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*Advisory Council on Historic Preservation*

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## **Archaeological Conservation as Process and Product: A Federal Perspective**

**Ronald D. Anzalone**

Advisory Council on Historic Preservation

Alice felt as if she would never be able to talk again, she was getting so much out of breath: and still the Queen cried "Faster! Faster!" and dragged her along. "Are we nearly there?" Alice managed to pant out at last. "Nearly there!" the Queen repeated. "Why, we passed it ten minutes ago! Faster!"

Alice looked round her in great surprise. "Why, I do believe we've been under this tree the whole time! Everything's just as it was!" "Of course it is," said the Queen. "What would you have it?" "Well, in our country," said Alice, still panting a little, "you'd generally get to somewhere else--if you ran very fast for a long time as we've been doing." "A slow sort of country!" said the Queen. "Now, here, you see, it takes all the running you can do, to keep in the same place. If you want to get somewhere else, you must run at least twice as fast as that."

--Lewis Carroll, "Through the Looking-Glass"

### **INTRODUCTION**

Countless books and articles have either explored in some depth, or at least touched upon, the conservation of our cultural heritage. For the purposes of this volume, it would be an exercise in futility to attempt to detail current procedural requirements for historic preservation through various federal statutes and regulations. A number of sources have attacked this task in the past (e.g., Scovill, Gordon and Anderson 1977; King, Hickman, and Berg 1977). None has managed to provide completely up-to-date information on even the regulatory oscillations current that year, and there have been a myriad of changes since 1977. If there is one constant here worthy of note, it is certainly the fact of change, and there is an unfortunate but real possibility that such a discussion of regulatory procedure, besides being overwhelmingly boring, would itself be eligible for the National Register of Historic Places as a historical resource. At the same time, any attempt to deal with the full range of historic, archaeological, and cultural properties that come under the purview of historic preservation and related laws is well beyond the scope of this paper.

Consequently, this paper will focus on a polemical discussion of some of the elements surrounding the national treatment and oversight of archaeological resources and their management conservation generally advocated by federal policy and law as it evolved into the middle of the decade. Several primary themes punctuate this presentation. The first of these themes concerns the value of archaeological things, and considers a number of problems and concerns associated with the often complementary but sometimes conflicting search for and realization of archaeological research values and the value of archaeology to the public. The second theme, in juxtaposition to the first, concerns some current federal land use and development planning policies and strategies and appropriate mechanisms for incorporating the consideration of archaeological resources into such planning. The third theme, the logical bridge between the first two, provides some thoughts on the development of priorities, both research priorities and planning priorities, can perhaps be profitably used to find points of mediation and accommodation between archaeological values and development needs. To the extent possible, a few recent examples will be cited that illustrate these points. This article does not purport to represent the federal government viewpoint on archaeological conservation, but simply one perspective based on personal involvement at the regulatory and "horsetrading" middle ground.

## A LOOK BACK

In the summer of 1971, an article entitled "A Conflict of Values in American Archaeology" appeared in American Antiquity. Some may remember it; many may not. In any case, the article touched on a perceived rift between the "needs and ethic of an explicitly scientific approach to archaeology and the operating assumptions of those governmental agencies that support archaeological salvage," and went on to assert that the conflict "was like to provide an effective deterrent to the organization of productive large-scale research programs in American prehistory" (Kinsey 1971:255). The paper advocated regional plans and research designs that could be used to make future site-specific decisions on "salvage" research, as one way to avoid the inductive, particularistic amassing of salvage data on a piecemeal basis.

In some ways, little has essentially changed in the intervening 15 years. It is certainly true that there have been advances since then; there is (more or less, according to vagaries of budget requests, executive policies, and congressional action) a full-fledged national historic preservation program, with a substantial archaeological component, in place today where little more than highway or reservoir salvage existed in 1971. Most archaeologists have been involved in one capacity or another in the program, most often as contractors, and perhaps a majority have at least a passing acquaintance with the meaning behind those cryptic numerical code sequences we use: 1-0-6, 1-1-5-9-3, 93-191. There is, hopefully, more than a passing acquaintance among the archaeological community with the regional or state planning idea and the "archaeological overview" study. But as a group, we are still grappling with the same fundamental problems recognized over a decade ago. How can we make justifiable decisions that are at once helping us to advance scientific knowledge, and at the same time providing a valid basis for management decisions about archaeological resources? In the search for "balance" between archaeology and development interests, where does the public interest lie? What, in fact, is the public interest in what has come to be known as "public" archaeology? Finally, and perhaps most importantly, how can we as members of the archaeological community best contribute to the realization of that public interest at the same time as we protect our own narrower interests, specifically as advocates of archaeological conservation and the broadening of archaeological knowledge?

While such discussions go well back in time, like the components of the archaeological properties in question, their most recent sequence may be seen to date from 1974 with the National Park Service/Society for American Archaeology sponsorship of six seminars on the "Future Direction of Archaeology" at Airlie House, Virginia. Eventually published by the Society for American Archaeology (McGimsey and Davis 1977), the Airlie House Report added to the growing participation of federal agencies in the archaeological preservation polemic.

The Advisory Council on Historic Preservation, although established to "advise the President and the Congress on matters relating to historic preservation" (16 U.S.C. 470j) and supposedly sharing leadership of federal preservation programs with the Department of the Interior, had extremely limited interest and involvement in questions of archaeological resources prior to 1976. In 1976, amendments to the National Historic Preservation Act of 1966 for the first time provided for federal agency consideration of not only properties listed in the National Register of Historic Places, but also those eligible for such listing. More than any other legislative change, including the celebrated "Moss-Bennett" bill (P.L. 93-291, the Archaeological and Historic Preservation Act of 1974), the change solidified and ensured the substantial federal

consideration of archaeological properties with the "potential to survey adequacy and evaluations of archaeological significance, yield information important in prehistory or history." Although there have been two investigations and reports from the General Accounting Office in response to requests from the House Committee on Interior and Insular Affairs. Both of these concerned archaeological sites to some extent before, and to a much expanded extent afterward, the Advisory Council did not even have a federal funding and management of archaeological studies and archaeologist on its staff until late in 1978. Despite that basic preservation as they related to how the various legal mandates were handicapped, however, the Council formed a task force in 1976-1977 actually being carried out in practice. The first of these reports, on that included representatives of various affected federal agencies, the New Melones project itself, was issued in 1979 and raised the the archaeological profession, and State Historic Preservation how notorious blockbuster questions of "How much archaeology is Offices to review what was seen by many in both historic enough?" Specifically, the report noted that "Efforts to preserve preservation and the federal government as "the problem with archaeological and historical resources at the New Melones Dam archaeology." The "problem" stemmed mainly from three project in California have been clouded by the lack of federal considerations that federal agencies (and applicants for federal guidance on the adequacy of archaeological preservation and who permits or assistance) had to worry about: the requirements for should direct the program" (GAO 1979:i). The General Accounting Office did not stop there. The second report, issued in 1981, was the expanded consideration of the effects of federally-sponsored considerably broader in scope and dealt with the question of whether projects on archaeological resources that might be "eligible" for the federal agencies were doing enough or too much in carrying out the National Register in accordance with the amended National Historic Preservation Act; and the provisions for scientific data recovery of responsibilities, from identification to protection and mitigation. threatened resources under that statute and the Archaeological and The report stated that "the Department of the Interior must provide Historic Preservation Act of 1974. Under the auspices of the task better leadership and direction to Federal agencies and States. . . . force effort, and with Department of the Interior funding and interior has not established good criteria for agencies to use in participation, an important conference was held at the Fort Burgwin determining whether identified sites are important to the national Research Center, New Mexico, in 1978 (ACHP 1978). heritage, nor has it provided guidance on the extent to which

The resulting conference report set the stage for most of the archaeological resources must be recovered, recorded, or preserved national archaeological policies in operation today. Using much of to comply with Federal laws and regulations" (GAO 1981:i). Other the Fort Burgwin report as its basis, a fuller report of that task federal agencies were also singled out for their failures in this force was finally issued in 1979, several months after the Advisory regard, and the Advisory Council was criticized for being lax in its Council finalized and issued its revised regulations (originally issued review of federal efforts. The report concluded with a number of in 1974) for complying with Section 106 of the National Historic general and specific recommendations, among them: that archaeo- Preservation Act (36 CFR Part 800). The task force reported logical overview studies should be done; that surveys be better presented a number of general and important, if sometimes coordinated with land-use planning activities; that survey standards elementary, conclusions on a wide range of topics, including be finalized; that significance evaluations and other decisions be inventory, evaluation, and mitigation. Among other recommen made with reference to state archaeological preservation plans; and dations, the task force saw the need for evaluating archaeological that mitigation adequacy be judged in relation to problem properties within the context of state plans; establishing priorities orientation, overall research design, and state planning priorities. for evaluating sites and determining appropriate disposition as early All of these things stimulated Advisory Council interest in as possible in project planning; developing guidelines or standards making a more active role in archaeological oversight than had for mitigation work; and developing mechanisms for dealing with previously been the case. An immediate result of the task force regulatory compliance for the consideration of archaeological report and the New Melones GAO report was the preparation and resources on a comprehensive programmatic basis for long-term circulation of the Council's Handbook, Treatment of Archaeological programs or large-scale projects. properties (ACHP 1980). Picking up on many of the recommen-

At the same time, controversies surrounding archaeological investigations that had been made to provide better guidance, the investigations in the New Melones Reservoir in California, including handbook had wide dissemination and active use, although intended

to address only some of the "problems" with archaeology. In order to more fully understand current thinking and policy, therefore, it is necessary to briefly digress and describe the Advisory Council's principal statutory role in the federal archaeological program as it has come to be exercised.

### THE CURRENT SECTION 106 SYSTEM AND ARCHAEOLOGICAL RESOURCES

Besides its role as historic preservation policy advisor, the Council is responsible for overseeing federal compliance with Section 106 of the National Historic Preservation Act, which states that federal agencies, and, by implication, recipients of federal aid or licenses or permits, and other assistance, must take into account the effect of their undertakings on historic properties. Such historic properties include archaeological resources. In doing this, they must also afford the Council a reasonable opportunity to comment on the undertaking. Since the full Advisory Council itself is a 19 member body comprised of Presidential appointees, federal agency heads and others, it clearly cannot comment on all the projects and other action being carried out each year. Thus, a process has been set up in which review of these activities, most often discrete development projects, is carried out cooperatively by State Historic Preservation Officer personnel and Council staff. If representatives of the agency in question, the State (SHPO), and the Council can agree on how a project or a program is to be carried out, they put that agreement down in legal language. This accomplishes both the directives of Section 106; it shows, on paper, that the Council has had its chance to comment by providing input into the final project plan or lessening its damage to historic properties, and it also formally demonstrates in what manner the agency is "taking into account" the effect of its actions on historic properties in a document that can stand up in court if necessary. The heart of this process is "consultation," in which the various parties engage in, if you will, haggling on the end result. Anything and everything may be included in this consultation, but principally the considerations are four:

1. What, in detail, is the nature and value of the historic properties being affected? (IDENTIFICATION AND EVALUATION)
2. Are there alternatives that will avoid the project's effects on any or all of the properties? (PROJECT PLANNING)
3. Are there alternatives that will lessen, or mitigate, the

project's effects on any or all of the properties?  
(TREATMENT/MANAGEMENT OPTIONS)

On balance, what is the best course of action to which all parties can agree? (DECISION AND IMPLEMENTATION)

It is important to note in passing here that there is nothing in the arrangement that suggests that these four broad topics must be dealt with sequentially, or that the answers given to each of the questions will not affect the other appropriate answers. As we shall see, the underlying assumptions promoting this interrelatedness are the foundation of the comprehensive archaeological planning strategies discussed in more detail below. In any event, though, the process defined under Section 106 is not an unbalanced advocacy for the preservation of historic buildings, archaeological sites, or anything else. The process embodies principles of negotiation and exchange in that it is supposed to present a search for the "public interest," a balance that is struck between historic values and the value of development. This would appear to be the essence of a conservation or "wise use" philosophy as it might be applied to archaeological conservation, and I would strongly disagree with anyone who interpreted "conservation" to mean either stockpiling against some distant future day or enclosure in a glass bubble. Council staff review of proposals affecting archaeological resources proceeds from the basic premise that while there is indeed a finite and nonrenewable universe of archaeological things, there is an equally bounded universe of time and money to commit to them in the face of other needs. At the same time, "consumption" of some resources is necessary in order to advance knowledge to the point where better informed decisions can be made for future management. Priority definition is essential; the overriding problem is how to come up with a basis for defining those priorities in the first place, and how to make decisions about the fate of irreplaceable resources with far less than complete information about them.

In looking at the effects of undertakings specifically concerned with archaeology and consulting about such projects, Council staff are guided by principles contained in the previously referred-to Handbook for Treatment of Archaeological Properties, drafted in 1980 under the principal authorship of Thomas F. King. Of the principles contained in the Handbook, the most important to mention here are nine:

Archaeological research, addressing significant questions about the past, is in the public interest.

2. Archaeological properties are important wholly or in part because they may contribute to the study of important research problems.
3. Not all research problems are equally important; hence, not all archaeological properties are equally important.
4. Treatment of an archaeological property depends on its value for research, balanced against other public values.
5. Eligibility for the National Register suggests, but does not define, how an archaeological property should be treated.
6. If an archaeological property can be practically preserved in a place, it should be.
7. Both data recovery and destruction without data recovery may be appropriate treatments for archaeological properties.
8. Data recovery should be based on firm background data and planning.
9. Data recovery should relate positively to the development of State Historic Preservation Plans.

These statements are generally consistent with current archaeological philosophy, federal historic preservation policy as it has evolved over several decades, and the recommendations of the Carter/Kerr McGee site in the Powder River Basin of Wyoming, Fort Burgwin conference, the Archaeology Task Force, and the George Frison complains that "the concept of 'inventory and General Accounting Office. The principles are not without controversy (for example, consider the implications of numbers three and seven). However, as a basis for reviewing federal activities that might affect archaeological resources, the application of these standards and the use of more comprehensive and "programmatic" strategies and oversight have increasingly played a significant role in determining the way in which archaeological conservation is being carried out under its federal and legislative mandates. At the same time, standards such as these are mainly focused on the point at which decisions need to be made about archaeological mitigation and other preservation efforts cannot address some of the fundamental problems recognized not just by the General Accounting Office and federal agencies but by practicing archaeological professionals: the adequacy of identification, and evaluation of significance, within the context of land-use planning needs.

Although little information is available to date on the application, usefulness, or practicality, the National Park Service has recently addressed these issues to some extent with its "Standards and Guidelines for Archaeology and Historic Preservation" (September, 1983). These were developed in response to a need expressed in the amendments to the National Historic Preservation Act, passed in 1980, for broad federal standards for

dealing with all kinds of historic properties. Of particular interest is the section on comprehensive planning (Standards for Preservation Planning). The introduction hastens to point out that "These standards and guidelines are not regulatory and do not set or interpret agency policy. They are intended to provide technical advice..." (National Park Service 1983:44716). This "technical advice," however, makes it clear that the general policy direction is clearly biased toward comprehensive preservation planning and contextual studies to develop goals and priorities for identification, evaluation, and treatment of archaeological resources. On a statewide basis, this is to be done through state preservation plans; on federal lands, areal management plans are intended to focus state or multi-state priorities more specifically and adapt them to specific land-use planning needs.

**COMPLIANCE" ON THE GREAT PLAINS:  
SOME PROBLEMS AND POSSIBLE SOLUTIONS**

In a recent article describing archaeological investigations at the Carter/Kerr McGee site in the Powder River Basin of Wyoming, George Frison complains that "the concept of 'inventory and avoidance' of cultural resources without strong parallel program of research should be abandoned" (Frison 1984:311). At the same time, since it is not possible to either save or investigate all archaeological resources, cultural resource managers must, in addition, be able to establish priorities and make proper decisions. . . . The data base is now sufficient to plan long-range, problem-oriented paleoindian research in the Powder River Basin. The goals of this research should be agreed upon by researchers, CRM, contract archaeology and avocational archaeologists, and all should work together toward these goals" (Frison 1984:311-312).

Examination of the trends actually reflected in recent Bureau of Land Management and Forest Service area planning efforts, along with a brief examination of the contents and implications of several programmatic Memoranda of Agreement involving consideration of archaeological resources in the Great Plains that have been negotiated among federal agencies, State Historic Preservation officers, and the Advisory Council, may be instructive in examining the issues being raised by Frison (as well as myself). Along with site-specific special use permits, licenses, and other regulatory controls, as well as the specific cultural resource procedures of the Bureau of Land Management, the Bureau of Reclamation, the Forest Service and other agencies that have some control over development, these form the basis for archaeological "compliance,"

and hopefully conservation and management, under the federal system.

While there are many individual projects, both large and small that are also discussed and dealt with each year, and which result in Memoranda of Agreement or other resolutions, the broader "Programmatic" agreements illustrated in Table 5.1 that are negotiated for an entire federal program, large management unit, or major multi-state project in recent years, point to some noteworthy general directions and goals that transcend the individual situation. For example, the 1981 ETSI Coal Slurry Pipeline agreement, for a discrete (although large) proposed project, was relatively straightforward in somewhat linear fashion, and merely: (1) set forth cooperative procedures among the various parties; and (2) called for BLM Class I, II, and III inventories in advance of construction (presumably directed at identification and avoidance where possible). By contrast, the more recent agreement for the Garrison Diversion Unit, also for a discrete "project" of water control structures, provides for an overview study connected to the generation of "predictive" models, followed by the implementation of a comprehensive plan for dealing with the various classes of resources that will be affected by the construction of water control structures and all of the activities related to that work.

The broader question of how to deal with archaeological conservation within an entire program or management unit has followed a similar trajectory. Again, an agreement not dissimilar to the pipeline project that codified standard Bureau of Land Management inventory procedures and more fully spelled out interaction with State Historic Preservation Officers was executed in 1981 for many western states affected by the BLM's Livestock Grazing and Range Improvement Program. Once more, no particular comprehensive planning applicable to archaeological resources was called for on these 174 million acres, save for BLM's general planning responsibilities under the Federal Land Policy and Management Act and the National Environmental Policy Act. How these planning responsibilities have been put into practice may be illustrated with reference to a recent planning effort being undertaken for the Buffalo Resource Area in north central Wyoming (Bureau of Land Management 1984). Under BLM's preferred alternative, individual cultural resource management plans are to be done for several resources related either to prehistoric resources or historic archaeological sites, as well as other resources as properties are nominated to the National Register; Class III inventories are to be conducted in other areas being subjected to surface disturbance from energy development and extraction or forestry.

Table 5.1. Selected Agreements under Section 106 of NHPA Applicable to Archaeological Conservation Planning in the Great Plains.

States	Agency	Application	Date
AZ, CA, CO, ID, MT, NV, NM, OR, UT, WA, WY	BLM	Livestock Grazing and Range Improvement Program	1/14/80
AZ, CO, KS, LA, NE, OK, SD, WY	BLM USFS	ETSI Coal Slurry Pipeline	7/02/81
ND	USGS	Little Missouri Grasslands Energy Exploration and Development	12/08/81
MT	BLM	Public Lands Transfer to State	3/02/83
ND	BOR	Garrison Diversion Unit Project	8/16/83
Nationwide	OSM	Federal Coal Management	

KEY:

BLM Bureau of Land Management  
 USFS U. S. Forest Service  
 BOR Bureau of Reclamation  
 OSM Office of Surface Mining

All but Forest Service is in Department of the Interior; Forest Service is in Department of Agriculture.

Although there is nothing inherently wrong with this approach, particularly considering the normal exigencies of money and time, it differs significantly from, for example, arrangements under the Little Missouri Grasslands agreement in one important respect: unlike the Little Missouri case, there is no explicit context within which to relate management needs to archaeological research. An overview, an overall archaeological plan for the entire resource area, or, if you will, a "research design" covering archaeological investigations for all future land-use planning activities in the resource area, would tie many apparent loose ends together.

This brings us to a few brief words about the running of the Federal Coal Management program and its implications for future archaeological conservation activities connected with coal exploration and surface mining in many Plains states. As many readers are aware, the relationship of this program to historic preservation mandates has been in a state of flux for some years. This situation stems from a combination of factors, including conflicting federal and state laws; complexities in the administration of the program itself, with a number of federal agencies and numerous other constituencies and interests involved; and disagreements over the specific appropriate mechanisms for managing the archaeological resources being affected by large-scale surface coal mining. The situation came to a head with Pittsburgh and Midway Coal Company's 1982 proposal to expand its McKinley Mine in western New Mexico, and its desire to establish exactly how much it was required to do to identify, evaluate, and deal with affected historic and archaeological sites on its mine tracts. The subsequent controversy over the application of "predictive modelling" to archaeological survey and evaluation in a mining area resulted in bitter disagreements among federal agencies, state historic preservation officers, the professional community, coal companies, and the Advisory Council (see Keel and King 1982; Merlan 1982; Tainter et al 1984).

Following the Advisory Council's and the National Park Service's endorsement of a comprehensive plan/sampling approach, as advocated by Pittsburgh and Midway, some consensus seems to be emerging concerning the overall program. Current thinking, although still not without disagreement, seems to be moving toward the development of Historic Management Plans that would be prepared either by federal land management agencies on a regional or areal basis, or by coal mining applicants for a more specific exploration or mine tract area. Project planning and archaeological activities under such a system would (theoretically) flow from such comprehensive plans at several scales: within a region, within

resource area or similar management unit, and within a specific mine area.

## A SUMMARY OF TRENDS IN THE FEDERAL PROGRAM: ATTACKING THE PROBLEMS AND SETTING PRIORITIES

As we have seen, the trends in the development of the federal government's approach to archaeological conservation have been consistent and, I think, generally positive. Overall, the continued apparent need for outside intervention in the way agencies conduct their business has given way to more and more internalization of archaeological conservation concerns. From a project by project approach, more comprehensive strategies and program reviews are taking place. From an inflexible application of rote approaches in archaeological and management method and technique has come more willingness to devise flexible procedures and innovative strategies for solving problems. Finally, the emergency salvage mentality that characterized the archaeological conservation of a decade ago may perhaps slowly be giving way to more long-term planning and truer management with a capital M.

All of these trends could potentially have some very positive results with regard to the archaeological research that, along with public education and heritage conservation, comprises the product of archaeological conservation. It seems clear that comprehensive management approaches and planning should, if done properly, logically necessitate more comprehensive thinking about broad research questions, regional research problems and priorities, and more effective and efficient designs to carry out research. A report produced in 1983 following a "think tank" conference held under the auspices of the Southwest Region, U. S. Forest Service may perhaps point out one possible path toward the kind of research/management salvation sought by George Frison. Entitled "Problem Orientation and Allocation Strategies for Prehistoric Cultural Resources on the New Mexico National Forests" (Green and Plog 1983), the resulting document represents the results of a conference that discussed, among other things, appropriate ways of integrating management priorities and research priorities in "allocating" resources for the best possible use of archaeological properties. The allocation approach developed on a trial basis for New Mexico forms one of the bases for a Programmatic Memorandum of Agreement among the Forest Service, the National Conference of State Historic Preservation Officers, and the Advisory Council.

The approach takes the comprehensive planning and management philosophy one step further toward realization on a



practical level. In essence a sort of "research design" for archaeological resource management within a given area, in this case all National Forest lands in New Mexico, the strategy (a) formulates significant research topics applicable to the given universe of archaeological things (such as the rise and fall of civilization); (b) generates more specific research questions stemming from the larger problems (e.g., why did prehistoric people begin to live in sedentary communities?); (c) identifies what is known about the archaeological resource universe; and (d) establishes an allocation strategy with which to make both general and specific management decisions. The allocation strategy itself consists of a hierarchical series of decisions based on an examination of the modern (and perhaps future) use potential of various classes of resources; an evaluation of site condition, prehistoric or historic site use, and site size; and three "allocation" categories based on sample preservation needs, conservation needs for research or other purposes, and the decisions to remove some sites from further management consideration. Thus, each decision point requires educated and creative consideration of research needs and potentials as well as other public interests within the overall Forest management framework.

### DEALING WITH SOME LINGERING HURDLES

All of the above may or may not sound fine and generally positive. In any event, some significant practical problems remain to be overcome in implementing some of these ideas. The availability of funding to achieve such archaeological conservation management is clearly of paramount concern. While funding to deal with case-by-case crises and project is more generally available either through federal and state agency program budgets or through various requirements imposed on permit applicants and others, enough funding to accomplish the type of comprehensive plan implementation discussed above on a large scale is currently not available. A cooperative public and private sector effort to accomplish some of these goals, however, might be possible if mining companies, forestry products companies, and other development concerns were convinced that an investment in broader conservation planning would make the extent of their responsibilities more predictable and their business goals more readily attainable.

At the same time, Powell et al (1983) may speak for many in the professional community in voicing their considerable frustration and skepticism over their long-term experience with Peabody Coal

Company's mining and archaeological management activities on Black Mesa, Arizona. The problems they cite of changing legislative and regulatory directives, overlapping (and often conflicting) agency policies and needs, and professional disagreements about the appropriate conduct of archaeological research over the course of 15 years are legion. The concerns voiced by Native Americans, even conflicting concerns separately pursued by Navajo and Hopi factions, are real. While certainly not a panacea for all of these ills, the best way currently available to archaeological conservationists for addressing these ills seems to be what the Forest Service has apparently attempted in New Mexico--write a "research design" for archaeological management backed up by multiparty agreements laying out how it will all work and who will pay for it. In some states it may prove practicable to base such an arrangement on state historic preservation planning mechanisms; elsewhere, it may be necessary for principal federal land managers to take the lead. As the Queen exclaimed to Alice, "Nearly there! Why, we passed it ten minutes ago! Faster!" Let us hope that we have better luck in agreeing on a mode of transportation, as well as the route to follow, and can recognize our desired destination if and when we ever get there.

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