

BLM's Nationwide Programmatic Agreement: The View From ACRA

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There has been considerable discussion on ACRA-L recently regarding the newly signed nationwide Programmatic Agreement (PA) between the Bureau of Land Management (BLM), the Advisory Council (ACHP), and the National Council of State Historic Preservation Officers (NCSHPO). Much of this discussion focused on the question of whether BLM should be asking for public comment and input in the "protocols" that they will be negotiating with the SHPOs of states in which the BLM owns/controls land.

There has been so much discussion and dissension about this topic, that ACRA's Government Relations Committee felt it important to post a message in an effort to clarify the situation and to offer a possible strategy for those wishing to be involved in the negotiation of the protocols. - Michael R. Polk, President, ACRA

The PA went out for comment, as required by law. It contained information on how BLM would negotiate the "protocols" with the SHPOs. BLM received comments, but from their perspective there was not a significant amount of opposition to the PA. The PA was signed at the NCSHPO meeting in Portland, OR, and BLM is now negotiating the protocols with the various states.

The protocols will detail the administrative

procedures that BLM will have to follow in each state. Much of the protocol will concern administrative details such as how reports are submitted (monthly, quarterly, etc.), what efforts are being made to share and synthesize data, etc. Each SHPO will negotiate its protocol, and BLM expects that each state will identify classes or types of properties that individual SHPOs will want to be involved in the process more fully (BLM expects this will only occur if there are effects).

According to BLM, federal law (the Federal Advisory Committee Act) strictly governs how BLM can ask for advice or comments from non-governmental entities and makes it virtually impossible to engage in limited public participation, i.e. asking for comments from a select group of the general public. This is intended to prevent undo influence by a single interest group.

In BLM's opinion this law does not permit public comment/involvement in the formulation of the protocols or the revision of the BLM manuals. BLM has told the states, however, that there is nothing to prevent the states from soliciting comments from their constituencies (like NMAC) and bringing those concerns to the table during the negotiation of the protocol. Preservation associations, local governments, tribal officials, and others are specifically given an opportunity within the PA to identify themselves as interested parties. The PA states that BLM will confer with these parties to promote consistency of practice, identify problems or concerns, and create opportunities to advance the purposes of the PA.

BLM believes that the SHPOs are beginning to realize that BLM is making a good faith

Related Story..

**New Mexico BLM Turn Downs
New Mexico Archaeological
Council's Request to Participate in
Development of State Protocols -
See Page 5**

...continued on Page 5

Errors and Omissions Insurance Review, Update, and Future Plans

By Chris Butler , C & D Butler, Inc.

Next month ACRA will meet in St. Louis for the annual convention. I am optimistic that there will now be a special insurance program for ACRA members to obtain professional liability insurance coverage. I thought it would be a good idea to briefly discuss the need for this coverage by reviewing information from a previous *ACRA Edition* article.

This coverage is very different from standard insurance coverage, such as automobile and workers compensation. Because of the unique nature of the coverage, the cost to purchase professional liability insurance can be expensive. Unlike automobile and property insurance where statistics are available to predict risk, professional liability is simply a guess. Unless you can easily group a profession together, such as attorneys, the premium is going to be based on each account's individual characteristics. The less an insurance company knows about a profession, the more likely a higher premium will occur. Unfortunately, some ACRA members have had this happen to them because insurance companies are unfamiliar with your profession.

Obviously, an important question to ask is what does this coverage insure against? It insures you for an actual or alleged error, omission, or negligent act you make in the performance of your profession. Unlike most insurance coverage, where damage to property or injury to a person must occur, this policy protects you when someone has incurred financial loss due to your error or omission.

An example of an error that could cause financial loss would be a firm that mistakenly does not identify an historic site. The site is discovered after construction begins and everything has to be stopped. Your firm has made a mistake and it is causing a financial loss to the construction company. Your general liability policy will not insure this claim. Unless you have professional liability coverage, you have no protection.

In addition, this coverage provides claim expense. This means expenditures, including legal services, costs of investigations, experts, and court costs, which would be incurred in defending a law suit against you. These costs can add up quickly and can be in the thousands or tens of thousands of dollars. Even if a suit is groundless, by having insurance you can avoid having to pay these expenses because your policy will cover you.

Another key difference between professional liability and other insurance coverage is that it is a **claims made** policy. This means that the policy only covers those wrongful acts that occur and result in a claim made during the policy period. If you purchase a policy on 1/1/96 and a claim is filed against you on 3/1/96, the claim is only covered if the act which caused the claim occurred on or after 1/1/96. If the act occurred on 11/1/95, the claim would not be covered. Because of the claims made policy, which almost all errors and omissions policies use, you need to be careful in changing policies. Also, if you are buying your first errors and omissions policy, it is not going to insure you for prior acts committed before the date that the policy is issued.

Obviously, I can not discuss all the details about professional liability coverage in this column. My comments are based on general conditions of a standard policy, so please remember that each company will have specific coverage, conditions, and exclusions.

The main point I want to emphasize is that even small firms should carry professional liability coverage. Although the chances of you making a mistake are unlikely, it is difficult to know what each employee and subcontractor is doing. People do make mistakes and at times they can and do have significant financial consequences. It makes good business sense to protect your business properly by carrying this coverage.

In the next issue, I will discuss the specifics of the program for ACRA members.

300 Years of California Mission History: The Mission as a Frontier Institu- tion Revisited

Saturday, October 4
- Sunday, October 5, 1997.
*The Temple in San Diego
Heritage Park, Old Town,
San Diego, CA.. Spon-
sored by the Califor-
nia Council for the Humani-
ties.*

This event is organized in recognition of the 300th anniversary of the founding of the first mission in the Californias at Loreto, Baja California. It is the initial event in a week-long series of activities that recognize the Ibero-American experience. San Diego has a proud and fascinating Native American and Ibero-American history. The roles of the two cultures will be addressed by nine speakers over the two days in nontechnical presentations and panel discussions.

Nine community leaders and scholars have been asked to address their remarks to aspects of the mission era in both Californias. The panel will include Native Americans and scholars who have approached history from the Native American and other perspectives. The public is invited at no admission charge, although donations will be gratefully accepted.

For further information contact: The Center for Spanish Colonial Archaeology, 4060 Morena Blvd, Suite G-250, San Diego, CA 92117.

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Locating Archaeological Sites Through Vegetation Patterns: A Summary of Responses Posted on ACRA-L.

By James Battin, Aberdeen Proving Ground

Thanks to everyone who sent replies to my inquiries about the relationship between vegetation patterns and archaeological sites. As promised, here is a summary of the responses I received.

I received advice on the use of vegetation for finding archaeological sites and on other ways of determining areas of high archaeological potential, particularly through the use of remote sensing. Apparently, considerable work on the use of remote sensing for archaeology has been done by the Army Corps of Engineers Research Lab (CERL), though I have yet to successfully contact the relevant researchers at CERL. Aerial Archaeology, a consulting firm, also does remote sensing work, primarily in the southwest. They have an interesting web page at www.nmia.com/~jaybird/AANewsletter/. Specific methods suggested by various respondents included the use of soil stains, shadow patterns, and suspicious vegetation anomalies. Another suggested method for finding old building sites was to walk old road networks.

Of the replies that had to do with vegetation, species that were considered to have some value in predicting high-potential archaeological areas fell into two categories: exotic or unusual plants that were planted around building sites, and vegetation indicative of disturbance, especially poison ivy, cedar trees (which tend to indicate over-tilled and otherwise poor soils), and thorny, nasty vegetation.

I received a number of suggestions of potentially useful vegetation species and patterns, a list of which follows:

- At Fort Bragg, NC, historic sites appear to be associated with black walnuts.
- In Indiana, yucca and daffodils are good indicators.
- In the South, many people planted pine trees as "coffin trees" which would be cut down when a family member died and needed to be buried.
- In Florida, Australian pine was used as a windbreak in orange groves.
- Osage oranges were planted as living fences.
- Other useful species include wisteria, box hedge, honeysuckle, vinca, tree of heaven, ginkgo, narcissus, oleander, lilies, ivy, privet, rose, pecans, and fruit trees.

In the short time that we have been doing this, we have found that daffodils and black walnuts seem to be the plants that are most often associated with building sites. Black cherry and black locust are commonly associated with building sites, but are also common in many other areas so these species do not appear to be good indicators. We have also found Osage oranges at several sites. Other unusual species include Paulonia, trumpet creeper, basswood, box elder, sassafras, sweet buckeye, Kentucky coffee tree, and sugar maple.

I was surprised to find that there appears to be very little in the way of systematic studies or published literature on this subject. We have considered conducting a fairly simple statistical study of building sites on the Aberdeen Proving Ground to determine what vegetative characteristics are the most useful indicators of high-potential archaeological areas. I would be interested in hearing opinions of the usefulness of such a study.

Thanks again.

James Battin
Aberdeen Proving Ground

STRAIGHT FROM THE T-SQUARE

Contributing Editor, Donald M. Durst

“Developing Our Young: Growing Our Profession - Part 2 of 3”

Every profession must have a meaningful process in which to develop their future leaders. Part Two of “Developing Our Young” provides a closer look at how the architectural profession develops their interns. The Intern Development Program (IDP), as defined in the *1996-1997 IDP Guidelines*, is a profession-wide, comprehensive program that assists in the development of competent architects. IDP provides a structured transition between academic training and becoming an architect. Please note, one cannot be called an architect nor use that term in anyway without being licensed. As a result, the phrase *licensed architect* is actually redundant.

IDP works by providing a structured environment where an intern can be exposed to all the major activities undertaken by an architect. The program sets minimum hour goals in 16 categories that an intern must achieve in order to be eligible to take the Architectural Registration Exam (ARE). Categories range from building design to code research to project management to community service. An intern must obtain approximately 5,600 hours, which is just shy of 3 years of fulltime employment.

Activity in each category is recorded by the intern on a standard form. The intern is then required to have sponsor, usually an architect in the firm, verify and sign the intern's record form. The record is used as a career planning tool as well as the intern's basis for admission into the ARE. When the intern has obtained the

required minimum hours in all 16 categories, the intern may then submit his record and application form to the state registration board. The state board will then review the application and determine if the intern is eligible to take the ARE.

Each architectural office has its own policies and procedures on training their interns. Therefore, it is not possible to outline what a true “typical” experience would be for all architect-interns. Large architectural/engineering firms often designate an Intern Development Coordinator, who oversees the firm's intern program. This program often includes in-firm mentoring as well as firm-sponsored ARE study sessions and classes. The goal is to produce a well-trained candidate who will pass the ARE, become a licensed architect, and remain a productive, knowledgeable, *long term* employee of the firm.

My own initial reaction to the IDP was overwhelming, especially since I chose during my academic years to work at a different office in a different part of the country during each summer break. This made record keeping and obtaining the necessary signatures by sponsors a nightmare. My diverse experience also made it difficult to gain the necessary hours in all the various categories. Interns who chose to complete their IDP at one office often took the ARE sooner than I did. However, I believe my personal intern development approach gave me an advantage because it showed me that there are multiple solutions to the many common problems encountered during an architectural career.

In our office, as soon as an intern has been hired, we immediately require them to establish an IDP file. Again,

from personal experience, I know the cost of maintaining a file can be expensive for a new graduate. But we feel it is very important that each intern share some of the burden in their career development. One can view this policy as means of “putting your money where your mouth is”—this is the financial sacrifice an intern has to make if they wish to one day become an architect.

However, most firms, like ours, provide ample company time to complete, consult, and record their daily journal. As with our firm, architects in the company would often serve as sponsors to individual interns. Each architect in our office has served as a sponsor. Many offices hold workshops and discussion sessions with the interns to review various assignments being undertaken by the interns.

One aspect, which I think may be less common in the architecture profession, is that our office provides associate level membership to the American Institute of Architects (AIA) for each intern employed by our company. However, there is a big catch. It is *required* that each member join a AIA committee *and participate* within the local chapter. Although this policy is expensive, I strongly believe that our firm reaps tremendous benefits from this policy.

Can CRM firms accomplish the same development through ACRA? Yes! We should encourage our interns to actively participate in ACRA. We should sponsor our interns to attend conferences that deal with CRM business issues as much as possible. Although the paper-giving conferences, where one person can show off all the neat artifacts they may have

found (the equivalent of the AIA design award sessions), are good for the ego and for recognition, they often lack real-world substance and do not provide many professional growth opportunities. Rather, we must send our interns to ACRA-sponsored events. For example, the upcoming ACRA conference in St. Louis should be overflowing with CRM interns.

I believe the long term solution for preparing futher leaders in CRM requires ACRA to establish a committee on the professional growth and development of CRM interns. This committee should review the entire development process of a CRM intern from the moment the individual leaves the academic world to the point where they are ready to be a Principal Investigator or Project Manager. Who should participate in the CRM's equivalent of IDP? Any CRM intern who wishes to develop a *professional* career in the CRM industry and is not already enrolled in another established and recognized development program such as IDP.

Intern development should not be considered a burden for either the employer or employee. It should be viewed as a continuing transition of passing our professional experience from one generation to the next. Intern development is, in many ways, a lot like developing a relationship with a new client. Firms do this in order to expand their business. We need to do the same in order to grow our profession.

Annual Committee Reports Due September 1st.

At the request of Mike Polk, ACRA's president, the *ACRA Edition* will publish annual committee reports in the September issue. Since the newsletter must be sent out in time for members to receive it before the Annual Meeting (September 19-21), all annual reports must be submitted to the Cory Breternitz no later than September 1st.

New Mexico Archaeological Council Asks to Participate in State Protocols Plans

On June 18, I wrote to the New Mexico Bureau of Land Management (BLM), asking for New Mexico Archaeological Council (NMAC) to be an interested party in the development of the New Mexico state protocols under the new BLM nationwide programmatic agreement. On July 1, I received a letter from Stephen Fosberg, the BLM New Mexico state archaeologist, stating that the state-level agreements were "internal administrative documents" and turning down NMAC's request. It appears that the BLM's intent is to prepare the state level protocols, which will affect every cultural resource on BLM land in New Mexico, without any input from any interested group. And this is not just a NMAC issue. Tribes whose ancestors are buried on BLM land, oil and gas companies, utilities, ranchers, and everyone else with a stake in how the BLM makes decisions, will not have the slightest chance to comment on these very critical decisions. This is a very disturbing development; in its very first opportunity to display what it will do when given some freedom of action on cultural resources, the BLM has opted to slam the door on public involvement. My question is, what do they have to hide behind that closed door?

Dave Phillips
President, NMAC

New On The World Wide Web

Check-out:

"<http://www.miningrendezvous.com>"

This is a new site under development and will be expanding to carry news, calendars of events, and the Arizona Mining & Mineral Museum home page. It contains everything related to Mining & Mining History. Note the scheduled dates for: "Mining Artifact Collectors Rendezvous" and "Mining History Rendezvous." More details will be forthcoming. Your suggestions are welcome. If you want a presence on this page, contact the Mine Boss at the following address: Paul L. Kouts, 18007 N. 46th Drive, Glendale, AZ 85308; plkouts@primenet.com; 602-789-8215

BLM ..

..continued from Page 1

effort to streamline the process while still assuring that significant resources are considered. In BLM's view the alarm bells that have been going off are the result of their efforts to make the process as open as possible. The information on the Colorado Web page is a draft, and BLM and the SHPO are still working on language, but because it's on the Web, people are taking it as a final version. BLM has said that the SHPOs will see copies of the revisions to their manuals, and that BLM will solicit SHPO comments on the manuals - even though these documents are not legally open to public comment. BLM is asking for SHPO advise on the language and procedures contained in the manuals.

ACRA encourages interested parties to work with their SHPOs and to enter into the negotiation of the protocols through that venue. BLM seems to have complied with the law. The PA is signed. The opportunity for interest parties to effect change in the process is through the negotiation of the protocols.

Patrick O'Bannon, Chair
Government Relations
Committee

Legislative Update

ACRA/SOPA Weekly On-Line News

August 15, 1997

Support Sought for LWCF

Efforts are underway this month to gain support in the House of Representatives for additional funding for the Land and Water Conservation Fund (LWCF). Representatives Dale Kildee (D-Mich.), Scott McInnis (R-Colo.), Rodney Frelinghuysen (R-N.J.), and Sam Farr (D-Calif.) are distributing a letter urging their colleagues to support the addition of \$700 million for the LWCF in the Fiscal 1998 Interior Appropriations. The bill approved by the Senate Appropriations Committee contains the funds, but the House-passed bill does not. The Senate version is expected to go to the Senate floor in September. Afterwards, a House-Senate Conference committee will iron out the differences.

The LWCF, established in 1965, is the companion to the Historic Preservation Fund, authorized in 1976. The LWCF provides money to acquire federal parks and recreation lands and grants for states to acquire and develop parks and recreation facilities (including historic properties). No funds have been appropriated for state grants in the past two years. The 1998 budget agreement allowed an additional \$700 million for the LWCF, subject to appropriations. Within that amount, the Senate Appropriations Committee specifically set aside \$100 million for state grants; the rest is for federal land acquisition.

ACTION NEEDED: The Senate included the \$700 million in their Interior Appropriations bill but the House did not. Letters to the House are needed to urge them to accept the Senate's level of funding, including the \$100 million for the state portion of the LWCF. Letters of support would also be helpful to the Senate, to thank the committee

for what they did and to urge them not to reduce the amount below the full \$700 million and not to cut any of the \$100 million allocated for the state portion.

ACHP Letters on Military Historic Housing

The Advisory Council on Historic Preservation (ACHP) has sent a strongly worded letter to the leaders of the House and Senate Appropriations Committees expressing its "dismay" over language in the Senate report on the fiscal 1998 military construction appropriations (S. Rpt 105-52) that states the committee "continues to be concerned that maintaining historic quarters is overburdening the military housing accounts." ACHP Executive Director John Fowler notes that similar language was used in the report on last year's bill. He states that the Council feels "that neither report's conclusions are supported by evidence and that legitimate concerns of efficiency managing historic properties are being ill-served by these repeated attacks on the established process for evaluating historic significance."

Mr. Fowler further notes that the Council has a responsibility under Section 202 of the National Historic Preservation Act to advise the President and Congress on matters relating to historic preservation. He stresses that "There are many effective ways for Federal agencies to maintain and use historic properties under their charge that are also consistent with their mission and budgetary priorities. In fact, each of the required service reports recently completed by the Navy, Air Force and Army discuss different approaches to effectively managing historic housing inventories. Both the Navy and the Army assert that historic housing is not a drain on their fiscal resources and represents

only a fraction of their total housing inventories." Mr. Fowler also cites other examples in the Department of Defense of "innovative approaches to historic property management." He concludes by urging "reconsideration of this matter when the conference committee convenes and eliminate the negative language related to historic preservation."

Round 2 on Homeowners Tax Credits

Although the bills to provide a 20 percent tax credit for rehabilitation of historic homes did not make it into the tax reform package that the President just signed into law, there's still a chance to get something enacted during the 105th Congress, according to Nellie Longworth, president of Preservation Action, the national grassroots lobbying organization for historic preservation. She notes that the problems the bills faced this year largely stemmed from faulty economic assumptions about the impact of projected losses to the federal treasury. She and other preservationists are, however, cheered by the large number of cosponsors of the bill—99 in the House and 21 in the Senate. They are now gathering statistics from state historic preservation offices and the National Park Service to show how many homes might be affected under different scenarios. For further information, contact Preservation Action, 1350 Connecticut Avenue NW, Suite 401, Washington DC 20036. Phone: 202-659-0915 Fax: 202-659-0189. E-mail: preservationaction@worldnet.att.net Webpage: www.preservnet.cornell.edu/presaction/home.htm (Note: Membership in PA is only \$35 a year.)

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Dr. Berle Clay Joins Staff of Cultural Resource Analysts

Cultural Resource Analysts, Inc., is pleased to announce that Dr. R. Berle Clay has joined the firm's Lexington, Kentucky, office. Having attended Yale University and then later, the University of Kentucky for graduate work, Dr. Clay earned his Ph.D. from Southern Illinois University in 1968. Clay served as State Archeologist and Director of Kentucky's Office of State Archeology between 1976 and 1997.

Between 1968 and 1976 he was an Associate Professor of Anthropology at Tulane University. He held a similar position at The American University between 1967 and 1968 where, in addition to his teaching responsibilities, he completed archaeological field research in France, Spain, and the District of Columbia.

Clay's expertise combines 37 years experience in all aspects of archaeology including teaching, management, and field research in both academic and cultural resource management contexts. Beginning with a research interest in the Ohio Valley (fieldwork in Kentucky, M.A. Thesis), his career has involved Paleolithic research in France (Ph.D. dissertation) and Bronze Age museum study in Spain (with Dr. Walter Taylor) and, since 1976, Ohio Valley archaeological research on the Archaic, Early Woodland, and Late Prehistoric time periods. He has published his research widely and is well known for his contributions to archaeology of the Eastern United States. In addition, since the late 1980s he has concentrated in near-surface remote sensing using various geophysical techniques.

Clay has specialized in the application of near-surface geophysical survey techniques to archaeological sites. Using high speed EM technology, he has pioneered the use of soil conductivity and magnetic susceptibility surveys in a variety of archaeological contexts, both prehistoric and historic, in the Ohio Valley. These surveys, in both academic research and cultural resource management contexts, have assisted in the development of archaeological research and evaluation strategies.

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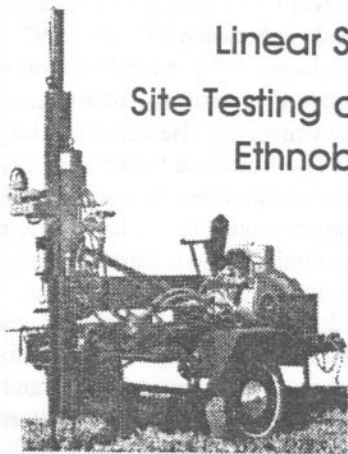
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This publication's purpose is to provide members with the latest information on the association's activities and to provide up-to-date information on federal and state legislative activities. All comments are welcome. Please address comments to:

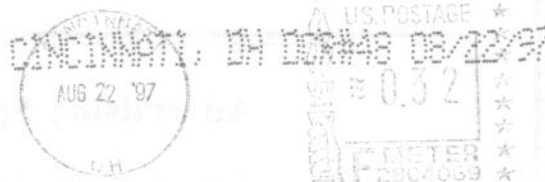
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