

Tom McCulloch

From: Crampton, David B SAS [David.B.Crampton@sas02.usace.army.mil]
Sent: Wednesday, March 22, 2006 11:14 AM
To: Tom McCulloch
Subject: Advisory Council Draft Policy on treatment of burial sites, human remains, and funerary objects

Tom:

Attached, for what it's worth, are my comments on the March 14, 2006 Advisory Council Draft Policy on the treatment of burial sites, human remains and associated funerary objects. They are my own views, based on my training and experience, and do not reflect any "official" views, of my agency or any other body or organization. They are also "unofficial" in the sense that I am not submitting them to you or the Council as an official response and comment on the notice. Should you have time, I would appreciate your thoughts on them. I do not know, because I have not compared, whether my views fall completely within the viewpoints of any of the major archaeological organizations or not; I would assume and hope that they are by-and-large congruent and consistent with the views and policies of the SAA, for example.

While at the oncologist's office waiting on my mother yesterday I picked up the March 13th issue of Time Magazine. I believe it was the March 13th 2006, that is, last week's issue, though I didn't look at the year in the date line clearly, and Dr.'s offices are sometimes notorious about keeping outdated issues of magazines on the shelf in their waiting rooms. Looked new and unread, though. At any rate, there was an article in it about the Kennewick skeleton. I appreciated Owsley's comments. A couple of weeks ago someone asked me out of the proverbial "clear blue sky" what I thought about the possibility of a relationship between the Paleoindian lithic tradition (Clovis, Folsom, Sandia, etc.) and late Paleolithic points from Southwestern Europe. I forget just how they phrased it. Causing me some pause, and thinking silently to myself "Huh? Say what?," I shrugged my shoulders and responded "Not much." I later wrote them a response explaining that it was a matter of "convergence" and quoted a good bit from Francois Bordes from many years ago on the subject, and the fact that while many Paleoindian tools might look completely at home in the Silutrean industry of Iberia and France, or vice versa, there was no direct link between the two industries through either time or space or direct ancestral-descendant populations, and that it was a matter of similar technologies independently derived, and that the Paleoindian tradition of the New World had its most probably had its direct antecedents from the Upper Paleolithic lithic industries of northeastern Asia. I avoided getting into a discussion of human physical variation, save to indicate that the New World was not settled by Caucasian populations from southwestern Europe, or "Spanish seal hunters" as one NPR Saturday quiz show purported, and that there likely were many waves of settlement by smallish bands of humans of Asiatic origin, perhaps of slightly varying genetic composition, owing to small population (gene pool) size and the attendant statistical variation in alleles represented in any particular gene pool, isolation and genetic drift, and even more probably of differing linguistic affiliation. I avoided mentioning the Ainu. Would have liked to have seen a photograph of the spear point in the pelvis, though. It wasn't clear in the captions or article whether the Clovis point shown in the article was actually the one associated with the remains, or just a representative example of its type.

Take care, and hope all is well. I hear that there is a new person there, a Mr. Eddins, that will deal with the Regulatory stepchild now. Please tell him that I try to keep us from getting too screwed up.

MEMORANDUM FOR RECORD

SUBJECT: Review Comments on the Federal Register (Vol. 71, No. 49:13066-13070) Notice of Tuesday, March 14, 2006, from the Advisory Council on Historic Preservation "Advisory Council on Historic Preservation's Draft Policy Statement Regarding Treatment of Burial Sites, human Remains and Funerary Objects"

1. I have reviewed the above-referenced notice. I have a few comments, thoughts, and questions, with regard to the draft policy. I provide these comments from the perspective of:

a. Someone with a BA in Social Sciences with a specialization in Anthropology, and an MA in Anthropology with a specialization in archaeology, and is a member of the Society of American Archaeology, an occasional member of the Society for Historical Archaeology, the Southeast Archaeological Conference, the Archaeology Section of the American Anthropological Association, as money for dues allows, and certified by and a member of the Register of Professional Archaeologists;

b. Someone who has experience with the legally permitted archaeological excavation of prehistoric aboriginal burials in this country and in Mexico:

1. From actual hands-on excavation of burials in the context of research-driven archaeology done under NSF dissertation improvement grants, NSF research grants, and National Geographic Society grants;

2. From the administration of Section 106-driven data recovery excavations on which burials were found, and in some instances, anticipated;

3. From having a modicum of course work in the identification and analysis of human skeletal material from archaeological contexts, and in-field experience in the identification of very fragmentary human remains found in surface contexts; and

4. From someone that has written as part of an MA qualification studies dealing with the utility of mortuary data for the archaeological interpretation of social organization and on the form and interpretation of Late Formative burial practices from a specific site.

5. From experience in conducting consultation with Federally recognized tribes, SHPOs, and other entities, sometimes more successfully than others.

c. The following comments represent my own personal views and experience, and are not intended to represent the views of my agency (US Army Corps of Engineers) or any organization of which I am a present or past member.

2. I think that it is good that the Advisory Council on Historic Preservation has an explicit policy statement with regard to the treatment of burial sites, human remains and funerary objects. I also agree that the 1992 amendments to the NHPA and the passage of NAGPRA, among other things

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required some reformulation of the Advisory Council’s 1988 stated policy with regard to this subject.

3. I will begin my comments with one concerning the text of the draft policy, found at the end of the notice at Roman numeral III, page 13070: I think the text of the Advisory Council’s draft policy is essentially good, and may not require much change or tweaking, depending on what public comments the Council receives with regard to this public notice.

4. Page 13070, Roman Numeral III, middle column, “Principle 1”: I am unsure just what “absolutely necessary” means, and am afraid that this may be interpreted in widely varying ways. I am also unsure that it can be very easily or adequately defined as to what is “absolutely necessary.” I would assume that it might eventually come to mean something like “the only feasible and prudent alternative” in the older Section 4(f) construal of the DOT Act, which might be a workable solution for CRM and Section 106-driven adverse effects. I am somewhat concerned that this might not leave any room or leeway for academically scientifically driven research, such as might be funded by the NSF.

5. Page 13070, Roman Numeral III, middle column, “Principle 2”: “Dignity” and “respect” are qualities that are viewed through the filter of cultural values, and may be subject to some differences of interpretation, of action, and of intent from one individual to another, and one cultural background to another. Therefore, I agree that such treatment can only be agreed to have been obtained when there has been “meaningful consultation,” though I’m chary of the use of this term. I’ve seen it (ab)used when the intent was simply to delay, deter, or prevent some action, and when the user’s ears were not necessarily open to meaningful dialogue (i.e., two-way communication) and consultation, despite what their words were saying.

6. Page 13070, Roman Numeral III, middle column, “Principle 3”: While early and meaningful coordination is preferable, sometimes consultation on a specific project or undertaking, as opposed to consultation on programmatic methods for handling certain sorts of scenarios, can occur too early in the planning process, e.g., before alternatives analysis and alternate site analysis is fully complete, or the actual scope of the undertaking and area of potential effect is determined.

7. Page 13070, Principles 4-8: No comments. I fully agree in principle.

8. Page 13067, Roman Numeral II, “Explanatory Notes on the Draft Policy”, left hand column, task 3: This paragraph reads:

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“This policy is not intended to recommend a specific outcome, but rather focuses thinking on what Section 106 participants need to consider in reaching decisions. The policy is not bound by geography, ethnicity, nationality, or religious belief. It applies to the treatment of all burial sites, human remains, and funerary objects encountered during the Section 106 process.”

I would comment that known, demarcated cemeteries are not normally considered for inclusion in the National Register of Historic Places under the criteria of eligibility, unless certain exceptional criteria apply. Such cemeteries can be disturbed, and moved, however, and the treatment of such cemeteries is generally by permit at the County Government level, and may be subject to some state regulations as well. The same holds true for abandoned and unmarked cemeteries; they are subject to certain state laws, and require permits if they are to be moved/disturbed from the Superior Court having jurisdiction (in Georgia). These cemeteries and burial grounds may be encountered/identified in the Section 106 process, but their treatment does not depend on whether or not they are determined eligible; it is prescribed under Georgia State statutes. I agree in principal that we should strive to treat all historic cemeteries uniformly, whether they are Native American, antebellum slave, Euroamerican, or of some other identifiable social group. I also think that prehistoric cemeteries should be treated in a conservative fashion, i.e., with an eye to their preservation first, but with provision allowing for discrete and discretionary legitimate scientific investigation where and when necessary.

9. Page 13067, Roman Numeral II, “Explanatory Notes on the Draft Policy”, left hand column, “Scope and Applicability”: It states here that the Federal Agency should consider the removal of human remains or funerary objects (on Section 106 projects) only when these or other alternatives that leave the remains in place cannot be reasonably implemented. As noted above, in comment #4, I am uncertain that one could ever argue that it was absolutely necessary to disturb or remove human remains or funerary objects if the motivating purpose was academically oriented scientific archaeological research, e.g., for the study of possible social status differentiations as manifested in mortuary practices, the study of differential nutrition as manifested in osteological material between upper and lower classes in a stratified society such as a Mississippian Chiefdom, or the study of an ethnic group’s cosmological beliefs as manifested through their burial customs.

Of course, on tribal land, the owner tribe has an absolute right to dictate through its normal governing channels whether any burial sites may be disturbed or removed, under what conditions and for what purposes. Should the same standard apply to all Federal land, or non-Federal, non-tribal land, especially in instances where the genetic/historical relationship or link between the existing tribe and the archaeological and human remains are very tenuous, such as when an Archaic burial is located in an area that during the early historic period was occupied by Tribe x?

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I recognize that in earlier eras there was too much, and sometimes too hasty exploration, of aboriginal mortuary sites and, that owing to elapsed time between excavation and (sometimes partial) analysis, much data that was recovered has been lost or not fully made use of, and that therefore those mortuary sites that remain should be more carefully treated, and efforts made to preserve them, rather than to automatically go for excavation. Still, one would hope that some room for legitimate archaeological/scientific research on mortuary sites to be allowed.

10. Page 13067, Right Hand Column, “Discussion of Principles,” Principle 1: “Burial sites, human remains and funerary objects should not be knowingly disturbed unless absolutely necessary, and only after the federal agency has fully considered avoidance and/or preservation in place,” This principle is consistent with the Council’s 1980/83 handbook on the treatment of archaeological properties, 36 CFR 800 and the NEPA EA/FONSI and EIS processes, and the conservation-archaeological principle of preferring preservation in place to data recovery when and where possible, because of the fact that the archaeological resource base for any given era is finite, and data recovery excavation is not perfect, and inherently destructive to some extent. The phrase “absolutely necessary,” however, I fear is open to widely varying interpretation. Finally, I am somewhat confused as to the meaning of the last two statements of the discussion of principle 1, found at the end of paragraph 4 of the right hand column, page 13067:

“Alternatively, preservation may reveal that preservation in place may not be the preferred outcome or treatment. Natural deterioration may be the acceptable or preferred treatment.” In the case of an archaeological site, is not “in-place preservation” tantamount to “natural deterioration”? Do not all archaeological sites deteriorate or alter over time, through geological, geochemical and biological processes? One may retard such deterioration, but not halt it, I would think.

With regard to public disclosure of the location of archaeological sites in general, and burial or mortuary sites in particular: Section 304 of the National Historic Preservation Act exempts information on the location of historic properties from the Freedom of Information Act and public disclosure if the Secretary of the Interior and the Agency determine that disclosure may: 1) cause a significant invasion of privacy; 2) risk harm to the historic resource, or 3) impede the use of a traditional religious site by practitioners. The policy statement and discussion concerning Principle #1 (i.e., that burial sites, human remains and funerary objects should not be knowingly disturbed unless absolutely necessary) that indicates that the location of sites to be preserved in place should not be publicly disclosed, to the extent allowed by law, is consistent with Section 304.

While I understand the reasoning behind this position, when working on CRM archaeology one is dealing more often with design engineers, planners, property owners, etc. and reviewing

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conceptual plans and more detailed engineering plans based on photogrammetric and traditional surveying mapping at a detailed and accurate scale. It is difficult to plan, and ensure, that a particular area or site with no visible above ground manifestations is avoided and preserved in place without having those locations explicitly on the relevant plan sheets. While this is not, *per se*, public information, it does disseminate to a moderately large number of people. From a practical point of view, it is difficult or next to impossible not to reveal site locational information to the public, particularly if one is going to go to the effort to file a real estate restrictive covenant on a property in order to preserve a site in place. That does not mean that one cannot downplay, and "soft pedal" such information.

Further, while it is good to keep such information away from those that might wish to "treasure hunt," I feel that it is sometimes better to make such information as widely known as possible, so that the general public, which is likely to take some pride and concern in such sites if they are known to them, can help protect sites by keeping tabs on them. Most pothunters already know where "good sites" are, sometimes long before any archaeologist. Also, many are unaware of how much archaeology there is in various parts of the country, such that actually showing them a plotted distribution of sites of particular time periods etc., may increase their awareness that such sites should be taken into consideration in the planning process. I am thus ambivalent about too strict and sacrosanct an adherence to secrecy of site locational information.

11. Page 13067, Principle 3, Discussion: I believe that this definition is that found at 36 CFR 800.16(f). It is good that it is included in the list of defined terms involved in/for Section 106. It is not the same thing as coordination, which one hears often around various government agencies, and which seems often to mean "Here, we've let you know what we're going to do, comment as you wish, but now we've notified you, we're going to do it."

12. Page 13068, middle column, Principle 4: this principal "recognizes that Native Americans are descendents of aboriginal occupants of this country (and also, of course, of Canada, Mexico, South and Central America). Federal agencies shall consult with Indian tribes and Native Hawai'ian organizations that attach religious and cultural significance to burial sites, human remains, and associated funerary objects, and be cognizant of their expertise in, and religious and cultural connection to them."

As a general principle, these statements are hard to argue or disagree with. On an operational basis, however, this principal is a bit more problematic, when one tries to identify specific groups that should be consulted in a given instance, particularly in areas where the movement of ethnic groups into and out of areas that may or may not have been in their "traditional" territories was frequent and sometimes of limited duration, where extrapolating a historically known ethnic group and its material culture backwards in time from the historical present to an archaeological

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culture centuries or more removed in time is not possible, or at best extremely tenuous, and/or where historically competing and antagonistic groups may claim the same ancestral territory and remains, and may possibly have conflicting views on how to handle any discovered remains or site.

Hypothetically, if one encountered a Late Paleoindian burial in some given geographic locale, with which groups would one initiate consultation? All federally recognized tribes? That or those tribes historically known to occupy that region or that at one time claimed it? Given the wide-ranging nomadic hunting and gathering subsistence, technology, and lifestyle of such groups, and the tendency for band and tribal groups to fission, it is highly unlikely that any direct connection between the two could be made. Would or should the claim of a group that historically occupied a region to treat the burial in accordance with their customs, which likely were not those of the deceased override the potential scientific value of the burial for insights into the more remote past of those first “Americans”? That is not to say that one could not arrange for whatever ceremonial rights relevant Native American groups might think appropriate for such remains if and when found. I do think there should be a middle ground that could be found viable by both groups, and consultation the means through which this can be achieved.

13. Page 13068, Middle column, Principal 5, Discussion: On tribally owned land, the wishes of the tribe, as expressed by their governmental representatives/bodies must of course be respected. For other lands, I would have to state that “careful disinterment” means not only that those doing the work should have, or be supervised by, people having expertise in disinterment techniques of human remains to ensure that in excavating a burial the material is kept as intact as possible and pieces are not left behind. It *also* includes proper field recordation of the sort discussed in this policy statement, including *in situ* photography. To not do so would be contrary to USDO National Park Service Standards and Guidelines for Archaeological documentation and accepted standards of scientific archaeological excavation and investigation. One would only hope that in instances where it was “absolutely necessary” to excavate or remove human remains from Native American mortuary sites that one could consult reasonably with the appropriate Federally recognized tribe(s) to agree to such procedures.

14. Page 13068, right-hand column, paragraph 2: Although I agree with the statement that the “Federal agency official should maintain an appropriate deference for the dead and their

descendants and descendant communities, and that the federal official (or archaeologist) should also maintain respect for the customs and beliefs of those who may be descended from the deceased, and try to avoid conflict with them, I do not agree that the word “respectfully” is self-explanatory; if it were, there would not be such a gulf between those who would immediately

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rebury the remains and who would not record details of the interment and those who would excavate and record them very thoroughly prior to subsequent reburial and re-interment ceremonies. As an archaeologist, and as one who has excavated as meticulously as possible Native American burials and or caused them to be excavated in such fashion, it is my feeling that not excavating them and recording them to the most rigorous standard of archaeological excavation would be in fact highly disrespectful of all communities. The term respectful, further, is in part dependent upon the viewer’s interpretations of a given protagonist’s actions and intent, and which may in part depend upon the viewer’s predisposition or assumptions about the protagonist, or his/her intent.

15. Page 13068, right hand column, Principle 6: There can be no argument with this principle. Those relevant and applicable laws, whether local, tribal, state, or federal, need to be adhered to.

16. Page 13068, right hand column, Principle 6, Discussion: The first sentence of the discussion here is phrased such (is not unheard of...) that it makes it seem as if encountering burial sites is something that is unusual. Expressed as a relative percentage of all Federal actions, it probably is a relatively rare occurrence. It is not infrequent, however, as attested by the existence of this Advisory Council policy.

17. Pages 13068, last paragraph, and 13069, first paragraph (continuation of last paragraph of previous page): Here the discussion seems to drift away from human remains, mortuary sites and funerary objects, to a generalized discussion of steps and reporting in the Section 106 process of identification, evaluation, assessment of affects and mitigation of adverse effects for archaeological properties in general. The discussion seems a bit out of place here. Rather than discuss the Section 106 process in general here, more pertinent I would think would be a brief note about how one might go about assessing whether or not a given site or site type might be likely to contain human remains or not, with or without any fieldwork or field data. For example, what sorts of sites are likely to contain burials in a given region? How are these recognized?

There is a statement made at the top of page 13069 with which I disagree. It is the second complete sentence in the first paragraph, left-hand column. It states: “While it is impossible to define a point applicable in all instances at which testing ends and archaeological data recovery begins, a rule of thumb is that adequate testing has been done when a decision about National Register eligibility begins.” I would argue that the way to differentiate the two is by asking the

question what is the purpose of the work being undertaken? Testing, or the evaluation of a site’s National Register eligibility, through fieldwork and archival (comparative) research, has as its

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aim very different goals and purposes than does data recovery of archaeological data from an adversely affected “significant,” i.e., National Register eligible, site. When testing a site, one is asking the question(s) does this site contain the type and quantities of data of such-and-such types that would allow a particular sort of analysis, and can this analysis be used to further explain, infer, or interpret past sociocultural systems? One need not recover sufficient quantities of that particular class or classes of artifacts to actually do such analyses, but only show that the right kinds of data occur, and from the samples observed, likely has sufficient quantities of the right kinds of data such that those analyses would be possible. At the testing level, my recommendation is to do as limited amount of test excavations as possible to make a decision about eligibility as possible, and leave as much of the site as intact as possible, should it be determined that it may be preserved in place. In this respect, I agree with the notice’s “rule of thumb.”

At the mitigation, data recovery level, the questions are different, and one is expected not just to demonstrate that a site possesses the right kinds and quantities of data to do particular sorts of analyses that may help explain or interpret past sociocultural systems, but to actually do and perform those analyses. The questions become: How does one maximize the data recovery of data of x and y, etc., types; how do these data inter-relate, etc. At the data recovery level, my opinion is that all possible analyses that can be performed should be performed, and it is critical that data collection methods be structured in a manner that will allow for such analyses. Aside from fieldwork, which should be maximized, within physical, fiscal, and practical limits, or at worst optimized (since once completed any remaining portions of the site will be destroyed), at the lab processing and analysis level one is not just counting sherds, but reconstructing vessels, one is not simply sorting flakes by type and morphology, but attempting to reconstruct the flint-knapping technology represented, the activities for which flint tools were used, one is not simply trying to demonstrate that a given pit feature contains datable materials and diagnostic types, but to determine functions of various sorts of pits and other features, etc., etc. At the testing level, lab analyses do not need to be complete or thorough, at the mitigation level they need to be thorough and exhaustive.

18. Page 13069, left-hand column, paragraphs 2 and 3: While the last paragraph on page 13068, continuing onto the top of page 13069 seems a bit of a digression from the subject of this FR notice, the last two paragraphs on the discussion of Principle 6 return to the specific subject of human remains, burial sites, and funerary objects. These paragraphs are to the point straight-forward and clear, and bear no argument or discussion.

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19. Page 13069, Principle 7 and discussion of principle 7: No comment, pro or con. Laws and the regs mandate this, and thus it must be done.

20. Page 13069, Principle 8 and discussion: the principle is founded on the language of NAGPRA, which is logical. My only comment, noted above, is that as the age of the burial site increases, the ability to ascribe it to any particular Native American tribe or band or group of related tribes, decreases, rapidly. This increases the number of potential consulting tribes and makes identifying those “correct” tribes to consult increasingly problematic. It also increases the chances for differing, sometimes opposing opinions or comments on appropriate treatment.

21. In summary:

a. I recognize that there is the need for such a policy as the one the Council has drafted, and that it is the appropriate agency to do so, with input from the National Park Service, various National Archaeological organizations and all Federally recognized tribes and the general public.

b. The policy drafted is essentially good.

c. I have only two concerns:

1. That provision be included for academic, scientifically oriented excavation of mortuary (burial) sites when it is necessary or appropriate, except on tribal lands where the owner tribe does not allow it; and

2. If human remains are excavated from an archaeological burial site or “mound,” whatever their subsequent disposition, they should be excavated and recorded in as meticulous and careful a manner as possible and as the state of preservation will allow, including scaled drawings, photography and written notes, and non-destructive analysis of grave goods and skeletal elements present, unless they are from tribal lands from a tribe or group that expressly forbids it.

d. If human remains are identified on a Section 106 project, and a Native American Indian tribe is identified with whom to consult, and that group wishes, or groups wish, to consult, and

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the results of consultation indicate that the group or groups wish to conduct a traditional Native American ritual or ceremony appropriate for the occasion of disturbance, excavation, and/or reburial, the agency involved should make all appropriate efforts to accommodate such wishes.

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