



SOCIETY FOR AMERICAN ARCHAEOLOGY

July 10, 2008

Dr. Tom McCulloch  
Office of Federal Agency Programs  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue NW Suite 803  
Washington, D.C. 20004

Dear Dr. McCulloch:

The Society for American Archaeology (SAA) appreciates the opportunity to comment on the Advisory Council on Historic Preservation's (ACHP) draft Policy Statement on Archaeology and Heritage Tourism. As stated before, SAA strongly supports the work of the ACHP and its Task Force on Archaeology, which produced the draft policy.

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 7,500 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.

SAA agrees with the document's call "to better encourage use of archaeological resources for public benefit including education programs and heritage tourism." Public education and appreciation of the nation's archaeological record is a very important part of preserving our shared cultural resources. In general, the procedures suggested in the draft policy and guidelines are to be commended. They outline a process for considering multiple points of view when considering the development of a heritage tourism destination. While this represents a strong and valuable step in the right direction, we have some concerns that we believe need to be addressed in the final version of the document.

With respect, the draft policy statement and guidance focuses too much on the heritage tourism aspect of the issue, and would like to see heritage education programs addressed more fully and more specifically in the document, not just as an alternative to heritage tourism when that direction is not appropriate. Public education is an important—albeit often neglected—part of the NHPA. Formal and informal educational programs offer opportunities to reach many audiences and yet are too often locally specific and/or and unsustainable. It would also be useful to have more fully developed guidelines to help ensure that educational materials meet broader educational goals and can be used by wider audiences for longer periods of time.

In addition, the implementation of the guidelines is not clearly addressed, and raises many questions. Who will be responsible for the consultation process, and how will it be funded? Disagreements over potential uses of archaeological sites will arise. How will these conflicts be resolved? Who will hold the authority in this process once it has begun?

There are two other issues that SAA believes could be better addressed in the draft policy. The first concerns archaeological properties on accessible federal lands that are still actively used by Indian tribes as part of their traditional cultural practices. While the guidance provisions call for broad consultation with interested parties, they should specifically require consultation with Tribes about these traditional cultural properties if they are to be considered for heritage tourism activities. The second concerns the draft's definition of "archaeological resources." SAA believes that in the interest of consistency the draft should incorporate the definition found in the Archaeological Resources Protection Act.

SAA agrees that heritage tourism and public education can, if implemented in an effective, appropriate, and sustainable way, be of great value to the nation in preserving and protecting its cultural resources. We thank the ACHP and Task Force for their efforts, and look forward to working with them on this important issue.

Sincerely,

A handwritten signature in cursive script, appearing to read "Dean R. Snow".

Dean R. Snow  
President