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(Officers and staff are listed on Page 2.)

In This Issue...

The President's Corner 3
by Teresita Majewski

A Message from the Executive Director 6
by CJ Summers and Taylor Dubord

High Stakes of the 2012 Election for Cultural Resources 7
by Marion Werkheiser

Annual Conference Highlights 11
by Chad Moffett

2012 ACRA Awards 18
by Al Tonetti

Marketing 101: The True Cost of Proposals 22
by Christopher D. Dore

New Member Profile: Merjent 23

ACRA Firm News: CRA Architecture 24

News from the Joint Task Force on Collections 25
by Ralph Bailey

Cultural Resources Legal Conference in D.C.: Pure Goold 28
by Marion Werkheiser

ACRA Edition Announcements and Updates 29

ACRA CONSULTANTS DATABASE

Please take a moment to look at your Consultants Database listing on the ACRA website to make sure it is updated with the most current information. If you would like to change or add any information, please [email Ally](#).

ACRA's Mission

"...to promote the professional, ethical, and business practices of the cultural resources consulting industry."

ACRA's Vision

ACRA: The voice of cultural resources management

ACRA's Values

- Integrity
- Professionalism
- Collaboration
- Leadership
- Success

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Collections Management and Curation Task Force - Ralph Bailey, *Brockington and Associates, Inc.*

Worker Safety - Keith Seramur, *Seramur and Associates, PC*

THE PRESIDENT'S CORNER

By Teresita Majewski



The number of ACRA activities that took place during the last quarter of 2012 is really impressive.

The 18th Annual

Conference in Seattle was a great success, with over 100 participants (see summary later in this issue). The local conference hosts from

Historical Research Associates, Inc. (Lynn Compas, Brent Hicks, and Kenda Salisbury), ACRA Conference Committee Chair Chad Moffett, and Executive Director CJ Summers and Association Manager Ally Lancaster deserve kudos for all of their hard work. Having the conference at the historic Fairmont Olympic Hotel was a real bonus. Thanks also to our speakers, ACRA Partners, and conference sponsors for their contributions and support. I'd like to particularly mention Marion Werkheiser of ACRA's government affairs consulting firm, Cultural Heritage Partners, PLLC (CHP), for her lively and informative plenary session outlining the potential impacts of the November elections on our industry. A slightly modified version of that presentation appears in this issue. We were also fortunate to have Milford Wayne Donaldson, chairman of the Advisory Council on Historic Preservation, as our keynote speaker at the awards dinner. Mr. Donaldson stayed for the entire conference, and we appreciate his interest in ACRA. I'd also like to thank ACRA Awards Committee Chair Al Tonetti (ASC Group, Inc.) and his committee for their work on the 2012 awards program, as well as the firms that submitted the nominations (see awards write-up in this issue).

ACRA's officers and directors met twice at the conference. Highlights of the board meetings include confirming the association's sound financial position for this year, and the decisions to retain in 2013 the services of both CHP as ACRA's government affairs consultant and Clemons and Associates as ACRA's association management firm. Other topics of discussion included the 2013 annual conference, which is planned for October to coincide with legislative visits and a reception on the Hill; and the board voted to send ACRA's executive director to one professional conference/event in 2013 to recruit new members and publicize ACRA. Society for American Archaeology (SAA) President-elect Jeffrey Altschul updated the board about the Discovering the Archaeologists of the Americas initiative. The SAA plans to establish a task force that will take 6-12 months to examine why SAA should do this and what they should do. It will be a multiyear project, and ACRA will be involved.

At the annual business meeting, I recognized and thanked outgoing Vice President for Government Relations Jeanne Ward (Applied Archaeology & History Associates) and outgoing directors Charissa Durst (Hardlines Design Company), Joe Joseph (New South Associates, Inc.), and Matt White (Suncoast Archaeological Consultants) for their dedicated service to ACRA. I also welcomed and introduced incoming Vice President for Government Relations Ian Burrow (Hunter Research, Inc.) and incoming directors Keith Seramur (Seramur and Associates, PC) and Joe Trnka (Kirkham Michael). Tom Motsinger (PaleoWest Archaeology), Andy Weir (CCRG, Inc.,

..continued on Page 4

and Coastal Carolina Research), and Al Tonetti (ASC Group, Inc.) were reelected to another term as directors. Also at the business meeting we drew and announced the winners of the raffle for books donated by publishers Left Coast Press, Springer, and Wiley-Blackwell. Thanks to all who purchased raffle tickets! And I don't want to forget the drawing that was held for those that had reserved a hotel room at the host hotel and were registered for the conference by the early bird deadline. Prizes included two complimentary room nights (donated by ACRA) and a Kindle and a Kindle Fire (donated by Cal Clemons, founder of Clemons and Associates, ACRA's association management firm). Cal's generosity is much appreciated.

A nice touch at the conference was the "committee breakfast" held at the meeting to provide the opportunity for committee members to touch base in person as well as to invite others interested in joining committees to learn more. Contact me if you would like to volunteer for committee service or if you have questions.

In the last issue of *ACRA Edition*, I mentioned that while the ACRA-SAA CRM Expo at the Memphis SAA meeting was extremely successful, the event will go on hiatus for the April 3-7, 2013, SAA meeting in Honolulu and will return at the Austin, Texas, meeting in 2014. A number of ACRA members are, however, participating in the SAA's Student Day event in Honolulu, which involves an event to welcome student participants as well as learning labs that encourage one-on-one activities and discussions with students. There is another surprise event in the works for ACRA members attending the Honolulu SAAs. Watch for more details as they develop.

I want to bring to your attention an ACRA initiative mentioned in the Government Relations Committee update in the November 15 Monthly Member Update – collecting data on our industry that can be used for two essential purposes. The



Martin F. Dickinson (SouthArc, Inc.), CJ Summers, and Taylor Dubord at the CLE Conference.

Government Relations and Membership Committees are updating the list of CRM firms originally assembled by Sarah Herr and Christopher Dore. As of this writing, updates have been provided for nearly every state and territory. The revised list will provide basic data on the industry in terms of numbers of companies and their distribution. Data collected will be used in packets that Government Relations is preparing to distribute to congress by early next year. This information will also be useful for sharing with state legislators. For Membership, it will provide updated contact information for the end-of-the-year membership drive. ACRA HQ is helping to compile the updated master spreadsheet, but without the help of dedicated volunteers, this initiative would not have been possible. Thanks to each of you and your firms for the time you generously donated to the update. I assure you that it will be time well spent.

..continued on Page 5

A C R A E D I T I O N

ACRA cosponsored the extremely successful CLE conference in D.C. on October 18-19. An article later in this issue provides a summary, but the organizers are too modest. More people wanted to register than there were seats available, and the conference room was at full capacity! ACRA sponsored a networking reception, which was attended by participants and instructors. Executive Director CJ Summers and incoming Executive Director Taylor Dubord attended the conference to raise ACRA's profile among attendees. We owe a round of applause to the organizers, Jon Berkin (Natural Resource Group, LLC), Marion Werkheiser (CHP), and Cinder Miller (Gray & Paper, Inc.). Well done!

Congratulations are in order to ACRA Past President Christopher Dore, who was recently selected as the founding editor for the SAA's new, online-only, peer-reviewed quarterly journal – *Advances in Archaeological Practice*, which goes online next summer. The new journal will provide a forum to discuss and share information about issues, policy, methods, and techniques in the practice of archaeology. Chris is looking for manuscripts from employees of ACRA-member firms. The first two issues (next fall and winter) will be distributed free to the 11,000 plus people on SAA's mailing list – providing great visibility for authors!

In the past year, ACRA established the Collections Management and Curation Task Force, which is chaired by Ralph Bailey of Brockington and Associates, Inc. Ralph and I attended a meeting in Washington, D.C., this past September as part of a group interested in moving forward together to address issues related to this topic that impact

archaeology in general and our businesses as well (see elsewhere in this issue). One of the short-term goals of the group included urging the National Park Service (NPS) to publish the proposed deaccessioning regulation in 36 CFR Part 79, the *Curation of Federally-Owned and Administered Archeological Collections*. The proposed deaccessioning regulation, 36 CFR Part 79.12, was drafted by staff of the Departmental Consulting Archeologist in collaboration with an interagency working group between 2005 and 2007 and was sent to the NPS Regulation Officer in early 2009, but remains unpublished. On behalf of ACRA I have sent a letter to the NPS asking them to provide a schedule for publishing 36 CFR Part 79.12 on deaccessioning in the *Federal Register*. I will keep you posted on the NPS's response, and the letter and a brief explanation has been posted on the Advocacy page of the ACRA website. ACRA will, of course, review and provide comments when the time comes.

You all know by now that after five years as ACRA's Executive Director, CJ Summers is stepping down to spend more time with her family. Her husband is active military, and they just completed yet another move. CJ has done so much for ACRA during her tenure, and it will be very difficult to say goodbye. However, she will be working with and mentoring our incoming executive director, Taylor Dubord, to ensure a smooth transition during the remainder of 2012. Join me in wishing CJ all the best, and we hope that you won't be a total stranger! We are a stronger and more focused association because of you.

Best wishes to all of you for a very safe and happy holiday season!

A MESSAGE FROM THE EXECUTIVE DIRECTOR EXECUTIVE DIRECTOR CHANGES

By CJ Summers and Taylor Dubord

CJ Summers Bids a Fond Farewell

After five years, I will be stepping down as ACRA's executive director. As most of you know, my husband is active duty Army. We have just completed yet another move to Fort Bragg, North Carolina where he is assigned to a Special Forces Group. This means multiple deployments are imminent, and his operational tempo has increased. As a reminder, I have two young sons; Cooper (age 5) and Jack (age 3).



How does this impact ACRA? I care very much about all of you. I have formed close relationships and care about ACRA's future. With this in mind and a lot of careful thought, I came to the conclusion that it would be difficult to perform the duties of an effective executive director for ACRA given my current family circumstances. Please understand that while this decision was difficult, I made it because I truly care about ACRA and its future. I am not walking out on you. I will always be available by email or phone.

Your new executive director is Taylor Dubord (see below). I am confident in her abilities and know that she is a perfect fit for ACRA. Please be patient with her as she learns about ACRA and its members. Go out of your way to introduce yourself to her so she can create the same relationships in ACRA that I have.

Thank you for being a part of my life. I wish ACRA and every member of ACRA the best of luck!

Meet ACRA's Incoming Executive Director



On January 1, 2013, Taylor Dubord starts as the executive director of ACRA. A graduate of the University of Rhode Island, Taylor began her career with Clemons and Associates, Inc. (C&A) in 2010. She has a background in event management and member

services and brings leadership, knowledge, and efficient organizational skills to the clients she serves at C&A. Taylor participates in voluntary organizations by being a member of the American Society of Association Executives and the Association Management Companies Institute. She is also currently attending a certificate program in association management that builds the competencies needed to manage trade organizations more effectively.

Taylor enjoys the opportunity to travel, plan, and attend association conferences and meetings. Taylor is excited to join the team and looks forward to being a part of ACRA's bright future!

HIGH STAKES OF THE 2012 ELECTION FOR CULTURAL RESOURCES

By Marion Werkheiser

At the Annual Conference in Seattle, Marion Werkheiser, attorney at Cultural Heritage Partners, PLLC, and government relations consultant to ACRA, talked with the membership about the implications of the 2012 election on cultural resources. Below is a summary of her presentation and the feedback received from the audience. Now that the results of the election are known, ACRA will continue moving forward to ensure that the organization has the most-effective government relations policy possible for addressing the organization's business and historic preservation concerns at the federal and state levels [editor].

The 2012 election will have profound consequences for the cultural resource management industry. Republicans and Democrats have put forth strikingly different visions of the fundamental role of government. Republicans argue that states are in a better position to dictate regulatory policy, while Democrats favor more consolidation at the federal level. Since the founding of the country, the central debate of American federalism – whether power should be consolidated at the state or the federal level – is playing out again in 2012. The majority of ACRA-member firms rely on federally mandated review processes for their livelihood, so the outcome of this debate will greatly impact the CRM industry.

Romney/Ryan

Governor Romney and his running mate Congressman Paul Ryan painted a picture at the Republican convention of a much smaller federal government. “They would cut the top tax rate to its lowest level in 80 years and make major changes to federal programs,” explained David Leonhardt, writing an article for the *New York Times* on what the



Marion Werkheiser offering insights and advice on government affairs.

first 100 days of a Romney administration might look like. He explained, “A sweep of Washington could make possible the sort of change Republicans have been talking about for three decades without having yet done: a significant shrinking of government.”

..continued on Page 8

Ronald Reagan cut domestic programs somewhat but expanded the military, while George W. Bush talked about small government but actually made it bigger. Next year, though, could be really different.”

Romney has said that while the need is clear for significant infrastructure improvements, such as bridges, rail, and roads, he would only borrow for infrastructure improvements when there is a direct revenue stream to pay it back, like tolls. He would shift power to the states to approve drilling and energy development and remove many federal permitting requirements. That’s important because when the federal government is cut out of the picture, so is Section 106, and so our industry would rely more on state law to mandate CRM activities. Gov. Romney has also said that he will streamline environmental reviews by shifting more power to the states and by enforcing hard deadlines.

If Gov. Romney wins the White House, the most well regarded models also predict the Republicans keeping control of the House of Representatives and also winning a narrow majority in the Senate.

Obama/Biden

If President Obama wins reelection, we can expect much of the same approach that he has followed the past four years. In March 2012, President Obama issued an Executive Order establishing an inter-agency steering committee to coordinate and streamline federal infrastructure projects. He has also followed this “working group” approach on energy issues, establishing an inter-

agency group on hydraulic fracturing to coordinate federal regulation. Other notable actions have included delaying permitting on the Keystone Pipeline because of environmental concerns and using executive orders to mandate efficiencies in environmental reviews. In the next 4 years, I think we can expect much of the same approach from an Obama administration – a consolidation of federal regulation and a push to make it more effective and efficient.

If President Obama wins, projections show divided government – the Republicans will still control the House and the Democrats will keep their slim majority in the Senate.

Congressional Races

We can also expect that same dynamic to play out on the Congressional level. We’re losing a lot of our champions this year, and some of our champions are in trouble. There are currently 124 members of the bipartisan historic preservation caucus. The caucus must be renewed in each Congress, and we already know of some major changes:

- Historic Preservation Caucus Co-Chair Russ Carnahan (D-MO) lost his primary battle, as did 4 other members
- 12 members of the House historic preservation caucus have announced retirements
- 5 House historic preservation caucus members are endangered

..continued on Page 9

- Three Senate friends are retiring: Snowe (R-ME), Webb (D-VA), Bingaman (D-NM)

Senator Bingaman's departure is one of the greatest losses. He has been holding the line on preservation for a number of years, including stopping House Bill 1505 from moving forward – that bill would create categorical exemptions from Section 106 for activities undertaken by the Department of Homeland Security near U.S. borders. If the Democrats lose the Senate, we can expect Lisa Murkowski from Alaska to chair the committee, who is best known for her advocacy for deregulation of oil and gas companies.

Whether the Republicans or the Democrats win in November, we can also expect turnover at the agency level – for example, Secretary Ken Salazar is planning to leave the Department of the Interior in a second Obama administration. With a Republican win, we could expect a drastic shift in priorities at the agency level focused on deregulation around the environment.

Be Prepared

At the Seattle conference, the ACRA membership brainstormed ways that we can prepare for either election result. Suggestions included:

- Position ACRA as a resource to Congressional offices so that we can be proactive in countering any criticism of Section 106 projects;
- Be ready for tax reform legislation and work to

protect the historic rehabilitation tax credit;

- Expand our alliances to include state-based preservation organizations and tribal governments;
- Reach out to new and old members of Congress to educate them about the CRM industry;
- Cultivate relationships with the trade associations that represent ACRA member firms' clients, e.g., National Association of Environmental Professionals, Southern Gas Association, etc. to amplify our voice;
- Be prepared to describe the economic impact of the CRM industry, especially the number of jobs that it creates;
- Advocate for streamlining federal regulation as opposed to deferring to state regulation;
- Step up our monitoring of agency actions so that we anticipate and comment on any proposed streamlining efforts;
- Consider having CRM Day in the Spring to establish relationships with new personnel on the Hill and in the Administration (especially if Republicans win the White House); and
- Grow membership to increase our numbers and resources.

..continued on Page 10

Power in Numbers

We then discussed the exponential growth in money in presidential campaigns; this year's effort will cost a combined \$6 billion. ACRA firms may wish to consider making modest contributions to your legislators; doing so will get you on the candidates' donor lists and ensure you are invited to any number of events with the candidate in your district.

Yet there is still power in numbers, and not just numbers with a dollar sign before them. We saw wildly successful grassroots efforts this year related to the Stop Online Privacy Act (SOPA) and the Protect IP Act (PIPA) when Wikipedia and other websites went dark in protest and also when more than 20,000 people threatened to close their accounts at Bank of America after the bank proposed a \$5 monthly fee on debit cards. Congress still listens to voters, no matter how much money they have, if there are enough of them voicing a concern.

We need to be thinking about our own numbers. That's why partnerships are so important—if we can coordinate with other groups that share our values, we can get thousands of people calling their Congressional offices and really put some pressure on lawmakers to deliver for us.

However the election goes, we have some serious work to do to shore up Section 106. We need to convey to legislators the value created by the process and focus on how Section 106 facilitates

responsible development, rather than delaying it. We will be seeking out all opportunities to make this argument and appreciate your sending us your Section 106 success stories—specific examples where the process worked well and delivered for the public.

And finally, in addition to Section 106, we brainstormed other issues that ACRA firms are concerned about going into the next Congress:

- Monitoring state level regulations
- Funding for SHPOs and THPOs
- Preserving and expanding the historic rehabilitation tax credit
- Advocating for Small Business Administration programs to benefit ACRA firms
- Veterans Curation Program

In conclusion, we want to be prepared for any election result. Our long-term success will depend on relationships we build with our legislators, how we frame our issues, and the number of constituents we can rally to support our cause. My colleagues and I look forward to working with you to ensure the CRM industry is both protected and expanded, and that we advance our business and preservation values to government officials at all levels.

ANNUAL CONFERENCE HIGHLIGHTS

By Chad Moffet, ACRA Conference Committee Chair



Conference was held at the historic Fairmont Olympic Hotel.

Success!! Consistently, ACRA conference attendees say that the annual conference is the most important gathering place the CRM industry has to offer for networking and learning opportunities. This year was no different. More than 100 participants (many first-timers) attended ACRA's 18th Annual Conference held in Seattle, Washington, on September 6–9, 2012, and the conference was packed with educational workshops, great sessions, and plenty of social events. If you didn't attend, you missed out on one of great benefits that ACRA offers.

The conference was held at the historic Fairmont Olympic Hotel, located in the heart of vibrant downtown Seattle. The conference sessions were extremely well-attended, and the social events were enjoyable and provided excellent opportunities for networking. The conference included a fascinating tour of the ins and outs of the Fairmont Olympic Hotel. Capping the entire event was a memorable cruise and dinner at Tillicum Village on Blake Island.

The local conference hosts from Historical Research Associates, Inc. – Lynn Compas, Brent Hicks, and Kenda Salisbury – Executive Director CJ Summers, and Association Manager Ally Lancaster deserve thanks from the ACRA membership. Putting on a conference of this scale is no easy task, and their planning efforts really showed. Thanks are also in order to our speakers, ACRA partners, and sponsors, who were integral to the success of the conference.

..continued on Page 12

Every year ACRA asks its members to review the conference and let us know what worked and how we can improve the event so it remains an outstanding membership benefit. Below is a summary of conference highlights based on attendee feedback – *this is what over 115 of your colleagues, partners, and clients say about this year’s conference.*

Workshop and Sessions

What Wins & Why? The Art & Science of Winning Proposals

This workshop enlisted the talents of Joanmarie Eggert (Kennedy/Jenks) and focused on understanding RFQ/RFP evaluation and selection criteria, go/no-go decision-making, proposal development, graphic design, shortlist interview, and post-award debriefings.

“I thought the panels, discussions, and workshops were all well-presented and worth it. I learned a lot.”



Jon Davies, Director of Client Services at BHC Consultants, LLC, during *Business Development: Uncovered/ Proven Methods and Tools for Successful Client Development* workshop.

“I really learned a lot at this conference. Thank you!”

Business Development Uncovered: Proven Methods and Tools for Successful Client Development

Taught by Jon Davies (BHC Consultants, LLC) and Traci Nolan (GeoDesign, Inc.), this workshop provided hands-on, down-in-the-trenches, business development (BD) based on proven techniques and tools. The workshop addressed following topics:

- Defining BD
- Strategic BD Program
- Prospecting
- Client Relationships
- Client Relationship Management

“The ACRA meeting focused on what matters most to our members as business owners. Sessions were devoted to government relations, firm succession and transition, business development, and marketing. These are topics and concerns of interest to all of our members, whether our formal training is as archaeologists, historians, architects, or landscape architects.”

Government Relations: CRM Legislative Opportunities

ACRA’s Government Affairs Consultant Marion F. Werkheiser provided need-to-know information from the Hill and facilitated an interactive discussion on how ACRA and ACRA member firms can be positioned to provide feedback and leverage

..continued on Page 13

A C R A E D I T I O N

opportunities in legislation affecting the CRM industry and group discussions and interactive dialogue on possible scenarios based on upcoming changes in the administration.

“I have only been to a couple of ACRA conferences – but this is my favorite so far! Keep up the good work!”



Group discussion on how to leverage opportunities in legislation affecting the CRM industry.

“Content was great, location was great, and the ACRA members are great.”

A range of specialists provided insights on a range of marketing, management, legal, financial, and worker safety topics.

- Marketing:
 - Business Development Live!
 - Building Shareholder Value & Ownership Transition Planning Management: Strategies to Address Critical Leadership & Ownership Challenges (Jon Pruitt, A/E Consulting

Services, Inc.)

- It’s What You Don’t Say That Counts – How to Project Your Best Non-Verbal Self (Kenda Salisbury, Historical Research Associates, Inc.)
- Strategic Teaming (ACRA members Tom Bodor [The Ottery Group], Charissa Durst [Hardlines Design Company], Duane Peter [Geo-Marine, Inc.], and Hank McKelway [AMEC])



Attendees speak with Ed Edelstein speaker in the Management: Strategies to Address Critical Leadership & Ownership Challenges session following the end of the session.

- Legal Issues: Copyright & Intellectual Property (Eden Burgess, Cultural Heritage Partners, PLLC)

..continued on Page 14

- Finance & Accounting: Key Financial Indicators – Building a Performance Dashboard (David James, Clark Nuber, P.S.)
- Worker Safety: New Requirements & OSHA Reporting (ACRA members Keith Seramur [Seramur and Associates, PC], Nathan Boyless [Metcalf Archaeological Consultants, Inc.], Jim Hughey [HRA Gray & Pape LLC], and Lawrence Alexander [Alexander Archaeological Consultants])

Clients and ACRA members provided Case Studies Highlighting Innovative Methods and Best Practices

- Case Studies & Current CRM Topics: Creative Mitigation - Milepost 31 & Alaskan Way Viaduct Replacement Program (Kevin Bartoy, Washington State Department of Transportation)
- Case Studies & Current CRM Topics: Innovative & Creative Solutions for Incredible Client Demands (ACRA members Tom

Motsinger [PaleoWest Archaeology], Donn Grenda [Statistical Research, Inc.] and Charles Niquette [Cultural Resource Analysts, Inc.]

“Very well organized. This was my favorite of the three ACRA conferences I’ve attended thus far.”

“I learned a lot from each session. I really appreciate the effort that the planning committee put into this year’s conference.”



Seattle provided a great backdrop to the conference and the ferry ride to dinner Saturday night at Tillicum Village.

Social Events and Networking

“The Tillicum Village dinner and cruise on the Sound was great. We were all able to relax and have some fun in a beautiful setting. Very nice.”

“I like the opportunity to talk to other CRM practitioners and hear about, topics that I just don’t know much about, like copyright law.”



Kevin Bartoy, Cultural Resources Specialist with the Washington State Department of Transportation discusses Milepost 31 & Alaskan Way Viaduct Replacement Program case study.

..continued on Page 15

A C R A E D I T I O N



Conference attendees enjoying a networking opportunity.

“The networking opportunities are always one of the best parts of this conference. Marion Werkheiser was excellent again and thought provoking.”

“Exceptional organization, training value, and business development opportunities. ACRA knows the business community and provides relevant training, business development opportunities, and socializing with peers within the framework of this conference.”

“CRM professionals can't afford to miss the annual ACRA meeting. No where else can you learn the kind of information you need to maximize your business success, expand your networks, and be prepared for upcoming economic and political changes that impact the CRM industry.”

“The sessions lead to some of the best discussions I have had about the business...”

“As always, ACRA's annual conference is the most important meeting I attend. The connections I have made have helped in the development of my business in ways no other conference could.”



Annual banquet and awards ceremony.

“The annual ACRA meetings are one of the few times you get to set aside any differences with competitors and find yourself among colleagues and friends. I always enjoy discussing the current trends in CRM and business, and these meetings create the perfect forum to facilitate those conversations.”



Attendees debarking at Tillicum Village.

..continued on Page 16

“The ACRA conference is the single most important forum for business leaders in cultural resource consulting to discuss and share ideas on how to improve our industry.”

At the annual conference dinner, our keynote speaker was Milford Wayne Donaldson, chairman of the Advisory Council on Historic Preservation. Mr. Donaldson stayed for the entire conference, and ACRA appreciates his interest and support. Two awards were also presented in the Industry Award-Private Sector category (see article in this issue).

Feeling like you missed out? You did. Copies of the presentations from the conference are included in the “Members” section under “Archives” (<http://acra-crm.org/displaycommon.cfm?an=1&subarticlenbr=248>).



Keynote speaker Milford Wayne Donaldson .


Thanks for all the great feedback on the educational components of the conference and we look forward to seeing you at ACRA’s 19th Annual Conference in Washington, D.C., in 2013.


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2012 ACRA AWARDS

By Al Tonetti, ACRA Awards Committee Chair



Chair of the ACRA Awards Committee Al Tonetti.

At the 2012 annual meeting in Seattle, ACRA presented three awards: two in the Industry-Private Sector category and one in the Industry-Public Sector category. Industry awards are made to an ACRA company's private or public sector client who has shown a commitment above and beyond what is required to meet laws and regulations pertaining to the preservation of cultural resources. Recognition is for a single project or for an on-going commitment. Eligibility includes nomination by an ACRA member firm in good standing, documentation of the nominee's on-going adherence to following the spirit and letter of cultural resource laws, regulations, or standards, the nominee's commitment to supporting thorough and outstanding research or documentation, and examples of their projects, actions, or funding support documenting work above and beyond simple compliance with the law. Summaries of the three awards follow.

Industry-Private Sector: Holly Corporation Nominator: William Self Associates (Bill Self)



Larry Olsen of the Holly Corporation accepting the ACRA award, with Michael Boley and Terry Majewski.

This award was made based on the Holly Corporation's outstanding support for CRM investigations into Great Basin prehistory and history. Particularly commendable was their use of offsite mitigation to gather data important in regional prehistory and history, and their public outreach to the nonarchaeological community through publications and a website aimed at furthering public understanding of CRM in the region.

From 2006 to 2011, the Holly Corporation completed CRM studies for their Utah-Nevada (UNEV) Pipeline, a 400-mile refined petroleum pipeline from Salt Lake City, Utah, to Las Vegas, Nevada. As part of the NEPA process, CRM investigations were conducted on over 700 miles of proposed and alternative routes, access roads, and ancillary facilities. As a result, 400

..continued on Page 19

prehistoric and historical-period sites were identified in the preferred pipeline right-of-way, 200 of which were determined NRHP eligible. Following extensive multi-agency consultation, a Historic Properties Treatment Plan was developed to address mitigation of the historic properties where avoidance was not an option. A cultural-ecological framework was used to structure prehistoric archaeological site investigations. Excavation and analyses of cultural materials were guided by five general research themes: chronology, settlement distribution, site structure, subsistence practices, and technology.

Sixteen sites were subject to mitigation through excavation. These included Fremont short-term habitation sites, Archaic period sites, an Archaic/Formative site, and a Formative period site. Most of the sites contained little in the way of surface deposits because of their deflated dune locations. Two sites, however, yielded significant buried cultural deposits, including temporary structures and features. Archaeological excavation also took place at a historical-period farmstead near Salt Lake City that became an early duck hunting club, the remains of a Civilian Conservation Corps Camp, a homestead, and a small rural site. As an alternative to excavations at numerous small lithic scatters along the pipeline right-of-way, and following agency concurrence that sites of this type already had been amply investigated, Holly funded geoarchaeological studies at several prehistoric sites, obsidian hydration studies, and deep soil coring of paleosols near the Old Sevier River Bed to gather data on late Pleistocene sediments to fill a gap in certain time periods.

The Holly Corporation also funded archival research to document the many significant historical-period linear sites along the corridor, including railroads, roadways, irrigation canals, and other linear sites. The compiled documents make up a valuable record of late-nineteenth- and early-twentieth-century transportation development in Utah.

In addition to the numerous technical reports prepared to meet state and federal historic preservation requirements, the Holly Corporation sponsored

preparation of two public outreach documents, a comprehensive website www.utaharchunev.com, and promoted dissemination of project information by sponsoring papers and posters at Utah Archaeology Week and Utah Professional Archaeological Council meetings, and the biannual Great Basin Conference.

**Industry-Private Sector: South Carolina Electric & Gas Company (SCE&G)
Nominator: S&ME, Inc. (Bill Green)**

From 2005 through 2011, the South Carolina Electric and Gas Company (SCE&G) conducted CRM investigations pursuant to NHPA Section 106 for the relicensing of its Saluda Hydroelectric facility in South Carolina. Surveys covered 620 miles of shoreline and 127 islands in Lake Murray and portions of the Saluda and Little Saluda Rivers and their tributaries. Of the 156 archaeological sites identified, 3 were determined NRHP eligible, and 17 others were thought to be eligible. Of the 15 historic structures identified, the Saluda Dam and Powerhouse Complex and the Eptings Campground were determined NRHP eligible. One archaeological site, the Tree House Site, 10 likely eligible sites, and the Saluda Dam and Powerhouse were to be affected by the undertaking. Management recommendations for historic properties were detailed in a Historic Properties Management Plan developed by S&ME and SCE&G.

A major part of SCE&G's compliance was completion of archaeological data recovery at the Tree House site, a deeply stratified site of nearly nine acres containing occupations from the Early Paleoindian through Mississippian periods. Of particular note, a one percent sample of the site on privately owned property was excavated to help mitigate the adverse effects of erosion caused spillway releases. Data recovery included excavation of 200 square meters up to 3.65 meters deep. More than 37,000 artifacts ranging in age from 13,500 to 800 years ago were recovered, and more than 80 features were excavated, including one Paleoindian pit feature. Other important information gathered from the investigation included documenting the state's first Early and Middle Archaic structures, several Middle Woodland

..continued on Page 20

structures, the first documented Late Archaic Mill Branch occupation outside of the Savannah River valley, and a possible new transitional Late Archaic/Early Woodland phase (the Craig phase) containing unusual steatite-tempered pottery similar to Marcey Creek wares found in the Mid-Atlantic. Although the portion of the site on private property was eroding, mitigation of these adverse effects was not required until a new license was issued by the Federal Energy Regulatory Commission. However, because portions of the site were eroding, and others in danger of development, SCE&G decided to perform data recovery. In addition, SCE&G agreed to protect and preserve the entire portion of the site located on their property through a restrictive covenant.

Another important part of the project was to share the information gathered during multiple phases of the project with the public <http://www.sceg.com/en/our-community/environment/default.htm>. On behalf of SCE&G, S&ME designed three artifact and interpretive displays about the excavations at the Tree House site. One display is located at the corporate headquarters of SCE&G, while the two other two displays are installed at the Lake Murray Visitors Center and Saluda Shoals Park, facilities that annually attract more than 400,000, including many school groups. S&ME also prepared a booklet on the prehistory and history of the area, including information about the Saluda Hydroelectric Project and its stewardship of archeological and historic resources. These brochures were printed in a glossy, color format and made available to the public at no charge.

SCE&G also has received state and national acclaim by winning the 2012 National Council on Public History Excellence in Consulting Award, the 2011 National Hydropower Association Outstanding Stewards of America's Waters Award, a 2011 Excellence in Engineering Award from the American Council of Engineering Companies of South Carolina, and the 2009 Palmetto Trust for Historic Preservation Corporate Stewardship Award.

**Industry-Public Sector: U.S. Army, Redstone Arsenal, Environmental Management Division, Cultural Resources Team
Nominator: Alexander Archaeological Consultants, Inc. (Lawrence Alexander)**



Ben Hoksbergen of the U.S. Army Redstone Arsenal accepting the ACRA award, with Lawrence Alexander and Terry Majewski.

Located in the Tennessee River valley of northern Alabama near the city of Huntsville, Redstone Arsenal (RSA) is the premier location for the U.S. Army's rocket and missile programs. Incorporating 38,000 acres, RSA's cultural resources are managed by an Integrated Cultural Resources Management Plan overseen by two CRM managers who oversee nearly 1,000 archaeological sites and more than a thousand historic structures.

RSA's CRM efforts promote anthropological research and the protection of heritage assets while supporting the

..continued on Page 21

A C R A E D I T I O N

military mission through creative practices of site mitigation and avoidance. The installation's public outreach and education efforts have raised awareness of CRM among RSA personnel and the surrounding community. Highlights of RSA's CRM program include:

- Completion of a Phase I archaeological survey of all RSA lands.
- Examination of recent LiDAR images of archaeological sites and detection of previously unobserved disturbances and additional features.
- Archaeological site boundaries mapped using GPS. Data collected from GPS mapping assimilated and stored as shape files in a limited access GIS for 955 archaeological sites.
- Alabama SHPO concurrence that 439 sites are NRHP eligible. Their preservation is coordinated with installation activities.
- Artifacts recovered from CRM projects curated in accordance with 36 CFR 79. Photographic record of all prehistoric diagnostic artifacts complete and entered into a database queried by GIS location, site, or artifact type.
- Following NAGPRA guidelines, representatives from 17 Native American tribes completed a MOA on repatriation of recovered human remains and associated sacred artifacts. All reburials in the RSA are unmarked but mapped and designated as cultural resources to avoid future disturbance.
- An innovative PA developed in conjunction with the ALSHPO and ACHP to mitigate impacts to late nineteenth and early twentieth century house sites, comprising approximately 32 percent of the NRHP eligible sites. As part of the PA, historic site type models of the post Civil War cotton economy and settlement in the Upland South have been documented by incorporating archaeological survey data, intensive testing at over 25 historic sites, archival research, and oral history.
- In 2007, former residents and their descendants were reunited at the facility to tour and share information about the facility's pre-1941 cultural landscape so that cultural resources managers can make better and more informed decisions about which resources should be prioritized for preservation.
- Inventoried historical-period buildings and structures on the RSA include two from before the arsenal was established, 714 dating to the World War II era, and 834 structures built during the Cold War era.
- Compliance with NHPA coordinated with ALSHPO and ACHP to expedite management of NRHP eligible buildings. A MOA includes management of 437 NRHP-eligible historic structures, one WWII district, two Cold War districts, and five Cold War buildings.
- Completed HABS/HAER documentation on all NRHP-eligible buildings, including black and white photography, digital archive of existing architectural drawings of historic buildings and plans and drawings depicting original equipment within historic districts.
- Beginning in 2006, collaboration with Huntsville City School's Earthscope Program establishing an annual Indian Education/Archaeological Resources Outdoor Classroom for more than 1,200 fourth graders, and an annual Earth Day Celebration for approximately 300 fifth-grade students. Students learned about Native American culture, and lectures were given explaining how archaeologists learn about past cultures, and on the importance of natural resources to prehistoric American Indians and on the importance of preserving cultural resources.
- Public brochures explaining how archaeological resources are managed at RSA.
- Papers detailing archaeological investigations at RSA presented at regional amateur and professional archaeological society meetings.

MARKETING 101: THE TRUE COST OF PROPOSALS

By Christopher D. Dore, Ph.D., M.B.A.

Let me tell you a story.

Every so often, a utility company put out a request for proposals (RFP) for cultural compliance services. The jobs were large jobs, netted nice profits, and provided interesting work. A heritage company always bid on those solicitations. Every few years the heritage company won the award, celebrated, made money, and had fun. Everyone was happy in heritage land until one day when the company went out of business. What happened?

Let me give you some facts to see if you can solve the mystery. The average job size was \$800,000. The profit was 14 percent. The average proposal cost was \$15,000. The win rate was 10 percent.

Given the facts above, with a job size of \$800,000 and a profit of 14 percent, the profit on the job that was won was \$112,000. What was the cost to win this job? Was it \$15,000? That seems like the right answer, but is it really? With a win rate of 10 percent, it didn't take one proposal to win the job with this utility, it took 10! So, the cost to win the job was 10 x \$15,000 or \$150,000. Unfortunately for the firm, the job profit was only \$112,000 and represented a net loss for this firm of \$38,000 every time they won a job from this client.

Analyses like this one are not difficult to do, but they do require that you keep a good database of proposals and their associated costs for not only the proposals that you win, but the ones that you don't win. And, of course, you need to be able to link the proposal database to the job database so you can tie proposal costs to project profits and losses.

You can also solve the proposal cost equation for the profit required to cover the cost of proposals. This is perhaps the more useful tool to support day-to-day proposal decisions. Let's use the same set of

figures in the example above. You receive an RFP from the utility client. Because your marketing department is on the ball and keeps good databases, you know that the win rate with this client is 10 percent. You also know that it will cost about \$15,000 to prepare the proposal. When you are preparing the budget for the proposed work, how much profit do you need to charge? This is the formula that will tell you:

$$\frac{1}{\text{win rate}} \times \text{proposal costs} = \text{job revenue}$$

Plugging in the numbers, we get:

$$\frac{1}{0.10} \times \$15,000 = \$150,000$$

This results in a required profit of 0.1875 or 18.8 percent to break even. Is the profit too high to be competitive with this client where you had charged 14 percent? If so, then it is time to work on lowering your proposal costs or increasing your win percentage with the client.

I have programmed the formula into a little Excel spreadsheet that allows you to alter the win rate, proposal costs, and job revenue, and see the effect upon profit percent. I'm happy to share it with you if you ask.

Have a question about marketing heritage services? Send an e-mail to chris@dore.us with Marketing 101 in the subject line. I won't disclose your name or firm, but I might use your question in a future column.

NEW MEMBER PROFILE: MERJENT

Based in Minneapolis, but serving clients throughout the country, Merjent is an environmental compliance and permitting specialist for the energy industry. The cultural resources group assures that our client's projects comply with historic preservation laws and regulations, including Section 106 of the National Historic Preservation Act. Merjent assists energy producers to manage and design large and small construction projects. We also serve as third-party contractors, and have extensive experience working on projects related to Federal Energy Regulatory Commission and National Environmental Policy Act actions.

Merjent's cultural resources lead Peg Boden began working in the CRM industry in the early 1990s, while completing her Ph.D. at the Johns Hopkins University. Although not trained in North American archaeology, she found many opportunities to learn on the job and advance in the business. She now works as a consultant to the energy industry, where she provides cultural resources expertise to projects of all types and sizes.

Merjent's mission is to provide the highest-quality service and products. This includes advising their clients about any changes in historic preservation laws and regulations, as well as the latest trends and innovations in CRM. The company recently joined ACRA to stay informed about these topics.



ACRA FIRM NEWS: CRA ARCHITECTURE

The architectural leadership of Cultural Resource Analysts, Inc. (CRA) (www.crai-ky.com) has spent much of 2012 moving the study of modern and recent past cultural resources forward. CRA's Director of Architectural and Cultural History, S. Alan Higgins, has been at the forefront of the study of the recent past for more than five years, presenting his work at the local, regional, and national levels. He currently serves as president of the Recent Past Preservation Network (RPPN) (www.recentpast.org), a national nonprofit organization, and presented his work at two national conferences in 2012.



In May, Mr. Higgins organized and presented the panel Addressing Challenges of the Recent Past at the National Association of Environmental Professionals Annual Conference. Here, he presented a framework for the current state of management practices for post-World War II resources.

Mr. Higgins once again spoke on the recent past at the Preservation Combination, organized by Preservation Pennsylvania and PennDOT. His presentation, "Architecture of Consumerism: Addressing Challenges of Post-War Commercial Architecture," was part of the panel, The Shock of the New: The National Register Eligibility and Management Implications of Post-World War II Resources.



The Zapruskis Residence in Thornbury, Pennsylvania (architect Rudolph Zapruskis).



Pruis Hall at Ball State University in Muncie, Indiana (architects Evans Woollen and Associates).

In addition to his work at the national level, Alan is currently completing photography and crafting an architectural context for the mid-century built environment of Evansville, Indiana, for future publication, with a particular emphasis on the firm of Hironimus + Knapp, a prominent regional firm of its day. The work will also serve as the touchstone for a series of lectures and related activities, drawing awareness to a portion of the state largely unrecognized for its modern architecture. For more information or materials on the recent past or his work, contact Alan at sahiggins@crai-ky.com, and follow RPPN on LinkedIn or at www.recentpast.org.

NEWS FROM THE JOINT TASK FORCE ON COLLECTIONS

By Ralph Bailey, ACRA Collections Management and Curation Task Force Chair



Participants in the inaugural JTFC meeting, September 2012 (from left): Mark Warner (seated), Giovanna Vitelli, Terry Childs, Kevin Smith, Danielle Benden (seated), Terry Majewski, Michael K. "Sonny" Trimble, Deb Hull-Walski, and Ralph Bailey.

The Joint Task Force on Collections (JTFC) was created by individuals from three of the leading professional groups for archaeologists and/or CRM professionals practicing within the United States: the Society for American Archaeology (SAA), the Society for Historical Archaeology (SHA), and ACRA. These three organizations' members include archaeologists working in academic, government, museum, and CRM settings on all aspects of the archaeological record. These individuals are united, among other things, through their shared interest in material culture; through the generation, analysis, interpretation, curation, and management of archaeological collections from archaeological investigations; and through their recognition of on-going ethical responsibilities to the

collections and records created through fieldwork, conservation, collections management, and use of collections.

JTFC Mission

Attempts to address concerns related to collections have often been undertaken independently by our separate professional organizations, which has led to duplication of effort and, at times, diluted results. The JTFC was created with the goal of bringing archaeologists and affiliated professionals together to foster collaboration among and between organizations in order to address the many collections-related challenges we face. Specifically, the task force is charged with (1) identifying overall objectives relating to archaeological collections; (2) serving as a unified voice for collections-related issues that are relevant to SHA, SAA, ACRA, and their constituents; and (3) developing a common platform for action, designed to benefit the discipline and ultimately the general public for whom we curate collections in the public trust.

The First JTFC Meeting

Stimulus for the JTFC has emerged over the course of several years of discussion between members of SAA, SHA, and ACRA. Funding requests have been made by JTFC members to their respective "parent" groups for limited financial support to attend at least one face-to-face meeting per year, and other meetings will be held via conference call. Expenses for the two ACRA representatives who attended this meeting did not come from ACRA's 2012 budget (Ralph Bailey was supported by Brockington and Associates),

..continued on Page 26

but an item has been requested for the ACRA 2013 budget for some task force expenses. Plans are in the works to have ACRA host a meeting of the task force again in D.C., just prior to ACRA's October 2013 conference.

The first JTFC meeting was organized by members from the SHA and graciously hosted by Deb Hull-Walski at the Smithsonian Institution's National Museum of Natural History (NMNH) on September 17 and 18, 2012. Prior to that meeting, representatives from each of the three constituent organizations compiled answers to a series of questions about their organizations' past activities, progress, and problems in dealing with collections and curation, which were shared before the meeting. This provided JTFC members with the focus areas considered most urgent, most problematic, or most progressively addressed within their own and their peer organizations. The goals of this first meeting were to (1) convene the first official JTFC meeting with key participants; (2) address the items that were articulated at the April 2012 SAA meeting in Memphis, Tennessee, and compiled from the questionnaire prior to the meeting; and (3) propose courses of action based on these items. Participants in the September 2012 meeting were:

- Kevin Smith (Chair, SAA Committee on Museums, Collections, and Curation; Brown University)
- Danielle Benden (SAA Committee on Museums, Collections, and Curation; University of Wisconsin)
- Terry Childs (SAA Committee on Museums, Collections, and Curation; Department of the Interior Museum Program)
- Michael K. (Sonny) Trimble (SAA; Director, Center of Expertise for Curation and Management of Archaeological Collections, U.S. Army Corps of Engineers, St. Louis District)

- Deb Hull-Walski (Chair, SHA Curation Committee; American Alliance of Museum; Smithsonian Institution)
- Giovanna Vitelli (SHA Curation and Ethics Committees; Oxford University)
- Mark Warner (SHA Board and Ethics Committee; University of Idaho)
- Teresita Majewski (President, ACRA; Statistical Research, Inc.)
- Ralph Bailey (Chair, ACRA Task Force on Collections Management and Curation; Brockington and Associates)

Short-Term Goals Established at the Meeting

The group established a series of short-term, intermediate, and long-term/ongoing goals. To give the ACRA membership an idea of what is already underway, the short-term goals are listed below. By the end of 2012, a full report on the task force meeting will be posted on the ACRA website, which will include all of the goals and a more-extensive report on the meeting.

- Build an ongoing advocacy/lobbying program to require collections support be part of the archaeology message
- Identify our organizations' success stories
 - Develop a plan for lobbying
 - Create a one-page "message" that can be used to advocate on behalf on part of our organizations
- Develop uniform standards for culling/sampling and deaccessioning different types of materials
 - Send parallel letters to the National Park Service from the highest-possible level in each organization to request publication of the proposed deaccessioning regulation in the Federal Register, with the goal of getting

..continued on Page 27

A C R A E D I T I O N

- the U.S. government to establish the regulation and professional societies to adopt deaccessioning standards [ACRA's letter was mailed on November 17, 2012]
- Build on existing lists of specialists who can help determine what should be kept or culled
 - Compile, review, and adopt best practices on culling/sampling, deaccessioning, and no-collection policies
 - Raise consciousness among professionals as to collection problems and opportunities
 - Target publishing and presentation venues that can serve as forums for discussions on these issues
 - Have regular sessions at all three of our organizations' meetings
 - Advocate collections-focused research and concurrently deemphasize object recovery projects
 - Write letter highlighting best practices incorporating curation and collections support into archaeological proposals
 - Identify related committees, and reach out to our public affairs points of contact
 - Collect existing long-term plans for managing/triaging the backlog of collections
 - Establish a central "Dropbox" location for collecting this information in one place [already completed]
 - Publicize UW's policy for handling of collections upon researcher's retirement as a "best practice"
 - Begin identifying what the group's Internet presence should be
 - Agree on definitions of collection types, including various types of "orphan" collections
 - Continue to deepen relationships within this group and, through our participation in other committees, seek further buy-in from broader constituencies at the right time

JTFC has wasted no time in beginning on the short-term tasks listed above. If you have questions, please don't hesitate to contact [Ralph Bailey](#) or [Terry Majewski](#) for more information. Watch for more information in upcoming ACRA communications and on the website.

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CULTURAL RESOURCES LEGAL CONFERENCE IN WASHINGTON, D.C.: PURE GOOLD

By Marion Werkheiser, Cultural Heritage Partners, PLLC

On October 18 and 19, 2012, ACRA sponsored a Cultural Resources Continuing Legal Education (CLE) conference in Washington, D.C. – the first of its kind! ACRA’s government affairs representative Marion Werkheiser of Cultural Heritage Partners, PLLC co-chaired the event, along with Jon Berkin of ACRA-member firm Natural Resource Group, LLC.

The two-day meeting featured some of the nation’s foremost experts on legal issues concerning Section 106 of the National Historic Preservation Act, the National Environmental Policy Act, tribal sites, historic preservation, dispute resolution, ethics in cultural resources, and working with archaeologists and historians in court. The keynote speaker was James Goold of Covington & Burling, who fascinated the audience with his story of the well-publicized five-year

legal fight over the *Mercedes*, a Spanish galleon that sank off the coast of Portugal in 1804. Mr. Goold helped Spain win its claim to the \$500 million in objects recovered from the ship earlier this year.



CLE conference keynote speaker James Goold of Covington & Burling. (laureada.wordpress.com)



Capacity attendance at the CLE conference in Washington, D.C.

The conference drew attendees from all over the country and from private companies, tribes, and government agencies, and reached capacity attendance. The ACRA-sponsored reception on Thursday evening was a highlight of the experience. If you have some thoughts on what you would like to see at the next continuing legal education conference on cultural resource issues, [please contact Marion](#).

ACRA EDITION ANNOUNCEMENTS AND UPDATES

2012 Annual Conference Presentations Available

Some of the presentations from the 2012 ACRA Annual Conference are now available online. Please [click here](#) for access to the presentations. Thank you to all those who presented this year and helped make the conference valuable and successful.

Please contact [ACRA HQ](#) if you would like a copy of the keynote speech by Wayne Donaldson, as the file is too large for the website.

2012–2013 ACRA Partnership Program

2012 has been an exciting and challenging year for ACRA and the CRM Industry. This year's major activities have included redesign of the ACRA website and increased government relations activities. 2013 looks to be just as exciting. When you begin developing your 2013 budget, please consider setting aside something to become an ACRA Partner.

[Click here to become an ACRA Partner!](#)
[For a printable copy of the registration form, click here.](#)

If you are interested in becoming a partner, upgrading your current partnership, or if you have any questions, please contact [CJ Summers](#) at ACRA Headquarters.

ACRA Member Update

Legacy Consulting Services (LCS) and Renewable Technologies, Incorporated are working on what is probably the largest Historic American Engineering Record (HAER) documentation project ever completed in Montana. They are working on HAER documentation of the historic (1910 and 1917) Rainbow Hydroelectric Generating Facility. The historic facility is being replaced by a new generation facility. LCS is also working with PPL Montana on a process for consideration of possible repurposing of the 1910 powerhouse at Rainbow, for non-generation purposes. PPLM is working with the local Historic Preservation Officer and others on potential repurposing. The HAER documentation would address either the effects of removal of the historic generating facilities or repurposing of the plant. The work is projected to be completed in the first quarter of 2013.



2013 ACRA EDITION SCHEDULE

ISSUE	DEADLINE	RELEASE
Winter	January 14	February
Spring	April 15	May
Summer	July 15	August
Fall	October 14	November

ACRA Edition is a quarterly publication of the American Cultural Resources Association. This publication's purpose is to provide members with the latest information on the association's activities and to provide up-to-date information on business issues and federal and state legislative activities. All comments are welcome.

Please address comments to:
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