

CULTURAL RESOURCE MANAGEMENT PLAN for the KEYSTONE ARCHAEOLOGICAL PRESERVE, EL PASO, TEXAS

(Revised August 2006)

I. Background and Purpose

The Keystone Archaeological Preserve is located on the lower floodplain of the Rio Grande with wetlands immediately to the north and west and the Keystone Dam immediately to the east, in northwest El Paso, Texas. The site was first discovered in the 1970s during an investigation of the area prior to the construction of Keystone Dam which was intended to provide flood control on one of the larger arroyos from the Franklin Mountains to the Rio Grande. Following the site's initial discovery, the University of Texas at El Paso's (UTEP) Centennial Museum conducted a testing project to determine the significance of the site. In 1979, Thomas C. O'Laughlin excavated portions of Site 33 for the purpose of mitigating the effects of dam construction and prepared a report in 1980 for the Army Corps of Engineers. An excavation was conducted by members of the El Paso Archaeological Society in 1984, but this excavation was on a portion of the site which is now outside of the The Archaeological Conservancy's (TAC) and City of El Paso's portions of the site.

Research revealed the presence of both Middle Archaic and Late Prehistoric (El Paso and Mesilla Phase) occupations of twenty-three (possibly 41) brush huts; basin-shaped shallow floors and fragmentary chunks of clay, some with impressions of vegetation were found dating to about 2400BC-1800BC. Three were fully excavated. Along with the brush huts, excavators found domestic hearths, roasting pits, and a large trash midden, along with chipped stone, ground stone, utilitarian pottery sherds and



numerous scatters of fire-cracked rock that date to the later Late Prehistoric Period (200AD-1450AD). The Keystone site is important as one of the oldest known village site in the western U.S. and perhaps the largest site containing Archaic period houses in the western U.S. or northern Mexico. The site may be unique in its ability to inform us about the major behavioral changes that occurred during Archaic times, when humans in the Southwest first changed from mobile hunter-gatherers to more sedentary reliance on cultivated plants, harvesting wild crops and utilizing the wetland food sources. Excavations to date have not determined differences in site usage between the Archaic and Late Prehistoric phases.

The Keystone archaeological site, 33(41EP494), consists of a five-acre portion owned by the City of El Paso (EP) and a four-acre portion donated by developer Chris Cummings to The Archaeological

Conservancy (TAC) in January 1999. Both the TAC and City portions of the site are located within a 52-acre tract of land known as Keystone Heritage Park. The 52-acre park in El Paso's upper valley is a City-owned property leased to Keystone Heritage Park, a non-profit organization charged with preserving and developing the park. Oversight of the archaeology rests with the El Paso Museum of Archaeology, Museums and Cultural Affairs Department, City of El Paso. The tract was originally privately owned by several families, who compacted the property and sold and/or traded the land to the railroad and the City of El Paso. In 1983, the Texas Historical Commission designated the Keystone site a State Archeological Landmark (SAL) under the Antiquities Code of Texas. State officials also determined the site's eligibility for listing on the National Register of Historic Places.

It was decided by TAC, the Texas Historical Commission, the City of El Paso and the predecessor of KHP at the 2000 Keystone Archaeological Preserve management meeting that both portions of the site would be included in that management plan, and that concurrence also applies to this revision of the management plan. However, each party to the site management plan will retain exclusive authority to decide matters that apply only to their portion of the site. At some point in the future, TAC, the City and KHP may explore the possibility of signing a lease providing for the management of the TAC portion of the Preserve by KHP. Such a lease would require KHP to keep appropriate insurance to indemnify TAC against damages.

This cultural resource management plan ensures that any future investigations within the Keystone Archaeological Preserve will be conducted according to the highest standards of problem-oriented, scientific research, in accordance with the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation, and in consultation with the Texas Historical Commission. The plan also ensures that the preserve will be protected for future generations to enjoy. The plan addresses site security, access, erosion control, groundcover, and artifact curation. The plan is not designed to require a consensus of the participants.

All Conservancy preserves are managed according to the general guidelines outlined in the attached Management Plan for Archaeological Conservancy Property, adopted by the Conservancy's Board of Directors in February 2003. The general plan is designed to be supplemented by specific elements included in this plan. The previous 2000 management plan meeting for the Keystone Archaeological Preserve was held at 12:00 p.m. on Tuesday, February 15, 2000 at El Paso City Hall. The following people attended the meeting: Myles Miller of the Texas Historical Commission; Robert Andron, Assistant City Attorney; Roy Gilyard and Rosemary Staley with the City Planning Department; Albert Olvera with the Subdivision Section of the City Planning Department; Bashar Abugalyon with the City Development Division; Charlie Nutter with El Paso Parks and Recreation; David Carmichael of the Department of Sociology & Anthropology at UTEP and on the Board of Directors for the Keystone Archaeological Protection & Preservation Association (KAPPA); Bernie Sargent, Vice President of KAPPA; Ron Kneebone with the Albuquerque District of the U.S. Corps of Engineers; Scott Cutler, Curator of the UTEP Centennial Museum; Skip Clark, volunteer archaeological site steward with the Texas Historical Commission; and Tamara Stewart with The Archaeological Conservancy. A draft cultural resource management plan was submitted for review and comment to members of the management committee; City of El Paso Mayor Carlos Ramirez.; and Chris Cummings, President of CIC Corporation.

The 2006 management plan committee meeting was held at 9 a.m., August 7, 2006, at the El Paso Police Department Westside Regional Command Center, 4801 Osborne Drive, El Paso, Texas. The following people attended the meeting: James B. Walker, Southwest Regional Director, TAC; Gordon Wilson, TAC board member; Debra Beene, Archaeologist, Texas Historical Commission; Keystone Heritage Park Board members Joanne Burt, President, Mary Haynes, past president, Scott Adkins, Ray Cox, Bernie Sargent, Alex Neill and Susan Austin; Helen Baumgaertner, KHP Historian; Carolyn Parker, KHP Fundraising Advisor; Kevin Von Finger, KHP Habitat Chairman; Lois Balin KHP Habitat Advisor; John Seebach, Project Archaeologist, Center for Big Bend Studies, Sul Ross State University and KHP Archaeological Advisory Team; Skip Clark, Texas Archaeological Stewardship Network, Archaeological Division Volunteer Archaeological Steward and Keystone site steward; Jason Jurgena, Curator of Collections, Museum of Archaeology; Lora Jackson, Curator of Education, Museum of Archaeology; Alan Phelps, El Paso Archaeological Society and member of the KHP Archaeological Advisory Team; Jay Sharp, Camino Real De Tierra Adentro Trail Association; Carolyn Clark; Lynn Halaky El Paso Junior League; and Marc Thompson, Director of the El Paso Museum of Archaeology. Comments were received by E-Mail from Myles Miller.



A draft plan was submitted to all those who attended the meeting and to those interested parties not in attendance including: Alicia Franco; Yolanda Alameda, Director, Museums and Cultural Affairs Department, City Of El Paso; Annette Marie Torres; Beto O'Rourke; Brian Knight; Carol Miller; Catherine Calhoun; Chris Cummings; Daniel Haggerty; David Kessinger; Eliot Shapleigh; Elizabeth Leal; Ellen Goodman; Jim Mace; Joan Shepack; John D. Wilbanks; John Kiseda; Juan Gomez; Julie Kallman; Liz Walsh; Lori Lowman-Hudson; Marcella Navarette; Marguerite Davis; Mary Russell; Matthew Niland; Melvin Moore; Mike Churchman; Milly Field; Myles Miller; Paul Hutchon; Randall Hayes; Richard Langford; Richard Worthington; Scott Cutler; Tammy Vasilatos; Thomas O'Laughlin; and Vanessa Loughheed.



The final plan incorporating all comments will be re-submitted to the Texas Historical Commission, TAC, the City, KHP and all members of the management committee, The Archaeological Conservancy's Board of Directors will use this plan as a management guide for the Keystone Archaeological Preserve. The plan will also be submitted to the city of El Paso for their consideration in making decisions about the city owned portion of the preserve. The management

committee will remain a standing committee, and will reassemble to address new issues or concerns as they arise. This management plan is designed to be amended by the committee if changed circumstances require such amendments.

It was decided at the management committee meeting that both the four-acre Conservancy-owned portion and the approximately five-acre city-owned portions of the Keystone site will both be included in this management plan. The Conservancy, the City of El Paso, and KHP will work closely to coordinate the management and security of the Keystone site.

II. Site Security & Protection

A. The Keystone Heritage Park and the Keystone Archaeological Preserve were partially fenced with a 6-foot-high chain link fence on two sides of the Park, on the west side along Doniphan Drive and along the south side at KAPPA Drive and along an unpaved road which provides easement access to the City's portion of the site. This south fence also marks, roughly, the south sides of both the TAC and City portions of the Archaeological Preserve. Thus at present, only one side of each portion of the Preserve is fenced. KHP will replace the Doniphan Drive fence with a more attractive fence and the existing chain-link fencing there will be re-installed along the east side of the Park between the Preserve/Park and the dam. This will fence the east side of the City's portion of the Preserve.

Keystone Heritage Park, Inc. has engaged a surveyor to survey the boundaries of the Heritage Park and of both portions of the Preserve. TAC will fence the three sides of its portion of the Archaeological Preserve. KHP is pursuing the possibility of having the City fund the fencing of this site. If the City is unable to provide funding, KHP will seek alternate funding sources. Thus the Archaeological Preserve will be completely fenced off from the rest of the Park and from access from the land on the south, owned by Chris Cummings. The current installed fence was, and the additional fence will be posted to prevent trespassing, and a combination lock will be placed on perhaps two pedestrian gates. Any ground disturbance that is required for the fence construction will be monitored by an archaeologist. A gate to the TAC portion of the archaeological site will be installed at the west side of TAC's portion of the site, off of the El Paso Electric Company's easement on the Preserve's west boundary line. When the complete fencing is installed for the City's portion of the site, a gate will be placed at the fence at the access easement across Cummings's land to KAPPA Drive. These gates will have combination locks.

B. Keystone Heritage Park has worked closely with Skip Clark to train site stewards for the Preserve. Skip Clark has completed the Texas Historical Commission site steward training program and will routinely monitor the Conservancy-owned portion of the site, reporting any trespassers and/or unauthorized site disturbance. Members of KHP have done an excellent job of monitoring the site. Together, the city, Skip Clark, and KHP members will coordinate site-monitoring efforts.

C. Both portions of the Keystone site were designated a State Archeological Landmark (SAL) in 1983 under the Antiquities Code of Texas.. The SAL designation remains with the site through any

changes in ownership and will afford the Preserve protection and recognition as an officially recognized site.

D. The committee decided that it was time to apply for designation on the National Register of Historic Places.

III. Site Access – Professional, Public, and Native American

A. TAC has an access easement to the TAC portion of the site on an El Paso Electric Company's easement along the west boundary line to KAPPA Road. The City's portion has an easement to KAPPA Road through the Cummings property on its south side.

Public Access

B. The Conservancy-owned portion of the Keystone site will be accessible to Conservancy personnel, Skip Clark and trained site stewards, members of KHP who are involved with site security and management and, to the general public only for docent-led tours by appointment. The City-owned portion is also available for docent-guided tours. Public educational tours of the preserve are encouraged and will be conducted by appointment. The tours will be led by the site steward and other trained volunteers, such as members of the KHP group. Those who wish to tour the preserve must request permission from any of the following: TAC, KHP or the site steward, who will send a letter of permission to the visitor/s and will arrange for a trained volunteer guide to accompany the visitor/s to the preserve. All visitors to the Conservancy tract will be required to sign a "Risk Acknowledgement Form." Tammy Vasilatos believes that KHP should be allowed to charge an entrance fee to cover the costs of insurance, security, and maintenance.

Professional Access

C. Access to the preserve will be granted to qualifying individuals and institutions for research purposes. There are two separate approval processes. Any professionals requesting permission to conduct research within the preserve must submit a written proposal and research design, which will be reviewed by a Conservancy-appointed committee for the TAC portion of the site, and by KHP, and the City for the City's portion of the site. Because the site is a designated SAL, researchers are also required to submit research proposals to the Texas Historical Commission for either portion of the site for review and approval, and the issuance of a permit. Thus, a research proposal requesting permission to do research on only TAC's or only the City's portion of the site will require only the permission of the pertinent owner and the THC; not both TAC and the City. The KHP Board of Directors would like the opportunity to comment on any request by professionals to conduct research at the site so that KHP will have been able to work with and have knowledge of research done at the site. Generally only minimally invasive research projects are allowed on Conservancy preserves. Research results must be published and made available to the public and other professional archaeologists.

Although the attached Management Plan for Archaeological Conservancy Property states that fieldschools will not be allowed to work at Conservancy preserves, this policy is reviewed by the Conservancy's Board of Directors on a case-by-case basis, and exceptions to this policy have been made in the past. Dr. Carmichael of UTEP was concerned about this policy at the 2000 meeting, particularly given the excellent opportunity that the Keystone site offers for students at UTEP and the cost-effectiveness of having students assist with research projects. The Conservancy's and the City's primary concern regarding fieldschools conducting research on their preserves is that it be problem-oriented, provide an adequate level of professional supervision, and not degrade the cultural resources simply for training purposes. The KHP Board would like the opportunity to comment on any requests by professionals to conduct research at the site. If eventually KHP is to house artifacts of the site, KHP would like to work with and have knowledge of any research on the site.

D. Myles Miller wrote for this plan revision to express the view that "...my primary concern is that any proposed archaeological investigations at Keystone Site 33 be supervised by a qualified and dedicated principal investigator and that they be fully funded. Although management decisions should be guided by the preservation ethic, I am not against some level of investigation taking place, particularly if such investigations are guided by sound research and public education goals...I am not against excavations being conducted by an archaeological field school affiliated with a strong, accredited graduate program. However, as stipulated under the management plan [2000]; the field school will require a full-time principal investigator, a peer-reviewed research program, and a multi-year funding structure that will provide for scientific analysis and formal publication of the results of investigations. Moreover, any excavation program, whether conducted through a field school or grant, should incorporate a public education and awareness component."

E. Given the importance and uniqueness of the Keystone site and its designation as a SAL, the Texas Historical Commission has certain requirements regarding professional investigation and access to the Keystone site. The THC does support controlled investigation of the Keystone site, but is concerned that, because there is usually limited funding to fully investigate a site, certain studies and activities are often not completed, such as chronometric studies, analysis, dissemination of research results, etc. Therefore, the THC has three issues regarding archaeological investigations at the Keystone site:

1) They strongly support non-destructive, non-invasive surface investigations of the site such as mapping (as well as site clean-up and stabilization), ground-penetrating radar, magnetometer, and other non-invasive studies to more conclusively identify what is located at the site. John Seebach noted that "The brush cover, as well as City caused disturbances (the water lines, cement pads, etc.) may limit the effectiveness of these techniques-especially given the ephemeral nature of the prehistoric structures."

2) The substantial majority of the site should be left intact for future research.

3) They would like to see grants for research in place before any investigation begins in order to guarantee full intensive analysis, study, and reporting of results. This is to prevent the common scenario seen with under-funded field schools: site investigation is incomplete and/or the results are not well-reported or disseminated. This third point has not become THC policy, but is a serious concern. The

Conservancy shares the Texas Historical Commission's position on these issues. TAC is willing to review and approve a research proposal contingent upon the researcher obtaining the funding outlined in the proposal's budget page.

Native American Access

F. Native American access to the preserve is unrestricted, provided that the Conservancy, KHP and/or the site steward are contacted prior to the visit with the names and addresses of the visitors and the time and date of the planned visit. The visitors will be given the combination to the gate lock and will be allowed to visit the preserve unaccompanied.

IV. Erosion Control & Groundcover

A. Currently groundcover at the site consists of sand ground and dunes covered with thick, healthy, stabilizing native vegetation. Considerable commentary was included within the 2000 Management Plan about existing erosion problem areas. However, at the date of this 2006 visit, these problems have been corrected or alleviated by improved groundcover due to the reduced visitation since Keystone Heritage Park was established and partially fenced and patrolled. Committee members noted new erosion gullies cut by recent heavy rainfall, which dumped 15 inches of rain in eleven days, and unknown overflow mechanisms and possible leaks associated with the adjacent Keystone Dam, at the far southeast corner of the City's property, but not on the preserve. Rapid response by the City during the record rains redirected the flowing water off the Preserve, eliminating what could have been severe erosion to the site. Gravel from the dam has washed onto a portion of the city's portion of the preserve. John Seebagh commented that the jackrabbit population explosion poses a very serious problem to the subsurface deposits and stratigraphic integrity of the site through burrowing and warren construction. The rabbits, at least a large number of them, need to be removed most preferably through no-kill traps. Furthermore, the unnamed ex-KHP volunteer's continued trespassing in order to feed the rabbits must be stopped. Committee members, docents, and site stewards will continue to monitor for problems.

V. Artifact Curation

A. The Corps of Engineers currently has approximately 84 cubic feet of materials that were previously recovered from the Keystone site and four other sites in the immediate vicinity. Some or all of these materials, including field notes, maps, and photographs, are curated at Centennial Museum. Committee members will attempt to obtain any of O'Laughlin's field notes, maps, etc, not already curated, for deposit at the Centennial Museum, with the artifacts.

Recently, Texas strengthened requirements for repository facilities. Centennial Museum received approval of its application to act as a THC approved repository on 9 August, 2006 and will continue the process to reinstate the museums status as a certified THC collections repository for the receipt of new

collections. It was decided that Centennial Museum continue as the facility for previously recovered non-burial related materials from the Keystone site. TAC, THC, and KHP will together determine the appropriate curation facility for future recovered materials.

With the agreement of the Corps, the Conservancy, the City, and the Texas Historical Commission, and KHP, Keystone site materials may be temporarily loaned for public display in approved facilities, for approved professional research, and for Native American access. This would need to be coordinated through Centennial Museum. Part of the Corps' mission is public education, and they have resources available to assist with public interpretive programs, collection exhibits, etc. The Corps of Engineers will fund the Centennial Museum's reprint of the original Keystone report for all that are interested.

Curation arrangements for future excavations at Keystone are the responsibility of the investigator, and a signed agreement between the investigator and a repository approved by TAC, THC, the City, and KHP must be established before permission is granted to begin the investigation. Additionally, the investigator will have to demonstrate adequate funding. TAC policies recommend the permanent curation of any future artifacts from the site within the state of Texas.

VI. Other Issues

A. As part of the Conservancy's donation agreement, a plaque will be erected at the Preserve acknowledging the Chris Cummings's donation of the 4-acre portion of the site to the Conservancy.

B. Keystone Heritage Park, Inc. has as its long-term goal, the creation of a destination park to provide accurate and appropriate preservation, interpretation and education of the Keystone Archaeological Site and Keystone Wetlands, within the City of El Paso. KHP has already accomplished the creation of The Desert Botanical Gardens and started development of the Chihuahuan Desert Experience and a visitors' center is part of KHP's future plans. As part of the plans for development of Keystone Heritage Park, KHP plans, in order of completion, include:

1) Completion of a survey of the boundaries of the Keystone Heritage Park and both of the portions of the Keystone Archaeological Site, in preparation for complete fencing of the three properties.

2) With completion of the survey, members of the Site management Committee will collaborate on producing a detailed map of the Archaeological Site showing legal boundaries, easements, SAL boundary limits, topographical features, past excavation locations if possible, areas where Tom O'Laughlin thought additional houses may be located, and superimposed archaeological features of any subsequent remote sensing activities.

3) Testing remote sensing methods, if possible, to determine whether such testing can determine the location of subsurface archaeological features.

4) Funding the production and publication, by a professional archaeologist, of a synthesis of existing reports and knowledge regarding the Keystone Archaeological Site, putting the site in context, including

an overview of its significance in the Archaic period prehistory of the El Paso region, to be used for academic publication, public education, a bibliography, creation of a reference library on the Keystone site, and future fund raising efforts.

5) Submitting an application for nomination of the Keystone Archaeological site to the National Register of Historic Places.

6) John Seebach suggested that KHP follow through with the suggestion contained in the 2000 Site management Plan that: Because the Public Works Department is responsible for site maintenance, someone with this department should also complete the site steward training program.

On a longer term basis, the City of El Paso and KHP may consider possibly developing an interpretive center, kiosk, trail guide and trail location numbers or perhaps a diorama to show the history of the site, an artist's interpretation of what the site looked like when occupied, photographs of artifacts recovered, the archaeological excavation process, and other items which would enhance interpretation and visitor enjoyment. Marguerite Davis suggested the possibility that KHP build a moderate size building, construct some middle Archaic housing thought to replicate the houses, use mirrors to expand the optical illusion and then use artifacts to tell the story.

The placement of paths, boardwalks or other forms of non-invasive access onto the site would be investigated. Longer term, it may also be beneficial for the Preserve to be consolidated under one ownership or management control, if legally possible.

John Seebach added "I think the concerns about the 'Children's Virtual Dig' (see KHP master plan map) that were minimally addressed at the meeting should be aired further. If it is the stated goal of KHP to educate the public about El Paso's past and the human past, the importance of archaeology in telling that story, and the need for preserving archaeological sites then the mock dig needs to be abandoned. Archaeologists are concerned with studying the material remains of once-extant cultures and asking questions about the same. We do not dig for the sake of collecting prehistoric trash. A mock dig no matter how it is presented, places primary importance on discovery-not interpretation. Continuing the mock dig undermines the missions of TAC, the THC, and KHP itself. There are other far better ways to teach schoolchildren about the archaeological enterprise."

KHP will provide both TAC, the City, and the THC with copies of KHP's Master Plan.

Jay Sharp will send a letter to TAC, THC, the City, and KHP explaining the benefits of a memorandum of understanding with the Camino Real de Tierra Adentro Trail Association.

Attached is the document: General Guidelines for Management of Archaeological Conservancy Preserves, 2003.

Maps: Survey Drawing; Portions of A.F. Miller Survey; January 10, 1983

The Keystone Archaeological Preserve, El Paso, TX

Keystone Heritage Park Master Plan

Portion of the Keystone Dam City of El Paso by Brock & Bustillos Inc. Sept 7, 2001

GENERAL GUIDELINES FOR MANAGEMENT OF THE ARCHAEOLOGICAL CONSERVANCY PRESERVES

Purpose

The Archaeological Conservancy (TAC) acquires archaeological and historical properties for the purpose of preserving them from damage and destruction in order that through a long future they may be studied to increase our understanding of the lives of their occupants and of the past in general. TAC preserves are managed according to the principles of Conservation Archaeology, which mandates that major parts of the preserves be saved for future generations. To this end, research on TAC preserves is welcomed so long as it is carefully controlled and thoroughly documented to minimize damage and maximum increase in knowledge.

General Policies

Acting on behalf of the Board of Directors of The Archaeological Conservancy, the President of TAC is responsible for implementing the following policies:

1. A management committee and plan that addresses specific elements and concerns will be established by the TAC for each of its preserves. These Cultural Resource Management Plans will be consistent with the general purposes and policies of TAC as well as the Secretary of the Interior's Standards for the Treatment of Historic Properties. They will consider such matters as stabilization, site security and protection, nondestructive use of the property, research, curation, access, and other issues relevant to prudent management and stewardship for the public good.
2. Provision will be made by TAC at all preserves for adequate ground cover, minimum erosion, stabilization, and disturbance (from planting, mowing, grazing, etc.) and for fencing and monitoring when appropriate and necessary. The President will consult with local farmers and with county agricultural agents as to suitable ground cover, methods of plowing and planting to avoid disturbance below the existing plow zone, and the best frequency of harvesting or mowing. In regions where ground cover is difficult to establish, other suitable measures will be taken to prevent or retard erosion including reintroduction of native vegetation where possible.
3. Permission will be required for all visits to preserves, such as those by interested students, local groups, or professionals. Requests for such visits will be made in writing to the appropriate Regional Director of TAC. Visitors to a preserve ordinarily will be accompanied by a site steward and will be asked to give their names and addresses along with the time and date of their visit. Access to a preserve by Native Americans or any other group having historic ties to that preserve will be given special consideration although it, too, must be arranged through the appropriate TAC regional office.

4. Research will be permitted when appropriate to a problem-oriented program, but permission will be required with the conditions stated below. Field schools and other training programs are allowed if they are problem oriented, adequately supervised, and meet TAC's stipulations for a permit.

5. All research undertaken on a TAC preserve must comply with the terms of state laws and applicable provisions of any federal laws governing human remains.

6. Because the Conservancy believes in the widest possible dissemination of information about its preserves, researchers, visitors, and other users are encouraged to fully cooperate with the scientific media as well as popular media, including newspapers, magazines, journals, and electronic media. In all such contacts, The Archaeological Conservancy shall be identified as the owner of the archaeological preserve.

Media access to news about Conservancy preserves and research thereon shall not be discriminatory. The Conservancy does not reserve preferential access to news for its own publications, nor will it allow any researcher or user to give preferential access to news about research or use on any Conservancy preserve to any media outlet.

Procedures for Applying for a Research Permit

1. Formal application will be made in writing to the President via the appropriate Regional Director, with (a) a detailed research plan (see check list attached), (b) an endorsement of the research by the institution or organization employing and funding the investigator, and (c) evidence of compliance with TAC's insurance policy. All research must have institutional/organizational affiliation, and the Principal Investigator must have a graduate degree in anthropology/archaeology, preferably a PhD.

2. A request for non-invasive research (such as a magnetometer survey, mapping, aerial photography, and zero collection surface survey) may be submitted, with the approval of the President, by stating in letter form, the questions being addressed, the work to be done, the personnel involved, the sponsoring organization, the dates of the project, the expected research benefits, and a timetable for a report. Whenever appropriate, the research should follow the procedures outlined below in Sections 4 and 5.

3. For more invasive field work (surface collecting, testing, or excavation) a comprehensive research design will be submitted, comparable to that required by the National Science Foundation or the National Endowment for the Humanities, including (a) the relation of the proposed work to previous investigations at the preserve or in the area, (b) specific area(s) of the preserve designated for investigation, (c) the proposed field procedures, (d) techniques for acquiring and analyzing data, (e) a timetable for the field report, the analysis and reporting of the results, (f) a detailed budget for field work, analysis and publication, and for costs of curation of artifacts and samples for curation, (g) a copy of a negotiated curation agreement, and (h) such other details as TAC may specify.

The research design should be oriented to problem solving rather than mere data gathering. Curriculum vitae of the principal investigator and any other professional staff should be included.

4. In the event of more than one request at a single preserve at the same time, the President may require the applicants to coordinate their plans before the applications receive further consideration; or the President may appoint a Review Committee to consider them and select only one for approval.

5. Review Committee. The President will appoint a minimum of a three-member committee to evaluate the qualifications of the researcher(s) and to review the application and determine if it is acceptable. In addition to the appropriate Regional Director the committee should include, insofar as is possible and practical, (a) a representative of a state or local archaeological society or other organization and (b) a recognized authority on the archaeology and/or history of the area and problems of the research being proposed, who is not involved in the project or associated with its sponsors. The committee could also include a non-professional avocational archaeologist, historian, or other appropriate specialist, who is interested in the local or regional archaeology and history, or a nationally recognized authority on archaeological research design and excavation procedures. One member will be designated by the President to serve as chairman. Members of the Board of TAC may serve on review committees.

6. Each Review Committee member will receive a copy of the proposal and within 30 days will discuss it with the other committee members in person, by mail, and/or telephone conference, and the committee will agree on a recommendation to which a majority of the members must agree. The chairman will notify the President of TAC the committee's recommendation, which may be (a) the acceptance of the proposal as submitted, (b) acceptance subject to modifications specified by the committee, or (c) rejection, with specific reasons stated. The President will communicate to the applicant the results of the review. In the case of (b) the same committee will review the revised application, if one is submitted. In the case of (c) the President may, but need not necessarily, invite rewriting and resubmission.

7. At his discretion, the President may approve a project on the condition that the project receives adequate funding.

Research Procedures

1. Compliance. The President may appoint a member of the Review Committee to monitor the research project during the field work and report to the President periodically or at its conclusion.
2. Changes in the permitted research design, such as extending the excavations

Beyond areas indicated in the application or modifying the data collection procedures, are possible, but only if they have prior approval by the President. Failure to obtain such approval can result in revocation of the TAC permit and banishment from the site.

3. The preserve must be left in safe, stable, and secure condition during interruption in the work and its completion, at the expense of the investigator. All excavations must be backfilled.
4. Each backfilled area must be identified by including, at the investigator's expense, well-fired ceramic tiles (about 3"x3") that name The Archaeological Conservancy and give the date of the backfilling.
5. Preliminary Report. Within 90 days after the conclusion of any field season the principal investigator will provide a written report of results to the President. This report will include a map of the preserve indicating the location(s) of field work, and discussion of results. It may include a request for modification of the original proposal if a subsequent field season has already been approved. Failure to submit a preliminary report in a timely manner may be grounds for denying future research on a TAC preserve.
6. Final Report. Within a reasonable period of time following completion of the analysis of the data (usually a year or less), one or more papers or scientific reports will be presented at professional meetings and will be submitted for publication. Copies of papers presented at meetings and of their published versions, as well as any other published reports, will be sent to the President, the appropriate State Historic Preservation Officer, and, if requested, to members of the Board of TAC, and to any other organization or institution that the President may specify. All reports, papers, and presentations should acknowledge Conservancy ownership of the preserve.

Ownership and Disposition of Collections

1. Ownership. The collections from a field program will include all artifacts, samples or specimens for analysis (faunal or floral identification, pollen study, dating, etc.) and all related documentation whether written or taped or digital and including maps, diagrams, drawings, and photographic negatives and one print of each. The collection remains the property of TAC until it is transferred to an appropriate repository, usually within the state where the preserve is located. Collections will not belong to the excavator, and the excavator's institution may or may not be chosen as the permanent repository. All costs associated with preparing and curating collections shall be the responsibility of the researcher.
2. Borrowing Collections. The excavator, through his/her institution or sponsoring organization, may borrow a collection until analysis is complete and when doing so must inform the President of TAC of the location in which it will be kept, and of any change in its location. Portions of the collection may not be loaned to others, except that for analysis and identification specimens and artifacts may be sent temporarily to appropriate laboratories.
3. Duplication of Documents. The excavator may duplicate any and all documents relating to the collection for his/her permanent use and possession. Duplication of artifacts, however, will require permission from the President of TAC.

4. Final Repository. The collections will be deposited in a public institution that, except for unusual circumstances, will be located in the same state as the preserve. Private curation facilities may be considered provided they meet minimum standards for curation and are accessible to researchers. Proper procedures for storage, curation, preservation, and retrieval of the collection must be followed by the permanent repository. The documentation must remain in the same repository as the rest of the collection and be stored in accordance with proper archival standards. In the case of breaches of proper storage and/or other procedures by the repository, as judged by the President of TAC, the collection may be transferred to another repository. The deaccessioning of any part of the collection by the repository will result in that part of the collection being transferred to another facility deemed appropriate by TAC.

Public Education

At the conclusion of a research project the investigator should assist local museum and related organizations in updating and expanding any information they are disseminating to the public in the light of new data and conclusions. Publication of a report on or description of, the research in a popular medium is encouraged but not required.

Approved

TAC Board Meeting

February 8, 2003