

No.	Comment	Response	Commenter
34	<p>General plans with cultural resource elements should have specific language and/or planning tools for ensuring curation at project completion. In order to ensure curation, CEQA should be amended to require this as mitigation. Regardless of what CEQA says, local agencies can still require curation as a condition of project approval in support of policies included in the cultural resources element of general plans.</p>	<p>Curation, with input from culturally affiliated groups, may be one option for the disposition of excavated artifacts. Specific recommendations will be retained for later consideration.</p>	<p>Myra Herrmann</p>
39	<ol style="list-style-type: none"> 1. Need to enforce budget allocation for curation. 2. Create more Native American Partnerships to assist in creation of curatorial facilities and assist in curation policies. 3. We look to our elder archaeologists to explain oral history and to turn in the collections and documentation they created. 4. Provide grants to curate orphaned collections. 5. Create synonymy for sites curated at multiple repositories and finding aids available on the web for access to information. 6. Education of long term impact of collection creation. 	<ol style="list-style-type: none"> 1. Support noted. 2. White paper revised to include Native American consultation and participation. Specific recommendations will be retained for later consideration. 3. White paper revised to include orphaned collections. 4. Seek funding for curation is discussed. 5. White paper revised to include database management of collections. Specific recommendations will be retained for later consideration. 6. Educating the stakeholders is discussed. 	<p>Wendy Teeter</p>
12-C	<p>The Curation paper identifies the problem as a space problem when in fact the problem is that the State is unwilling to deaccession archaeological material that has been long forgotten and untouched by archaeologists, scientists and public agencies. California Indians often question what will be gained by keeping archaeological material locked in storage units. Some archaeologists also question this because once the items are accessioned they forever become part of the storage system, which is seriously over crowded and under funded.</p>	<p>The author does not view curation as a space problem and making deaccession decisions at this time is premature. Dead storage is not an appropriate use of cultural material as discussed in the Ideal Situation section of the paper.</p>	<p>Yurok Tribe, October 28, 2008</p>

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Revised October 19, 2009

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12-D	The author of the curation paper offers solutions that are unrealistic and contrary to what many tribal groups have requested for years. This is an important paper then needs more thought and input from a variety of groups, not just archaeologists.	Comment noted. White paper revised to include Native American consultation and participation.	Yurok Tribe, October 28, 2008
16-E	controversial topic. Many, if not most, tribes believe that the ultimate determinations regarding the disposition of the archaeological and cultural resources of their ancestors should be left to the appropriately affiliated tribe. In this manner, if a	White paper revised to include Native American consultation and participation. Specific recommendations will be retained for later consideration.	Lytton Rancheria of California
	<p>V. <u>Current Situation</u></p> <p>Revise the last paragraph to state that, “Few CRM-generated collected (sic) are curated in spite of the 2004 amendment specifically referencing curation as a mitigation measure in CEQA Guidelines section 15126.4(b)(C).”</p> <p><u>Ideal Situation</u></p> <ol style="list-style-type: none"> 1. Second bullet: Add collections generated from testing to the list of curated collections. Those materials may prove important in the future. 2. Third bullet: Add that every effort should be made to keep collections near their community of origin and the affected communities. 3. Federal and State NAGPRA should be clearly referenced here and the obligation for State Agency compliance, to see that the appropriate material be timely repatriated to tribes. Repatriation, including that performed by the UC System, should be done through a fair process in which affected tribes are invited to participate. Autonomy of UC campus in NAGPRA processing should be evaluated. <p><u>How to Bridge the Gap</u></p>	<p><u>Current Situation</u> White paper revised to incorporate this recommendation.</p> <p><u>Ideal Situation</u></p> <ol style="list-style-type: none"> 1. White paper revised to include reference to collections generated from “test excavations” (in addition to data recovery excavations) 2. Curation plans addressed and revised to note preference to keep collections in-state and “local.” 3. White paper revised to reference federal and California. Specific recommendations will be retained for later consideration under implementation procedures. <p><u>How to Bridge the Gap</u></p>	

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19-E	<p>1. When a new project proposes to impact a site that was previously surveyed or excavated, the best practice should be that the new project locate and curate related/prior orphan or test collections.</p> <p>2. Make it a reasonable option to coordinate with Native American-operated museums and cultural centers to curate or exhibit appropriate collections. This could have many benefits including potential for costs savings and will keep Indian people involved.</p> <p>3. The State must finally seat, fund and staff the State NAGPRA Commission.</p>	<p>1. Mandate curation plans is addressed and revised to include identification of existing (including "orphaned") site collections in a centralized database.</p> <p>2. White paper revised to include consultation and partnerships in curation with Native Americans. Specific recommendations will be retained for later consideration under implementation procedures.</p> <p>3. White paper revised to reference California NAGPRA Carrying out and enforcement of current state law is not within the scope of this paper.</p>	Courtney Coyle, Esq.
1-A	<p>The normal difficulties of working with excavated archaeological resources are compounded with sensitive cultural and spiritual issues for California Indians. In attempting to address these problems, comprehensive inclusion of the concerns of Native people and comprehensive knowledge of curation methods are both needed, and must be pursued as extensively as possible within the limits of time and space.</p>	<p>White paper revised to include consultation with California Indians on issue of culturally sensitive curation methods.</p>	Rumsey Indian Rancheria

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1-B	<p>Current practices are insensitive to cultural and religious significance of sacred objects. Stewards over many collections have begun responding to the demands from cultural groups for increased attention to the spiritual needs of sacred objects. Traditional care of indigenous curation describes the care, treatment, and handling of sacred or religious objects in the manner prescribed by the cultural for which the object has ritual significance. Anthropologists have been concerned with the collecting, curating and preserving people's material cultural but have not been interested in learning about how these objects might be curated from other perspectives. While some believe the trend jeopardizes the further development of professional methods and standardization, most acknowledge the value of indigenous curatorial traditions. Such recognition opens up possibilities for the exchange of information, knowledge and expertise. The point is to give credence to bodies of knowledge and practices that have been historically overlooked or ignored.</p>	<p>White paper revised to include consultation with California Indians on issue of culturally sensitive curation methods.</p>	<p>Rumsey Indian Rancheria</p>

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1-C	<p>We recommend merging traditional indigenous curation methods with more modern techniques. Specifically, we recommend that alternative methods of curation based on cultural context and protocol be explored and adopted. For example, the “Indigenous curation,” methods are intended to protect both the material and the spiritual integrity of the objects, reflecting a particular community’s religious and cultural protocol regarding the use and treatment of certain kinds of objects. Recognition of indigenous curation in the form of co-curation of collections and exhibitions is becoming commonplace internationally and is adopted by certain United Nations Educational, Scientific and Cultural Organization (UNESCO) agencies, such as the ICOM, an international convention committed to the conservation, continuation, and communication to society of the world’s natural and cultural heritage.</p>	<p>White paper revised to include consultation with California Indians on issue of culturally sensitive curation methods. Specific recommendations will be retained for future consideration under implementation measures.</p>	<p>Rumsey Indian Rancheria</p>
22-C-1	<p>The steps you outline in remedying the “curation crisis” are commendable and ambitious, but one critical phase in the process is missing: oversight. Public agencies and local governments simply must be held accountable for substandard curation practices. Many state and local agencies do not understand or otherwise ignore their compliance requirements regarding collections. Many of the collections will remain uncared for and unreported if there are no consequences or follow up. A curation committee of task force should be established that periodically reviews curation facilities’ progress in achieving the objectives spelled out in the guidelines.</p>	<p>Curation plans and educating the stakeholders are addressed. Specific recommendations for monitoring and enforcement will be retained for later consideration.</p>	<p>Elk Valley Rancheria</p>

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22-C-2	<p>If repatriation is not possible, then the State should require good faith, substantive efforts to curate collections at repositories owned by tribes that desire to bring artifacts back to the local tribal community. Further, the State should assist tribes in their efforts to develop such program whereby collections not repatriated may be curated at tribal facilities.</p>	<p>White paper revised to include consultation and partnerships in curation with Native Americans. Specific State policy changes are currently beyond the scope of this paper, but will be retained for future consideration.</p>	<p>Elk Valley Rancheria</p>
23-B	<p>Cindy Stankowski, M.A.'s paper on Curation states the need for measurable and accountable curation objectives. The SIR TGLC states that the solution to this problem is to return the items to the affected Tribes. If they are part of a burial they need to be reburied. Too many of our Ancestors are in boxes in museums waiting to be reburied. The scientists do not need any more to study. Since there is limited space in California repositories and museums, return those things to the Tribes. Newly "discovered" items can be documented but left where they are found. We wholeheartedly disagree that "all future archaeological collections generated from every data recovery project are curated at a qualified repository." Tribes do not want accessible information to the general public, sites are destroyed, disrespected, and pot hunted. Section II explains providing funding, training and staff to OHP to meet critical interpretation and outreach needs. It is most important to reach out to Tribes and consult with them.</p>	<p>White paper revised to reference Federal and State NAGPRA, need for consultation and partnerships in curation with Native Americans. Curation plans are addressed, and revised to consider development of pre-excavation collection plans (as part of research designs) in consultation with culturally affiliated Native Americans.</p>	<p>Susanville Rancheria</p>

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26-B-1	<p>Current curation practices largely remain insensitive to the living cultures from which sacred objects, objects of cultural patrimony, and associated funerary items originate. Some scientists and museum officials have begun to take active efforts in responding to the demands from traditional groups for increased attention to the spiritual needs of these items and objects. Anthropologists and archaeologists have historically been concerned with collecting, curating, and preserving people’s material culture, but have not been interested in learning about how these objects might be curated from other perspectives. Curation under the direction of the tribally affiliated religious or spiritual leader can often assist in the handling of sacred or religious objects in the manner prescribed by the culture for which the object has ritual significance. Such recognition opens up possibilities for the exchange of information, knowledge and expertise.</p>	<p>White paper revised to include consultation with California Indians on issue of culturally sensitive curation methods.</p>	<p>Pit River Tribe</p>
26-B-2	<p>In attempting to address these problems comprehensively including of the concerns of tribal people and comprehensive knowledge of curation methods are both needed, and must be pursued as extensively as possible within the limits of time and space. We recommend implementing policies such as the International Council on Museums (ICOM) Code of Ethics for Museum, where the needs of the museums are balances with close collaboration wit (sic) the communities which their collections originate.</p>	<p>White paper revised to include consultation with California Indians on issue of culturally sensitive curation methods. Specific policy recommendations will be retained for future consideration.</p>	<p>Pit River Tribe</p>
	<p>Items to added (sic) to bridge the gap section</p>		<p>Santa Ynez Band of Chumash Indians</p>

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30-B	<p>A. Develop plans and strategies for working with tribes, for the sole purpose of repatriating these items in curation (human remains & artifacts). Identify tribes and their areas of historic occupation for the purpose of repatriation.</p> <p>B. Make repatriation part of the state budget for funding such efforts.</p> <p>C. Work with state and local municipalities in designating land for the sole purpose of reburial of our ancestors and cultural items.</p> <p>D. Change the laws of the state to make it a crime to dig up our ancestors and cultural items.</p>	<p>A. White paper revised to reference Federal and State NAGPRA, need for consultation and partnerships in curation with Native Americans; and developing culturally sensitive (and legally responsive) curation plans in partnership with Tribes.</p> <p>B. Comment noted, but beyond the scope of present paper. Specific recommendations will be retained for later consideration.</p> <p>C. Specific recommendations will be retained for later consideration</p> <p>D. Comment noted. Current laws do exist; changes are beyond scope of this paper.</p>	
31-B	<p>Artifacts from submerged locations require specialized curatorial treatments, conservation and storage. During an annual SCA meeting in March 2003, some of organized 3 sessions concerning submerged historic or prehistoric site documentation, remote sensing, artifact treatments, and site management. It is likely that most California professional curators or archaeologists do not have the specialized training to handle adequately items from a water environment. Thus, during NPS maritime projects when I was involved, a “no collection” policy was used. To “bridge the gap”, I would like to see mention of two important aspects: 1) recognition that items from aqueous environments require treatment from specialists and 2) presence of hazardous chemicals such as preservatives or stabilizers require industrial health/safety guidelines, similar to some NAGPRA or State Repatriations situations.</p>	<p>Specific recommendations will be retained for later consideration.</p>	Roger Kelly

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3-F	<p>Most California Native people involved in tribal cultural programs expressed that they were generally opposed to curation of archaeological collections by non Indian museums and institutions as a means of disposition but that any decision on disposition should be made by the people of the tribe or tribes from whose lands the resource is taken. The white paper addressing Curation and Collections acknowledges that there are serious problems with the curation of cultural resources and that few CRM generated collections are curated. Many end up being stored in warehouses. Although the ostensible reason for curation is to ensure availability for further research, most collections are never utilized in this way.</p>	<p>Comments noted.</p>	<p>NAHC General Counsel</p>
	<p>The guidelines would provide that the preferred method for disposition and curation of cultural resources would be repatriation to tribes, Tribes, landowners and developers would be required to consult on initiation of the project on a possible agreement to return cultural and archaeological items to tribal ownership. Some tribes have established their own repositories for their cultural patrimony. These tribal repositories contain archives, site records, field notes, oral histories and a variety of records of traditional knowledge as well as collections in some instances. Tribes in possession of repatriated collections could chose (sic) the appropriate method for disposition, that is, to re-bury and/or curate depending on tribal traditional beliefs.</p>	<p>White paper revised to address culturally sensitive curation plans developed in consultation with Tribes, and tribal partnerships in curation. Issue of suggested "preferred method" is beyond scope of this paper, but shall be retained for future consideration.</p>	<p>NAHC General Counsel</p>

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3-G	<p>A. California Indians believe that it is of the utmost importance that their cultural patrimony and knowledge derived from it be preserved for continued use and benefit of tribal people. They are keenly aware of their traditional obligation as stewards of their lands and it resources. California Indians believe that California tribes' primary right of ownership and control over their cultural patrimony must be a guiding principle of cultural resource preservation. Many California Indians believe that a new model incorporating this guiding principle for cultural resource preservation is needed.⁵</p> <p>B. The NAHC believes that all parties should work toward a new model for CRM practice, wherein Native knowledge and ways of knowing and relating to places, remains, sites, landforms, power areas and other areas used by Native people are valued equally and afforded co-equal status with western ways of knowledge. Tribal cultural experts would have a primary role, at least equal to that of archaeologists in the current process and their assessment and recommendations would be entitled to significant weight. Tribal cultural experts w</p>	<p>White paper revised to include need for consultation and partnerships with Native Americans. Concept of new model for CRM is retained for future consideration.</p>	<p>NAHC General Counsel</p>
	<ol style="list-style-type: none"> 1. Enforce curation budgets 2. Need tribal curation facilities 3. Turn in old collections with oral history of archaeologists 4. Centralize collections or cross-reference where collections are housed 5. Repatriate everything vs. curation 	<ol style="list-style-type: none"> 1. Curation plans is addressed, including need for budgeting & enforcement. 2. Revised to include Tribal partnerships and consultation. 3. Revised to address "orphaned" collections. Specific recommendation to be retained for future consideration. 4. Revised to include need for central database for identifying collections 5. Comment noted. Opined directive beyond scope of this paper. 	

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43-B	<p>6. Cull collections; have a strategy</p> <p>7. Tribal partnership</p> <p>8. Tax deduction for mitigation</p> <p>9. Stays in state</p>	<p>6. It may be premature to discuss culling at this time until the full extent of existing collections is known.</p> <p>7. Revised to include Tribal partnerships in curation</p> <p>8. Comment noted. Beyond scope of this paper.</p> <p>9. Revised to note desire to keep collections in-state and "local".</p>	<p>Notes from SCA Symposium: Affecting Change in California Archaeology</p>
44-F	<p>CS: We want the items eithe(r) (sic) returned to the affected tribes, and then the tribes can decide whether they need to be reburied, or retained in their own cultural centers and museums.</p> <p>IS: Docuementing (sic) the artifacts, getting locations, and leaving where they are at—instead of curation</p> <p>IS: No curation; There is limited space, so items that are newly discovered should be reburied and left where found; items in curation should be returned to tribes.</p> <p>Mitigation measure: to protect them in situ, or close by; If you take everything, there is nothing left to link us to the land—it's like we were never there, it's cultural genocide.</p> <p>We disagree with the statement that all future collections should be curated</p> <p>HBG: bring artifacts/collections back to the tribes. Curation should not be the one and only option.</p>	<p>Revised to include consultation with Tribes on curation plans, collecting policies as part of research design, tribal partnerships and disposition of collection.</p>	<p>Notes from Yellow Creek Campground Workshop</p>

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45-E	<p>About which facility will be used, as well as the treatment during curation (display, etc.). I think reburial is a form of curation; how many pieces of groundstone are needed? What does come out the ground should go back to the tribe. ????? than write a new one. (sic)</p> <p>San Diego does have a curation requirement, which was hard to get. I believe in curation, though there is something to be said for “how many ground stones do we need?” Local agencies have a lot of power: they can put in requirements for things like curation.</p> <p>Not mentioned in the Curation Paper: archives, non-archaeological sources of information, very important sources. Analysis also not mentioned.</p> <p>Reporting: all project information should go back to all parties involved in the project.</p> <p>The “qualified repository” requirement leaves out a number of tribes</p>	<p>Comment noted. Revised to include consultation with Tribes on curation plans, collecting policies as part of research design, tribal partnerships and disposition of collections.</p> <p>Comments noted.</p> <p>Paper revised to include curation of associated documentation and facilities for analysis.</p> <p>Comment noted. Curation plans revised to include need for reporting and consideration of confidentiality.</p> <p>Comment noted</p>	<p>Notes from the California Indian Conference</p>
46-A-34	<p>Comments by Helene Rouvier #40 (Curation): She stated that the Wiyot Tribe has just established a Tribal Cultural Center with museum and archival storage. They want to establish their own tribally owned and operated CRM consulting firm.</p>	<p>Comment noted.</p>	<p>Notes from the SCA NA Programs Committee Workshop</p>

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46-A-46	<p>Comments by Ed Ketchum #55 (Standards & Guidelines/Curation): He argued that DNA testing is a small part of the issue. The bigger issue is the treatment and disposition of human remains—all must be treated with dignity and respect. He made a comparison to Kennewick Man, arguing that remains should be under control of Native people. He argues that human remains are not resources. They should be returned to their people and not stored in boxes of in museum displays. He adamantly supports people indigenous to the area determining how best to treat the remains and whether certain testing can be conducted.</p>	<p>White paper revised to include consultation with California Indians on issue of culturally sensitive curation methods. NAGPRA applies and changes to law are beyond scope of this paper.</p>	<p>Notes from the SCA NA Programs Committee Workshop</p>
46-A-47	<p>Comments by Donna Yocum #56 (Standards & Guidelines/Curation): Donna was the subject of MtDNA testing for a case study, and found it a very difficult decision with many emotions. She noted there is a fine line with desecration in such a personal decision, along with many other issues surrounding such a decision to allow taking DNA samples. The San Fernando Band is not federally recognized, but has good rapport with the federally recognized tribes and archaeological teams working on the discovery. The Positive DBA (sic) result was an overwhelming step forward in proving cultural heritage. Not everyone agrees with decisions to allow DNA testing, and she respects that. She urges that all tribes need better communication with developers and contractors...need results, appreciates help. She believes the voice of the Native Americans will override almost everyone.</p>	<p>Comments noted.</p>	<p>Notes from the SCA NA Programs Committee Workshop</p>

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46-A-50	<p>Comments by Valentin Lopez #60 (Curation): He opened by stating this is a very important issue. He remarked that how we handle remains is the single most important thing we do as a tribe. He described a case example from Hollister, where bone was discovered in a hay field and dispersed over a large area. He and the tribal representatives didn't want to walk over that hallowed, sacred ground.</p> <p>He stated that it has been common for the Amah Mutsun to get calls from Coroners about the discovery of skulls or partial remains. Also, they've received calls from universities, where remains have been locked up for years in their collections. He feels that the spirit of every one of his ancestors is still alive. He observed: "When we bury them, they take possessions, etc. When unearthed, that spirit is disrupted. When we rebury them, our goal is to make sure that spirit finds peace." He remarked that the remains need to be given proper respect so that when reburied they can pass back to the other side. That prayer means listening; who is talking to us? He believes that his ancestors are out there, giving them advice.</p>	<p>Comments noted. White paper revised to include consultation with California Indians on issue of culturally sensitive curation methods.</p>	<p>Notes from the SCA NA Programs Committee Workshop</p>
46-A-51	<p>#61 (Curation): Val strongly believes that no one should touch human remains with your hands, gloves should be worn. He doesn't feel that anyone is worthy of touching those remains.</p>	<p>White paper revised to include consultation with California Indians on issue of culturally sensitive curation methods.</p>	<p>Notes from the SCA NA Programs Committee Workshop</p>

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46-A-53	<p>Comments by Gabriel Gorbet: #63 (Curation/Conservation): Gabe observed that each tribe has its own particular cultural views about death and ancestral remains. Some commonalities include: transcendence of human soul upon death (although view on place where soul goes may differ); remains associated with human soul are connected, thus there is a great respect for the human remains.</p> <p>He asserted that studying remains for human curiosity and for science is anathema. He's found that it is difficult to listen to such talks, and asked, "How much real science was learned by studying Kennewick Man," noting studies have shed light on how he was interred, that he had an arrow in this thigh, and how remains decomposed. Gabe inferred these were limited contributions; the Kennewick man study "didn't get the cure for cancer or affect world peace." He posed a question to archaeologists regarding ethics, "What are the values of the questions you are striving to answer through scientific study?"</p>	Comments noted.	Notes from the SCA NA Programs Committee Workshop

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46-A-56	<p>Comments by Melany Johnson #66 (Curation): She began by stating that she wants to communicate her views without intent to disrespect. At Susanville Indian Rancheria, she is responsible for the NAGPRA program. NAGPRA is a human rights law. She observes that Indian people continued to struggle with agencies for repatriation. That true consultation often is not happening; that it does not just involve sending a letter. Not until 1978 were California Indians allowed to practice their Native religion. Every burial artifact has a powerful connection to the person they were associated with. Burial offerings were not always placed with the remains; for example, offerings may have been put in a basket set under a tree. She asserted that non-Indians cannot see the intangible connections between places and the sacred, as Indians do. Sacred places are known to Indians through traditions, and these places have strong connections to the spiritual world. She is glad that Indian youth (are) (sic) being educated about sacred places, earth, air.</p> <p>#67 (Curation): Melanie (sic) observed that UC-Berkeley/Phoebe</p>	<p>Comments noted. NAGPRA compliance is beyond scope of this paper.</p>	<p>Notes from the SCA NA Programs Committee Workshop</p>
46-A-61	<p>Comments by Cassandra Hensher #73 (Curation): Cassandra began by questioning the interpretation that artifacts and remains are “property,” i.e., private property rights. She opined, “What happens to remains affects living communities, what happens is a human rights issue.” She questioned the costs, to Indian people, what benefits and to whom?</p>	<p>Comments noted.</p>	<p>Notes from the SCA NA Programs Committee Workshop</p>
	<p>Current Situation: 1. Indians do not support curation. They want the items to go back to the places and sites where found.</p>	<p>Current Situation: 1&2 Comments noted.</p>	

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47-E	<p>2. The “curation crisis” only impacts archaeologists— Native Americans do not support building more curation facilities</p> <p>Ideal Situation:</p> <p>1. There are NO curated collections of Indian artifacts; all items are returned.</p> <p>How to Bridge the Gap:</p> <p>1. Give back or “repatriate” existing collections to Native American Tribes and let them decide if curated short-term, reburied, etc. Artifacts, etc., should be adequately documented before reburial</p> <p>2. The issue of contaminated objects in existing collections needs to be addressed. Museums that contaminated the objects should take responsibility.</p> <p>3. Curation facilities must consult with Native Americans regarding appropriate handling and storage practices of existing collections.</p> <p>4. Archaeological reports must identify the final disposition of collections (accession number, repository name and location).</p> <p>5. Native American Monitors must keep records of what items are taken from a site.</p> <p>6. Each Tribe has the right to decide the final disposition of culturally associated collections.</p>	<p>Ideal Situation:</p> <p>1. Comment noted.</p> <p>How to Bridge the Gap:</p> <p>1. White Paper revised to reference Federal & State NAGPRA and consultation with culturally affiliated tribes as to the disposition of collections.</p> <p>2. Comment noted, but issue of responsibility for contaminated collections is beyond scope of this paper.</p> <p>3. White paper revised to include consultation with California Indians on issue of culturally sensitive curation methods</p> <p>4. Curation plans revised to include <u>need for reporting</u> and consideration of <u>confidentiality</u></p> <p>5. Comment noted. Specific recommendation will be retained for later consideration</p> <p>6. Comment noted.</p>	<p>Notes from the Redding Rancheria Workshop</p>

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4-E	<p>Although archaeologists recommend curation in perpetuity as the preferred and recommended disposition of archaeological collections, the protection, proper handling, and disposition of all archaeological items are of the utmost importance to Tribes. The ACBCI THPO is not opposed to curation as a means of disposition however the California Environmental Quality Act (CEQA) does not require curation. Therefore the repatriation of all archaeological items as a preferred method of disposition (for some Tribes) is not contradictory to CEQA. Repatriation as a means of disposition may occur between agency/landowner and multiple tribes.</p>	<p>Comments noted.</p>	<p>Agua Caliente Band of Cahuilla Indians</p>
4-F	<p>The ACBCI THPO recommends early consultation between the lead agency, property owners/ developers and the affected tribe(s). Such consultation is a useful way to address a myriad of issues-including treatment plans and disposition-and may allow for the property owners/developers and affected tribe(s) to enter into an agreement regarding the protection, preservation, and disposition of cultural resources which may be present or discovered during build-out of the proposed development.</p>	<p>Comment noted. White Paper revised to include Tribal consultation, to address pre-excavation research designs and curation plans, including material remains located during post-review discoveries</p>	<p>Agua Caliente Band of Cahuilla Indians</p>
4-G	<p>Consultation between the affected tribe(s) and the property owner/developer may lead to agreements addressing the treatment and disposition of archaeological resources that may be impacted by a proposed development. Such a consultation and agreements shall be formulated on a case by case basis and should be the preferred method in addressing cultural resources issues.</p>	<p>Comment noted. White Paper revised to include Tribal consultation, to address pre-excavation research designs and curation plans, including material remains located during post-review discoveries</p>	<p>Agua Caliente Band of Cahuilla Indians</p>

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4-H	The treatment and final disposition of all archaeological resources shall be done so with the full input, consideration, and implementation of recommendation of the affected descendant groups.	Comment noted. White Paper revised to include Tribal consultation, to address pre-excavation research designs and curation plans, including material remains located during post-review discoveries	Agua Caliente Band of Cahuilla Indians
7-G	The Curation of Archaeological Collection and Information is a section the Tribe would like to see more Tribal involvement. In an ideal situation, why can we not look at tribes as an option for housing objects found during excavation as well as inadvertent discoveries? A tribal nation is just a capable of caring for objects as any other facility. If an object is culturally affiliated to a tribe or found within their aboriginal territories who else to properly tend to the object then (sic) that of the people it descends from? We would like to see more objects curated by tribal nations.	Comment noted. White Paper is revised to include consideration of Tribal partnerships.	Smith River Rancheria
8-D-1	The Tribe believes that the curation of artifacts and cultural items has reached a point of saturation. In fact, when working on local projects, the Tribe often requests that such items be repatriated and when possible, re-interred near their original location. While the Tribe understands that curation is necessary for some items, the bulk of material that is discovered during data recovery has little, if any value, in the Tribe's view, for scientific research.	Comment noted. Scientific research is not the only reason for curation. Cultural use, educational programs and further understanding of history are important as well.	San Luis Rey Band of Mission Indians
8-D-2	In speaking with other cultural resource professionals, the Tribe is sensitive to the fact that others do not share its views on this issue. However, the position paper must address tribal concerns about curation and whether, and to what extent, if any, it is necessary. Certainly, items in "dead storage" should be returned to the tribes, or if agreeable to all interested parties, managed for public education. Ideas about scientific research are often at odds with tribal views on the subject and in order to improve state policy in this area, neither viewpoint can be ignored.	Comments noted. White Paper is revised to include consideration of Tribal partnerships.	San Luis Rey Band of Mission Indians

No.	Comment	Response	Commenter
8-D-3	<p>Perhaps the formation of a <u>Curation Committee</u> or some similar policy entity is needed for this discussion. Because the Tribe understands that curation holds different meanings and concerns for different communities, both professional and tribal, all views should have a place at the table in discussing this very important issue.</p>	<p>Comment noted, and recommendation retained for future consideration.</p>	<p>San Luis Rey Band of Mission Indians</p>
9-C	<p>The lack of appropriate conservation space is one of the principal problems confronting archaeology in San Francisco. We would add to the recommendations of the Position Paper the following:</p> <p>Encourage the convening of a Statewide conference on the curation crisis problem raising the visibility of the problem and facilitating an important sharing of the range of needs and of potential solutions. Preservation of archaeological resources in the form of data recovery would seem to logically require curation of the recovered data having long-term research value such that the absence of curation would be a failure of mitigation to a less-than-significant level, in CEQA parlance. Many local agencies would assumedly appreciate the opportunity to explore alternatives in dealing with this legal and practical dilemma.</p> <p>Encourage agencies to report accessions or recovered archaeological material to a central repository, such as the Information Centers. Agencies could provide electronic copies of the catalogues of accessioned collections to the center repository where such information could be easily consulted by</p>	<p>Comment noted, and recommendations retained for future consideration.</p> <p>White Paper revised to include need for central database for identifying collections; specific recommendation retained for future consideration.</p>	<p>San Francisco Planning Department</p>