built environment who has no experience in cultural resource management is actually adding an additional encumbrance to an already complicated procedure.

If the decision to add this wording was an attempt at a qualitative improvement the deficiencies need to be clearly stated. Thinking back to when Lynne Sebastian was removed from as State Historic Preservation Officer, the big question that was never answered was "what did she do"? We still don't know. The same question could be asked with this new requirement. It is extremely difficult to address deficiencies in one's work if they have not been clearly stated. If those deficiencies were clearly stated than they might be repairable with a tune-up rather than a major overhaul. Training to overcome the deficiencies is a practical solution that produces better-rounded preservationists. In fact the holistic and integrated nature of preservation is better served by taking this approach.

What is it that distinguishes the built environment from the archaeological environment? The regulation states a functioning acequia is "built environment" while SHPO Note 5 indicates an abandoned acequia is an archaeological site. How much difference is there? If one reads the Historic Cultural Property Form Inventory Manual the architectural sequence starts with what would be called archaeology. This is also true of Early Architecture in New Mexico (Bunting 1976). Further, the HCPI form is designed to record a variety of cultural phenomena, including what would be considered by most archaeologists, archaeological sites. The regulation does not define the built environment, thereby creating confusion as to "when a site is a site". The regulation needs to clearly define the entities that constitute the built environment.

The built environment can be described through a series of typological classifications, just like archaeology. Mapping and pattern recognition are integral parts of both idioms. Photography and narrative description are common tools for both. In fact the real difference is where one chooses to draw the line, and if it is decided one can record this, but they are not competent to record that, the perspective on complex cultural environments is under direct attack. As an example of the integrated nature of archaeology and architecture one should bear in mind the vital role the Society of Industrial Archaeology played in the creation of the Historic American Engineering Record.

The Historic Cultural Property Inventory Manual emphasizes the need for someone who meets the Secretary of the Interior's standard to making formal determinations of eligibility. This is a draft state, not a federal regulation. Further, individuals and organizations conducting cultural resource investigations are not making formal determinations of eligibility. Anyone who has ever reported a site or a structure in a survey report is aware of the fact that theirs is nothing more than a recommendation, and certainly not a formal determination of eligibility. The regulating agencies do that. Finally there is cost. Cultural resource management runs on budgets. While we all aspire to loftier ideals than the bottom dollar the reality is that a CRM firm that does not turn a profit will soon be out of business. Without a clear articulation of the role of the supervisory historic architect, historian or architectural historian, and without adequate addressing of the above-stated ambiguities there seems to be potential for increasing the costs of projects without a tangible payoff to those who are paying for the work. Practitioners of CRM are acutely aware of the dual role they play, essentially as mediators and facilitators between their clients and the regulatory agencies.

Therefore the cost benefit from the added supervision needs to be made clear.

There is a need for tempering from both archaeologists and architects as we continue to try to establish a method for coherently interacting with one another. Projects dealing with complex built environments (such as urban settings) would be best served by utilizing the expertise of architectural historians or historic architects. How rural or largely vernacular environments are significantly different in that archaeological and architectural phenomena exist as a continuum. The degree of separation from the physical world is not as great as in a heavily built-up context. Also of consideration is effect. Cultural resource inventories do their best to report the cultural phenomena that are present. They also are charged with making determinations of the project effects to the resources that are present. It seems like excessive detail to expect HABS/HAER level documentation during inventories. Inventory level documentation can be acquired and evaluated in light of the potential effect to the resource even by a trained layman. If there will be an effect to the built resource the expertise of a historic architect or architectural historian is appropriate (as long as they are versed in cultural resource management practices).

Recognition of one's experience, interests and abilities, even if their degrees are in something else, should be taken into consideration. J. B. Jackson, so instrumental to understanding of cultural landscapes, had only minor training in architecture. H. P. Mera was a physician, and that Franz Boaz, the father of anthropology, was a geographer by training. If we are not allowed to grow past regulated boundaries of our advanced degrees, and receive no recognition for having continued to learn and grow, we are not serving an integrated discipline of preservation, and are artificially circumscribed. The draft regulations appear to enforce that kind of circumscription, and are therefore fundamentally flawed.

## Editor's Corner

Last time I appealed for more NewsMAC content. Since then there has been a virtual flood of recipes. It's not really what I wanted but here's a few:

### Shrimp and Grits

*Submitted by Tom McIntosh*

Cheese grits\*

1 pound fresh shrimp  
6 slices bacon  
Peanut oil  
2 cup sliced white button mushrooms  
1 cup minced scallions  
1 large clove garlic, peeled and minced  
4 teaspoons lemon juice  
Tabasco sauce  
Salt and pepper  
2 tablespoons chopped fresh parsley

Prepare grits and hold in a warm place of in a double boiler.

Peel shrimp, rinse, and pat dry.

Dice bacon and sauté lightly in a skillet until edges of bacon are brown, but the bacon is not crisp. Remove from heat, drain on paper towels, then crumble.

Add enough peanut oil to the pan to make a layer of fat about 1/8-inch thick. When oil is quite hot, add shrimp in an even layer.

Turn shrimp as they color; add mushrooms, and sauté, stirring for about 4 minutes.

Add scallions and garlic. Heat and stir for about a minute more.

Season with lemon juice, a dash or two of Tabasco, salt and pepper to taste, and parsley.

Divide the grits among 4 plates. Spoon the shrimp on top, sprinkle with crumbled bacon, and serve immediately. Serves 4.

### \*Cheese grits

1 cup stone-ground or quick grits (not instant)  
4 cups water (or milk for creamier grits)  
1 cup grated cheddar cheese  
¼ cup grated Parmesan cheese  
4 tablespoons butter  
½ teaspoon salt  
1/8 teaspoon pepper  
Pinch of cayenne pepper  
¼ teaspoon Tabasco sauce

Cook grits according to package instructions for 1 cup of dry grits. Turn off heat and add remaining ingredients to sauce pan. Stir until just mixed and serve.

### Green Chile Stew

*Submitted by Dave Kirkpatrick*

1 pound lean pork (boneless ribs, sirloin chops/roast, loin, etc); cut into small cubes and browned in Dutch oven (with/without legs). I prefer cast iron or heavy pan, like pressure cooker, to help retain heat. The amount of meat is based on the number of people being served. For 4-6 people, I use 1-1.5 pounds in a 12 inch Dutch oven.

1 or more large (fist-size) yellow onions, diced and browned with meat. You can add diced garlic at this step. When meat is browned, add potatoes.

3-4 medium size potatoes, cubed, and added to the Dutch oven, skins optional. Number of potatoes is dependent on the number of people and desired amount of "leftovers".

Add a "quart" bottle of beer, covering meat and potatoes. Beer adds a sweet flavor. You can use sweet onions and delete the beer. I have also used water and/or chicken broth or beef broth if using beef.

Water or broth can be added if the available beer is not quite enough to cover meat and potatoes.

Add garlic powder and black pepper to your preferences. I use a little oregano. It can come-on strong if you use too much. Diced garlic can be used when cooking the onions rather than powder. Some cooks add oregano and other spices later in the cooking, while simmering, to avoid overpowering the dish. Bring to a boil and reduce to a simmer in a covered Dutch oven.

When the potatoes start to get soft but not done, add diced green chile, usually 12-18 peppers (I freeze 6 peppers or so to a bag), the amount is your preference. If the green chile is added too soon and cooks too long, it gets soggy and mushy. Serve in bowls. Toppings are sour cream or a shredded white cheese. Also serve warm wheat or flour tortillas. Salt is usually added at the table rather than in the cooking. I often serve a lettuce salad with sliced tomatoes as a side dish. If the chile is hot, this helps cut the heat.

Note: This is an intuitive recipe. The amounts depend on the number of people being served. I have cooked it both inside on the stove and outside in a Dutch oven. Outside takes a little more time to bring to a boil. And it is better the next day, so there are always left-overs for burritos. I have used beef, usually boneless beef ribs, a lean cut found at Albertsons. We prefer the pork flavor and it takes less cooking time to tenderize the meat. Of course, you can simmer the beef cuts for awhile and then add potatoes, etc.

**NMAC** is a nonprofit organization whose purpose is to maintain and promote the goals of professional archaeology in New Mexico. NMAC's goals are to:

- promote archaeological research within New Mexico and disseminate knowledge arising from that research;
- promote awareness of New Mexico's cultural resources among public agencies, corporations, and members of the public;
- encourage the legal protection of cultural resources; and encourage high standards for professional archaeology.

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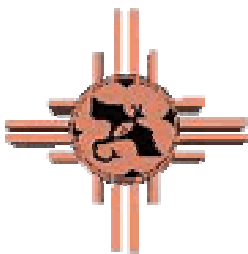
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## NewsMAC

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PO Box 25691  
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*Your membership has **REALLY** expired!*

*Your membership is current for 2005.*