



GAAC

GOVERNOR'S ARCHAEOLOGY ADVISORY COMMISSION

Dr. James Watson, Ph.D.
Chairman, AZSITE Consortium Board
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Dear AZSITE Consortium Board Members,

The Governor's Archaeological Advisory Commission (GAAC) is writing to initiate a dialog regarding the current management of AZSITE. GAAC has observed that AZSITE is not currently operating in compliance with Executive Order (EO) 2006-03, *AZSITE and the AZSITE Consortium*. This situation, coupled with a significant devolution of leadership and management at AZSITE since 2016, has resulted in a data backlog that has forced cultural resource management and historic preservation professionals to revert to more time-consuming, costly, and potentially erroneous sources for cultural resource records review.

According to the EO, the AZSITE Consortium is "the decision making and planning body within the Executive Branch for the AZSITE database and GIS inventory of Arizona's historical and archaeological properties." The purpose of the AZSITE Consortium is to "cooperatively share data, provide shared staffing resources, seek grant funding, and develop and implement a single statewide historic property (archaeological and historical period properties) inventory database and geographic information system (GIS)." The EO stipulates that, "the AZSITE Consortium shall continue to participate in the management, maintenance, and updating of the AZSITE statewide electronic inventory of historical and archaeological properties and surveys." The AZSITE Consortium is composed of an Executive Management Board and a standing advisory committee. The AZSITE Board consists of the Arizona State Historic Preservation Officer, the Director of the Arizona State Museum (ASM) at the University of Arizona, the Director of the School of Human Evolution and Social Change at Arizona State University (ASU), and the Director of the Museum of Northern Arizona (MNA). The AZSITE advisory committee may include representatives from the Governor's office, a state agency, a federal agency with an Arizona presence, a tribal representative, and a private cultural resource consulting firm. The EO states that "AZSITE shall be available for authorized use by state and federal agencies, tribes, political subdivisions of the state, cultural resource consultants, and research institutions for carrying out state and federally-mandated cultural resource reviews, historical and archaeological research, and historic preservation planning activities."

Assisting state agencies in the management and preservation of historic properties through this inventory is one part of the Arizona State Historic Preservation Office's responsibilities. As an advisory body appointed by the Governor, GAAC counsels the Arizona State Historic Preservation

Office about issues affecting Arizona archaeology, including the preservation and management of cultural resources data. It is in this capacity that GAAC is expressing its concerns regarding the current state of AZSITE and requesting that the AZSITE Board take action to bring the program back into compliance with the EO.

This letter comes in direct response to the recent removal of the AZSITE manager. The AZSITE manager is currently the only full-time position in AZSITE. AZSITE users were notified in an email on September 9, 2019 from the manager stating that her contract would not be renewed after September 30, 2019. This came as a surprise because the AZSITE Board meeting minutes and community engagement suggested that she had the skills, aptitude, and attitude needed to face the challenges of this position. In fact, despite the recent poor performance of AZSITE, there were signs that the situation was beginning to turn around, and members of the cultural resource management and historic preservation community expressed optimism that AZSITE would soon regain its momentum. The August 2, 2019 Board meeting minutes indicated that the AZSITE manager position had been made full-time and that there were sufficient funds generated from user fees to also hire an assistant. The manager's removal came after the recent AZSITE user survey closed on August 28, 2019, which was focused on exploring a creative and responsive restructuring of the AZSITE fees. ASM's decision not to renew the manager's contract was not communicated to other members of the AZSITE Board, even as a courtesy, in advance of the announcement.

This is the fourth AZSITE manager to be removed or leave the position in the past four years. Mr. Rick Karl, the long-term AZSITE manager, retired in late 2015. He had a succession plan in place, but his successor's termination was announced in the April 12, 2017 AZSITE Board meeting minutes. During the last three months of her contract, she was not allowed to work at the ASM, which led to a gap in service and knowledge continuity. The next AZSITE manager hired by ASM filled the position on a part-time basis between September 2017 and April 2018. The most recent manager was hired in August 2018. Many of these staffing replacements were preceded by substantial time gaps. Each dismissal resulted in another setback in the accumulation of program history, skills, and working relationships necessary to manage AZSITE.

The lack of continuity in AZSITE management and concomitant delay in ASM meeting their obligations to update the database with Archaeological Records Office (ARO) records have lead Arizona land managers to stop allowing cultural resource management professionals to use AZSITE as their primary source of archaeological information. At that point, the database was years out of date. Since 2018, professionals who work on state lands must use the ASM's ARO as their primary source of information. ARO is open three days per week and requires in-person visits, by reservation. The ARO does not allow map tracing, or other means of accurate transfer of site location information to visitors, thereby leading to erroneous maps from in-person visits. The ARO does conduct a records check for a fee, but for most cultural resource management firms, this was not an anticipated fee because records review was something that they already paid to accomplish using their annual AZSITE user fee. For cultural resource management firms without an office in Tucson, sending an employee to ARO or using ARO's fee-based service can be an expensive proposition. The requirement that archaeologists visit or pay ARO for a records check, when ASM is required have its records (managed by ARO) in AZSITE, represents a managerial failure of the AZSITE Consortium.

Given the current problems surrounding AZSITE management and the data backlog, land managers are withdrawing from AZSITE or not providing updated information to the database, choosing to spend their resources developing internal databases instead of investing in the communal vision that once characterized AZSITE. This requires professionals and researchers to check multiple site files and provides no mechanism for arbitrating disparate data. For example, the site files obtained from different databases might have different site boundaries or might not represent the most current information about a specific site. AZSITE and its ARO data are suspect because of a perceived failure to update the database; however, data sets from other sources may be less carefully evaluated. ASM only recognizes site boundaries stored in their own database, which in turn affects how permits are issued. The importance of unified and current site information is non-trivial for effective cultural resource management in Arizona. The lack of such a resource could unintentionally damage some of Arizona's cultural resources, especially in places where infrastructure is expanding quickly to meet growing demands.

Currently, the AZSITE Board is composed of people representing institutions that were historically responsible for state site records. When AZSITE was initiated, these institutions worked together to obtain grants, develop and host the database, and provide their records for upload. These institutions also donated in-kind services, such as student labor or server space. The AZSITE Board members and the institutions they represent have a responsibility to work together to advance AZSITE; however, because most of these institutions no longer (or rarely) issue new site numbers, they have little reason to continue to invest in AZSITE. An exception is the ASM, which holds the records for permitted work conducted on state, county, and municipal lands. The ASM is also in operational control of AZSITE, hires the AZSITE manager, and provides the necessary office space, in addition to making ARO updates available to AZSITE for upload. ASM is not the only stakeholder, as three other institutions have an EO responsibility to assist and support AZSITE and numerous other entities have an interest in its overall maintenance and success. A greater representation of interests is necessary on the AZSITE Consortium.

GAAC asks that the AZSITE Board consider enacting, at minimum, the actions described below to comply with the stipulations in the EO and provide stronger management and accountability to AZSITE users, who rely on the database for local, state, and federal compliance, preservation management, and research. GAAC believes that AZSITE needs a Consortium that is more balanced and accountable to the cultural resource management community than is currently in place.

As such, GAAC recommends that the AZSITE advisory committee, which ceased meeting in 2015, be reinstated immediately. Reinstatement of the AZSITE advisory committee was requested by a member of the public at the August 2019 AZSITE meeting and identified as an agenda item for the subsequent meeting, but was not, in fact, included on the agenda for the October 2, 2019 meeting. The AZSITE advisory committee is appointed by the Governor's Office and its composition is outlined in the EO. GAAC suggests that the AZSITE advisory committee be developed in a way that a lack of quorum does not negate its effectiveness and that participation is something easily accommodated.

GAAC also recommends that the AZSITE Board reorganize so that institutions with an interest more equally share in their EO responsibilities and ASM is not left as the only possible

administrator of the AZSITE manager. The AZSITE Board should create hiring and dismissal guidance that identifies the necessary skills for the AZSITE manager position and develop contract guidelines that measure the manager's performance according to AZSITE standards. GAAC recognizes that human resource issues are complex but notes that although the hire is made by ASM, the hire is *for* AZSITE and is funded by AZSITE user fees. When personnel issues arise, resolution should start with the AZSITE Board or AZSITE advisory committee, rather than be a unilateral decision by one AZSITE Board member organization. Furthermore, the AZSITE Board should be afforded an opportunity to comment on personnel actions before public disclosure.

Finally, GAAC encourages the AZSITE Board to review and revise the AZSITE Agreement so that it reflects the current state of AZSITE and is acceptable to all members of the AZSITE Board. ASM presented an AZSITE Agreement to the AZSITE Board in January of 2017 and a plan was developed to pursue the issue further; however, the dismissal of the 2015-2017 manager dominated subsequent AZSITE Board meetings and a review of the AZSITE Board meeting minutes indicates that the issue was not raised again. Issues concerning managerial control, hiring and dismissal practices, user fees, and products, may all be addressed in this document in a spirit of collegiality and accountability.

GAAC understands that the January meeting of AZSITE will be exploring some of the larger structural issues affecting AZSITE. GAAC looks forward to participating in discussions about the long-term direction of this essential tool for managing and preserving Arizona's heritage resources.

Sincerely,



Ian M. Milliken, Chair
Governor's Archaeology Advisory Commission

CC: Lauren Bouton, Policy Advisor, Officer of the Governor