

EDITION

The Voice of the Cultural Resource Industry

October 2003

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ACRA Members enjoying a Texas BBQ during the 2003 Conference in Dallas.

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ACRA's Mission

Our mission is to promote the professional, ethical and business practices of the cultural resources industry, including all of its affiliated disciplines, for the benefit of the resources, the public, and the members of the association by:

- promoting and supporting the business needs of cultural resources practitioners;
- promoting professionalism in the cultural resources industry;
- promoting and providing educational and training opportunities for the cultural resources industry; and
- promoting public awareness of cultural resources and its diverse fields.

A basic tenet of ACRA's philosophy is the cost efficiency of private-sector firms in meeting the need for expertise in cultural resource management. ACRA is strongly opposed to unfair competition from tax-supported contracting programs. We believe that a greater benefit to society, and to the resources, derives from the existence of a healthy community of tax-paying, job-generating, private sector CRM businesses.

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THE NEW ACRA EDITION

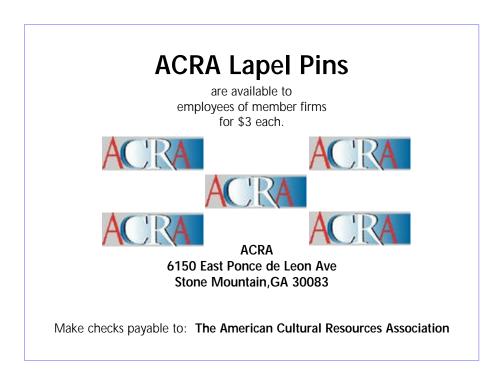
Welcome to the "new" ACRA Edition. The ACRA Board has decided that ACRA Edition from now on should be available to anyone who visits our website, and that it should broaden its scope, so here it is. It's ACRA's hope that everyone involved in cultural resources management will come to find ACRA Edition indispensible for news, views, and commentary on the complicated world in which we work. So please point your non-ACRA colleagues this way, and encourage them to send material to us.

We have included several items that we feel will be of interest to a broader readership. David Phillips' paper on the origins of CRM includes many familiar names and puts on record some history that was in danger of being lost. Diana Godwin outlines some of the issues surrounding historical careers in CRM and is actively working on developing a graduate program in this area.

Please give us some feedback on this new trial format. Getting the balance right may take a while, but the process will be quicker if we know what people think.

Thank you for electing me as President-elect for 2003-4 (and, therefore, as Chair of the Newsletter Committee). I look forward to learning a great deal over the next few months.

lan C. Burrow, Ph.D., RPA <u>burrow@hunterresearch.com</u>



WHO'S MY DADDY? WHO'S MY MOMMY? RESULTS OF A POLL ON THE ORIGINS OF PRIVATE-SECTOR CRM

Submitted By David A. Phillips, Jr., RPA

After being asked by Bill Doelle to co-author a paper on the growth of private, for-profit CRM in the Southwest, I became curious to know whether that field began in our region or somewhere else. In March 2001, I began e-mailing queries to ACRA-L, the list server sponsored by the American Cultural Resources Association. A number of ACRA-L subscribers responded with information based on their memories of the start of the field. Many of the following quotations are taken from e-mail messages in a relaxed format, and, therefore, have been edited for both grammar and clarity. I deeply appreciate the contributions of my fellow ACRA-L subscribers.

As of this essay, in 2001, private-sector CRM is only 29 years old, but the knowledge of its origins is already being lost. A great deal of that loss is due to a lack of reflexive thinking: until recently, private sector CRM was something we just did, so we could pursue archaeology or whatever other studies we loved to do. Moreover, the field began as disjointed efforts across the country, with little sharing of information except through individual working relationships. It was only in the past few years that CRM realized that it was, in fact, an industry, and consciously began creating channels for internal communication. Moreover, the roots of private sector CRM were not a concern until it had become a major force in archaeology and in historic preservation in general.

This is a good time to be collecting the oral history of the field; some of its founders of the field have died, others have retired or drifted from the profession, and the remaining pioneers will not be around much longer. As shown by the extracts reproduced below, the memories we do have of those early years are getting hazy. By setting the following information to paper (so to speak), I hope to preserve some of our tribal folklore for the next generation.

The table on the next page provides a state-by-state summary of the information contained in this essay. Before proceeding, I'll repeat a statement often made on ACRA-L, which is that CRM is much more than archaeology. At the same time, there is no doubt that archaeologists were the core of the emergent CRM industry.

The Father of Private Sector CRM: Roger Desautels

When I began this survey, many CRM professionals (including myself) could not name the first person to do private sector CRM. Fortunately, a few people had memories of this earliest part of the story.

According to Mike Polk, "I have always been told that

Roger Desautels in Costa Mesa, California [had] the first CRM firm to really operate similarly to how we do today. I can't remember his firm's name, however. His firm began, I believe, in 1962, and his first large and notable project was a cultural resources inventory of Amchitka Island in the Aleutian Islands prior to the test detonation of a hydrogen bomb."

A corroborating response comes from Ron May: "Roger Desautels formed Scientific [Resource] Surveys, Inc. (SRS) in 1962 and his first report was an archaeology survey of Amchitka Island. This remains today as the first for-profit CRM firm in California. Desautels is deceased, but his children and his widow carry the torch."

May explains Desautels's ability to establish his business as follows: "Roger was a showman, which means he was darn good at marketing archaeology. He managed to convince someone at the Department of Energy and Department of Defense to fund the survey of Amchitka Island and linked the . . . Antiquities Act with their project. He convinced them that this was a positive public relations move."

Gerrit Fenenga reports that Desautels published a brief account of the origin of his company in The Masterkey (Vol. 45, No. 2, pp. 69-71, 1971).

... And the Mother: Roberta Greenwood

If Roger Desautels was the father of private sector CRM, it appears that Roberta Greenwood may claim to be its mother. In 1965, Greenwood excavated Shisholop (CA-VEN-3) under contract to the California Division of Beaches and Parks. A year later, she excavated the Chapel of Santa Gertrudis (CA-VEN-168) and the Ventura Mission Aqueduct, under contract to the California Division of Highways and the Department of Parks and Recreation. She had been doing similar work before 1965, "but not with all-paid crews or with formal public contracts."

Greenwood explains that private sector work was her chosen career path: "I did not aspire to teach or be closeted in a museum, but preferred active fieldwork and research." Incidentally, in 2001, she was awarded the J. C. Harrington Medal from the Society for Historical Archaeology.

Later California Developments

Ron May writes, "I entered the field in 1970 as a contract employee with the California Division of Highways and Roger Desautels and [his company] split the assignment [with me]. He

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| <u>State</u> | <u>Year</u> | Person/Firm/Comments |
|----------------|---------------|--|
| Alaska | ca. 1973-1974 | The Arctic Company surveyed the Alaska Pipeline in the "early 1970s." |
| Arizona | 1974 | In October, Lyle Stone founds Archaeological Research Services (ARS). |
| Arizona | 1977 | Rick Effland and Margerie Green establish Archaeological Consulting Services, Ltd., in (Tempe?). |
| Arizona | 1981 | In October, David Phillips establishes a branch office in Tucson for New World Research (then based in Pollock, La.) A few weeks later, William Doelle and Linda Mayro establish Desert Archaeology. |
| California | 1962 | Roger Desautels establishes Scientific Resource Surveys (SRS) in Costa Mesa (?). First big job is survey at Amchitka Island nuclear test site. |
| California | 1965 | Roberta Greenwood conducts her first fully funded salvage project, completing a transition from volunteer-based efforts. |
| Delaware | 1977 | MAAR Associates, Inc., founded |
| Georgia | 1976 | Pat Garrow establishes a CRM program at Soil Systems, Inc. (SSI). |
| Georgia | late 1970 | Dean Wood establishes CRM program at Southeastern Wildlife Services in Athens; program becomes Southeastern Archaeological Services. |
| Hawaii | 1971 | Francis Ching establishes Archaeological Research Center Hawaii (ARCH) to do contract archaeology. |
| Idaho | 1977 | Loralea Hudson, George Gauzza, Jr., and Gary Ayers incorporate as Cultural Resource Consultants, Inc. |
| Iowa | ca. 1971 | Mike Weichman (sp?) may have been the first to incorporate as a private CRM firm, but soon moved away. |
| Iowa | 1973 | Environmental Research Center established in Iowa City. |
| Iowa | "early 1970s" | David Stanley establishes Bear Creek Archaeology, an ongoing CRM firm. |
| Kentucky | 1974 | Ohio Valley Archaeological Research Services Associates (OVARA) does the first private-sector CRM |
| | | in the state. Ca. 1977, OVARA became Archaeological Services of Kentucky (ASK). |
| Louisiana | late 1970s | Prentice Thomas and Jan Campbell establish New World Research in New Orleans, later moving the firm to Pollock in central Louisiana. |
| Maryland | ca. 1967 | Glenn Little founds Contract Archaeology, Inc. |
| Michigan | ca. 1973 | Earl Prahl of Commonwealth Associates, Inc. (for-profit A&E firm), hires archaeologists for electric utilities. |
| New Jersey | 1960s | Ed Rutch founds Historic Conservation and Interpretation, Inc. |
| New Jersey | 1981 | John Hotopp founds cultural resource program at Louis Berger and Associates, an engineering company. |
| North Carolina | 1971 | Contract Archaeology, Inc., excavates the North Carolina Arsenal site for the NC Dept. of Transportation. |
| Oklahoma | 1973 | Annetta Cheek conducts a survey for the Tulsa District, COE. In the same year, she and her husband Charles then establish Archaeological Research Associates, Inc., as a non-profit firm. |
| Pennsylvania | 1972 | National Heritage Corporation of West Chester (founded in 1968) hires its first archaeologist, Bill Macdonald. The company's second archaeologist was Alex H. Townsend (1975); the third was Dan Roberts (1976). |
| South Carolina | ca. 1974-1976 | Leslie Drucker and Ron Anthony establish Carolina Archaeological Services (CAS). |
| Utah | 1976 | Richard Hauck founds Archaeological Environmental Research Corporation (AERC) in Bountiful. About the same time or slightly after, Clay Cook, Diana Anderson, and 1-2 others found Utah Archaeological Research Corporation (UTARC). |
| Utah | 1977 | Lloyd Pearson founds K. K. Pelli in Moab. |

took Riverside and San Bernardino Counties and I took San Diego and Imperial Counties. I operated as an independent CRM consultant. The state Division of Highways projects led to contract work with the San Diego State University Foundation in 1971 and 1973. In 1972, I went to work for David D. Smith & Associates, which was one of the earliest post-NEPA and [post-] Section 106 firms in California. I took a leave of absence to do the 1973 Kitchen Creek dig on Interstate 8 but returned to DDS in 1973. DDS&A dominated the San Diego scene until Westec Services

and Recon formed in 1973-1974. By 1974, CRM was commonplace in California."

Southwest

Private, for-profit CRM seems to have started late in the Southwest, perhaps because of the strength of the institutional CRM programs (the CRM era arguably began with a 1950 museum-based pipeline archaeology project in Arizona and New

Mexico, and with the subsequent establishment of a permanent highway salvage program in New Mexico in 1954). The earliest private, for-profit CRM company in the region was probably ARS. In August 1974, Lyle Stone founded Archaeological Research Services in Arizona. He described how it happened: "While in Michigan between 1965 and mid-1974, and while Staff Archaeologist for the Mackinac Island State Park Commission (For Michilimackinac and Fort Mackinac) I had the opportunity (taking one day per week leave from my state job) in late 1973 and into 1974 to work on a part-time consultant basis for Commonwealth Associates in Jackson, Michigan, and thereby had the opportunity to get involved in some very early CRM, helping set up the CRM division, doing research and writing reports, and I liked it. Also, I had a lot of what I thought were new and innovative ideas about archaeology and state parks but my position, while good and stable, wasn't one in which it was useful to rock the boat; I needed an outlet to do some things on my own. In addition, I found myself becoming somewhat of an officious bureaucrat and didn't like the feeling; at that point I knew that I could serve the resource, the profession, and the public in a better way. So . . . my wife (an Arizona native almost) and I decided to set out for Arizona and go into CRM as our business and be closer to family; we also had two kids at the time and I wanted them to have the Arizona experience. So, partly personal and partly professional. At least I had some freedom of thought away from the university and bureaucratic atmosphere, and had some specific things in mind that I wanted to do in CRM. My business took off after a while, and I'm still at it full time."

Margerie Green writes, "I believe my company, Archaeological Consulting Services, Ltd., was the second [firm in Arizona]; we started in 1977. It is quite possible that there were others starting up in other parts of the state that we didn't hear about until later because everyone's operation was quite small back then." She adds, "I think the things that convinced clients to go private was the greater flexibility/availability of the little guys, the fact that they were cheaper than universities, and the fact that we weren't associated with a large bureaucracy."

In 1981, after leaving a California teaching job, this author founded a branch office for New World Research in Tucson; a few weeks later Bill Doelle and Linda Mayro returned to Tucson after doing MX missile surveys, and started Desert Archaeology. This was the start of the private sector CRM boom in Tucson.

Intermountain States

Mike Polk provides the following account of the start of private-sector CRM in Idaho: "I was a graduate student at Idaho State University between 1973 and 1975 and worked under the two most prominent archaeologists in the state at the time, Earl Swanson and Bob Butler. I continued to have contacts (and still

do) in that state and it was sometime after my departure that CRM as we know it today began there. Idaho State and the University of Idaho did quite a lot of CRM work during the 1873-1976 period, but private institutional work didn't begin until 1977."

"Idaho has never had very many companies. From the most recent 'Directory of Idaho Archaeologists' that I have (dated January 1999), there are only, at most, six consulting companies with more than one individual in them (three of which are local, the rest being satellite offices of out-of-state companies). From Loralea Hudson (now with Northwest Archaeological Associates, Inc. in Seattle), I received the following information . . . She began, undoubtedly, the first CRM company in the state."

Hudson's information, provided by Polk: "I started my company in 1977; we actually got together in 1976 but I believe the incorporation (Idaho) papers were January 1977. The corporation, Cultural Resource Consultants, Inc. (CRC), was based in Sandpoint, Idaho, and the owners were me, Gorge F. Gauzza, Jr., and Gary G. Ayers. All University of Idaho graduates, I might add. Gary and I were graduate students in Anthro and George received his B.A. in History. . . . I think my last contract at CRC was [in] 1987 or 1988. . . . CRC was always the "biggest" CRM [firm] in north Idaho. . . . Others . . . well, Dave and Jennifer Chance had a company in the late 1980s, but that [was] basically a one-person shop. . . . For the most part it was one-person operations, maybe hiring (contracting!!) a person or two for a specific project."

Polk remarks that private sector CRM did not become commonplace in Idaho until the late 1980s, adding, "Even today, Idaho State University runs a contracting program and gets a fair share of work in southeastern Idaho."

In discussing Utah, Polk reports: "While I know that the University of Utah and Brigham Young University were doing archaeological contract work earlier, I believe (but am not completely sure) that Richard (Rick) Hauck began his company called AERC (Archaeological Environmental Research Corporation) in Bountiful, Utah, about 1978. It is still in business under Rick's ownership. Another company that began about this same time, perhaps slightly later, was Utah Archaeological Research Corporation (UTARC), under the ownership of three to four people, including Clay Cook (now out of the field [and] living in California), and Diana Christenson, now archaeologist for the BLM Arizona Strip Field Office in St. George, Utah. UTARC folded in the early 1980s."

In a later e-mail message, Polk corrects the founding date for AERC to 1976. He adds that another firm "close on the heels of AERC was K. K. Pelli (company name) of Moab, Utah. That was operated by Lloyd Pierson beginning in 1977. Lloyd is now retired and still living in Moab."

Polk goes on to describe subsequent developments in

Utah: "By the early 1980s (before the big energy development business shakeout in 1985-1986), CRM companies were well established in Utah. At that time AERC, UTARC, Abajo Archaeology (in Bluff, Utah), Environmental Consultants, Inc., in Ogden (begun in 1981; later to become my company, Sagebrush Consultants), P-III Associates in Salt Lake City (begun in 1980), and, perhaps, Senco-Phoenix in Salt Lake City (later moved to Pleasant) were in place."

Midwest

Adrian Anderson provides the following extended account of the early years of private CRM in Iowa: "When I become SHPO (SLO, then) in 1971 one of the first tasks became educating the professionals (academics, except for NPS archaeologists at Effigy Mounds National Monument) into the world of 106 and CRM. Everyone wanted contracts—they had been engaged in "highway salvage"projects since about 1966—and most absolutely refused to lay out a scope of work that required them to complete a project in a timely manner. The first meeting of the Association of Iowa Archaeologists was spent going through the law and rules, and the most acrimonious aspect of the meeting was the [failure] of participants to understand that SHPO could not keep bidders from outside Iowa out of "their" market. The State Archaeologist wanted to run the contracting—and engage in contracting—no conflict of interest there!

"I think perhaps Mike Weichman (sp?) may have been one of the first to incorporate as an individual. He soon moved to Missouri, though, working for the state. David Stanley, with his Bear Creek Archaeology, was one of the first to actually form an ongoing business, early in the 1970s."

Michael Weichman provides slightly different information for Iowa. The first firm Weichman is aware of in that state was the Environmental Research Center in Iowa City. Weichman confirms that the Iowa SHPO played a role in encouraging the development of private sector consulting, and adds that such consulting was common in Iowa by 1979-1980.

According to Donald J. Weir, "I don't know who was the first, but I was hired in late 1973 by Commonwealth Associates, Inc., a for-profit architecture and engineering firm, of Jackson, Michigan, to undertake [an] archaeological project for large utility companies, primarily electrical transmission and power generation [companies]. I was hired by the late Dr. Earl Prahl and was the third archaeologist on staff." Also according to Weir and Tom King, in 1974 or 1975 Prahl was replaced by Jim Fitting. King adds, "Jim came out of academia and shortly after moving to Commonwealth began promoting 'client-oriented archaeology,' Earl moved East to take over the job I'd held at the New York Archaeological Council when I went to NPS-Washington in 1976."

James Robertson adds, "Fitting taught, I believe, at Case Western followed by his tenure as the first State Archaeologist in Michigan. Subsequently, Fitting joined Commonwealth Associates, Inc., which shortly thereafter merged with Gilbert and became Gilbert/Commonwealth, which ultimately gave birth to the independent company Commonwealth Cultural Resources Group, Inc., of Jackson, Michigan (and other office locations), headed by Don Weir, another board member of ACRA (who worked directly under Prahl and then Fitting before taking the helm himself at C/C and founding CCRG).

According to Charles Cheek, "When I moved to Oklahoma in 1972, I do not think there were any contract firms based in [the state]; perhaps some from Texas worked in the area. At least the other firms were not on my radar as I was busy with my first teaching job. My wife, Annetta, did not have a job, so she contracted with the Tulsa District Corps to undertake a survey in 1973. She was aware of NHPA and recognized the possibilities for gainful employment in it. We then formed a non-profit firm, Archaeological Research Associates (ARA), to do contract work in that year. (We found out later that there was a number of other firms that had that name in other states.) We became non-profit because we did not want to have to worry about the tax picture and may have felt that the clients would be more responsive to that as well. . . . We were non-profit but had the same issues as for a [for] profit firm."

Mid-Atlantic States and Northeast

According to Joel Klein, "Ed Rutch founded his firm, Historic Conservation and Interpretation, Inc., sometime in the (early?) 1960s—long before NHPA. Ed was primarily an industrial archaeologist but he also did historic and prehistoric archaeology. He was/is based in Newton, N.J."

According to Ron Thomas, "My earliest recollection of a CRM firm operating in the Eastern U.S. was the one operated by Glen Little sometime in the late 1960s. I recall excavating at the Indian Queen Tavern in Charlestown, Maryland." Charles Cheek expanded on this posting by stating: "Ron Thomas is right. Glenn Little hired me (while [I was] a graduate student) in 1967 to work as crew for his firm Contract Archaeology, Inc. Glenn was a graduate student at Catholic University at the time (where I had been an undergraduate and had done some volunteer work for him . . .). I think he had been part of a cadre of students who had been mustered to lobby for NHPA in the mid-1960s. In conversations with him at the time, it was clear that he thought that privatefirm archaeology was the future of archaeology. I was hired to work on a National Park Service project for Glenn in Washington, D.C., that summer. Harvard Ayers, now a professor at Appalachian State (Ph.D. from Catholic University) was the site supervisor.

"Glenn also had other projects including the Paca House in Annapolis. This was during the restoration of the house and he hired Stanley South, whom he had worked for previously, to direct the project. I don't know if Glenn's firm was first, but it was close, and was directly inspired by the potential of NHPA. Unfortunately, Glenn had heart problems and left archaeology within a few years of starting his company and I lost track of him years ago."

According to James Robertson, "Alex Townsend was the first archaeologist with National Heritage Corp. (among the earliest firms to consider both archaeology and architecture in preservation), [which was] started by renowned preservation/restoration archaeologist John Milner. This was the predecessor [company to] John Milner Associates, Inc., of West Chester, Pa. (and other office locations). Townsend's successor was Dan Roberts of JMA, a current board member of ACRA."

Dan Roberts amplifies on Robertson's posting: "Bill MacDonald was the first archaeologist hired at National Heritage Corporation of West Chester, Pa. I believe this was in 1972. National Heritage Corporation was founded in 1968, primarily as an architectural restoration firm, and changed its name to John Milner Associates, Inc., in 1977. Alex H. Townsend was JMA's second archaeologist (McDonald left for the University of Michigan in 1975) and I was hired as the firm's third archaeologist in 1976."

Kay Simpson remarks on the establishment of the Cultural Resource Division of Louis Berger: "Dr. John Hotopp founded the division in 1981 out of our corporate office in New Jersey. I've never worked in N.J. so I don't know how we fit within the history of the state's CRM program [but] we've been around a long time (in CRM years!). The company, of course, is much older (founded 1953)."

Southeast

Tom Padgett writes, "The earliest CRM work I know about in North Carolina was done by Contract Archaeology, Inc., a firm hired by the N.C. Dept. of Transportation in 1971 to conduct excavations at the North Carolina Arsenal Site in Fayetteville. . . . The University of North Carolina at Chapel Hill had done some [reservoir] work previously . . . but Contract Archaeology, Inc., is the first private firm I know of for this state."

Thomas Sanders writes, "The first individual/firm to do CRM work in Kentucky on a non-institutional, for-profit basis was Ohio Valley Archaeological Research Associates (OVARA). . . . The year was 1974." He adds, "In 1974 a new State Historic Preservation Officer (Eldred Melton) was appointed in Kentucky. [Melton] brought a professional staff to the SHPO's office. In particular, Section 106 and EO 11593 requirements were enforced. This resulted in numerous requests, starting in 1974, to the University of Kentucky's Department of Anthropology for

archaeological assessments on small projects. The Department of Anthropology was not prepared for such work, though they had long been involved in substantial undertakings such as reservoir salvage and, more recently, federal highway construction projects. With the approval of Dr. Lathel Duffield, several graduate students (Lloyd Chapman, Roger Allen, C. Wesley Cowan, and Betty McGraw) went together and formed OVARA [Ohio Valley Archaeological Research Associates] to deal with these small projects. Lloyd Chapman did several of these small surveys in the weeks before OVARA was formed, and may have been the first private, non-institutional CRM archaeologist in Kentucky. OVARA continued to do these small projects for several years. It was reformed about 1977 under the name ASK (Archaeological Services of Kentucky), by several of the same individuals."Sanders concludes by stating that by 1980 there were several private firms working in Kentucky; by 1984 the industry was well established there.

According to Pat Garrow, "I was one of the first in the South to start a CRM program in a private firm. I built a program at Soil Systems, Inc., starting in 1976, that was billing \$2-\$3 million a year by 1980 or so." He latter expanded on this: "I met the people at Soil Systems while employed at the North Carolina Archaeology Branch. [SSI] expressed an interest in starting an archaeology practice at their firm, and first tried to recruit Steve Gluckman, who headed the Branch. Steve told them he would consider it if they would also hire me to do the actual work while he saw to long range planning for the program. They then decided to bypass Steve and offer me the job instead.

"The Soil Systems offer came at a good point in my life. I had just come off a serious illness that had kept me out of work for several weeks, and I had [used] that time to review my career and decide what I really wanted to do in the future. I had already tried teaching at the college level and decided that wasn't for me, and had done a year of barely supported research on a site in northern Georgia, and decided I did not want to live grant to grant. The private sector seemed to be a new and exciting area, and I decided to give it a try. "I was the first archaeologist hired at Soil Systems, and remained in technical charge of their archaeology practice until I left in 1983 to help my wife form Garrow & Associates, Inc. During my time [at SSI] the program grew to be either the biggest or one of the biggest in the country. Soil Systems was bought by a holding company in 1980, and they began to take real control of the program in 1982. The company was out of the archaeology business shortly after I left in 1983.

"The person who made the decision initially to build an archaeological program was a Senior Vice President in charge of the environmental division. He thought it might eventually bring as much as \$5,000 a month."

J. W. "Joe" Joseph provides additional information on

early CRM in the Southeast: "I started work in the southeast in 1976, so a few years late to provide the earliest CRM history around here. At that time the major players, from my perspective, were the universities (South Carolina Institute of Archaeology and U. Tennessee anthro were my earliest employers). Leslie Drucker and Ron Anthony had started Carolina Archaeological Services (CAS) in SC . . . between 1974 and 1976, I believe. Pat Garrow had been hired by Soil Systems, Inc. in Atlanta around this time . . and was beginning to build SSI's program.

Prentice Thomas and Jan Campbell would have established New World Research in Florida [actually Louisiana?] at roughly this same time, and a little later a company called Southeastern Wildlife Services would be created in Athens, Georgia, by Hilburn (Billy) Hilstead (later of Law Environmental). [SWS] would include a cultural resource arm headed by Dean Wood—this would evolve into Southeastern Archaeological Services in the late 1970s."

Outside the Forty-Eight

Earl Neller provides the information about Hawaii. He notes contract archaeology projects by the Bishop Museum in the late 1960s, but then provides information on an early non-institutional CRM operation: "In 1971, Francis Ching established Archaeological Research Center Hawaii (ARCH) to do contract archaeology in Hawaii. Early projects were a highway survey and salvage [excavation] and portions of a statewide inventory of historic places for the SHPO. At the time it was considered heresy for anyone to be taking on archaeology besides the Bishop Museum."

According to Leonard Voellinger, "My first non-university experience was with the Arctic Company. In the early 1970s they surveyed the Alaska Pipeline. I worked for them in 1976." In a separate e-mail message he explains that "The Arctic Co. was established as a contractor to do environmental work on the Alaska Pipeline, probably by 1973 or 1974."

Why Did Private Sector CRM Take Off?

When private sector CRM got started, it did so in the face of established institutional programs. How did the private sector operations manage this? As one of the first private sector practitioners, Roberta Greenwood attributes her ability to obtain work to her existing track record: "I already had a substantial body of work which was recognized. [To provide] just one example, the work at the Browne Site (CA-VEN-150), which became SAA Memoir No. 23. I did not count that as a "first" [private sector job]—even though done in 1959-1960—because it was an unpaid undertaking accomplished with volunteers. I had directed other

excavations as well, for UCLA and others, that were not direct contracts to me."

Ron May discusses the growth of the field in southern California: "Tom King served as Chief Archaeologist, University of California, Los Angeles, in the late 1960s/early 1970s and promoted archaeology via federal historic preservation regulations. He recruited supporters from museums, academia, and SRS in his efforts to force the Bureau of Land Management and Army Corps of Engineers to do archaeology in the course of their projects. He got the Society for California Archaeology to host a two-day training course in either 1969 or 1970 for the California Division of Highway and then they created contract positions for "District Liaison Archaeologists" to serve as go-betweens to take engineering designs to institutional sources for record searches. He appointed me to one of those roles in 1970."

Speaking of the operation started with his wife in 1973, in Oklahoma, Charles Cheek writes: "Actually, we did not have to do much in the way of convincing. We were about the only non-state agency doing work in Eastern Oklahoma. We had credentials (Ph.D. and ABD from U. of Arizona). I suspect we were competitive. Our overhead was ridiculously low, about 15 percent if I remember correctly. It was low only partially because we wanted to be competitive but also because we had no idea how a business, for profit or non-profit, was run." Cheek states that private-sector CRM was commonplace in Oklahoma by the mid-1970s, "but much of it was from Texas [firms]."

Looking at the Great Basin area, Mike Polk remarks: "I believe the most persuasive part of the equation was oil and gas development in the Intermountain area in the late 1970s. Also part of this trend was oil shale development and the infamous MX [missile] project in adjacent Nevada. Business was exploding and companies were desperate for archaeologists to do clearance projects on well pads and roads and to do geophysical surveys in Utah and surrounding states. I understand from Clay Cook, formerly of UTARC, that in 1979 he had a three week backlog of well pad surveys charging out at \$1,000 each! At this time in Laramie, Wyoming, John Greer and his company Archaeological Services, Inc., had 150 people stationed in various places in the field, from New Mexico to Montana, South Dakota, and Idaho. Universities and colleges with their schedules, long time frames, and academically oriented approaches were likely a frustrating option for private development people. Private enterprise was a welcome addition to the field."

In a later e-mail message, Polk adds to this thought: "While oil and gas development was certainly the impetus for private enterprise to develop in CRM [in the Intermountain area], the underlying causes obviously relate back to increasing understanding and enforcement of NHPA and NEPA requirements by the BLM and, to a lesser extent, the USFS. Probably adding to

this was the fact that most of the BLM districts were, at the time, hiring archaeologists for the first time so there was a person in each district beginning to enforce the requirements, whereas earlier it was generally up to a recreation planner or a generalized environmental office. While the BLM and USFS would say that their personnel would and could carry out inventories for the developers, the waiting time was usually one to two years. The urgent need for drilling and exploration thus demanded more immediate inventories Hence the hiring of cultural resource specialists, particularly those who could respond most rapidly, i.e., private firms."

In writing about the success of CRC, Inc., started in Idaho in 1977, Polk notes that the founders were "local university products" so that "contacts and legitimacy had already been established" with potential local clients.

Writing about the East, J. W. "Joe" Joseph states, "From my experience there were two models of privatization. The first was engineering firms that branched into environmental studies and were then seeing a need for archaeology. This was the Soil Systems model, with Pat Garrow in Atlanta. [SSI was] Tom Wheaton's first employer in archaeology about 1977. While I never worked for SSI I did work for Commonwealth on the Russell Reservoir Project in the late 1970s and early 1980s. I think projects like Russell, . . . Cooper River Rediversion, [and] Tennessee Tombigbee were too big for any university to take on and so opened the door for other CRM players, some of whom, such as SSI, Commonwealth, and Louis Berger, were becoming almost national in scope by the late 1970s.

"The other model was independent archaeologists (in your CRM history make sure you have a place for the role of couples—Leslie Drucker and Ron Anthony of CAS, Prentice Thomas and Jan Campbell of New World, in 1984 Pat and Barbara Garrow, who would become my employers at Garrow & Associates) who saw a chance to make a living in something other than academic settings (or, conversely, who couldn't find academic or other university jobs)."

My own impression is that the institutions unwittingly helped set the stage for their displacement by private firms. Until the 1960s, "salvage archaeology" had been done by those institutions in accordance with long-standing "gentlemen's agreements" under which each institution had its own territory or research interests (or both) and other institutions did not trespass. "Salvage archaeology" done in this milieu was consciously noncompetitive. In the 1960s, however, institutions (or perhaps more precisely, a new generation of professors at those institutions) began actively competing with each other over the rapidly growing funding pool in salvage archaeology, and their efforts to get a crack at contracts helped turn the funding process into one that was openly competitive. This made it easier for private firms to

break into the contract archaeology game.

This personal impression is supported by Leonard Voellinger's observations. He states, "During the late 1960s and early 1970s numerous professors and research assistants began "moonlighting" and hiring graduate students to assist them with projects. I suppose these moonlighting professors were the incipient professional CRMers." In a later e-mail, Voellinger provides his personal experiences along these lines: "I came into contract work in the early 1970s, as a student at George Washington University in D.C. We did contract work for the Corps of Engineers along the Potomac River, and [for the Washington Suburban Sanitary Commission] along the Anacostia River . . . The P.I. was a professor, and my pay checks came from the University . . . Later he went to work for the Arctic Company's subsidiary, Iroquois Research Institute, and hired me to do more Corps work . . . Early in my career in CRM I came across lots of people (namely Rollin Pangborn in Missouri, C. Wade Meade in Louisiana, [and] Gregory Perino in Oklahoma and Iowa) who had been working for professors at universities, as para-professionals who went out on their own (Meade was a history teacher doing archaeology) —as well as professors who were [consulting] (and still do)."

The emergence of open competition among institutional sources of CRM (including those moonlighting professors)—in lieu of the former exclusive institutional turfs—helped set the stage for competitive private-sector CRM.

In 1976, the field was well enough established itself to merit a publication edited by William K. McDonald: Digging for Gold: Papers on Archaeology for Profit (Museum of Anthropology, University of Michigan, Ann Arbor). The data gathered through the ACRA-L poll supports the idea that by that year, private, for-profit CRM was spreading rapidly in the United States. The poll's results also indicate that the rapid growth of the field was preceded by years of effort by a few pioneers. Their early work undoubtedly was critical in building a sense among clients that the private sector was a legitimate alternative to institution-based programs. Much of the current demand for CRM in this country is derived from the National Historic Preservation Act and other federal law. but nothing in that law mandated the emergence of a private industry to provide CRM services. Those of us who routinely provide such services on a private, for-profit basis owe a great deal to the handful of professionals who first did CRM as a business.

DEVELOPING A VIABLE CRM-BASED GRADUATE PROGRAM FOR PUBLIC AND CULTURAL HISTORIANS

Submitted By Diana Sepulveda Jarvis Godwin, Ph.D Historic Preservation Services

Cultural Resource Management is a profession which employs large numbers of archaeologists and anthropologists, yet it also has a consistent need for reliably trained, well-prepared historians. Archaeology and Anthropology consistently produce competent graduates who can crossover to explore the disciplines of history yet fewer historians successfully make the transition to the CRM field immediately upon graduation. The difference most likely originates in the limited fieldwork experience available to historians-in-training in many programs. In-class field training must also be supported by extensive and satisfying internship experiences. Interns must demonstrate their usefulness to a CRM company by possessing the basic skills demanded by the industry and their potential future employers.

The successful preparation of students for CRM work demands a broad interdisciplinary approach that ultimately diminishes the divide between the professions of history and archaeology/anthropology. Each discipline is trained to record details of the past in its own way, yet the methods of training and research are quite different. Historians tend to concentrate on traditional research and writing methods and archaeologists normally engage in extensive fieldwork from the earliest stages of their studies. In many CRM projects, archaeologists are often responsible for the work that historians are specifically prepared to do, sometimes with inadequate training and experience in the methodologies of historical research and analysis.

Any program which proposes to produce graduate students who can be immediately effective in CRM projects must also make sure that these students become proficient in the techniques of field assessment, documentation, project management, and report production. The CRM field requires versatility, an interdisplinary approach, basic management and business skills, and the ability to be an acute observer.

CRM majors must be able to use and understand the vocabularies of archaeology, anthropology, architectural history, and traditional history as well as possess a deep knowledge of the specialized language of the National Park Service and its relevant branches, including those responsible for the National Register of Historic Places and the Section 106 Review process. In the past, this information was largely learned haphazardly and directly through on-the-job experience.

The current climate for CRM work demands not only basic proficiency but also requires a realistic knowledge of the immediate demands and constraints of the work. Public History

and CRM programs are proliferating throughout the nation but are their graduates truly prepared to participate in full-fledged research, documentation, and field projects in the field of Cultural Resource Management immediately upon graduation?

Many current "CRM" or "Public History" programs reflect the divide between academia and the practical application of historical methods to actual CRM projects.

A program that will consistently produce productive and effective CRM and Public History Specialists must provide exposure to the common knowledge base required to complete the typical and atypical CRM contracts. CRM Projects are extremely diverse and require many different skills including mapping, research, a knowledge of architectural history, GIS/GPS, photography and effective narrative writing skills. Those most active in the field realize that flexibility and ingenuity are prized attributes in CRM work since few projects require the same identical approach and new solutions must often be devised to suit varying field and research characteristics.

The most valuable Public History/CRM program would produce professional Cultural Historians knowledgeable in the vocabularies of the Anthropology and Archaeology disciplines, with basic archival and oral history skills who are capable of synthesizing many forms of historic and cultural information into professional reports. Versatility and the ability to quickly learn new techniques and methods also are required because of the diversity of CRM projects.

The development of a curriculum based not only on the high standards of the profession of History but also upon the specific needs of Cultural Resource Management as defined by the National Park Service and other relevant federal, state, and local agencies would benefit not only the graduate students who pursue nonacademic historical career paths; it also would benefit the fields of Cultural Resource Management, Historic Preservation and Conservation, Museum Studies, and Archival management and research.

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2003 ACRA AWARDS

Submitted By Charissa Wang, Hardlines Design Company Awards Committee Chair

The 2003 ACRA Awards were presented on Saturday, September 13, 2003, during the luncheon held at the historic Stoneleigh Hotel during the ninth annual conference of the American Cultural Resources Association in Dallas, Texas. The ACRA Awards honor people and projects that represent outstanding research, management, and commitment to our nation's cultural resources.

Past winners have run the full range of cultural resources projects. They have included public interaction and discussion at active archaeological excavations, unique traveling exhibit highlighting Native American relations during a dam construction project, public parks featuring restored architectural structures and archeological features, and an archeology excavation and permanent exhibit sponsored by the Pittsburgh Pirates.

This year's guest speaker and presenter was Ms. Loretta Lautzenheiser, President of Coastal Carolina Research, Inc., in Tarboro, North Carolina, and the outgoing President of ACRA.

This year's jury consisted of:

Anne Lee - an archeologist and faunal analyst with Hardlines Design Company in Columbus, Ohio;

Charlene Roise - a historian and President of Hess, Roise Company, a cultural resources firm located in Minneapolis, Minnesota; and

Jeanne Ward - an archeologist and President of Applied Archaeology & History Associates, Inc., of Annapolis, Maryland.

This year's jury elected to make three wards: Quality Product, Government, and Public Service.

The ACRA Quality Product Award recognizes an ACRA company's innovative or long- term research, preservation of a cultural resource for future generations (such as a building or archeological site), or an outstanding report, brochure, book, etc.

This year's Quality Product Award recognizes The Louis Berger Group, Inc., and the Virginia Department of Transportation for the substantial research of the 10,000-year-old Brook Run Jasper Quarry in Culpepper County, Virginia. The site was determined to be of national significance, and the project included development and implementation of a data recovery plan as well as a plan to protect and preserve the site during construction.

Jurors stated that the report generated for the project will be a "valuable resource for researchers both within and outside the mid-Atlantic region" and noted that companies will sure to be "citing this report for years to come." One juror even concluded her analysis with "can I keep the material?"

This project was sponsored by the Virginia Department of Transportation with a duration of 2 1/2 years. The challenge of this project lay in the fact that this type of site had not previously been identified in Piedmont Virginia, or even in the Eastern United States.

Archeologists completed extensive manual excavations and utilized specialized analyses for the first time in Virginia, such as radiometric dating, pollen and phytolith evidence, petroglyph analysis, and Instrument Neutron Activation Analysis. Site boundaries were determined using remote sensing.

In addition to the data recovery report, this project resulted in numerous public outreach products. These included a 30-minute



Loretta Lautzenheiser (left) presents the award to Kay Simpson.

educational video that aired on 3 Virginia PBS stations; an educational exhibit at the Museum of Virginia Historical Society; and the project was featured on the 2002 Virginia Archeology Month poster.

Archeologists collaborated with highway engineers to redesign the roadway improvements to avoid impacting the core area of the site. As a result of this coordination, future scientific analysis will allow archeologists to learn more about this important site unique in the prehistory of Virginia and the Eastern United States.

Ms. Kay Simpson of The Louis Berger Group, Inc., of Richmond, Virginia, accepted the award.

The ACRA Government Award is awarded to a SHPO, employee of a SHPO, government agency (federal, state, county, or municipal), or employee of a government agency that has worked with a CRM company or companies in a cooperative and supportive way in protecting cultural resources.

This year's government award recognizes the efforts of the Texas Department of Transportation in going above and beyond minimum requirements when balancing roadway improvements with cultural resources. Of particular note is the agency's commitment to including the voice of the local community.

Jury comments included "above and beyond compliance into the realm of sincere service to the community;" "way beyond what state transportation departments typically think is their responsibility" and "should be commended for initiating, funding and encouraging this level of excellence."

Three projects were highlighted. First, the mitigation of the Hancock Farmstead resulted in a historic and prehistoric technical report and a history curriculum for 7th grade children. This curriculum involves giving basic information to teachers and students; using classroom activities to simulate archeological analysis and interpretation; the part excavation plays in an overall archeology project; and the potential significance of even the smallest artifact.

Second, the mitigation of Mission Refugio focused on the Spanish Colonial period. State of the art osteological analyses were conducted to ascertain ancestry of health status of Mission population during this period. Public outreach efforts include weekly public briefings, brochures, a traveling exhibit, a video, and

contributions to the Texas Beyond History website.

Finally, the Freedman's Cemetery project entailed the removal of 1150 burials in an African American cemetery. The project included collaborations between the Texas DOT, an ACRA consulting firm, an African American museum and an African American historical group. The team used archival research, oral interviews, archeological data, and osteological data to tell the story of a Pioneer black community from 1865 to 1925. Public outreach programs included educational curriculum for 3rd grade children and a state of the art multimedia exhibit at the local African American museum.

Dr. Nancy Kenmotsu, Dr. Ann Irwin, and Dr. Owen Lindauer of the Archeology Studies Program of the Texas Department of Transportation were present to accept the award.



Loretta Lautzenheiser presents the award to Dr. Owen Lindauer (far left), Dr. Nancy Kenmotsu (center right), and Dr. Ann Irwin (far right).

The ACRA Public Service Award is awarded to a CRM firm or employee of a CRM firm that has worked with the community in a cooperative and supportive way in protecting cultural resources. This year's public service award recognizes the commitment to education, CRM legislation, and volunteerism of Al Tonetti of the ASC Group, Inc., of Columbus, Ohio.

Jurors familiar with Al's work noted that he has "worked tirelessly on behalf of Ohio's professional archeologists and has long been committed to the promotion of archeological preservation in the state." Another stated "I wish all archeologists would put so much effort into what can be more of a calling than a job."

For the past 27 years, Al has worked as a consulting archeologist in Indiana and Ohio as a self-employed consultant, a state archeologist, and finally as an employee of a CRM company.

Al served 2 terms as the President of the Ohio Archaeology Council, where he developed its conference and publication series, the proceeds of which fund the research grant program. He also has served as the State Network Coordinator for the SAA's Public Education Committee and is Ohio's Government Affairs Network State Representative for the SAA's Government Affairs Committee.

Recently, AI has prepared and delivered testimony to the Ohio House Select Committee Studying the Effectiveness of Ohio's Historical Programs and Partnerships, to improve coordination between archeology and Native



Loretta Lautzenheiser presents the award to Al Tonetti.

American communities. His cost estimates were included in the state's biennial budget bill.

Al's volunteer activities include conducting the Careers in Archeology program for Columbus Public High School students during Ohio Archeology Week. He participates regularly in career day programs in middle and high schools, and has personally mentored dozens of middle and high school student "shadowing" and extended internship experiences, including Chilean exchange students.

For his outstanding commitment to public education, improved legislation, and as a model for inspiring students in a career in archeology, ACRA recognized Mr. Al Tonetti, the Education Coordinator for ASC Group, Inc., of Columbus, Ohio.

TRANSPORATION ENHANCEMENTS SAVED

Prepared by Nellie L. Longsworth

On Thursday, September 4, during consideration of the FY04 Transportation Appropriations bill, the full House voted to retain the funding mandate for Transportation Enhancements (TE). The vote was 327-90 with 132 Republicans joining 194 Democrats and 1 Independent in removing the language inserted during House committee action giving States discretionary use of their TE money. In a simpler sense, this vote supported the current law, as written in TEA-21 and was a setback to Committee Chair Istook (R-OK) who, like many, tried to change the law through the appropriation, rather than the reauthorization process.

Grassroots support for the TEs was vocal and persuasive and included the support of many groups and organizations throughout the country. Had the vote failed to support mandatory funding of TEs in appropriations, there might have been an effort to make the TE program discretionary in the reauthorization on the horizon.

The highway program has always been a struggle between users and communities whose citizens believe they have a stake in the spending, as it is their gasoline taxes that underwrite highway construction. Prior to 1991 and the enactment of ISTEA with the TE requirements, communities were victims of federal and state highway planning that spawned dislocation and disruption in the paving of America.

ON THE MOVE

Cultural Heritage Research Services, Inc. (CHRS), welcomes Thomas E. Tolley to their North Wales, Pennsylvania, office where he will serve as a Project Manager. Thomas comes to CHRS from Statistical Research, Inc., of Tucson, Arizona. Tom has conducted projects in Arizona, California, New Jersey, New Mexico, New York, and Pennsylvania, as well as in Italy. He also has worked with research projects in England and Palestine. Tom received his B.A. in Classical Archaeology from The University of Arizona, and his M.A. with honors in Anthropology (Historical Archaeology) from Syracuse University. Thomas is also a member of the Register of Professional Archaeologists (RPA).

CHRS, established in 1981, is a leading CRM firm in the mid-Atlantic region. They provide a wide variety of historic architectural and archaeological services to governmental agencies, private clients, specialized CRM firms who require CHRS' wide range of expertise to fully satisfy their clients' needs, and CRM firms who need temporary assistance due to staffing shortfalls. CHRS provides archaeological services to preservation firms, historic architectural services to archaeology firms, specialized expertise (such as historical, urban or industrial archaeology, archaeobotany, and HABS/HAER documentation) to those without such experience, and professional research and oral history expertise to everyone. Of particular interest to ACRA members may be our work in producing an assortment of public dissemination materials including video documentaries, illustrated books and booklets, brochures and pamphlets, posters, interpretive panels, displays and exhibits, and historical markers.

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ACRA Members: Want a free plug for your company? The "On The Move" column of the ACRA Edition publishes news from your company. Employee promotions, individual or firm awards, acquisitions, mergers, new offices, contracts received, new hires, etc. Send your "press releases" to editor Jeanne Harris (ejharris@aol.com) or lan Burrow (burrow@hunterresearch.com). The next deadline is 1 December.

MESSAGE FROM THE PRESIDENT

Submitted By Christopher D. Dore, ACRA President

California Conference Task Force Wanted

California ACRA members:

David DeVries of Mesa Technical has generously accepted my invitation to lead a task force of California ACRA members focused on raising awareness of and increasing attendance at the upcoming ACRA conference in Redlands/Riverside (fall 2004). I am now asking you to join Dave in this effort. Serving on this task force won't require much of your time. It will, however, require some creative thinking and it is important that we have good representation from firms of all sizes, working in all parts of the state, and working for all types of clients. Your input is, therefore, important and that is why I am asking you to join. (Plus, who knows what valuable (\$\$\$) new business contacts you will make working on this task force?)

Please accept my invitation to serve your trade association so that we can work together to achieve a better business climate for our industry. When our industry is strong, your business prospers.

See you at the conference!

New ACRA Member

Mr. Steve Conkling LSA Associates, Inc. 20 Executive Park, Suite 200 Irvine, CA 92614 949-553-0666 949-553-8076 fax steve.conkling@lsa-assoc.com

COUNCIL OF SC PROFESSIONAL ARCHAEOLOGISTS

Submitted By Lesley M. Drucker

Council president Chris Gillam reported that he plans to submit a short, published response to a largely negative one that was published in follow up to his op-ed piece in a recent issue of *The State* newspaper. Several COSCAPA members offered comments and suggestions for continuing to pursue public education through the state's major newspaper.

In addition to preparing to elect new officers for the 2004 - 2005 calendar year, COSCAPA is also reviewing the status of its own Constitution and By-Laws, especially the early (and largely forgotten) adoption of a Code of Ethics modeled after SOPA (now ROPA). Natalie Adams is coordinating this review.

At its August meeting, COSCAPA state employees reported a number of new developments at their own agencies. The Office of the State Archaeologist and SC Institute of Archaeology & Anthropology are under new directorship. According to State Archaeologist Jonathan Leader, SCIAA is resuming its original mission to foster statewide research and education. While moving ahead with plans to move its offices and curational facilities to a new location in Columbia, SCIAA also is implementing new administrative policies that are improving access to state research files and records as well as research collections.

Valerie Marcil reports that the SC-SHPO is revising its MOA templates in response to various federal guidelines. SC Dept. of Archives and History is also expanding its website to include a series of Q/A tips for users of its community grant programs and services. Chris Judge reports that the SC Heritage Trust program is holding tight as its parent agency, the SC Dept. of Natural Resources, undergoes restructuring. New acquisitions are moving slowly but surely.



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ACRA's Members-Only Listserver

ACRA now has an online discussion group just for members. "MembersOnly" is a listserver that operates much the same way as ACRA-L, with the exception that it is only available to ACRA members. Its purpose is to offer the board, members, and the executive director a venue to share the latest news from ACRA; promote dialogue between members on current issues; and enable members to post announcements or inquiries.

To subscribe to the list, a member must contact ACRA's Executive Director, Tom Wheaton. Once you have supplied Tom with your e-mail address, he will subscribe you to this list. Contact Tom at 770-498-5159 or e-mail: tomwheaton@newsouthassoc.com.

ACRA Edition offers advertising space to our members. Does your company have a special product, service, or publication that would be of interest to some aspect of the CRM community?

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2003 ACRA EDITION SCHEDULE

February 3 February 17 April 7 April 21 June 2 June 16 August 4 August 18 October 6 October 20 December 1 PRODUCTION February 17 April 21 June 16 August 18 October 20 December 15

ACRA Edition

is a bi-monthly publication of The American Cultural Resources Association. Our mission is to promote the professional, ethical and business practices of the cultural resources industry, including all of its affiliated disciplines, for the benefit of the resources, the public, and the members of the 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 federal and state legislative activities. All comments are welcome.

Please address comments to:

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or

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