

HISTORIC ARCHAEOLOGICAL COLLECTIONS AS EVIDENTIARY PROOF TO SUBSTANTIATE SCIENTIFIC FINDINGS

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Recent point-counterpoint positions in the Society for California Archaeology Newsletter debated the need for preserving or dumping historic artifacts recovered from archaeological investigations. This paper will review the underlying reasons collections have been recovered and propose that archaeological collections are “evidentiary proof” regarding published research that cannot be destroyed by museum dumping. The paper will also examine legal obligations when entire sites are destroyed under federal and state law. Finally, the paper will examine a pilot program that preserved the historic archaeology collections for CA-SDI-12000, an 18th century Spanish cannon battery covered with an American whaling station and U.S. Army post in San Diego, California.

Recent point-counterpoint positions in the 2002 *Society for California Archaeology Newsletter* (Vol. 36, Nos. 3 and 4) debated the need for preserving or dumping historic artifacts recovered from archaeological investigations. More recently, the City of San Diego has begun considering a policy for deaccessioning historic artifacts recovered during federal Section 106 and California Environmental Quality Act (CEQA) impact mitigation work (Historic Resources Board, Archaeology Policy Committee, December 2003). This paper will review the reasons collections are taken; legal implications of dumping, and propose an alternative approach to collection triage using a pilot program developed at Naval Base Point Loma.

THE ISSUE

Sixty years of archaeological salvage programs coincident with the most massive land development period in California history has created enormous volumes of prehistoric and historic archaeological collections in every corner of California. The issue became most evident in the larger cities, like San Francisco, Los Angeles, and San Diego. Governments have dutifully mandated archaeological excavation instead of preservation, often at the urging of archaeologists eager to learn the mysteries buried beneath the city floor.

Thirty years of tenuous social compacts between academic anthropology departments, private and public museums, and private companies are now failing to contain the burgeoning volumes of archaeological collections. For the past six years, the Department of Defense and National Park Service have held Federal Partnership for Collections Management Workshops every two years to seek solutions.

The United States Army Corps of Engineers conducted nation-wide studies and recommended private funding for at least one regional collection center in each state. The estimated cost of building such facilities, however, is at least \$15 million dollars with annual funding at \$1.5 million. To date, only two such facilities have been built, neither of which are in California.

Innovative ideas such as adaptive re-use of surplus Department of Defense military igloo bunkers, old military facilities, underground ammunition magazines, old schools, and missile silos have been proposed for meeting this need. In Oregon, at least six million cubic feet of military surplus bunkers are lying dormant. The numbers could be larger in California, but no one with proper authority has surveyed the potential.

The San Diego Archaeological Center is a noble attempt by private parties to provide for archaeological collections in San Diego County, but its space will not last forever, the cost is currently \$600 a box, and could easily double over the next few years. Such programs require steady income to support plant facilities and staff. As well, the current facility at San Pasqual Valley will not meet all future regional needs.

THE DEBATE

Adrian Praetzellis and Julia Costello opened the California debate with the editorial position, “Don’t Keep Everything: Historic Artifact Discard Policy” (Praetzellis and Costello 2002:30-33). Citing federal policy 36 CFR 79.9 and the Secretary of the Interior’s “Archaeology and Historic Preservation Standard and Guidelines,” they focused on the vague wording:

Curation of important archaeological specimens and records should be provided for in the development of any archaeological program or project. Archaeological specimens and records that should be curated are those that embody the information important to history and prehistory (48FR44734-37).

They then quoted Advisory Council on Historic Preservation handbook language on the treatment of historic properties and made the leap that since not all National Register properties are worth the trouble to preserve, so must be true for artifact collections. Quoting then from the State of Maryland SHPO, they focus on three principles of triage in deciding what constitutes "important data" for curation. Finally, they note the State of California "Guidelines for the Curation of Archaeological Collections" provides for discarding

- A. Material hazardous to human health and safety;
- B. Material too deteriorated to be preserved;
- C. Or, its age being too recent to qualify as historical (SHRC 1993:3).

And then propose six principles that embrace the Maryland guidelines, as well as five new ones providing triage for artifacts that lack long term research value, come from disturbed contexts, are said to be in "excessive quantity," lack educational or interpretive value, and lack heritage values. They then propose field discard of construction materials, ecological specimens, rusted masses, containers, artifact parts smaller than a dime, isolated whole bottles, isolated distinctive ceramics, and easily identifiable items found away from features or sites. Those excavation recoveries of similar items, such as construction materials and lamp glass, are recommended for data recordation and discard. Finally, they recommend discard of artifacts recovered from features or buried strata that fail to meet research design values.

In response to Praetzellis and Costello, Roberta Greenwood and Alice Hale wrote the editorial rebuttal, "... But Let's Keep Enough" (Greenwood and Hale 2002:22-25) and urged a constructive dialog among historic archaeologists. In essence, Greenwood and Hale found Praetzellis and Costello's proposal "too draconian" and that it "would jeopardize all hope for continuing research on the discarded cultural materials" (Greenwood and Hale 2002:22).

Greenwood and Hale seriously doubted any field surveys conducted under Section 106 or CEQA inventory carry with them sufficient research designs to justify field discard or destruction of artifacts.

Greenwood and Hale refer to most field survey as a hasty glance and the field technicians would not have access to reference collections, library materials, or be qualified to make sound interpretations. This is because field survey budgets are severely limited and carrying reference material is impractical.

In point of fact, most surveys are conducted by prehistoric archaeologists who are not prepared to evaluate research potential of historic artifacts or features. Greenwood and Hale further caution that research designed recovery and analysis is rarely broad enough to exhaust full research potential of recovered items because Section 106 only requires determination of National Register eligibility.

Greenwood and Hale also rejected the assumption that surface features, such as sheet trash, do not have research value. Rather, they cite examples that could qualify a property for National Register eligibility.

They soundly rejected the notion that construction materials lack research value. They note that brick maker's marks, adobe bricks, and small items are important evidence used to reconstruct architectural functions that would demonstrate National Register eligibility.

Further, they rejected the notion that the sole purpose for historic urban archaeology is to "discover primary deposits" (Praetzellis and Costello 2002:32; Greenwood and Hale 2002:23). They argue for architectural study, as well as trash pit investigations.

As well, they rejected the proposal that identifiable artifacts like bottles, jewelry, and toys from "not important deposits" could be discarded. They defended these artifacts as both significant information and an opportunity for public education. They cited an example where a very narrow research design by-passed bottles with 29 different maker's marks that could be used by many scientists for a multitude of other research issues and that such collections should be curated for long-term exhaustive research, like chemical composition studies, protein residue analysis, and even DNA.

More recently, Mitch Allen of Altamira Press has called for papers to be included in an international journal to address museums, archives, and collections. He posited questions like: Why do we collect? What do we collect? And, what are the philosophical differences between various institutions? An intense debate on the Internet site HISTARCH recently carried over onto ACRA-L and everyone seemed to fear his or her favorite collections were threatened.

In all these debates, the hottest issues are how to dispose of the discarded or deaccessioned items. This comes down to the very ethics and standards most archaeologists have held high throughout their careers, and for which they hold bottle and treasure hunters' feet to the fire. Few want to recommend crushing, burning artifacts, or selling discards on Ebay. Yet, most people agree that unidentifiable parts of ceramics, glass, metal too corroded to be identifiable, and the bulk of construction and native stone need not be saved. Most recently, advisors to the City of San Diego recommended donating bottles and other discarded historic artifacts to artists to be used in murals and landscape art.

After a flurry of protest letters, the City of San Diego has recently floated the idea of keeping one example of each kind of artifact found on a site. This "Ark Theory," however, would not allow for long-term meaningful use of the collections because of discrepancies in training and interpretation of what constitutes "one of a kind"?

What becomes painfully clear is that some agencies around California cite the Praetzellis and Costello article as justification for wholesale discarding of historic archaeological collections. This destruction has been carried out with the incorrect assumption that historic archaeologists as a profession embraced a discard policy. The debate is far from over, but what will be lost in the interim?

WHAT ARE THE LEGAL IMPLICATIONS OF DISCARDING?

Since 1973, the vast majority of historic archaeological collections recovered in California were taken as a result of either federal or state environmental laws. Both laws assume a social compact between the citizens of California and the Lead Agency permitting destruction of archaeological sites. Native Americans, local historians, and people who read environmental documents believe that when, say, 90% or more of an archaeology site is going to be destroyed by bulldozing, a sample will be retained to mitigate for the loss. Preservation of the sample is the long-term mitigation, not the consultant's report. The CEQA document never discloses that some archaeologist down the line will throw portions of the sample in a dumpster. Public disclosure of dumping could lead to lawsuits against the Lead Agency for fraud and invalidate project approvals.

Some could also argue that destroying portions of salvaged data samples is a moral and selfish act by individuals who put personal issues above professional responsibility. If archaeologists truly believe long-term

storage is too costly or simply not possible because government agencies won't finance it, then they should argue strenuously against destruction of archaeological site and not agree to data mitigation because dumping collections extinguishes any concept of mitigation.

Samples of archaeology sites are like books in a library or boxes of letters in a research archives. They are to be conserved, catalogued, and available for future scientists to reexamine the items for exhaustive future research. The artifacts are the "evidentiary proof" used by archaeologists to support findings on unlimited numbers of scientific research projects. Destroying collections used as proof in reports and books is like destroying evidence in a murder trial before the appeals have been exhausted.

ONE ALTERNATIVE SOLUTION

Strangely enough, the pilot program proposed here for consideration as an alternative to dumping was created by the all-volunteer, not for profit, Fort Guijarros Museum Foundation working with the United States Navy in San Diego. Nonetheless, this very important collection of over quarter million historic artifacts is now preserved as supportive evidence for all past reports, publications, and future experiments in an underground bunker on federal property that goes far to meet the high standards of 36 CFR 79.9.

For the past 24-years, the Fort Guijarros Museum Foundation has conducted archaeological investigations of an 18th century Spanish cannon battery, 19th century shore whaling station, and 20th century U.S. Army post (CA-SDI-12000). Thousands of bags of artifacts were recovered, some of which were returned to the location of recovery after analysis and recordation.

Excavations at twelve different locations took place between 1981 and 1996. For the past eight years, detailed artifact analysis, conservation, computerization of data, and packaging in archival quality containers has been in process. Now those 400 boxes of field notes, food bone, ceramics, glass, native stone, architectural specimens, and miscellaneous items are maintained in a dry and cool, locked underground space and remain available for future scholarly research. Copies of the box inventories are also curated in the bunker and duplicates are to be donated to the South Coast Information Center at San Diego State University.

The Fort Guijarros Museum Foundation underwrote the cost of staffing the enormous effort over these past twenty-two years. The annual estimated staff

time is one and a half staff years, which matches the Navy's cost of facilities and initial cost of \$130,000 to convert the underground bunker for collection storage.

Federal environmental money enabled professional conservation of the metals and analysis of portions of the collections. More than 50 boxes of food bone were identified by genus and species, butchering technique, and quality of cut. At least three different scholars examined the British, American, French, Japanese, and Chinese ceramics. Two different scholars analyzed the glass. More than a dozen different metallurgists, metal workers, engineers, and archaeologists analyzed the ferrous and cuprous metal artifacts. All these studies went into the archives of field notes, reference materials, and conservation notebooks associated with the collections.

All 400 boxes of artifacts, food bone, and architectural samples are computer inventoried. All the items have been classified by the Sprague Functional Model and can be searched in the database for behaviors like personal, domestic, workshop, military, and Asian maritime activities. There are more than 12,000 photographs, slides, and negatives, all of which are now being computer catalogued with cross reference to location in the field notes and boxes.

REFERENCE COLLECTION PRESERVATION POLICY

The policy for deciding which artifacts to preserve in the Ballast Point Repository are as follows:

1. Are the artifacts free of hazardous materials?
2. Are the artifacts capable of contributing to ongoing scientific research?
3. Were the artifacts used in evaluating the National Register significance of historic archaeology sites?
4. Can the research performed to demonstrate National Register value be repeated with the sample preserved?
5. Have the artifacts been completely exhausted of research and reference value?
6. Are the artifacts mass-produced to the point that they do not belong to a rare class of artifacts not available in all cities in California?
7. Are representative samples of the specimens in the collection?

8. Are the artifacts simply too generic to ever be identified sufficiently for future scientific study?
9. Will the artifacts disintegrate even after conservation?
10. Have we really exhausted alternative sources for curation or repatriation to the archaeological site?

CONCLUSION

In conclusion, sixty years of historic archaeology and government-mandated environmental impact analysis has created a body of scientific archaeology collections with enormous long-term research potential. That long-term value is now threatened by proposals within our profession to discard or destroy significant portions of those collections. Government agencies are more than eager to destroy archaeological collections to avoid expensive storage, just as long as a professional archaeologist will commit in writing that destruction is an acceptable practice. Agency advisors are using the Costello and Praetzellis proposed policy to justify destruction of large portions of archaeological collections. However, agency destruction of collections could lead to costly lawsuits by Native Americans, environmental organizations, historians, and preservation organizations who learn that written mitigation measures in legal documents are being extinguished by later destruction of collections. Some archaeologist feel destruction of historic archaeology collections is morally and legally wrong. Our profession should actively examine alternative means for long-term curation of historic collections before endorsing destruction policies.

One creative alternative to destruction has been the innovative use of underground military bunkers on federal lands. A great many of the artifacts and food remains in the Ballast Point Repository on Naval Base Point Loma might have been discarded under the Praetzellis and Costello proposal. Some might have even been discarded by the procedures suggested by Greenwood and Hale. But under the circumstances of this particular research project, with the cooperation of the United States Navy, and the vision of the board of directors of the Fort Guijarros Museum Foundation, this pilot program at Naval Base Point Loma in San Diego stands as testament to an alternative to massive discarding of archaeological collections.

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