

WYOMING ASSOCIATION of PROFESSIONAL ARCHEOLOGISTS

Volume 11, Number 1

NEWSLETTER

Spring 1989

MINUTES, 1988 FALL WAPA MEETING

NOVEMBER 18, 1988, 1:30 P.M.
UNIVERSITY OF WYOMING

The fall, 1988 regular meeting of the Wyoming Association of Professional Archaeologists was called to order by President Dave Vlcek at 1:30 P.M. at the Wyoming Union, University of Wyoming, Laramie, on November 18, 1988.

It was moved by Vlcek and seconded by M. Miller to accept the minutes of the Spring 1988 meeting as published in the most recent issue of the Newsletter. The motion passed unanimously.

The treasurer's report was then read by Acting Treasurer Julie Francis. Assets of approximately \$1200 were reported. It was moved by Vlcek and seconded by Carino to accept the treasurer's report as read. The motion passed unanimously.

The membership was informed of training sessions for Section 106 Compliance, sponsored by the Advisory Council for Historic Preservation. Interested individuals were urged to contact Julie Francis for further information.

Several resource area management plans have been received for review. Vlcek provided a general discussion of projects on which comment is requested by federal agencies. These include the scoping plan for the Medicine Wheel,

Cedar Canyon and Worland District RMP's. A list of potential reviewers was solicited. Volunteers included Rick Laurent, Barry Shelley, John Albanese, Dianne Berrigan, and Dave Vlcek. Francis will distribute the RMP's to these people as appropriate. Barry Shelley agreed to review the Rock Springs Wilderness EIS.

Danny Walker reviewed the goals of the American Society of Conservation Archaeology. He encouraged the membership to join and distributed forms.

IMACS SHORT FORM

BLM is contemplating instituting the use of an IMACS short form. Comment on the implementation of these was only received from five contractors holding permits in Wyoming. As decided at the recent meetings held by the BLM in Lander, these will not be used for Section 106 compliance projects. They could be used by avocational archaeologists and for sites found off-survey. It should be considered experimental until the fall of 1990, then its use for Section 106 compliance projects will be evaluated. Carl Spath pointed out that SHPO has already made up short forms for avocational use. Ed Jess expressed surprise that BLM had decided not to use the form for compliance projects and emphasized the importance of including text on any form, no matter its length or degree of computerization. Julie Francis

pointed out that WAPA, SHPO, and BLM had already discussed the use of a short form and decided against it. Dave Vlcek does not favor assigning Smithsonian site numbers to sites recorded on this form. Mary Hopkins then noted the importance of including these sites on the State Data Base (i.e., assigning site numbers) so that these sites will show up on file searches. She also noted that there had been no problem in obtaining the appropriate information to assign a site number for sites recorded by avocational archaeologists.

SHPO REPORT

Tom Marceau gave an update on current happenings in the SHPO. The principal item discussed was new policies for file searches. He noted that the Cultural Records Office is undermanned and that there is a statewide hiring freeze. Thus conditions are likely to remain as they are. Information from requests for site numbers are put on-line, and mapping of surveys with no sites recorded is approximately 12 months behind. The emphasis has been on mapping of surveys on which sites had been recorded. The policy of giving file search results over the phone has a large potential for error, therefore the decision has been made to mail out file search results. The office is hoping to mail out file searches on the same day as the request is received. The ultimate goal is to go completely to the GIS systems, and provide complete maps and sites for all file searches. Brechtel asked if file search hours can be expanded or maybe have a separate telephone line for file searches hooked to an answering machine so that people can call in anytime. Dave Vlcek asked if file searches could be requested by letter. Ed Jess asked what can be expected for file search output now

that the system is being converted to the PC and not the UW mainframe. Anthony Swenson provided sample output of file search results. Ed Jess remarked this looks better than what Colorado provides.

Tom Marceau also discussed funding for the Cultural Records Office and noted that it is not supported by file search fees. The legislature had asked to make the Cultural Records Office self-supporting; this would have amounted to charges of \$60-70 per section, which were deemed too high. A compromise was reached in that 5% of all SHPO programs are funded by file search fees, in essence not trying to support on program on an unreliable and fluctuating source of income. Last year, file searches generated approximately \$35,000. The yearly Cultural Records office budget is approximately \$80,000.

Rick Bryant then pointed out the draft of the SHPO Exclusion Policy for Class III surveys and the State Plan were available for review. Comments are due by January 1. The new WAPA executive committee will make comments to the SHPO for the organization. Rick Bryant also pointed out that reviews are up 25% from last year and that sites recorded had increased by 40%. Rick Bryant will also submit the SHPO End of the Year Report to the WAPA Newsletter. Bryant also announced that Jeff Carbody of Western Wyoming College is the recipient of a SHPO internship.

OTHER BUSINESS

Vice President Jude Carino announced the following new members: Alice Tratebas, Lynn Harrell, Greg Newberry, Kevin Thompson, Ted Hoefer, Bill Batterman, and Mark Zyniecki.

Guests Mary Beth Galvan and Bennie Keel were introduced to the

membership.

Dave Vlcek provided a brief report on the recent meetings for BLM cultural resource personnel held in Lander. Major topics discussed included the GIS and DBase management systems, seismic lines, looting, and vandalism. It was apparently impressed on the cultural resource personnel that BLM managers often view archaeology as a bottleneck. The Casper and Rock Springs districts will be hiring one enforcement ranger each. BLM's concern for public awareness also seems to be on the increase.

A brief recess was then called.

The meeting was reopened with comments on the balloting in the newsletter. A majority vote gave honorary membership status to Dr. George Frison. The voting on the bylaws must be retabulated and will be presented in the spring newsletter for revote on those changes which did not pass.

Dr. Benny Keel of the National Park Service was introduced. He spoke briefly on various activities on the national level with which the NPS is involved through the Archaeological Assistance Division. There were two information clearing houses established two years ago; first is LOOT, List of Outlaw Treachery, and the second is a LEAP, List of Educational Archaeological Projects. Loot consists of updated information on all reports of vandalism including any legal action taken against the perpetrators. LEAP is information concerning all groups nationwide which are involved in public education and awareness of archaeology. There is also information available on how to establish such a public awareness program.

Of interest to Wyoming is the

progress being made on completing curation guidelines. It will be out by May.

Within the past few days, Congress made two amendments to ARPA. They include the following four points: 1) felony threshold was reduced to \$500 from \$5,000, 2) the inclusion of "intent to damage archaeological resources" was passed, 3) Federal agencies must establish programs of public awareness, and 4) Federal agencies must develop plans to inventory their lands.

An archaeological management data base has been started in Washington. This is not an analytical tool, but for management purposes. It is not intended for site data base or inventory data because of the extreme variability of sites nationwide. This must be done on the state level through SHPO.

During this fiscal year, 12 ARPA training programs will be presented throughout the country. Such topics as site stabilization, archaeological managers training, conference on peopling of the Americas including research problems, and symposium on how to deal with the media.

In closing, it was asked, "What was the possibility of reports on general synthesis of data for public information on such projects as Dolores, New Melones, Central Arizona Project, etc.?" In response, Dr. Keel basically said it was possible and desirable but time and money appeared to be real factors - generally not enough of either.

BAIROIL OIL FIELD

The remainder of the meeting was spent discussing the Bairoil Project and problems thereof. The discussion opened with brief explanations and histories from all

agencies involved and their point of view. Representing the Rawlins BLM District was Tom Zale, district archaeologist; representing SHPO was Rick Bryant; Dianne Berrigan representing the resource plan development; and John Albanese discussing the geomorphic stratigraphic units and site potential in the area. This was to refresh the memories of those present who were not directly involved with the events, and to present in a nutshell what has happened to create the problems.

These presentations were followed by a series of questions, intermixed with some complaints, primarily directed at Tom Zale. In general, the discussion was conducted in a professional manner by all participants.

The meeting concluded with a discussion on what steps WAPA might take to prevent this from happening again in the future. It was generally concluded that if we do not act in a positive manner, the incident at Bairoil will set a precedent with the BLM accepting inadequate archaeological studies with little or no scientific substance as the standard for the future. Craig Bromley suggested WAPA notify all BLM offices to gain interested party status for future projects, so we have a better idea ahead of time what is happening. Jude Carino made a motion to have Mary Beth Galvan's signature on these letters. It was seconded by Doug McKay and passed unanimously.

It was asked by Doug McKay if this was a case for the IBLA -- Interior Board of Land Appeals. Jude Carino did not know if these are actions at Bairoil can be appealed at this time. Rick Bryant questioned whether one can go to them for an after-the-fact judgement. It was noted by Benny Keel

that some allegations presented were serious, but he questioned their verifiability. If this was all verifiable, the Inspector General should be contacted at the Department of the Interior, Washington, D.C.

Julie Francis made a motion to have Mary Beth Galvan request all information on Bairoil under the Freedom of Information Act. It was seconded by Doug McKay. In the discussion which followed, Mary Beth Galvan agreed with this, but stated there must be clear cut definitions and decide what is practical in light of the situation and economics of the organization. It was pointed out by Benny Keel that, from a NEPA perspective, the first thing that should be done would be an assessment of the EIS. Bob Nykamp suggested we assess what information we have, and then request the remainder, since there is a charge for copies. The motion previously presented was amended to allow the Executive Committee to look into the details and then go to Mary Beth Galvan with the information. This passed unanimously.

Doug McKay made the motion to form a follow-up committee to work with the Executive Committee. It was seconded by Julie Francis and passed unanimously. The committee will work with the Executive Committee and technically review all information gathered. Mary Beth Galvan will advise them. The following people volunteered to serve: Dianne Berrigan, Bill Latady, John Albanese, and Bob Nykamp. It was noted by Mary Beth Galvan that in the process of dealing with the BLM in this manner, we probably will embarrass people and may get involved in some form of legal action, but all avenues must be explored before we take steps. In the process, other interested parties such

as the Wyoming Game and Fish and Wyoming Archaeological Society should be contacted. This would act to broaden the support base for the archaeology. Concern was made over official statements from WAPA and individuals associated with WAPA. We were all urged to separate these comments to not put WAPA on the spot inadvertently.

The Spring meeting will be in Rawlins in conjunction with the spring Wyoming Archaeological Society meeting. Suggested topic of discussion was the dangers of hydrogen sulfide. The BLM management will be invited.

Julie Francis moved to adjourn at 6:00 P.M. Seconded and passed.

\$

1989 DUES NOTICE

As you all recall, 1989 dues were payable at the Spring Meeting. For those of you who were unable to attend the recent meeting in Rawlins, dues should be sent to Julie Francis, OWSA, Box 3431, University Station, Laramie, WY 82071. Please send address changes too, and these will be forwarded to the Newsletter Editor.

ONCE AGAIN, OVER HALF THE MEMBERS OF WAPA HAVE NOT PAID CURRENT YEAR DUES!!!

Those of you who owe 1989 dues are:

- Brian Aivazian
Jenny Anderson-Hartley
Bill Batterman
Lee Bonham
Karin Bridger
Craig Bromley
Mike Burney
Dan Eakin

- Gail Firebaugh
Paul Friedman
Todd Guenther
Mary Helen Hendry
Ted Hoefer
Rick Hubbard
Susan Hughes
Tom Larson
Leann McClain
Doug McKay
Lance McNeas
Mike Metcalf
Bob Nykamp
Omaha Corps of Engineers
Dave Reiss
Gene Romanski
Paul Sanders
Jack Savini
Jamie Schoen
Robert Schuyler
Alan Skinner
John Slay
Craig Smith
Greg Smith
Steve Sutter
Russ Tanner
Chris Zier
Mark Zyniecki

The following have not paid dues for either 1988 or 1989:

- Bill Eckerle
Michael Nash
Asa Nielson

REMEMBER, BY THE BYLAWS (SECTION VI, PARAGRAPH 3) MEMBERS WHOSE DUES REMAIN UNPAID AFTER TWO CONSECUTIVE MEETINGS WILL HAVE THEIR MEMBERSHIP REVOKED!!!

PAY SOON TO AVOID THE EMBARRASSEMENT OF HAVING TO REAPPLY FOR MEMBERSHIP

\$



THE UNIVERSITY OF WYOMING
DEPARTMENT OF ANTHROPOLOGY
UNIVERSITY STATION, BOX 3431
LARAMIE, WYOMING 82071

To - The WAPA Membership.

It was a thoughtful and
deeply appreciated gesture
to award the Lifetime
Membership of the Wyoming
Association of Professional
Archaeologists.

Sincerely
George C. Frison

CONSTITUTION AND BY-LAWS

WYOMING ASSOCIATION OF PROFESSIONAL ARCHAEOLOGISTS

Section I - NAME

1. The name of the organization shall be the Wyoming Association of Professional Archaeologists (WAPA), hereinafter referred to as the Association.

Section II - DURATION

1. The period of existence and duration of this Association shall be perpetual.

Section III - PURPOSE

1. The Association is a nonprofit voluntary organization that exists for the purposes of maintaining and promoting the goals of professional archaeology in the State of Wyoming.
2. These goals shall include but shall not be limited to:
 - a. establishing and promoting high standards of archaeological research, reporting and management;
 - b. establishing and promoting professional archaeological interests in political and public forums;
 - c. establishing and promoting communications with the archaeological community;
 - d. establishing and promoting forums for discussing research problems and data;
 - e. promoting public education and interest in cultural resource preservation and conservation;
 - f. promoting investigations in the fields of prehistoric and historic cultural resources;
 - g. providing Association input to appropriate State, Federal, and local agencies.

Section IV - MEMBERSHIP

1. Voting Members
 - a. Qualifications
 - i. Minimum of a BA or BS degree in Anthropology;
 - ii. Minimum of 12 months full-time professional archaeological experience in Wyoming.
 - iii. Exceptions to i and ii shall be considered on a case-by-case basis by the Association Membership and Ethics Committee;
 - iv. No breaches of the Association Code of Ethics.
 - b. Entry Procedures
 - i. Application, including submission of vitae and statement of research interests in Wyoming archaeology;
 - ii. Acceptance by majority vote of the Association Membership and Ethics Committee after review of credentials.
 - c. Rights and Duties
 - i. Adherence to the Association Code of Ethics;
 - ii. Regular participation in Association activities;
 - iii. Full voting rights in all Association business;
 - iv. Eligibility to serve as an Association officer or member of any

- Association committee;
- v. Receipt of all Association publications.
- 2. Associate Members
 - a. Qualifications
 - i. BA in, or active participation in a BA degree program in, Anthropology.
 - ii. Exceptions will be considered on a case-by-case basis by the Membership and Ethics committee.
 - b. Entry Procedures
 - i. Application, including vitae and statement of interests in Wyoming archaeology.
 - ii. Acceptance by majority vote of the Membership and Ethics Committee after review of credentials.
 - c. Rights and Duties
 - i. Adherence to the Association Code of Ethics.
 - ii. All rights of Voting Members except voting on Association business, membership on standing committees, and serving as an Association officer.
 - iii. May serve as a nonvoting member on any ad hoc committee.
 - iv. Receipt of all Association publications.
- 3. Honorary Members
 - a. Qualifications
 - i. An honorary, non-voting membership can be awarded to persons who make a significant contribution which furthers the goals of the Association.
 - b. Entry Procedures
 - i. Acceptance by the Membership and Ethics Committee, or nomination at a regular meeting, followed by a 60 percent acceptance by the voting membership.
 - c. Rights and Duties
 - i. Acceptance of the Code of Ethics.
 - ii. All rights of voting members except voting on Association business, membership on committees, and serving as an Association officer.
- 4. Institutional Members
 - a. Qualifications
 - i. An institutional, nonvoting membership can be awarded to any organization wishing to house WAPA newsletters or any other Association publications in its library.
 - b. Entry Procedures
 - i. Acceptance by the Membership and Ethics Committee, or nomination at a regular meeting, followed by a 60 percent acceptance by the voting membership.
 - c. Rights and Duties
 - i. Acceptance of the Code of Ethics.
 - ii. Receipt of all Association publications.

Section V - MEETINGS

1. The Association shall meet semi-annually in regular sessions in October-December and in February-April and on other occasions as the membership shall deem necessary. A petition by ten voting members may request that the Executive Committee call a special meeting. Notice must be placed in

- the mail at least 4 weeks prior to all meetings, regular or special.
2. Passage of a motion at a meeting shall require 51 percent sustainment by the voting members present at that regular meeting, whereas business conducted at a special meeting must be sustained by a 60 percent affirmation by the voting membership, to be contacted by mail ballot.
3. Modification of these By-laws requires a 60 percent affirmation by the voting membership.

Section VI - FINANCES

1. Dues shall be paid to the Association at rate(s) established by majority vote of the membership. Dues notices shall be sent to all members prior to the spring semi-annual meeting. Dues are payable to the treasurer by the spring semi-annual meeting.
2. Dues shall be used for the purpose of financing the business of the Association, including but not limited to fees for secretarial services, and expenses of officers incurred in the normal course of Association business.
3. If dues remain unpaid for two consecutive meetings, membership shall be revoked. Prior to revocation, delinquent dues notices shall be sent by the treasurer. If dues remain unpaid, notice of revocation shall follow. Terminated members shall have an opportunity to reapply for membership.
4. Finances shall be administered by the Treasurer. Records shall be available for inspection by the membership at all times and shall be audited for the preceding fiscal year prior to the semi-annual spring meeting.
5. Single expenditures in excess of \$200 require the prior concurrence of the President; single expenditures in excess of \$500 require the prior concurrence of the Executive Committee, and shall be within the constraints of available funds.
6. Property
 - a. The Association may receive, maintain and hold, by request, device, gift, or otherwise, either absolutely or in trust, for any of its purposes, property, either real or personal, or funds, without limitations as to amounts or values.
 - b. The Association may convey such property and invest and reinvest any principal and interest; and may direct, manage, and expand the income and principal of the Association and the agency or agencies making such funds available, for the uses and purposes herein set forth.
7. No officer or member of the Association, in the absence of fraud committed by that officer or member, shall become personally liable for any debts or liabilities rising against or incurred by the Association or its officers, agents, employees, or members; and the private property of the officers and members of this organization shall be exempt from liability for any and all debts, obligations or liabilities of the Association.

Section VII - OPERATION

1. The place of business for the organization shall be c/o Office of the Wyoming State Archaeologist, P.O. Box 3431, University Station, Laramie, Wyoming 82071.
2. Robert's Rules of Order shall govern the procedures at each meeting; other rules may govern as established by the President or presiding officer at the beginning of the meeting.

Section VIII - OFFICERS

1. The Association shall have four officers: President, Vice-President, Secretary, and Treasurer. All officers shall hold office for one year. The Executive Committee shall fill any vacancy during any term of office, by appointment, from the membership. Such appointments shall be for the remainder of the original elected term of office.
 - a. President. The President shall serve as the Association's representative in all its official affairs and transactions. The President shall preside over Association meetings. The President may appoint committees as necessary, with the assent of the Executive Committee.
 - b. Vice-President. The Vice-President shall act with the powers of the President in the event that the President is unwilling or unable to perform appointed duties. In addition, the Vice-President shall chair the Membership and Ethics Committee. The Vice-President shall assume the Presidency at the end of the Vice-President's elected term.
 - c. Secretary. The Secretary shall announce all meetings to the membership of the Association and shall maintain minutes of all meetings.
 - d. Treasurer. The Treasurer shall keep membership rolls of the Association, shall maintain records of financial transactions in accordance with standard bookkeeping practices, and shall disperse funds according to Section VI.
2. The Association shall appoint or retain a legal Counsel, as needed.
3. The Association shall appoint an Editor who shall solicit and edit material for a newsletter of the Association, and, when authorized, develop other official publications. The Editor shall serve as long as such appointment remains agreeable to the editor, the Executive Committee and the Association.

Section IX - STANDING COMMITTEES

1. Executive Committee
 - a. The voting members of the Executive Committee shall be composed of the Association Officers, the newsletter editor, and 2 Members-at-Large, to be elected in alternate years for 2 year terms. The immediate past president shall serve as an "ex officio" member of the Executive Committee.
 - b. The Executive Committee shall act in behalf of the Association to further the goals of the Association as set forth in its Constitution and By-Laws.
2. Membership and Ethics Committee
 - a. The Membership and Ethics Committee shall be composed of the Vice-President and 4 voting Members, appointed by the Executive Committee, no more than 2 of which are Executive Committee Members. The Vice-President shall chair the committee.
 - b. The purpose of the Membership and Ethics Committee shall be to review and vote on new members who shall then be accepted by majority vote of the committee.
 - c. The Membership and Ethics Committee shall recommend that matters involving professional archaeological ethics of Association members,

or of persons or organizations external to the Association, be brought to the attention of the Executive Committee for action.

Section X - ELECTION OF OFFICERS

1. The Vice-President shall assume the presidency at the end of the Vice-President's elected term.
2. The other officers of the Association, and the two Members-at-Large of the Executive Committee, shall be elected by mail ballot of the membership, requiring a simple majority of all votes cast.
3. Completed ballots shall be mailed in signed, sealed envelopes, or submitted in person at the fall semi-annual meeting. Nominations shall be accepted at the regular semi-annual spring meeting. Ballots shall be mailed to the voting membership at least four weeks prior to the semi-annual fall meeting. Newly elected officers shall assume office at the end of the semi-annual fall meeting. Ballots shall be counted by two voting members appointed by the President.
4. The President shall not vote in an election, except to break a tie.

Section XI - PUBLICATIONS

1. The Association shall publish a newsletter. The Association, may from time to time, authorize the publication of other single or serial items.

Section XII - ADOPTION

1. These By-Laws shall become effective upon ratification by a 2/3 sustainment of those registered by the time of the second organizational meeting.

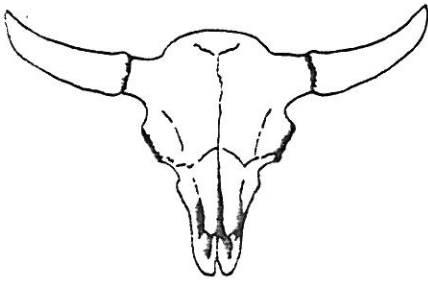
Section XIII - DISPOSAL OF ASSETS

1. In the event of dissolution, the Executive Committee shall dispose of all Association assets to an educational or scientific institution that is exempt from taxation under the then current code of the Internal Revenue Service.

Section XIV - CODE OF ETHICS

1. Standards and Goals
 - a. Members of the Association shall adhere to the goals outlined in Section III (2), satisfying their colleagues that the highest standards of research are maintained. Association members agree that all archaeological work is archaeological research, since this is the only way to determine the potential of cultural resources.
 - b. Other ethical standards include but are not limited to prompt reporting of results, maintenance of adequate facilities and staff, no employment of unqualified personnel in any capacity, use of common and professional courtesy in all potential or realized interaction with other archaeologists, and strong commitment to promotion of preservation and conservation of cultural resources.
2. Members shall ensure that all specimens recovered through survey and excavation be prepared and deposited at institution with facilities for permanent curation.
3. Members of the Association who author or sign research reports dealing with Wyoming archaeology shall deposit copies of said reports with the Wyoming State Historic Preservation Officer.

4. Members of the Association agree to allow ad hoc peer review committees to review reports which they have deposited with the SHPO.
5. Members shall not deal in, sell, nor trade, nor knowingly aid any individual or organization in the sale, trade, or transfer of any antiquity (archaeological object, site, or property) for the purpose of anyone's personal profit.
6. As professional archaeologists, members shall actively discourage vandalism of all cultural resource sites, objects, and properties.
7. Members shall be sensitive to and respectful of legitimate concerns of groups whose culture histories are the subjects of archaeological investigations.
8. Members shall respond to legitimate requests for information about their projects and research by other archaeologists.
9. Members shall avoid participation in any activity which may result in a conflict of interest, including, but not limited, to those circumstances where their own economic interests may be affected by professional duties and responsibilities to an employer or client. In those circumstances in which conflicts of interest are unavoidable, or when conflicts arise after an activity has been undertaken, members shall make full disclosure of their interests to all participants as soon as feasible.
10. Censure:
 - a. Determination of a probable breach of the Association Code of Ethics shall be made by the Membership and Ethics Committee, which shall bring it to the attention of the Executive Committee.
 - b. The Executive Committee will shall, following consultation and input from all parties involved, (1) rule on whether a breach of the Code of Ethics has taken place, and (2) if so determined, the Executive Committee shall vote on censure.
 - c. Censure may take the form of a letter, written in the name of the Association, denoting the misconduct or may result in removal from the Association.
 - d. All such censured members shall have the right of appeal to the voting membership. Such appeal shall take place during the next regularly scheduled business meeting following notice of censure.



WYOMING ASSOCIATION of PROFESSIONAL ARCHEOLOGISTS

P.O. Box 3431, University Station
University of Wyoming
Laramie, WY. 82071

82071	
JAN 20 '89	
<input type="checkbox"/> DM	<input type="checkbox"/> MN
<input type="checkbox"/> ADM	<input type="checkbox"/> FL
<input type="checkbox"/> PA	<input type="checkbox"/> SL
<input type="checkbox"/> AO	<input type="checkbox"/> BRA
<input type="checkbox"/> OPR	<input type="checkbox"/> NRA
<input checked="" type="checkbox"/> LRR	<input checked="" type="checkbox"/> PRA
<input type="checkbox"/> CT	Lead Resp

January 19, 1989

Bureau of Land Management
Casper District Office
1701 East E Street
Casper, WY. 82601
Attn. : Glen Nebeker

Dear Mr. Nebeker:

Thank-you for allowing us an opportunity to comment on the "Amoco Carbon Dioxide Projects-Draft Environmental Impact Statement", November 1988. Several members of our organization have commented on the document and a synthesis of the comments are included below. John Albanese has been assigned the lead on the review and future correspondence should be sent to him, in care of the President, at the address given above.

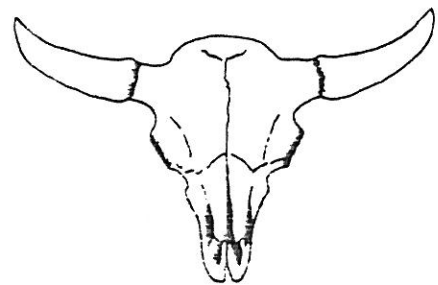
The Wyoming Association of Professional Archeologists offer the following comments:

+ Pursuant to 36CFR800.1(c)(2) and your cover letter for the subject document, we respectfully request to be an "interested party" in the Section 106 process as defined in 36CFR800.

+ The document identifies that treatment plans will be prepared for National Register eligible properties that will be adversely effected by the project (see page 4-52 and Appendix 3); however, there are no minimum data requirements established to accomplish this end. We strongly urge you to develop a set of minimum data requirements for the treatment plans. For example, lithic analysis, floral analysis, faunal analysis, geomorphological processes, feature analysis, and paleo-environmental reconstruction should, at a minimum, be included in the data collection and data analysis phase of the project treatment plans. We would gladly welcome the opportunity to work with you in developing these standards.

+ Appendix 3, Stipulation IV.C.5 discusses the use of open trench inspection as part of the treatment of cultural resources. Based on our organization's experience of many years, we firmly believe that an open trench inspection on a large pipeline is a valuable tool to discover and understand the nature of cultural resource occurrences in buried contexts. We urge you to seriously consider conducting an open trench inspection on the entire line or large portions of it, rather than on small, selected portions. We will be glad to work closely with you in developing an appropriate trench inspection plan.

+ Finally, we believe that the draft EIS should state that cultural resources are a concern on the project. A project of this size will require a substantial investment of money and time to mitigate the adverse effects on significant cultural properties. While adverse effects can be mitigated through data recovery, special requirements will be needed and will involve a commitment to essentially



WYOMING ASSOCIATION of PROFESSIONAL ARCHEOLOGISTS

P.O. Box 3431, University Station
University of Wyoming
Laramie, WY. 82071

destroy the resource. The document, as written, does not adequately address the investment of time, money, and significant resource loss as a result of the project. We ask that you consider this in developing the final EIS.

Thank-you for considering our comments on the draft EIS and we look forward to working with you on the project. Should you have any questions or concerns, please feel free to contact me at the above address or call me at (307) 234-1379.

Sincerely Yours,

John Albanese

cc.:

State Historic Preservation Office
Review and Compliance Section
2301 Central Ave., Barrett Building
Cheyenne, WY. 82002

Advisory Council on Historic Preservation
Western Division of Project Review
730 Simms St., Room 450
Golden, CO. 80401

President, Wyoming Association of Professional Archeologists



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240



IN REPLY REFER TO:

8140 (341)

DSV

FEB 14 1989

92

FEB 17 1989

ROUTING	INITIALS	DATE	MR
<i>[Signature]</i>	SD		<input checked="" type="checkbox"/>
<i>[Signature]</i>	ASD		<input type="checkbox"/>
<i>[Signature]</i>	SASD		<input type="checkbox"/>
<i>[Signature]</i>	EED		<input type="checkbox"/>
<i>[Signature]</i>	OPA		<input type="checkbox"/>
			LEAD RESP <input checked="" type="checkbox"/>
			ADMIN <input type="checkbox"/>
			CPMG <input type="checkbox"/>
			L&PR <input type="checkbox"/>

Memorandum

To: State Director, Wyoming

From: Director

Subject: Referral of Memorandum from Departmental Consulting Archeologist
Concerning Wyoming BLM Issues

Attached is part of a January 26, 1989, memorandum to the Director from the Departmental Consulting Archeologist, Dr. Bennie C. Keel. The remainder of the memorandum addresses an interagency matter in another State. As you were alerted in a telephone conversation with Bill Civish, Dr. Keel's focus is two Wyoming BLM issues brought to his personal attention in recent months.

With regard to the first issue in Dr. Keel's memorandum, the cultural resource protection aspect of the Bairoil Project has drawn an exceptional amount of public attention and controversy, often involving members of archaeological organizations within the State. We concur in Dr. Keel's belief that prompt completion of the cultural resource management plan and consultation with the State Historic Preservation Officer (SHPO) and Advisory Council on Historic Preservation (Council) should resolve many of the difficulties. For fullest resolution, we recommend that you consider conducting the consultation as a face-to-face conference with SHPO and Council staffs, including a representative of the Wyoming archaeological community as an interested person (see 36 CFR 800.1(c)(2)). If you wish, we would be happy to provide staff support to facilitate such a consultation.

For your information with regard to Dr. Keel's concerns about intradepartmental conformity of policy on the disposition of human remains, Manual Section 8142 was approved on December 12, 1988. Together with other new and revised Manual releases, it is presently in printing and will reach you soon. The .06 Policy portion of the 8142 Manual includes the following, in response to discussions with Dr. Keel and in keeping with previous BLM directives:

"G. Human remains recovered from public lands shall be handled strictly in accordance with the Department of the Interior 'Guidelines for the Disposition of Archeological and Historical Human Remains' (Appendix 2). No modification of the departmental guidelines is authorized without the Department's concurrence."

We have informed Dr. Keel that his memorandum has been relayed to you.


Assistant

1 Attachment

1 - Page 1 of DCA memorandum to Director, dated 1/26/89 (1 p.)



United States Department of the Interior

NATIONAL PARK SERVICE
P.O. BOX 37127
WASHINGTON, D.C. 20013-7127



IN REPLY REFER TO:

JAN 26 1989

Memorandum

To: Director, Bureau of Land Management

From: Departmental Consulting Archeologist

Subject: Bureau of Land Management Archeology

Several items concerning the Bureau of Land Management's (BLM) archeological program have come to my attention recently. I take this opportunity to bring them to your attention and request your assistance in dealing with them.

First, I was invited by the Wyoming Archeological Society to attend their annual meeting in November, 1988 and to meet concurrently with the Wyoming Association of Professional Archeologists. In both of these meetings various members of these organizations expressed disappointment with the BLM's treatment of archeological resources in the Bairoil Project. I have been unable to substantiate some of their claims but some of the things I heard cause me to question the conduct of the the program carried out by the project sponsor, AMOCO. The situation must be serious in that the State Historic Preservation Officer has indicated that he will object to the Determination of No Adverse Effect under which the Bairoil project has been proceeding if the BLM does not complete and consult with the SHPO on the Cultural Resource Management Plan (CRMP) prior to the conduct of further undertakings in 1989. I learned from one of your district archeologists that the CRMP is scheduled for completion by the end of January 1989. I believe that the prompt completion of the plan and implementation is consultation with the SHPO and the Advisory Council on Historic Preservation will resolve many of the difficulties attached to this project. I urge you to direct its timely completion and implemenation.

After discussing the Bairoil project with at least six individuals it is my distinct impression that many of the concerns about BLM policy and its implementation in regard to its archeological responsibilities can be relieved through the active and personal participation of the State Office archeologist with the archeological and preservation communities in the state.

Secondly, the Wyoming State Office policy on the disposition of human remains from archeological contexts is inconsistent with the Department's policy. Because of the sensitivity of the disposition issue it is extremely important that all bureaus and offices of the Department adhere to the same principles. For Wyoming and other BLM states, I will be happy to review any proposals you may have to interpret the Department's policy for particular field situations.

Finally, I had a review of the Fish and Wildlife Service's Stillwater National Wildlife Management Area conducted in late FY 1988. The report (attached) recommends that several Interior agencies as well as other agencies and institutions cooperate to develop a comprehensive and consistent plan for archeological resource management in the Carson Desert. The National Park and the Fish and Wildlife services have already initiated several of the report's recommendations. I request that you recommend to your Nevada State Office and Carson City District that they become involved in this effort. This activity provides an excellent opportunity for us to demonstrate the Secretary's leadership responsibility in historic preservation.

Attachment

bcc:AS/FNP-RF

AS/LM-RF

AS/

400-RF

434-RF

430-Chron

436-RF

8000- RD

8000- Cultural Resources

Douglas 3360 MIB

WYSHPO

NVSHPO

FNP:BCKeel:343-1876:01/24/89

Dir:BLM: Doc:Wyoming2

43 CFR Parts 3830, 3850, and 3860

[AA-680-09-4310; Circular No. 2614]

**Location of Mining Claims;
Assessment Work; Mineral Patent
Applications; Amendment Establishing
Service Charges and Making
Clarifications; Correction**

AGENCY: Bureau of Land Management,
Interior.

ACTION: Final rulemaking; correction.

SUMMARY: The Bureau of Land Management, Department of the Interior, is correcting an editorial error in the final rulemaking establishing service charges and making clarifications in the regulations on location of mining claims, the performance of assessment work, and mineral patent applications published in the Federal Register on December 2, 1988 (53 FR 48876).

FOR FURTHER INFORMATION CONTACT:
Ted R. Hudson at (202) 343-8735.

The following correction is made in the final rulemaking amending 43 CFR Part 3830 published in the Federal Register on December 2, 1988 (53 FR 48876).

Amendatory language inadvertently omitted is inserted between item 5 and item 6 in the middle column, page 48881, to read as follows:

5a. Section 3833.1-4 is added to read as follows:

Eleanor R. Schwartz,
Federal Register Liaison Officer.

[FR Doc. 88-28368 Filed 12-8-88; 8:45 am]

BILLING CODE 4310-84-M

43 CFR Public Land Order 6693

[WY-930-09-4214-10; WYW 101899]

**Withdrawal of Public Land for Natural
Corrals Archeological Site; WY**

AGENCY: Bureau of Land Management,
Interior.

ACTION: Public Land Order.

SUMMARY: This order withdraws 357.34 acres of public land from surface entry and mining for a period of 20 years for the Bureau of Land Management to protect the Natural Corrals Archeological Site. The land has been and remains open to mineral leasing.

EFFECTIVE DATE: December 9, 1988.

FOR FURTHER INFORMATION CONTACT:
Tamara Gertsch, BLM, Wyoming State Office, P.O. Box 1828, Cheyenne, Wyoming 82003, 307-772-2072.

By virtue of the authority vested in the Secretary of the Interior by section 204 of the Federal Land Policy and Management Act of 1976, 90 Stat. 2751; 43 U.S.C. 1714, it is ordered as follows:

1. Subject to valid existing rights, the following described public land is hereby withdrawn from settlement, sale, location, or entry under the general land laws, including the United States mining laws (30 U.S.C. Ch. 2), but not from leasing under the mineral leasing laws, to protect a Bureau of Land Management archeological site:

Sixth Principal Meridian

T. 21 N., R. 101 W.,

Sec. 18, lots 1-3, W $\frac{1}{2}$ NE $\frac{1}{4}$, E $\frac{1}{2}$ NW $\frac{1}{4}$,
NE $\frac{1}{4}$ SW $\frac{1}{4}$, NW $\frac{1}{4}$ SE $\frac{1}{4}$.

The area described contains 357.34 acres in Sweetwater County.

2. The withdrawal made by this order does not alter the applicability of those public land laws governing the use of the land under lease, license, or permit, or governing the disposal of their mineral or vegetative resources other than under the mining laws.

3. This withdrawal will expire 20 years from the effective date of this order unless, as a result of a review conducted before the expiration date pursuant to section 204(f) of the Federal Land Policy and Management Act of 1976, 43 U.S.C. 1714(f), the Secretary determines that the withdrawal shall be extended.

J. Steven Griles

Assistant Secretary of the Interior.

November 29, 1988.

[FR Doc. 88-28385 Filed 12-8-88; 8:45 am]

BILLING CODE 4310-22-M

New !
Archaeology & Historic Preservation
Federal Affairs Workbook

Foresight's Workbook has been prepared specifically to provide the archaeology and historic preservation community with an easy to use, all-in-one reference of information needed to be informed and involved in federal affairs. May be purchased as a complete set or individually in sections. Bi-annual updates in February and August. Quarterly updates in February, May, August and November. Subscription renewed annually (\$40 renewal for complete set; \$15 renewal per individual section if ordered separately.)

Complete Set: In 3 Ring Binder **\$60.00**

Issue Updates: **\$25.00**

- Congressional Issues: Summary of key issues in Congress affecting archaeology and historic preservation, updated quarterly;
- Agency Actions: Summary of agency actions, updated quarterly; and
- Special Alerts: Fact sheets and "alerts" on specific issues provided from time to time.

Washington Watch: **\$25.00**

- Congressional Contacts: Members of Congress listed by state and congressional districts, with addresses and phone numbers; key Congressional Committees, updated bi-annually;
- Federal Agency Contacts: Federal preservation officers and other agency contacts who work on archaeology related issues, updated bi-annually; and
- National Organizations: Key contacts in national groups working on archaeology related issues, updated bi-annually.

Special Help: **\$25.00**

- Federal Help: Frequently used reference phone numbers, in an easy to use format; a helpful summary of the workings of Congress and glossary of frequently used terms;
- Key Laws: The key archaeology and historic preservation acts with amendments, updated as new ones are enacted; and
- Regulations: List of key Federal preservation regulations, and copies of uncodified policies, standards and guidelines.

Written by Loretta Neumann, Kathleen Reinburg & Sara Rasmussen
 Foresight Science & Technology Incorporated

Clip and mail

Archaeology & Historic Preservation Federal Affairs Workbook

INITIAL ORDER

Complete Set: \$60.00 # Copies _____ Total:\$ _____
 Individual Sections: \$25.00 each
 Issue Updates: # Copies _____ Total:\$ _____
 Washington Watch: # Copies _____ Total:\$ _____
 Special Help: # Copies _____ Total:\$ _____
 Plus \$2.00 Shipping & Handling: \$ 2.00
 Total Payment Enclosed: \$ _____

METHOD OF PAYMENT

Check (Payable to Foresight Science & Technology)
 FEIN: 52-1273708
 Master Card Visa American Express
 Order by phone: (202) 833-2325 9:00am-5:00pm EST

SHIP TO:

Name/Title: _____
 Affiliation: _____
 Address: _____
 City/State/Zip: _____
 Phone: _____

Card Number:

Card Holder Name: _____
Card Holder Address: _____
Phone Number: _____
Exp. Date: _____

Mail to: Foresight, 2000 P Street NW, Suite 305, Washington, DC 20036



"The Khedive is making inquiries, Mr. Belzoni. Are you SOPA certified?"

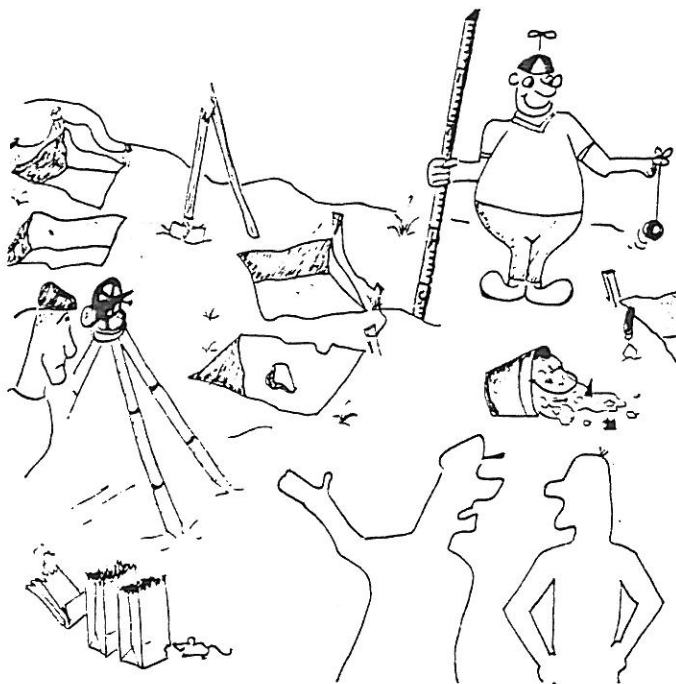
"Who will help me plant my wheat?" said the Little Red Hen. "Not I" said the fox. "Not I" said the dog. "Not I" said the cat. "Then I shall do it myself" said the Little Red Hen.

Here are some reasons not to join the Society of Professional Archeologists. It will cost you up to \$50 per year in dues; if you seek to become a certified member you must fill out an application form that is detailed and lengthy, documenting your training, experience and publication record, and that application must pass through a scrupulous screening by a certification committee which may ask for still more information on your qualifications; you do not receive a journal, nor are there opportunities for presenting papers at an annual meeting; all members become vulnerable to SOPA's grievance procedures should anyone charge a violation of the Code of Ethics or Standards of Research Performance; and you likely will be drafted into one of several committees, task forces or leadership positions that are difficult and time-consuming.

Why then do archeologists join SOPA? There are two kinds of reasons, one oriented toward the individual archeologist, the other toward the profession of archeology. For the individual, certification means that SOPA can be appended to the signature just as PE (professional engineer) or MD (medical doctor) are used in other professions. Beyond that superficiality is a more significant implication — "SOPA" indicates the archeologist has had his credentials accepted by his peers for certification as a professional, and has agreed to abide by the Code of Ethics and Standards of Research Performance. SOPA represents, for archeology, the same sort of quality control that mature professions already have instituted.

"Who will help me harvest my wheat?" said the Little Red Hen. "Not I" said the fox. "Not I" said the dog. "Not I" said the cat. "Then I shall do it myself" said the Little Red Hen.

Most SOPA-certified archeologists feel an intense commitment to their profession, a commitment that often transcends any individual satisfaction. That dedication is marked by a willingness to pursue, via a formal grievance procedure, accusations that a certified archeologist has violated the Code or Standards. It is marked by a willingness to set aside egoistic concerns and to have one's credentials examined by peers, and in turn to serve in examining others' qualifications. It is



"I asked them about SOPA, but they said SOPA's research performance standards stifle innovative methods."

marked by SOPA's standards for archeological field schools, by its several committees working on behalf of the profession in Washington (e.g. the Government Relations Committee, SOPA's oversight body on bills and proposed regulations affecting archeology), in the states (e.g. SOPA's encouragement to state professional bodies to adopt the Code and Standards), and in individual growth (e.g. SOPA's sponsorship of an Advisory Council on Historic Preservation 106 workshop and cosponsorship of the recent workshop on microcomputer applications in archeology).

"Who will help me bake my bread?" said the Little Red Hen. "Not I" said the fox. "Not I" said the dog. "Not I" said the cat. "Then I shall do it myself" said the Little Red Hen.

All SOPA's activities benefit all archeologists. For those who are **professional** archeologists the benefits are even greater, yet there are hundreds of individuals who have not been certified and thus are nonparticipants in the effort. Among those are state and Federal archeologists, academicians and research administrators, persons in the very positions which should provide the boldest leadership in recognizing professionals and working toward enhancing the quality and integrity of their work. In the 10 years since SOPA's founding this work has fallen on only a portion of the profession. It is time for the benefits and the burden to be spread.

"Who will help me eat my bread?" asked the Little Red Hen. "I will" said the fox. "I will" said the dog. "I will" said the cat. "Well," said the Little Red Hen, "it's about time."

If you believe it's time to give something to the profession of archeology, to help in the difficult task of creating a profession from a discipline, and to help measure the quality of archeological research, contact a SOPA member or officer. Join and help SOPA achieve the goals it has set, and you will see the day when the omission of "SOPA" from an archeologist's signature means much more than its inclusion does today.

For more information regarding SOPA membership and/or SOPA certification write:

Society of Professional Archeologists
P.O. Box 7808
Wake Forest University
Winston-Salem, N.C. 27109

or call (919) 761-5497

1990

Walker, Danny N.
1520 Mitchell Street
Laramie WY 82070