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Edward L. Bell

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Review Essay

On the Care and Feeding of Heritage Management Apprentices

Edward L. Bell

FEDERAL PLANNING AND HISTORIC PLACES: THE SECTION 106 PROCESS **by Thomas F. King 2000, *Heritage Resources Management Series* 2, AltaMira Press, Walnut Creek, California. 195 pages, appendix, index, $23.95 (paper); $62.00 (cloth).**

ASSESSING SITE SIGNIFCANCE: A GUIDE FOR ARCHAEOLOGISTS AND HISTORIANS **by Donald L. Hardesty and Barbara J. Little 2001, *Heritage Resources Management Series* 3, AltaMira Press, Walnut Creek, California. Foreword by Don Fowler, 184 + x pages, glossary, index, $23.95 (paper); $62.00 (cloth).**

These two books are published in AltaMira's *Heritage Resources Management Series,* sponsored by the University of Nevada, Reno, which offers coursework in cultural resource management (CRM)—the more common appellation[1] for the profession on this side of the Atlantic south of the 49th parallel (Beaudet and Elie 1991; Symonds 1995, 1999). These two books are, respectively, the second and third volume of the retrospectively created series, edited by Don Fowler, University of Nevada, Reno. The first volume included in the *Heritage Resources Management Series* was King's (1998) *Cultural Resource Laws and Practice: An Introductory Guide* (Symonds 1999).

More and more academic institutions are developing and expanding programs tailored to training students in CRM (Green and Doershuk 1998), so it is sensible that there be textbooks available that cover the nuances of federally based CRM procedure. Both are fine textbooks for college students in American CRM programs, and for use in continuing education classes in CRM practice and procedure. Most CRM practitioners now working had only government-issued documents to digest. At that time, one struggled with multi-generation photocopies of indifferent quality, plodding through the federally published materials designed not so much to be instructional and to foster discussion, but rather intended to bring about compliance. I can't but wonder how students have it so much easier these days, and I worry that perhaps we're coddling them unduly. Supplemental reference material and training in the art of scholarship will provide the next generation of CRM professionals with a full set of the tools they need to begin their apprenticeships in the discipline. Experienced professionals will benefit from these texts.

King's *Federal Planning and Historic Places: The Section 106 Process* is a gentle and reasonable introduction to the process of undertaking environmental review and historic preservation planning, chiefly that required by Section 106 of the National Historic Preservation Act of 1966 as amended (16 U.S.C. 470s), but also in part by a nexus of other federal laws, regulations, executive orders, policies, and guidance documents that require consultation to consider important cultural resources in project planning and land-use decisions. Regulations developed by the federal Advisory Council on Historic Places (ACHP) (and most recently revised on December 12, 2000) that implement Section 106 of the law may be

[1] Interestingly, some English practitioners in "archaeological resource management" are reconsidering the term "heritage management" (Symonds 1999).

found at 36 Code of Federal Regulations Part 800 (ACHP 2000). Earlier versions of the regulations were published in 1979, 1986, and 1999. While procedural details have changed slightly, the process followed under the regulations has not changed considerably, so King's book continues to offer helpful guidance about Section 106 review. I imagine that he will update his book to cover the regulations of 2000, and we can look forward to a revised version in due course. Perhaps in future editions of the book, the current regulations and more guidance documents will be included as appendices, as King (1998) did in part in his earlier book, and where King also smartly directed people to official web sites where the most current versions of these documents are available (Symonds 1999).

For the rules-and-regulations-phobic, it helps to have someone bravely attempt to lighten what are by necessity sober and dry procedures to be followed by federal agencies, local and state governments, applicants for federal funding and permits, and the public. The process is designed to ensure that historic and archaeological properties are identified, evaluated, and considered in federal or federally assisted projects, in consultation with the ACHP, Native American tribes, State Historic Preservation Officers, the public, and other interested constituencies (ACHP 2000). And King, who has participated in and consulted on many project reviews, and who also teaches classes in the subject, has undoubtedly found that a droll approach better reaches novices who require an initial introduction to the systematic procedures. After all, anything that can be done to encourage CRM practitioners to be attentive to the key regulatory procedures is admirable: King's humor works to good advantage. Federal regulations must be the Mt. Everest of comedic material, not an ascent I would attempt to scale. But witty he is, and God bless Tom King for it.

For those of us historic preservation planners who were "raised," as it were, on only the government-issued laws, regulations, guidance documents, and the like, King's at times breezy treatment may be often unbearable, entertaining, or unbearably entertaining depending on one's mood and disposition. I imagine some of his students rolling in the aisles, the rest rolling their eyes, but not a one bored or asleep. In a single instance he is maddeningly mysterious. Chapter 1 ("106 of What?") begins with the subsection titled "Not Dalmatians." A catchy title, yes. It caught my attention because I was unfamiliar with the phrase, and I wondered to what he might be alluding. I wondered, for instance, whether he was implying that the subject wasn't warm and fuzzy like 101 you-know-what. I searched in vain through the section and beyond, finding nothing to help me understand what he might mean by "Not Dalmatians." There is not a mention of projects or historic sites that are "dogs" (with apologies to Fido, taken to be "worthless" or "ugly"); nothing about adaptive reuse of historic fire stations; nor even a tale about the Section 106 review of Celebration, Florida, the ultra-modern planned community created by the Walt Disney Company. Alas, not even a throwaway nod to Patti Page inquiring about the cost of that canine in the storefront.

In my searching, I went to dictionaries, the internet, I asked my colleagues, relatives, even my roommate whose father was, conveniently enough, Chief of the Chelsea Fire Department: *nada*. (And despite what the *OED* tells me, here I take "NADA" to be an acronym for "not a Dalmatian anywhere.") I suppose in my set, old-fashioned ways, I expect a book chapter subtitle to have some bearing on what follows. At the risk of sounding like the Cruella De Vil of the scholarly book review set, I want those puppies, so to speak. But, if you must know, it wasn't long after this that my roommate asked, "What's all this about Dalmatians?" perhaps anxious that there might soon be a second overactive, high-maintenance companion sharing the space. Once I explained, he laughed and began referring to me as "Shakespeare" at every turn and opportunity. In my frumpy way, I scowled, "Everyone's a comedian."

Despite what you must think of me at this point, I am not completely without humor. After all, that was me who screamed out after glancing at a mock-up photo sent to my office for review, of a 190–foot steel telecommunications tower (its top-heavy, cantilevered, crowning platform bristling with antennae)—"Oh my God. It's The Thing That Ate Tokyo!"

You see, I suspected that hulking structure *must* have been designed by someone who, like me, had spent way too many sleepless nights watching Japanese monster movies. In the Buddhist manner, laughter lightens the spirit. It certainly serves King, and all of us, to do what we can to hold people's attention as we explain the different implications among the findings of "no effect," "adverse effect," and "no adverse effect." And (not unlike me) he is not altogether cute. Tom King offers his opinions (for which he is legendary) and bemoans what Tom King believes could be a better way to do things, if only whatever agency had just followed Tom King's advice. I found myself agreeing with him more often than I winced.

But I am disquieted by his chosen metaphors of child's play or gamesmanship to refer to the application of law, the implementation of regulation, and professional standards and practice: "Playing the Game"; "Who Plays?"; "The Game's Afoot!" imply, in my mind, a divisive "us and them" worldview, a trivializing or cynical approach to negotiation, or a lack of appreciation of the seriousness of the potential outcomes. Yet, because the stakes are so high, oftentimes involving patrimony and quality of life issues—the continuously shifting perceptions of people about their place, their past, and their destiny—the established rules take on that much more importance. Such circumstances, sometimes begun in conflict, require cooperative, good-faith efforts all around the table to reach a mutually acceptable resolution. Insisting on adherence to the rules and standards lessens the chance that these efforts are mere gambles.

Compliance with the law is a serious business. There is the possibility of litigation to avoid; there are vast amounts of public and private funding at stake; there are often pressing and at times conflicting public and private interests in the completion of new infrastructure; and there are the concerns of politicians and businesses for their public image and capabilities as adjudged by their constituents and customers. And there is no substitute for adherence to the letter and spirit of the law, for consistent and fair application of written regulations, standards, guidelines, and policy. Judging from his passionate treatment of these issues in the book under review and in his previous book (King 1998; cf. Symonds 1999), I am certain that King agrees with me on all these points. In fact, it is precisely the minutiae, the shadings of meanings, to which King wishes us to pay attention without losing perspective on the big picture: the substantive issues beyond the procedures, the spirit and purpose of the CRM endeavor.

King would no doubt agree, then, that one must finally steel oneself, and see what the current law and regulations actually say. I can credibly report from the trenches (O.K., from my desk, but on my word it *looks* as if some sort of skirmish must have played out here) that these documents, while dense and often complex, are not unintelligible. Certainly not the most inspiring of literary genres, but these technical publications are serviceable: in balance, they are well organized, logically constructed, and clearly written. King not only knows these rules cold, he knows the difference among *earlier* versions of the Section 106 regulations, some of which in fact still apply to current compliance projects that were first proposed and reviewed decades ago.

One must take time to read and consider what the law and regulations actually require, to take into account the many organized and well-written guidance documents, especially those prepared by the ACHP (available on line at http://www.achp.gov) (e.g., ACHP 1980, 1988).[2] And also, related documents prepared by the National Park Service (NPS) (http://www.cr.nps.gov), which promulgates standards and guidance for such things as the minimum qualifications for historic preservation professionals (NPS 1983b, 1999); how to conduct and report the results of CRM surveys (NPS 1983b); how to formally evaluate historic and archaeological properties to determine whether or not they are significant (and thus must be further considered in this environmental review process) (NPS 1981, 1983a, 1995); and how to curate the records and artifacts resulting from these efforts (NPS 1990b). There are also distilled treatments of some of

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[2] Although unexpressed on the title pages, Thomas F. King (then an ACHP employee) is credited as the primary author in the prefaces to both publications (ACHP 1980: 1; 1988: 5).

these topics written for the non-specialist (e.g., ACHP n.d.).

I learned on the job the usual way: I read and followed the laws, regulations, standards, and guidelines. I suppose that if I had King's book to read first, then the government documents that ensued would have been easier to digest. I would have had an immediately better grasp not only of how the process works, but also a rudimentary understanding of why and how it came to take the form it does. So, I would recommend King's book to students in academic programs that serve to train the next generation of historic preservation professionals: but, dear professors, please don't let them leave without providing them with the original texts that must serve as their primary reference sources for guidance and decision-making.

Those of us who are professionally involved with historic preservation planning in the United States (and her trust territories that are also subject to this process) will find many, many sections of King's book to be enlightening, provocative, and interesting—and funny to boot! His vast experience in the review process provides important tools of the trade to use, and pitfalls to avoid. King's book, as I have said, is wonderfully insightful. King is well known, highly respected, and even spoken of fondly in preservation circles. By continuing to share his wisdom and opinions in print, his reputation grows favorably. (Now then, Dr. King, about those Dalmatians . . . .)

Hardesty and Little's *Assessing Site Significance: A Guide for Archaeologists and Historians*, provides a thorough treatment of how to apply, to historical archaeological sites, the eligibility criteria (36 CFR Part 60) for listing in the National Register of Historic Places, and to a much more limited degree, for designation as National Historic Landmarks (36 CFR Part 65). This book is a fine supplement to the instructive booklets prepared by the NPS in their *National Register Bulletin* series. We are fortunate to have a book-length, focused treatment about evaluating historical archaeological sites. Most recently, the NPS prepared a revised version of its guidelines for evaluating archaeological sites (Little et al. 2000), and Little is a co-author of that.[3] Hardesty and Little's clear and cogent text explains how historical archaeological sites are evaluated for National Register or National Historic Landmark consideration. Going beyond the NPS booklet (Little et al. 2000), Hardesty and Little[4] provide longer case studies, and a more extended treatment of the concept of "significance" in terms of contemporary historical archaeological practice and theory. They also offer a very brief summary of the legal context of environmental review for evaluating the significance of archaeological properties.

In the United States, historic or archaeological properties are eligible for listing in the National Register of Historic Places if they have "integrity" (i.e., a relative degree of preservation), and meet one or more of the alphabetically designated National Register Criteria for Evaluation (A: associations with

[3] The NPS booklet, in its revised form (Little et al. 2000), deals with both ancient ("prehistoric") sites as well as historical archaeological sites, and so unavoidably lacks the focus that made the earlier version (Townsend, Sprinkle, and Knoerl 1993)—which had as its subject only historical archaeological sites—that much more useful for evaluating archaeological properties that date to the historical period.

[4] I can only imagine that it must have been a relief for federal-employee Little, in her co-authored nonfederal publication, to be allowed to spell the word *archaeology* the way that nearly everyone else spells it but the federal government, the latter insisting on *archeology*. A minor point, yes, but the practice is endlessly distracting to those of us who read texts closely, and momentarily think that we've encountered a typographical error. It has been said, perhaps facetiously, that a typographic error was the source of the odd federal spelling. More likely, it was because the US Government Printing Office adopted Webster's nationalistic-motivated dictionaries that, in this case, presumably attempted to render an "American" pronunciation of the diphthong and further simplify the ligature æ in print (cf. Crystal 1995: 81–82 and passim). Tom King, in the book reviewed above, spells it the federal way, which is strange because he comes across as a libertarian. I can't help but wonder whether that's just King's way of teasing us digging types, because he must know that nearly everyone in the discipline outside the confines of federal printing houses spells it *archaeology*. One hopes that AltaMira Press editors will in future consistently enforce a publisher's house style for spelling *archaeology* as it should be spelled.

important historical events; B: associations with historically important persons; C: distinctive characteristics of a type, period, or method of construction, the work of a master, possesses high artistic value, or a significant and distinguishable entity whose components may lack individual distinction; and, D: yielded or likely to yield information important in history or "prehistory" [i.e., ancient Native American history]), or, one or more of what are known as "criteria considerations" (exceptions to those broad categories of historic and archaeological properties that may be but are not usually considered eligible: religious properties; moved, reconstructed, or commemorative properties; birthplaces, graves, and cemeteries; and, properties less than 50 years old) (NPS 1981). There are at present nearly 73,000 historic and archaeological listings in the National Register of Historic Places, representing over one million contributing properties (historic and archaeological districts contain multiple properties).

Listing on the National Register of Historic Places is chiefly an honorary designation[5] that recognizes significant historic assets in the United States. Some state and local jurisdictions use the National Register of Historic Places in state and local land-use planning and other kinds of state and local regulatory considerations. A National Historic Landmark is a designation that is reserved for exceptional properties that have a truly national (as opposed to only local or state) level of significance (NPS 1983a). There are fewer than 2,500 National Historic Landmarks.

Of more immediate pertinence to the practice of CRM, and historic preservation planning for and environmental review of federal and federally assisted projects in particular, the National Register eligibility criteria are used as the touchstone in Section 106 review to determine whether a particular historic or archaeological property needs to be further considered in planning and project design. That is, say an archaeological site is discovered during advance cultural resource surveys for a new federal highway project. And, the site is evaluated and found to be eligible for listing in the National Register of Historic Places. The federal agency is then obligated to continue in the planning and consultation process to avoid adversely affecting the site's "historic" qualities and characteristics that make it eligible for listing in the National Register of Historic Places (such as intact archaeological features and artifact deposits that have or could provide important historical and scientific data). Thus, a property doesn't have to be actually nominated to or already listed in the National Register of Historic Places to be considered in the planning and review process; it merely has to be *eligible* for listing. National Historic Landmarks are afforded additional protections from federal or federally assisted projects and need to be considered much more carefully than properties that are only National Register-eligible.

Here is a book for those who have occasion to formally evaluate historical archaeological properties in situations that require the use of the National Register eligibility criteria and criteria considerations. It is completely suitable for students in CRM classes. For the practicing professional, however, this is no cookbook,[6] a point that students in CRM programs might not immediately grasp. Don Fowler, in the book's foreword (p. ix), writes that the National Register eligibility criteria "cannot cover every eventuality and hence, significance is subject to interpretation." Putting aside for the moment that the eligibility criteria are by definition and regulation designed to be applied to every case at hand, what Fowler intends to stress is the *utility* (although I endeavor to be kind about other people's

[5] At present, favorable tax benefits are available for National Register-listed properties, or National Register-eligible properties on the verge of being listed, in very limited circumstances, such as when a commercial property is rehabilitated in accordance with the US Secretary of Interior's Standards for Rehabilitation (36 CFR Part 67) (NPS 1990a); contact the NPS or your State Historic Preservation Office for the details.

[6] A common metaphor I independently considered in regard to Hardesty and Little's book under review, before happily discovering its previous, more artful use by King (1998:11, quoted in Symonds 1999), who states flatly that his book is not for cookbook users: "For such people I'd suggest culinary school rather than CRM, although I think you'll find that even the temperature at which water boils depends on the altitude."

pets and babies, I cannot at this juncture muster my will to use "beauty") of the eligibility criteria for general applicability. The *steps* required to determine precisely and to state explicitly how and why a particular historical archaeological site does or doesn't meet those criteria is what Hardesty and Little's book assists the reader to understand. Those steps are clearly, precisely, even finely drawn out in this volume. Yet, if the book were to be used alone in every eventuality (a ludicrous idea neither recommended nor intended by Dr. Fowler or the authors), the results would be predictably wooden.

In order to fairly evaluate historical archaeological sites under Criterion D (a site has yielded or is likely to yield information important in history—i.e., it has significant research value), one (but more usually a research team) has to be informed about past and current research about the appropriate geographic area (both applied and theoretical) in history, archaeology, and other pertinent disciplines, as well as about research findings for comparative sites located elsewhere. This is what is required for "Eligibility Step 2: Determine Which Historic Context(s) the Property Represents and How Property Types Relate to the Archaeological Resources" (p. 13), the kind of language Tom King (in the book under review, p. 179) blithely calls "Registerese."

Be that as it may, explicitly stating how and why a particular historical archaeological site has or may provide significant information is fundamental in CRM practice, and for that matter in contemporary archaeology as a structured mode of inquiry. To that all else derives: 1) developing and posing research questions; and 2) carefully crafting statements of the specific methods and sources of data that would be required to elicit information to address each research topic: a logical process that Grandma used to call "operationalizing" the research questions. Although the pickings can be slim, if archaeological sites can be thought of as a meal, then that logical mode of historical and scientific inquiry forms and informs the table manners of contemporary archaeology of whatever paradigmatic persuasion. It is the disciplined way to approach empirical data systematically to ensure that the resulting information is collected efficiently, can be evaluated for validity, and will have applicability to foster the augmentation and reappraisal of history and anthropology in tandem with the development of enhanced methods and approaches that can be applied in future.

Beaudry's influential "documentary archaeology" (e.g., Beaudry 1988, 1995, 1996; Yentsch and Beaudry 2001), whereby all kinds of written, oral, and material sources inform and complement the approaches, methods, and modes of analysis and interpretation of archaeological sources, is recommended at many turns in this book, although the influence may not always be apparent. Documentary archaeology is a means to establish not mere "research" significance, but more interestingly from an anthropological perspective, as an entrée to deduce emic cultural significance—not to be tautological, but that anthropological goal begins to express an appropriate research issue that could be considered in formally evaluating an historical archaeological site and its associated written, oral, and material data.

In these circumstances, it is abundantly clear that historical archaeological sites require the attention of historical archaeologists who are specialists in the geographic region under study; who are experienced with similar types of sites of relevant age, function, and form; and, who can locate, evaluate, and contextually interpret relevant documentary and comparative scholarly sources.[7] (In that regard, I wondered why the title wasn't cast as "a guide for *historical* archaeologists and historians." Perhaps the authors kindly considered that it wasn't just historical archaeologists, or even them in particular, who needed guidance, since not a few of those trained and experienced chiefly in the archaeology of the ancient Native American past, with little if any formal training in historical archaeology, end up making do on historical archaeological sites.)

Hardesty and Little cite many worthy pub-

[7] For a didactic treatment about developing a contextual research program for one category of historical archaeological sites, with suggestions to reference guides and research tools on documentary and scholarly sources in history, archaeology, and related disciplines, see Bell 1997.

lished examples of historical archaeology to make the point that documentary archaeology and comparative scholarship must be undertaken to fairly assess and contextually interpret historical archaeological data. One could quibble with the examples they cite, and consider others they might have cited, alternatively or additionally, but I exhausted my quibble somewhere between Tom King and the U. S. Superintendent of Documents. One is impressed, however, by the underutilized value as research and reference tools of carefully researched and exhaustively edited National Register nominations on file at the NPS and at State Historic Preservation Offices and searchable via the internet http://www.cr.nps.gov/nr/research.

Except perhaps in specialized, comprehensive bibliographies, updated at frequent intervals (e.g., Massachusetts Historical Commission [1978–2000]), it is difficult to fully guide a researcher faced with a vast literature, to specific, pertinent sources. Scholarship is an art that is learned by students under apprenticeship (are you still with me, my academic colleagues?), developed with experience, and furthered by keeping abreast of current research findings and new directions in the discipline. This book does an adequate job of conveying the reasons why documentary archaeology and comparative scholarship are essential. Keeping apprised of methodological innovations, alternative theoretical directions, and new interpretive trends in the field is vital for historical archaeology to continue to offer a powerful means to understand the past, and in a real sense to ensure the discipline's continued relevance by adequately identifying, fairly evaluating, and appropriately managing significant historical archaeological sites in planning and land-use decisions.

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Edward L. Bell is Senior Archaeologist at the Masschusetts Historical Commission (the State Historic Preservation Office) where he has provided professional assistance in archaeology and historic preservation since 1989. He is interested in linking the history and archaeology of local places to broader historical and social themes. He is the author of many reviews, articles, book chapters, monographs, and the reference book *Vestiges of Mortality & Remembrance: A Bibliography on the Historical Archaeology of Cemeteries* published in 1994 by Scarecrow Press.

Edward L. Bell
Massachusetts Historical Commission
220 Morrissey Boulevard
Boston, MA 02125
ed.bell@sec.state.ma.us