

# Preserving Our Options

## Public Archeology in Santa Fe, New Mexico

**S**anta Fe, New Mexico, population 70,000, encompasses an area of approximately 36 square miles centered on the old Plaza in the historic district. The city is also the seat of Santa Fe County, which has a burgeoning population of some 140,000 people concentrated primarily around the city limits. The combined city/county jurisdiction, covering 2,000 square miles of territory, is blessed with an abundance of world class cultural resources, from ancient Pueblo ruins to early Spanish colonial churches to the 19th- and early 20th-century buildings that make up the historic core of downtown Santa Fe itself.

Both the city and county governments passed preservation ordinances in the late 1980s that specifically link archeological site preservation with land use planning through their respective development review processes. In this paper I will briefly explore why the ordinances were adopted, how they work, and what the preservation payoff has been as a result.

Santa Fe has long been concerned with its image as a center of Anglo, Hispanic, and Puebloan culture, and efforts to preserve the city's historic properties began before the end of the last century.<sup>1</sup> In 1957, responding to a building boom that threatened the historic character of the downtown area, Santa Fe passed the first preservation ordinance in New Mexico.<sup>2</sup> While this law was

directed toward preserving the city's architectural heritage, it set an important legal precedent by imposing local control over actions that may affect cultural resources. The area's rich archeological record was not specifically included in the city's preservation plans until the late 1980s. It was only after several large scale hotel and commercial development projects uncovered rich archeological deposits in the heart of downtown Santa Fe during the late-1970s and early-1980s that the full scale of the city's archeological potential was realized by local officials. The publicity that these projects generated, and the lack of legal mandates protecting the archeological record, galvanized local citizens into pushing for new preservation requirements. In 1987, the city passed its archeological ordinance, and a year later the county followed with its own law.

The City and County of Santa Fe are divided into zones called "districts" that are defined by modeling the probability of finding archeological sites in these areas using site data housed at the New Mexico Historic Preservation Division (State Historic Preservation Office). Stratifying the city and county in this manner is tied to different sets of requirements for development in each zone. This arrangement builds into it the concept of project size thresholds: if the size of the project is above the threshold for the district in which it is located, an archeological survey and any necessary follow-up investigations are required; if not, then the requirement is waived. Both jurisdictions require that if archeological deposits are discovered during construction, the work cease and the city or the county be notified. Tying survey requirements to areas defined by site location estimates is a classic resource sensitivity approach to preservation planning and is designed to balance the costs and benefits of preservation against those of development.

In the city's high potential Historic Downtown zone, a development of 2,500 square feet or more triggers the survey requirement; in the more moderate areas along the Santa Fe River and the Santa Fe Trail corridors, the limit is two acres or more; and, in the suburbs where the archeological potential is predicted to be much lower, only

*The site of Pueblo Largo, a 13th-century village ruin located in the Galisteo Basin in Santa Fe County, is typical of the rich archeological record near Santa Fe, New Mexico.*



*This petroglyph, executed in the Rio Grande Classic style between AD 1325 and 1600, is typical of the rock art that is found throughout the Galisteo basin, in Sante Fe County, New Mexico.*

developments at 10 acres or more in size require survey.<sup>3</sup> Survey reports and other studies are submitted to the city by the developer along with property plats and design plans for review. A five-member archeological review board composed of qualified volunteers determines if the developer has complied with the archeological requirements of the law and makes its recommendations to the City Planning Department for or against project approval.

The county ordinance is also based on the zone concept and works the same way only on a much bigger scale. Again, the State Historic Preservation Office (SHPO) assisted county government in developing a map of the county that predicts where sites will be found. The county is broken down into three zones: high, medium, and low. Development in the high potential zone requires archeological survey if the property is five acres or more in size, or two acres or more if it is within the limits of a traditional community. In the moderate zone, the threshold is 10 acres or more, and in the low potential areas it is 40 acres or more.<sup>4</sup> Again, if the size of the property being developed is below these thresholds, the archeological requirements are waived.

Santa Fe County never established an internal review process. Instead, county staff relied upon the SHPO to advise the county on matters relating to archeology and historic preservation. From 1988 to 1996, the SHPO handled all reviews under the county code and in effect administered this program for county government. Changes to the county code in 1996 established a new process whereby the results of archeological investigations, along with preservation recommendations, are provided directly to the county planning staff by the archeologist who is hired by the developer. The SHPO continues to assist the county upon request, but administration of the law is now fully a county responsibility.

By law, the city and the county require that archeological surveys be conducted by qualified individuals; that sites be recorded according to defined standards; and, that an assessment be made of their significance based on the criteria for listing properties to the National Register of



Historic Places. Once a survey has been conducted and significant sites have been located, the developer must choose one of two options in order to receive project approval: archeological data recovery, including but not limited to, excavation to recover the information content of the sites; or, avoidance through project redesign to preserve the sites in place. Additional protective measures such as easements, deed restrictions, and covenants are also used to ensure preservation once the project under review has been approved.

Since the laws went into effect just over 10 years ago, a tremendous amount of new information about human occupation of the Santa Fe area has been gained, largely because of the archeological requirements contained in the city and county ordinances. Table 1 compares the total number of surveys conducted, acres surveyed, and sites recorded before and after the city and county ordinances went into effect in 1987/88. From 1971-1986, state and federal preservation requirements account for most of the archeological investigation conducted in Santa Fe County; however, survey counts, acreage, and site numbers all increase markedly once the preservation mandates were added to the local development review process. While some of the sites recorded after 1987 were destroyed by development and required data recovery, most were saved through avoidance, thus

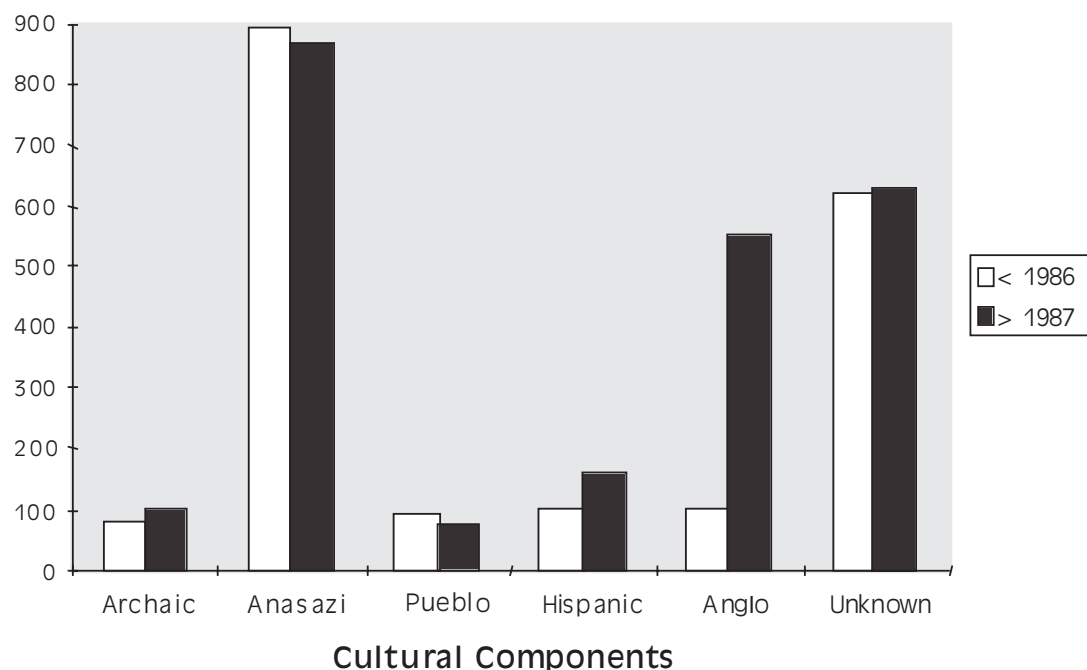
**Table 1**

Comparative figures for before and after the Santa Fe City and County ordinances went into effect starting in 1987. Note: state and federally mandated surveys conducted after 1987 have been removed to better illustrate the effectiveness of the local preservation laws.

Year	Surveys Conducted	Acres Surveyed	Sites Recorded
1971-1986	209	62,731	1601
1987-1996	895	78,907	3185

**Figure 1**

**Comparison of cultural components identified in the Santa Fe County area between 1971-1997 before and after city and county ordinances went into effect.**



demonstrating the effectiveness of local land use control as a preservation tool.

Another effect of the ordinances is reflected in Figure 1, which compares the number of cultural components, identified before and after the city ordinance was adopted in 1987. Note the increase in those identified as Archaic, Hispanic, and Anglo/European after this time. Prehistoric components, especially those identified as Anasazi and Puebloan, were the primary focus of identification efforts before the survey mandates went into effect, reflecting a significant research bias prior to 1987. Because the city/county laws require that all sites be recorded during survey, not just some of them, the long-term effect of these ordinances has been to produce a more accurate understanding of the cultural resources that exist on the landscape.

The communities of Santa Fe City and County have achieved an impressive preservation record through the enforcement of their archeological ordinances. A tremendous number of archeological sites have been located, recorded, and saved for the future. But this accomplishment did not just happen by itself. Archeologists, working with many other interested parties in the community, got involved, learned about the political and regulatory process, and successfully argued that protecting cultural resources was a land use prob-

lem that should be addressed through development review under local zoning authority.

#### Notes

- <sup>1</sup> Chris Wilson, *The Myth of Santa Fe: Creating a Modern Regional Tradition*, (Albuquerque: University of New Mexico Press, 1997).
- <sup>2</sup> Thomas Merlan and James P. Bieg, *The Power to Preserve*. Santa Fe: New Mexico Historic Preservation Division, Office of Cultural Affairs, 1996.
- <sup>3</sup> City of Santa Fe, *Archaeological review Districts*, Division 3, section 14-75.1 through 14-75-23 SFCC as amended. Santa Fe City Land Development Code, 1990.
- <sup>4</sup> County of Santa Fe, *Historical, Cultural, and Archaeological Districts*, Article VI, Section 3.1 through 3.8., as amended. Santa Fe County Land Development Code, 1996.

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Photos by the author.