Archeology Committee
October 28, 2021
9:00 A.M.
CALL TO ORDER

Today’s date is October 28th, 2021 and the time is [9:00A.M.]

This meeting of the Archeology Committee has been properly posted with the Secretary of State’s Office according to the provisions of the Texas Open Meetings Act, Chapter 551, Texas Government Code. The members may discuss and/or take action on any of the items listed in the agenda.
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1. **Call to Order** – *Chair Bruseth*
   A. Committee Introductions
   B. Establish a Quorum
   C. Recognize and/or excuse absences

2. **Minutes** – *Bruseth*
   Consider approval of the July 27, 2021 Archeology Committee meeting minutes.

3. **Amendments to sections 26.14 & 26.16, Title 13, Part 2, Chapter 26, Practice and Procedure, of the Texas Administrative Code, proposed for first publication and public comments in the *Texas Register (Item 3.5A)* - *Jones*

4. **Consider approval of Curatorial Facility Certification for the Witte Museum, Bexar County (Item 9.2)- *Jones***

5. **Division Director’s Report** – *Jones*
   A. Update on Archeology Division programs and staff - *Jones*
   B. 1554/ *La Belle* Collections Update - *Jones*
   C. TASN Program update - *Shelton*
   D. Upcoming activities/events - *Jones*

6. **Adjournment** – *Bruseth*

NOTICE OF ASSISTANCE AT PUBLIC MEETINGS: Persons with disabilities who plan to attend this meeting and who may need auxiliary aids or services such as interpreters for persons who are deaf or hearing impaired, readers, large print or Braille, are requested to contact Esther Brickley at (512) 463-5768 at least four (4) business days prior to the meeting so that appropriate arrangements can be made.
ITEM # 1
TEXAS HISTORICAL COMMISSION

ARCHAEOLOGY COMMITTEE MEMBERS
Members as of 7/01/2018

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HIGHLIGHTS FROM THE DIRECTOR

During this quarter, the Archeology Division (AD) welcomed Emily McCuistion as the newest staff member. She accepted the part-time position as a reviewer for Harvey, Irma, and Maria-related projects. A 2016 Texas State University graduate in the Anthropology Department, McCuistion wrote her master’s thesis on a Bayesian analysis of radiocarbon dating in the Lower Pecos Canyonlands. She brings years of experience working in the cultural resource management field in Texas, as well as working as an archeologist with the National Park Service.

During September, AD completed a Memorandum of Understanding with the Texas Archeological Research Laboratory (TARL) at UT-Austin that establishes clear deliverables and benchmarks for sharing archeological site data for the ATLAS moving forward. It also sets forth a plan to develop a shared database for a more efficient workflow for the submission, editing, and publishing of new site data. AD also coordinated the signing of transfer paperwork from the Ledesma family to move the 1980s archeological collections from the THC’s Old Socorro Mission State Historic Site in El Paso County, now at UT-Austin and Texas A&M-Galveston, to the THC where staff will be working to re-inventory them.

Additional items of note:

- July 3—Site visit to Tonkawa Creek Park State Antiquities Landmark (SAL), McLennan County (Rebecca Shelton)
- August—Brad Jones co-authored an article with Robert Selden (SFA) on 3D analysis of the Belle cannon published in Society for Historical Archaeology’s journal Historical Archaeology
- August 10–12—Visit to the Corpus Christi Museum of Science and History to review the conservation status of HIT collections and discuss long-term plans for the Belle and 1554 collections (Amy Borgens, Brad Jones)
- August 20–21—Visited data recovery at Bois D’arc Lake 41FN114, Fannin County (Rebecca Shelton)
- August 25—Site visit to the Phantom Lake Spring Site (41JD63) in Jeff Davis County to meet with Bureau of Reclamation staff to discuss an SAL nomination and plans to transfer the site to private ownership (Drew Sitters).
- September—Visited NRHP-eligible Pecan Spring Site 41EL11 at USACE Lake Bardwell, Ellis County (Rebecca Shelton).
- September 21–23—Participated in Texas Military Forces annual tribal consultation meeting (Marie Archambeaut, Maggie Moore)
- September 28—Presentation to UT Anthropology Cultures in Contact class (Brad Jones)

MARINE ARCHEOLOGY PROGRAM (MAP)

MAP has been working to recommence its student intern program, though this has been complicated by the ongoing pandemic. The MAP worked with two Texas A&M University (TAMU) graduate students on multiple data entry and artifact re-inventory projects, in particular that of the site of Brazos Santiago Depot. This THC project is being revisited by the MAP with TASN steward Janet Dye and TAMU student Robin Galloso, with the latter presenting findings as a doctoral dissertation.

The MAP received two separate notifications on August 13 regarding reported shipwrecks eroding out of riverbanks: a suspected ferry site in the Sabine River in Panola County and the remains of the steamboat Mary Conley (1865–73) in the Trinity River in Liberty County. Two separate site visits were arranged with the Mary Conley assessment occurring on August 20 and involving TASN Marine Stewards Andy Hall and Gary McKee. The general location of Mary Conley was known to the MAP because a boiler had been discovered; the wreck itself was buried and has remained elusive until recently. AD staff Amy Borgens and Maggie Moore visited the Sabine River site on
September 9 and confirmed it represents a type of ferry or keel boat. Both archaeological sites will be irreparably damaged by riverbank erosion. AD staff and stewards are working on site forms and final reporting of these two discoveries. As part of the MAP’s public outreach prorates, Borgens presented on Texas maritime archaeology for a Friends of the THC webinar on September 23.

**REVIEW AND COMPLIANCE ACTIVITIES**

Under the auspices of the National Historic Preservation Act and the Antiquities Code of Texas, the State and Federal Review Section staff of the AD reviewed about 2,302 proposed development projects during July 1–September 30. Of those, approximately 75 archeological surveys were required to determine whether any significant cultural resources would be adversely affected, and about 5,880 acres were surveyed. Approximately 70 historic and prehistoric sites were recorded, of which one was determined eligible for listing in the National Register, 50 were determined not eligible, and 19 were undetermined.

**CURATORIAL FACILITIES CERTIFICATION PROGRAM (CFCP)**

The THC’s CFCP ensures that state-associated archeological collections are properly curated. In the past quarter, AD staff Brad Jones and Maximilian Hall have reviewed the Self-Evaluation packet submitted by the Witte Museum in San Antonio and conducted the field review on September 16. Already an accredited museum by the American Alliance of Museums, the Witte has shown through the strength of its policies, procedures, and facilities that it is a world-class museum and ideal CFCP candidate. During the field review, Witte President and CEO Marise McDermott, Director of Collections Leslie Ochoa, Archaeology Curator Harry Shafer, and Paleontologist Thomas Adams provided an insightful overview of the museum’s facilities and efforts to continue improving the facility. Overall, the curatorial facilities were top-notch and a recommendation for certification will be presented at the October commission meeting.

Currently, three interns are working with Jones on collections projects. Texas State student Allison Hopson is assisting with review and analysis of ceramics from the Fort St. Louis/Presidio La Bahía site excavated by the THC. Austin Community College student Faizan Khan is also assisting with this site collection, conducting an analysis of Spanish olive jar fragments. Finally, recent UT-Austin graduate Chesley Hinds is assisting with ongoing curation of artifacts from the Lake Gilmer project.

**TEXAS ARCHEOLOGICAL STEWARDSHIP NETWORK (TASN)**

The TASN Annual Meeting and Workshop was held virtually on August 7. Stewards Stephen Bishop and Françoise Wilson presented on their collaborative work with Master Naturalists, and Wilson “Dub” Crook and Linda Gorski spoke on excavations at the Lone Oak Site. We recognized 10 stewards for their years of service with the Jim Word Awards, and also recognized the top 10 percent of stewards for their significant contributions in 2020 with the Norman Flaigg Awards. Additionally, we were able to welcome new members: Archeological Steward Ron Carpenter of Jasper County; Tribal Steward Bryant Celestine, Historic Preservation Officer for the Alabama-Coushatta Tribe of Texas in Polk County; and History Stewards Richard Denney of Travis County, Mary Kahle of Travis County, Larry Ottosen of Montgomery County, and Dan Utley of Travis County. The TASN will hold a business meeting on October 22 during the Texas Archeological Society (TAS) Annual Meeting, and we are excited to hold the 2022 Annual Meeting and Workshop at Washington-on-the-Brazos State Historic Site on May 14, 2022, and look forward to touring the grounds.

In addition to meetings, the TASN has again participated in the planning and organization of the nationwide Partners for Archeological Site Stewardship workshop (sitestewardship.org), to be held virtually November 2–3. Over 30 stewardship organizations and programs will participate, and Steward Johnney Pollan from Harris County will present on his ongoing community heritage research in Brazoria County. In 2022, AD staff and TASN members will begin publishing a digital TASN newsletter featuring agency and program updates, articles by stewards and THC staff, regional updates, and upcoming events.

**TEXAS ARCHEOLOGY MONTH (TAM)**

Each October, TAM promotes public engagement opportunities sponsored by the THC and our partners across the state, and this year we have a mix of in-person and virtual events (thc.texas.gov/tam). The THC and TARL are creating activity kits for Central Texas students. We are still accepting events for the TAM calendar and look forward to reporting on the outcomes next quarter.
ITEM # 2
1. Call to Order

Chairman Jim Bruseth opened the Archeology Committee (AC) meeting on July 26, 2021, at 11:15. Bruseth announced that the members could discuss and act on any of the items listed on the agenda. He welcomed everyone to Archeology Committee meeting and called the roll.

**Members Present**
- Jim Bruseth
- Pete Peterson
- Tom Perini
- Earl Broussard

**Members Absent**
- Donna Bahorich

Bruseth announced that Donna Bahorich was absent, that a quorum was established, and that the meeting was open.

Bruseth made the motion to excuse the absence of Bahorich.

Pete Peterson moved.

Tom Perini seconded.

Bruseth called for a vote, heard no opposition, and the motion passed unanimously.

2. Approval of Minutes

Bruseth called for the approval of the AC minutes for April 26, 2021.

Perini made the motion to approve.

Broussard seconded.

Bruseth heard no changes, called for the vote, and the motion passed unanimously.
3. Report

Bruseth called on Brad Jones to begin the report on the Archeology Division. He noted that the commission would be hearing from THC staff members Amy Borgens, Tiffany Osburn, and Arlo McKee.

Jones shared that there was a new building located behind El Rose. He informed the committee that former staff member Taylor Bowden had left the THC. Jones mentioned that Bowden reviewed work to do with Hurricane Harvey, Maria, and Irma. He revealed that his staff was seeking a replacement for Bowden and that the new employee would be hired by the next committee meeting.

Jones encouraged the AC members to read his Quarterly Report for details and then called on Amy Borgens to present on recent Texas Marine Archeology activity.

Bruseth asked all presenters to consider the time constraints that the committee had.

Borgens presented on her work for the 1554 project. She explained that the excavation of the 1554 shipwreck occurred almost 50 years ago. Borgens shared that she had focused on expanding the THC’s partnership with the National Park Service (NPS) and the Padre Island National Seashore. Her highlights included a collaboration with NPS’s student intern program, web content development, discussion on a traveling exhibit, and a Spanish language booklet that focused on the 1554 shipwreck in collaboration with the Instituto Nacional de Antropología e Historia.

Borgens hosted a cross-training workshop in May at the Corpus Christi Museum of Science and History that taught NPS employees about the material culture washing ashore along the Padre Island National Seashore. She shared that she was in the process of rebooting the THC’s internship program with Jones.

Borgens highlighted her work with NPS’s Submerged Resources Center, describing the collaborative fieldwork in May focused on locating submerged shipwreck targets and site formation data, a continuation of the project started in October of 2020. Borgens informed the committee that the offshore remote sensing work in May was stalled due to inclement weather.

Bruseth asked Borgens to give a short overview of the significance of the 1554 shipwrecks.

Borgens reported that the ships were discovered through a salvage effort in 1967. She highlighted that the discovery of the ships led to the enactment of the Texas Antiquities Code, and that the THC and NPS had relocated two of the three Spanish ships, but that the third remained missing.

Bruseth noted that these ships were part of the Spanish fleet that brought silver from the New World to Spain. He encouraged the commissioners to visit the Corpus Christi Museum of Science and History (CCMSH) and to explore the holdings at the facility. Bruseth noted that a quarterly meeting in Corpus Christi would be an opportune time.

Borgens reminded the commissioners that the 1554 wrecks are the oldest excavated European shipwrecks in the United States. She concluded her presentation and informed the committee that in
May the team had surveyed 626 acres for the lost Santa Maria Yciar vessel, completed 52 acres worth of refinement survey, and monitored about 30 remote sensing targets.

Jones thanked Borgens and called on regional archeologist Arlo McKee.

McKee informed the committee that his goal was to determine if the presumed Spanish salvage site discovered in 1973 (41KN11) was in an intact or disturbed context. He noted that 41KN11 was only occupied for seven weeks, and that the location was in a highly dynamic setting. McKee explained that part of his goal was to determine the age of the landform and to do this by collecting sand grain samples and using optically stimulated luminescence (OSL) techniques to date them. The committee was informed that sand grains could be studied to determine how long since they had last been exposed to sunlight. McKee concluded that testing could take up to 6 months and therefore a later report would follow.

Jones reported on his collaboration with NPS and the 1554 artifact collections. He explained that NPS was testing rocks that were thought to be the ship’s ballast stones. Jones shared that NPS was studying the wreck’s ceramics and that this would lead to a better understanding of ceramics found across the United States. He informed the committee that he was working on a stable-isotope analysis with Dr. Eric Guiry to study the history of the animals brought aboard and the diet of the individuals on the ship.

Jones also spoke of his collaboration with Dr. Russel Skowronek on a PXRF study of the brass and copper cookware from the La Belle collection. He explained that the La Belle artifacts were special because they were loaded on the ship in France and then shipped directly to Texas and represented samples that were very well dated and sourced. Jones shared that Dr. Skowronek had completed analysis of vessels at the Bullock Texas State History Museum and planned to study other examples of La Belle artifacts at other facilities and then provide the THC with a report.

Jones reported on his continued effort to help CCMSH with their care of artifacts and his upcoming meeting with the staff.

Bruseth asked Jones to make sure that a hurricane would not damage the collections.

Nau wanted to find out what CCMSH’s emergency plan was and how the THC could remove their items from the museum. He asked Jones to provide him with an updated report on a potential move.

Crane suggested that Jones inspect CCMSH’s security system.

Jones agreed and also reported that Borgens had completed a re-inventory of the 1554 shipwreck collections.

Bruseth commented that both the 1554 and La Belle collections were world class and that they stood in harms way.

Jones agreed.
Tiffany Osburn was called to the stand and presented on the Texas Archeology Society’s (TAS) 2021 Field School. She shared that the field school was an annual event that brought together professional and avocational archeologist for a weeklong program. The committee was informed that the field school rotated regions throughout the state and provided valuable research outcomes.

Osburn, the TAS Field School Committee chair, informed the committee that the 2021 field school was held in Kerrville and that the site’s research potential warranted a return in 2022. She shared photos of the archeological features discovered and provided information. Osburn recognized THC employees Jenny McWilliams and Carlyn Hammons for hosting a three-day Cemetery Workshop during the field school.

Osburn thanked all the sponsors and the countless supporters. She shared that Texas Parks and Wildlife, Texas Department of Transportation, National Park Service, and the Texas Historical contributed staff members. Osburn was thankful and proud that the THC supported TAS.

Jones thanked Osburn.

Jones gave a brief update on the CFCP program and announced that he would inspect the Witte Museum in San Antonio in September. He anticipated that the committee would review their application at the next quarterly meeting.

Jones shared that Texas Archeology Month was planned to occur in October and that the month would be filled with in-person and virtual events. He noted that he was excited about potential partnerships with the THC’s historic sites network.

Jones announced that the Texas Archeological Stewards Network meeting was scheduled for August and that he would report back at the next quarterly meeting.

Bruseth congratulated the THC’s Archeology Division and their dynamic set of programs.

Nau asked about the inspection date for the Witte Museum.

Jones answered that the date was September 16, 2021.

4. Adjournment

Bruseth asked for a motion to adjourn.

Perini made the motion to adjourn the AC meeting.

Bruseth adjourned the meeting.
ITEM # 3
Proposed PREAMBLE for Amendments to Rules 26.14 and 26.16

TITLE 13 CULTURAL RESOURCES
PART II TEXAS HISTORICAL COMMISSION
CHAPTER 26 PRACTICE AND PROCEDURE
SUBCHAPTER C ARCHEOLOGY

13 TAC §§ 26.14 and 26.16

The Texas Historical Commission (Commission) proposes amendments to § § 26.14 and 26.16 relating to Practice and Procedure for Archeology.

This change updates requirements for the submission of Antiquities Code permit and draft and final reports for archeological projects conducted under the Antiquities Code of Texas.

The proposed amendment to §26.14 for Issuance and Restriction of Archeological Permits removes the term “hard copy” and replaces “mailed” with “sent”. In the past year THC has brought online an electronic archeological permit application system that allows for submission of all required documents as electronic files, and issues all associated correspondence to the applicant, landowners, and sponsors (signatories) as electronic files, with hard copies sent on request. Existing language in the §26.14 specifies that the permit will be sent via “mail” as a “hard copy”. The proposed change will bring the language in the rules back in line with evolving practice.

The proposed amendments to §26.16 for Reports Relating to Archeological Permits address wording in the rules that is no longer consonant with existing practice since the adoption of an online project review portal eTRAC and the availability of other mechanisms to make reports available to the public. The first proposed change is the deletion of “and transmittal letter” from the report submission requirement. The THC’s eTRAC system provides the public an online portal to submit reports directly to THC staff for review, obviating the requirement for a transmittal letter. Proposed changes to language regarding the submission of draft reports has been edited to remove “printed” and language regarding binding of printed report, as these are now submitted as electronic files through eTRAC. The next proposed changes simplify the submission requirements for final reports to require that the only printed copies be submitted to THC and Texas State Library and Archive Commission. This proposed change deletes the requirement that redacted copies be sent to a list of eleven libraries and repositories. THC has adopted both an online system for providing full reports to contractors via the restricted Texas Archeological Sites Atlas and has an agreement with Stephen F. Austin University to provide redacted copies of reports to the public via Index of Texas Archaeology. Finally, the requirement to submit tagged PDF versions of complete and redacted reports to the THC remains but is updated to remove requirements that these be submitted on CDs or DVDs, as these may be more efficiently submitted via the eTRAC portal or email.

FISCAL NOTE. Mark Wolfe, Executive Director, has determined that for each of the first five-years the proposed amendments are in effect, there will not be a fiscal impact on state or local government as a result of enforcing or administering these amendments, as proposed.
PUBLIC BENEFIT/COST NOTE. Mr. Wolfe has also determined that for the first five-year period the amended rules are in effect, the public benefit will be an increase in regulatory efficiency and a simplification of the archeological permitting and review requirements.

ECONOMIC COSTS TO PERSONS AND IMPACT ON LOCAL EMPLOYMENT. There are no anticipated economic costs to persons who are required to comply with the amendments to these rules, as proposed. There is no effect on local economy for the first five years that the proposed new section is in effect; therefore, no local employment impact statement is required under Texas Government Code, § 2001.022 and 2001.024(a)(6).

COSTS TO REGULATED PERSONS. The proposed new section does not impose a cost on regulated persons, including another state agency, a special district, or a local government and, therefore, is not subject to Texas Government Code, § 2001.0045.

ECONOMIC IMPACT STATEMENT AND REGULATORY FLEXIBILITY ANALYSIS FOR SMALL BUSINESSES, MICROBUSINESSES, AND RURAL COMMUNITIES. Mr. Wolfe has also determined that there will be no impact on rural communities, small businesses, or micro-businesses as a result of implementing these amendments and therefore no regulatory flexibility analysis, as specified in Texas Government Code § 2006.002, is required.

GOVERNMENT GROWTH IMPACT STATEMENT. THC staff prepared a Government Growth Impact Statement assessment for this proposed rulemaking, as specific in Texas Government Code, § 2006.0221. During the first five years that the amendments would be in effect, the proposed amendments: will not create or eliminate a government program; will not result in the addition or reduction of employees; will not require an increase or decrease in future legislative appropriations; will not lead to an increase or decrease in fees paid to a state agency; will not create a new regulation; will not repeal an existing regulation; and will not result in an increase or decrease in the number of individuals subject to the rule. During the first five years that the amendments would be in effect, the proposed amendments will not adversely affect the Texas economy.

TAKINGS IMPACT ASSESSMENT. THC has determined that no private real property interests are affected by this proposal and the proposal does not restrict or limit an owner’s right to his or her property that would otherwise exist in the absence of government action and, therefore, does not constitute a taking under Texas Government Code, § 2007.043.

REQUEST FOR PUBLIC COMMENT. Comments on the proposed amendments may be submitted to Mark Wolfe, Executive Director, Texas Historical Commission, P.O. Box 12276, Austin, Texas 78711. Comments will be accepted for 30 days after publication in the Texas Register.

STATUTORY AUTHORITY. These amendments are proposed under the authority of Texas Government Code § 442.005(b), which designates the Commission as the agency responsible for the administration of the Antiquities Code of Texas.

CROSS REFERENCE TO STATUTE. These amendments are proposed under the authority of Texas Government Code § 442.005(b), which designates the Commission as the agency responsible for the administration of the Antiquities Code of Texas. The proposed amendments implement
Sections 191.054 and 191.055 of the Texas Natural Resources Code. No other statutes, articles, or codes are affected by these amendments.

The Commission hereby certifies that the section as adopted has been reviewed by legal counsel and found to be a valid exercise of the agency’s authority.
(a) Issuance of permit. The commission shall review the permit application submitted pursuant to §26.13 of this title (relating to Application for Archaeological Permits) and may issue the permit, issue the permit with special conditions, request additional information for review, request a revised scope of work or research design, or deny the permit application.

1) Review by commission staff. Within 30 days of the receipt of a permit application, staff shall notify the applicant in writing that the permit application is complete and accepted for filing or that the permit application is incomplete and specify the additional information required for review. The commission will also issue or deny the permit within 30 days. Investigations may commence upon receipt of notification of the assignment of a permit number, and a hard copy of the permit will be mailed to all signatories to the permit application.

2) Review by the Antiquities Advisory Board. The executive director may choose to submit the permit application to the Antiquities Advisory Board for its consideration. Permits that are denied by commission staff may be appealed by the applicant to the Antiquities Advisory Board. The board shall review such applications at its next scheduled meeting, provided it shall have a minimum of 15 days to prepare for such review. Recommendations of the board shall be taken to the next scheduled meeting of the commission by the chair of the board or by one of the other commissioners who serve on the board for action thereon.

3) The deadlines in this section may be extended for good cause. In the event a deadline is extended, the commission shall provide notice of the extension and the good cause to the applicant in writing. The applicant may complain directly to the executive director if the staff exceeds the established period for processing permits and may request a timely resolution of any dispute arising from the delay.

4) Failure to respond. If no response has been made by the commission within 30 days of receipt of any permit application, the permit shall be considered to be granted.

(b) Review by controlling entities. It is the responsibility of the permit applicant to obtain all necessary permissions and signatures prior to submitting an archaeological permit application.

(c) Special requirements. When a permit is issued, it will contain all special requirements governing that particular investigation; it must be signed by the director of the Archeology Division of the commission, or his or her designated representative.

(d) Permit period. No permit will be issued for less than one year nor more than ten years, but a permit may be issued for any length of time as deemed necessary by the commission in consultation with the principal investigator.

(e) Transferal of permits. No permit issued by the commission will be assigned by the permittee in whole or in part to any other institution, museum, corporation, organization, or individual without acknowledgement of the original permittee and the consent of the commission. If the investigative firm cannot obtain acknowledgement of the transfer from the original permittee, the permit application shall be denied.
holder, documentation of the firm's efforts must be submitted together with the transfer application form.

(f) State site survey forms. TexSite electronic forms for all sites recorded as a result of activities undertaken through an Antiquities Permit will be completed and submitted to the Texas Archeological Research Laboratory at the University of Texas in Austin, upon the completion of field work.

(g) Permit expiration date. The expiration date shall be specified in each permit and is the date by which all terms and conditions must be completed for that permit. It is the responsibility of the permittee, sponsor, investigative firm, and principal investigator to meet any and all permit submission terms and conditions prior to the expiration date listed on the permit.

(1) Expiration date notification. Principal investigators will be notified 60 days in advance of permit expiration date.

(2) Expiration date extension. A principal investigator must complete and submit a First Extension Application Form to the commission if he or she desires an extension of the final due date for the completion of an Antiquities Permit that was issued to him or her. The Archeology Division (AD) of the commission will review the submitted Permit Extension Form, determine whether an extension is warranted and extend the permit expiration date once for no less than one year and no more than ten years as deemed appropriate. In addition, and upon review and recommendations by the Antiquities Advisory Board, the commission may by a majority vote of its members, approve or disapprove an additional extension of the expiration date of an Antiquities Permit beyond the single extension that the AD staff of the commission is authorized to issue under subsection (c) of this section and this paragraph, provided that the following conditions are met:

(A) the principal investigator (PI), and/or the investigative firm listed under an Antiquities Permit must complete and submit a Second Extension Application Form to the commission, and give an oral presentation before the Antiquities Advisory Board justifying why a second permit expiration-date extension is warranted; and

(B) the justification for the second extension must show that the extension is needed due to circumstances beyond the control of the PI. Examples include, but are not limited to: funding problems, death of the PI, and artifact curation problems.

(h) Expiration responsibilities. Investigative firms must ensure that a principal investigator is assigned to a permit at all times, regardless of whether the permit is active or has expired. Both the principal investigator and investigative firm should ensure that a new principal investigator is assigned to the permit if, for any reason, the original principal investigator must leave the project. The assignment of a new principal investigator must be approved by the commission.

(i) Permit amendments. Proposed changes in the terms and conditions of the permit must be approved by the commission.

(j) Permit cancellation. The commission may cancel an Antiquities Permit if one or more of the following events occur:

(1) death or withdrawal of the principal investigator without a new principal investigator being named and approved by the commission;

(2) cancellation of the project by the sponsor or permittee prior to the completion of the archeological field investigations;

(3) violation of §26.18 of this title (relating to Compliance with Rules for Archeological Permits); and/or
(4) destruction of the permit area or associated cultural resources due to natural causes, prior to the substantive completion of the field investigations being performed under the permit.

(k) Permit censuring. The commission may censure a principal investigator and/or investigative firm under the following conditions:

1. if it is found that two or more permit application offenses have occurred in one calendar year. Permit censuring will render a principal investigator and investigative firm ineligible for issuance of another permit for six months after a finding by the board that two or more permit application offenses have occurred in a one-year period; or

2. if an investigative firm does not assign a new principal investigator to a permitted investigation within one month of the departure from the firm by the principal investigator assigned to the permit. Permit censuring will render the investigative firm ineligible for issuance of another permit until a new principal investigator is assigned to the applicable permits.

Source Note: The provisions of this §26.14 adopted to be effective May 20, 2013, 38 TexReg 2980; amended to be effective February 29, 2016, 41 TexReg 1440; amended to be effective December 31, 2017, 42 TexReg 7383
Texas Administrative Code

TITLE 13  CULTURAL RESOURCES
PART 2  TEXAS HISTORICAL COMMISSION
CHAPTER 26  PRACTICE AND PROCEDURE
SUBCHAPTER C  ARCHEOLOGY
RULE §26.16  Reports Relating to Archeological Permits

(a) With the exception of alternative mitigation and rock art preservation permits, a report and transmittal letter must be submitted to the commission describing the results of each permitted investigation. The report should meet the Council of Texas Archeologists (CTA) Guidelines for Cultural Resources Management Full or Short Reports, and must be submitted to the commission meeting the following requirements.

(1) The report must contain:
   (A) a title page that includes: the name of the investigation project, the name of the principal investigator and investigative firm, the county or counties in which the investigations were performed, the Antiquities Permit number, and the date of publication;
   (B) an abstract containing project field dates, project acreage, descriptions of the findings, a list of the sites recorded (with trinomials) and a clarification concerning which artifacts were curated and where they are or will be curated;
   (C) specific recommendations of which sites merit official designation as landmarks; which sites appear to be eligible for inclusion in the National Register of Historic Places; and which sites will be adversely affected by the proposed project;
   (D) map(s) with accurate plottings of the project area and archeological sites.

(2) One printed copy of the draft permit report and associated project area shapefiles must be submitted to the commission for review prior to the production of the final report. The draft report does not have to be bound, but should contain all of the basic content elements required for the final report. The final report must also contain any revisions in the draft that are required in writing by the commission.

(3) Upon completion of a permitted project, and at no charge to the commission, the permittee, sponsor, or principal investigator shall furnish the commission and the Texas State Library and Archives Commission, State Publications Depository Program (hereinafter, TSLAC) with one printed copy each of the final report. The commission's copy shall be an unbound copy that contains containing at least one map with the plotted location of any and all sites recorded, and two copies of a tagged PDF format versions of the final report on an archival quality CD or DVD. One of the in a tagged PDF format CDs or DVDs must include the plotted location of any and all sites recorded and the other should not include the site location data redacted. The TSLAC copy shall be bound and should not contain the plotted location of sites.

(4) A completed Abstracts in Texas Contract Archeology Summary Form must also be submitted with the final report. An electronic copy of the abstract and the completed abstract form must also be forwarded to the commission and, when appropriate, a Curation Form must also be submitted with the final report.

(5) Eleven or more printed copies of all reports without the site location information should be distributed by the permittee, sponsor, or principal investigator, at no cost to the commission, to university-based libraries and archeological research facilities around the state. Recommended
libraries include: the Texas Archeological Research Laboratory at the University of Texas, the Center for Archeological Studies at Texas State University, the Center for Archeological Research at UTSA, the Stephen F. Austin State University library, the Texas Tech University library, the Texas A&M University library, the UT El Paso library, the Southern Methodist University library, Dolph Briscoe Center for American History, Sul Ross State University library, and the West Texas A&M University library.

(b) When Antiquities Permit investigations result in negative findings, the report and curation standards shall meet the CTA Guidelines for Cultural Resources Management Short Reports, and Curation Standards and Procedures, and production must follow the same standards as set forth in subsection (a)(3) and (5) of this section.

(c) For reports related to alternative mitigation and rock art preservation permits any requirements will be stated in the permit conditions.

Source Note: The provisions of this §26.16 adopted to be effective May 20, 2013, 38 TexReg 2980; amended to be effective December 31, 2017, 42 TexReg 7383
ITEM # 4
Consider approval of Curatorial Facility Certification Program (CFCP) certification of the Witte Museum, Bexar County

Background:

The Witte Museum in San Antonio, Texas, applied to become certified as a curatorial facility under the Curatorial Facility Certification Program in September 2020. After successfully completing the application, the Museum submitted an excellent Self-Evaluation in May 2021, and a field review was conducted on September 16, 2021. Based on an analysis of the documents and the overall excellence of the facility, staff is recommending the approval of the certification of the Witte Museum for a ten-year period.

Suggested motion (Archeology Committee):

Move the Archeology Committee send forward to the Commission a recommendation of approval of certification of the Witte Museum, Bexar County under the Curatorial Facilities Certification Program for a ten-year period.
CURATORIAL FACILITY CERTIFICATION PROGRAM
Benchmarking Excellence

WRITTEN NARRATIVE REPORT AND CERTIFICATION RECOMMENDATION
To be completed by Field Reviewer

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Curatorial Facility
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Contact
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Email
Sept. 16, 2021
Date of Field Review

Signature of Field Reviewer

GUIDELINES

The Written Narrative Report and Certification Recommendation summarizes the findings of the field reviewer based on the responses to the Self Evaluation, the Field Review Questions and the on-site evaluation (Field Review). It is divided into the same nine areas of focus as the Self Evaluation: governance, finance, policies, procedures, physical facilities, staff, visiting scholars and researchers, records management and collections care.

When completed by the field reviewer, the Written Narrative Report and Certification Recommendation contains observations and comments regarding both issues raised and recognition of areas of operation that meet or exceed expectations as stated in the CFCP criteria and standards. The field reviewer also makes a recommendation either for awarding certification, awarding provisional status for a period of three years, or for denying certification. The recommendation is made in light of the institution’s own stated purposes and resources, and the field reviewer cites specific reasons for the recommendation. The Written Narrative Report and Certification Recommendation then is submitted to the THC’s executive director who may approve, disapprove or amend the recommendation.

The applicant curatorial facility is given no less than 30 days notice of the commissioners meeting when its application will be considered. It also is provided with a copy of the Written Narrative Report, the THC’s executive director’s recommendation and any other relevant documents. The applicant also has the opportunity to present written and oral information in support of its application to the staff and the Commission.
Introduction

The Witte Museum (Witte) is a venerable institution and a significant resource for the public and scholars alike who are interested in the archeological and cultural heritage of San Antonio and South Texas. Witte operates as a Texas non-profit corporation with an extensive main campus at 3801 Broadway Street that houses administrative offices, exhibit spaces, and collections storage, as well as a dedicated secondary facility for collections, the Repository.

![Figure 1: View of the main exhibition hall at the Witte Museum main campus.](image)

Since its inception, Witte has been closely associated with archeological research, and has made both collections under their own research programs, as well as acquired collections through donations by private individuals. Witte has, and continues to make, archeological collections and interpretation a key component of their mission. For example, the stunning Kittie West Nelson Ferguson People of the Pecos Gallery and lab incorporates artifacts from their collections associated from the Lower Pecos canyonlands and the White Shaman Preserve with thoughtfully composed reproductions and an array of exhibits and interactive spaces to provide a unique experience for visitors. Witte also works with other regional museums to loan artifacts from collections for display, a recent example of which include items from the private collection of THC Texas Archeological Steward Network member Ben McReynolds to the CFCP-certified Museum of the Coastal Bend. Overall, Witte has long been an important center for the study of prehistoric and historic peoples of Texas, and their application to the CFCP program reflects their ongoing commitment to this mission and their desire to better tell the story of Texas’ peoples while keeping regionally significant collections locally available for decades to come.

Witte applied to the CFCP program and was accepted into the certification process in October 2020. A complete Self-Evaluation was submitted on time in April 2021 and has been reviewed. A field visit to the curatorial facility was conducted on September 16, 2021. AD Division Director Bradford Jones and Maximilian Hall were hosted by Witte CEO Marise McDermott, Leslie Ochoa the Director of Collections, Dr. Harry Shafer Curator of Archaeology, and Thomas Adams, Ph.D. Curator of Paleontology and Geology. A complete interview and review of the facility was completed on that day. As evidenced by the following report, the facilities and the staff are exemplary and possess all the qualities necessary for CFCP certification. The Witte staff deserve to be commended for their high standards and diligence in working to preserve the cultural heritage of South Texas.
GOVERNANCE

This section of the narrative report addresses the legal existence of the curatorial facility, focusing on the application of the facility's Mission Statement, Statement of Purpose, and Scope of Collections.

Located in San Antonio and originally named the San Antonio Museum Association, the Witte Museum was established in 1925 to support literary and scientific undertakings and establish a museum. On October 18, 1926 the museum was constructed and first opened to the public. The Witte is guided in its operations by its bylaws that establish a Board of Trustees to oversee the operation of the museum, supported by robust collections management policy and collections procedures document.

Most recently re-accredited by the American Association of Museums in 2018, Witte exhibits and curates its collections in order to promote “lifelong learning through innovative exhibitions, programs and collections in natural history, science, and South Texas heritage”. In line with the Witte’s mission, the museum is dedicated to the implementation of stringent management protocols for the collections and providing appropriate curatorial and archival object preservation and secure storage. The facility and policies have evolved with the growth of the museum and changes in curatorial practice to meet the needs of the collections while allowing for information oversight and access for research by staff and visiting scholars.

Currently the Witte maintains regionally and globally significant collections of art, documents, natural history, paleontological and archeological artifacts donated or acquired by the Witte in the implementation of its mission, including large collections of archeological artifacts from Texas that were made by the museum in the early 20th century. None of the archeological collections are state-associated held-in-trust (HIT) collections. The Witte also owns very important archeological sites in the Lower Pecos Canyonlands in its White Shaman Preserve and has a state-antiquities landmark site on the Witte main campus. In line with their Mission Statement, it is, however, the Witte’s interest in being able to house state-associated HIT collections, particularly from the San Antonio region and greater South Texas, that is driving their current CFCP certification.

The Witte’s collections reflect their mission and scope of collection statements. The collections management policy of the Witte is periodically reviewed every five years and updated to ensure that it stays current with the needs of the museum. The most recent revisions were undertaken in 2021 in order to address areas of need in the policy identified during the CFCP process and bring their policy in line with CFCP requirements.

The Witte meets all CFCP requirements regarding Governance.
FINANCE

This section of the narrative report focuses on the curatorial facility's annual budget and funding sources.

The Witte Museum is a recognized non-profit, exempt from Federal Income Tax under section 501(c)(3) of the Internal Revenue Code. The Witte is funded through a combination of sources including endowments, visitor revenue, and grant and fund-raising.

The Witte has an annual operating budget that supports the museum, and an endowment that specifically supports conservation needs. Consolidated financials for the Witte Museum, Witte Museum Foundation, and the Witte Title Holding Company for years 2017-2021 were submitted with the CFCP Self-Evaluation. These demonstrate a clear and financially viable fiscal plan and the long-term financial stability of the institution to meet the core mission. The Director of Collections reports significant input into the formulation of the annual budget for the archeology as well as other collections.

The financial reports do demonstrate a significant decrease in the overall museum income during fiscal years 2020 and 2021 because of COVID-19, that resulted in the loss of 24 positions. Currently, the Witte reports success in raising funds to return the museum to near normal funding and ensure that the museum will continue to grow and function, including refilling staff positions. Even with the challenges of the past years, staff report that funding is adequate to support the mission, operations, and activities as they related to the archeology collections, and they are in the process of continuing to improve the facility and storage to accommodate new HIT collections in the future and address improvement to non-HIT legacy collections as well.

The Witte meets all CFCP requirements regarding finance.
POLICIES

This section of the narrative report provides a broad perspective of the curatorial facility's policies, from the perspective that such policies are formalized in writing and periodically reviewed.

Witte has a well written and comprehensive Collections Management Policy (CMP) that is reviewed and updated as necessary or every five years. It was most recently updated in August 2021 as a component of their certification preparation. All staff have a copy of the CMP. The CMP clearly establishes the mission of Witte and sets out guidelines for the acquisition and care of all collections, now including future state-associated HIT collections.

During the review of the CMP by the CFCP Coordinator during the initial application phase, the following sections of the CMP were identified as needing additional language to meet CFCP-standards: Acquisitions, Accessioning, Deaccessioning, Loans, Destructive Loans, Inventory, Record Keeping, Collections Care, Conservation, Emergency Procedures, Integrated Pest Management, and Security. Of particular concern was clearly establishing policies that address the acquisition of HIT collections.

As part of the Self-Evaluation, Witte submitted a revised CMP that incorporated the changes necessary to meet CFCP criteria. As requested, the required language referencing HIT collections as well as suggested changes has been added to the sections on Acquisitions, Accessioning, Deaccessioning, Loans, Destructive Loans, Inventory, Record Keeping, Collections Care, and Conservation.

The Witte maintains a Fine Arts insurance policy for its collections and items loaned to the museum. Witte requires a Certificate of Insurance prior to any loan.

The Witte meets all CFCP requirements regarding Policies.
PROCEDURES

This section of the narrative report provides a broad perspective of the curatorial facility's procedures, from the perspective that such procedures enact the curatorial facility's stated policies.

Overall, Witte's Procedures documents are thorough and well-written and were updated in 2021. Witte has particularly strong and clear procedures for Accessioning, Deaccessioning, Cataloging, Loans, and Inventory, and the procedures overall enact the policies laid out in the Mission Statement and CMP.

Witte also employs an appropriate Emergency Preparedness Plan, Security Plan, and Integrated Pest Management Plan in all its facilities. These plans are regularly reviewed and updated.

Since the initial application review and in preparation for certification, Witte has made updates to the Procedures documents in tandem with the CMP, incorporating the CFCP Coordinator's suggested revisions. These changes primarily relate to the acceptance of HIT collections and the attendant documentation. The resulting procedures and associated documentation now meet and often exceed the requirements for CFCP certification.

The Witte meets all CFCP requirements regarding Procedures.
PHYSICAL FACILITIES

This section of the narrative report provides a general description of the building and surrounding property, focusing on the safety and security of both people and collections.

The Witte is comprised of a main campus with exhibit and curation buildings, and the Repository, a stand-alone warehouse dedicated to securely and safely housing the museum's collections. The current main campus was remodeled in 2017 and represents a significant redevelopment of the museum grounds undertaken to modernize the exhibit and collections spaces, as well as ensure that any potential environmental hazards (primarily flooding) are mitigated. Of particular note for the purposes of the CFCP certification is the B. Naylor Morton Research and Collections Center located on the main campus. This building is designed to house all the paper records and curate elements of the artifact collections using an impressive visual storage system. Though archeological collections are primarily housed at the Repository, the visual storage component at the B. Naylor Morton Research and Collections Center provides a unique and dynamic opportunity for visitors and researchers to experience select elements of the archeological collections (Fig. 2).

![Figure 2: View of artifacts in visual storage space at the B. Naylor Morton Research and Collections Center.](image)

Witte’s primary curatorial space for archeological collections and for future HIT collections is the Repository, a modern structure made of concrete, steel, metal siding and sheetrock located at 4903 Stout Drive in San Antonio. The location of the building is safe from most potential natural disasters. The building and grounds are gated and locked, well-lit at night, and multiple points of security ensure access is limited only to staff or supervised visitors. Spaces in the Repository are designed to facilitate processing of archeological materials by staff and volunteers. The archeological collections storage space is large and outfitted with open steel shelving.
and ample workspace to facilitate the safe processing and movement of collections (Figure 3). As demonstrated by the ongoing reinventory and rehabilitation of the paleontological collections and their rehousing in cabinetry, the Witte staff have developed a long-term plan for improving collection storage and developed series of stations that facilitate the process while minimizing the movement of the collections. A large loading dock permits easy loading and unloading of incoming and outgoing objects. Both facilities have offices for staff and ample workspace for visiting scholars.

![Figure 3: View of archeology storage at Repository (left) and new cabinetry for paleontology (right).](image)

Periodic inspections and necessary repairs are performed by facilities personnel and overseen by the collections staff at the main campus and Repository. Both facilities have centralized HVAC systems that regulate temperature and humidity as well as filter air pollutants and particulates. The collections storage areas are equipped with humidity and temperature monitors. In the event of an electrical failure a back-up external generator will continue to power emergency lights at the facility and Witte is continuing to enhance the system to protect against any future threats. No active wet-pipes are situated within any curation space.

The main campus and the Repository are routinely inspected for fire hazards by the Fire Marshall. The Witte has upgraded the fire-alarm systems and the curation space is outfitted with smoke detectors, water detectors, and a dry-pipe building-wide sprinkler system. Fire alarms are monitored 24 hours and fire extinguishers are located throughout the facility.

In all respects the Witte facilities are clean and well-maintained spaces in which storage, movement, and space for the processing of the collection are all more than adequately provided for.

The Witte meets all CFCP requirements regarding the Physical Facilities
STAFF

This section of the narrative report examines the delegation of responsibility and authority, job descriptions and qualifications, access to professional training and support and volunteers.

Under the supervision of the museum President and CEO, Marise McDermott, the following three positions are currently staffing the key positions that oversee the current archeology collections and any future state-associated HIT collections:

Directo of Collections: Leslie Ochoa.

Registrar: Stephanie Pritchard.

Archeology Curator: Dr. Harry Shafer

All the staff descriptions meet or exceed those required for CFCP-certification. All current staff have appropriate educational backgrounds and follow a code of ethics specific to Witte. The museum provides opportunities for staff to participate in professional development training and regional and national conferences. The staff also have direct access to appropriate general collections care and subject area literature.

Volunteers and interns assist the curatorial repository staff with the care of the collections, particularly in terms of moving, rehousing, cataloguing, and inventorying. All volunteers are trained by a supervising curatorial staff member and follow procedures laid out in the repository CMP and procedures.

The Witte meets all CFCP Staff Requirements.
VISITING SCHOLARS AND RESEARCHERS

This section of the narrative report examines accessibility of the collections to visiting scholars and researchers, in-house requirements for visiting scholars and researchers, and related issues.

The Witte welcomes outside researchers who are interested in studying their collections. Visitation specific to the archeological collection is typically small, but both the main campus facilities and off-site repository provide ample resources for the effective study of the collections. As detailed in Witte’s CMP and procedure documents, outside researchers must submit an “Application for the Use of Materials” for approval by the collections staff.

Once approved, dedicated research workspace at both the main campus and the Repository that can be viewed from staff offices is offered to researchers and facilitates careful oversight of the collections and access to the staff (Figure 4). Any visiting scholars or researchers studying the collections at the facility are restricted to examining the artifacts in the designated space within the facility. Staff will facilitate all artifact movement, copying and scanning of collections, and otherwise provide all necessary instruction to visitors on the proper care of the objects.

Figure 4: Researcher workspace at the B. Naylor Morton Research and Collections Center. Leslie Ochoa, Director of Collections, is in the foreground.

The Witte meets all CFCP Visiting Scholar and Researchers Requirements.
RECORDS MANAGEMENT

This section of the narrative report examines record keeping including accessioning, cataloging, inventory, numbering and marking, accessibility, production and housing of records.

Witte follows standard accessioning and cataloguing procedures as explained in their CMP and Procedures, answers to the Self Evaluation, and as observed during the Field Review. Re:Discovery Porficio is the database and collection management software used by the Witte to catalog artifacts and records.

All new collections, except field collections made by Witte staff, must first be reviewed by the Collections Committee (made up of Collection and Curatorial staff, the President and CEO, members of the Board of Trustees, and other community members as needed) and they make recommendations to the Board of Trustees for approval. Accession policies and procedures involve a complete description, condition report, and photographic record of the object. Original accession and associated records are maintained at the B. Naylor Morton Research and Collections Center on the Witte main campus and copies maintained at the off-site repository. Though Witte currently holds none, future state-associated HIT collections will be labeled and marked using archival materials. All original paper records for state-associated HIT collections will be stored in archivally stable materials in appropriate file case (Figure 5).

Figure 5: View of primary records archive at B. Naylor Morton Research and Collections Center. Witte CEO Marisc McDermott is on the right.

The Smithsonian Trinomial System is utilized for all archeological collections, and when appropriate this is cross-referenced with previous regional site recording systems employed by prior staff and researchers. To the extent possible, staff utilize a standardized lexicon/vocabulary in the Re:Discovery Porficio collection database for the recording of artifact data in accession records, but retain previous descriptions for future reference. All data is preserved and cross-referenced with the locations, making records and artifacts easily
retrievable. During the field review, staff were able to locate a randomly selected Valverde projectile point from the collection in under ten minutes.

Spot check inventories are conducted as needed, with the Re:Discovery Porficio system providing an automated system to generate inventories as needed.

Witte currently houses no state-associated HIT collections, but as a part of the certification review process, museum staff have developed all the necessary paperwork and procedures to accept them once they have become certified.

The Witte meets all CFCP requirements regarding Records Management.
COLLECTIONS CARE

This section of the narrative report examines the condition of collection objects, conservation, accessibility, environmental monitoring, packaging, housing, research use and general security.

As currently noted, Witte has no state-associated HIT collections, but does hold significant archeological collections from across the state in the Repository. The overall standards and level of care afforded to the collections meets or exceeds CFCP standards. As the facility designated exclusively for collections storage and research, including the archeological collections, the Repository has a large and well-maintained space that provides an environment conducive to collections care. The collections are currently housed in a way that they are physically and intellectually accessible, with room to safely access the collections.

All archeological collections are maintained on open powder coated steel shelving, enclosed within the appropriate archival boxes and bags are to further protect sensitive materials and create stable microclimates (Figure 6). The use of acid-free boxes and bags further limits exposure to light and provides protection against outside climate fluctuation or potential emergency situations.

Though current shelving and housing meet CFCP standards, Witte is continuing to improve all aspects of its collection care and will be pursuing IMLS grants to transition the collections to enclosed cabinetry. They have begun this process with the paleontological collections and develop an efficient means to review and process the existing collection that can be transferred to archeological collections. When completed, this will be a top-notch housing system.

Figure 6: Dr. Harry Shafer shows THC staff an example of individually packaged cordage from an archeological site in Texas.
The Repository has a centralized HVAC system that controls temperature and humidity and uses filters to control atmospheric pollutants. Temperature and humidity are constantly monitored and set at 70 degrees and 50% relative humidity. Staff report that the system has been undergoing upgrades since the building was acquired, and that the system is reliable and more than sufficient. The collections storage area has no windows and lights are only used when the room is occupied, protecting delicate objects from excessive light levels. To mitigate UV, LED lights are being used.

Apart from minor stabilization or the cross-mending of artifacts, Witte does not practice conservation on-site, and has developed an overall conservation plan to guide them. Staff regularly monitor and assess the condition of the artifacts and seek professional assistance when necessary.

Access to the building is controlled and monitored by security in accordance with CFCP standards. The Repository is locked and alarmed, and access is limited to the curation staff with keys. A 24-hour video surveillance system provides constant security, even when staff are not on site. Integrated pest management and maintenance procedures are practiced, with staff overseeing all activities in the collections area.

The overall impression of the collections is one of cleanliness and good order and the facility is well maintained and provides an environment conducive to collections care. The collections are currently housed in a way that they are physically and intellectually accessible.

The Witte meets all CFCP requirements regarding Collections Care.
RECOMMENDATION TO THE THC

The recommendation is based on the findings summarized in the Written Narrative Report and constitutes the field reviewer's recommendation (supported by reasons) to award or deny certification or award provisional status.

The Witte Museum has no identified deficiency or disabling factors.

Based on the reasons outlined in this document, Witte has demonstrated that it meets the stated requirements to be a certified curatorial facility. It is the recommendation of the Field Reviewer that certification be granted for the period of 10 years.

Signature of Field Reviewer

Date

10/8/2021
ITEM # 5
ITEM # 6