



May 21, 2008

John Nau III, Chairman
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue NW, Suite 803
Old Post Office Building
Washington, DC 20004

Dear Chairman Nau:

The Society for American Archaeology (SAA) and Society for Historical Archaeology (SHA) and the American Cultural Resources Association (ACRA) were pleased to note the announcement of the creation of an Expert Panel to re-evaluate the current federal historic preservation program, as recommended by the 2007 Preserve America Summit. We are very appreciative that you are following the recommendation made by the Preserve America Summit. Our organizations, however, do have concerns about the panel and its plans.

SAA is an international organization that, since its founding in 1934, has been dedicated to the research about and interpretation and protection of the archaeological heritage of the Americas. With more than 7,400 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. SAA has members in all 50 states as well as many other nations around the world.

The Society for Historical Archaeology (SHA) is an international organization, the largest scholarly group concerned with the archaeology of the modern world with a membership of over 2,500. SHA promotes scholarly research, historical archaeology, and conservation of sites and materials on land and underwater. SHA represents historical archaeologists in academia, museums, government agencies, and the private sector. The Society's membership represents all 50 states and several nations around the world.

The American Cultural Resources Association (ACRA) is the trade association of the cultural resource industry. ACRA's 130 member firms employ over 2,150 people nationwide, working in historic preservation, history, archaeology, anthropology, architectural history, historical architecture and landscape architecture. ACRA members work closely with state departments of transportation, federal agencies, state and tribal historic preservation officers, other private sector groups, and the public. ACRA members are the firms that carry out federal and state laws requiring the protection of historic properties affected by construction projects, and as such are very familiar with archaeological issues. ACRA members work to create a balance between economic development and the protection of historically important properties and landscapes.

The first concern is that the panel membership does not accurately reflect the nature of the preservation community. The Preserve America Summit report stated that:

...the major preservation partners jointly convene a time-limited, independent review panel (including representatives from federal, state, tribal, and local governments, the business community, the non-profit sector, and academia) to evaluate the current federal historic preservation program and make recommendations.

While the panel members are noted and accomplished experts in their fields, we believe that the composition of the group as described in the May, 2008 announcement does not align with the Summit recommendations. Numerous disciplines within the field of cultural resource preservation do not appear to be represented, including archaeology, landscape architecture, battlefield preservation, and anthropology, to name just a few. Also, the panel appears to lack balanced regional representation. The federal government's enormous landholdings in the Western U.S. magnify the role played by preservation programs in that region. Given this fact, we believe that the lack of a Western perspective could make the panel's deliberations more difficult.

We understand that these recommendations concern the structural changes to the historic preservation legislation as it now operates. However, even with structural changes, understanding the entire field of preservation plays a vital role and can make all the difference when deciding how particular elements of the programs interact between one another and what changes will be effective and what could be negative.

The second concern is that the panel's plans for connecting with stakeholder groups and gathering expert information on the federal preservation infrastructure seem to be very vague. During the recent meeting of the ACHP in Washington, there was very little information given about the panel, other than that its reports to ACHP and the Department of Interior would be expected in November. There was no clear indication of how or when the panel intends to meet with outside groups. We believe that greater transparency is needed, as the work of the panel will be greatly enhanced with input from all the various constituencies with the preservation community, including archaeology.

SAA, SHA and ACRA appreciate the opportunity to express their concerns. We also congratulate you on all of your hard work over the years toward improving the effectiveness of U.S. cultural resource preservation programs, and look forward to working with the Expert Panel in the months ahead.

Sincerely yours,



Dean R. Snow
President
SAA



Michael R. Polk
President
ACRA



Lu Ann De Cunzo
President
SHA

Dean R. Snow, PhD, RPA
President
Society for American Archaeology
900 Second Street N.E., Suite 12
Washington, D.C. 20002

Michael R. Polk, M.A., RPA
President
American Cultural Resources Association Headquarters
5024-R Campbell Boulevard
Baltimore, MD 21236

Lu Ann De Cunzo, Ph.D., RPA
President
Society for Historical Archaeology
Department of Anthropology
University of Delaware
Newark, DE 19716