



SOCIETY FOR AMERICAN ARCHAEOLOGY

July 19, 2023

The Honorable Sara Bronin, Chair
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 2000

Dear Chair Bronin,

The Society for American Archaeology (SAA) is pleased to provide the following comments to the Advisory Council on Historic Preservation (ACHP) on the application and interpretation of the Secretary of the Interior's Standards for the Treatment of Historic Properties (Standards) and their accompanying guidelines. This is an important issue, but one that is part of a much larger panoply of policy matters associated with the SOI standards and guidelines that should be considered in tandem. The SOI standards were published in 1983, and have not been revised since that time, even though the practice of historic preservation, whether that be archaeology or historic architecture, has undergone tremendous change. We would like to emphasize that while ACHP is requesting comments on the SOI standards, the National Park Service is the agency that establishes them. The SAA would appreciate additional information on how the two agencies will coordinate on potential changes to the Standards after comments are received.

The SAA is an international organization that, since its founding in 1934, has been dedicated to research about and interpretation and protection of the archaeological heritage of the Americas. With more than 5,500 members, the SAA represents professional and avocational archaeologists, archaeology students in colleges and universities, and archaeologists working at tribal agencies, museums, government agencies, and the private sector. The SAA has members throughout the United States, as well as in many nations around the world.

As noted by the National Park Service, the purpose of the Standards is "to provide guidance to historic building owners and building managers, preservation consultants, architects, contractors, and project reviewers prior to beginning work" to restore and rehabilitate structures eligible for inclusion in the National Register. The standards consist of four sections, including preservation, rehabilitation, restoration, and reconstruction. Over time, the Standards have helped provide valuable guidance to those performing the planning and work to preserve the historic built environment for future generations. We agree with the ACHP that it is time to update the Standards to reflect lessons learned over time and to reflect current practices.

Nevertheless, while the information that the ACHP is gathering on this subject is important, the SAA feels strongly that such a survey must be holistic in nature. To accurately reflect the entire

scope of historic preservation as practiced through Section 106, which is the purview of the ACHP, the inquiry should incorporate feedback from the full range of practitioners in historic preservation, not just historic architecture. Many such structures are adjacent to, or are built directly upon, archaeological sites. Further, a substantial portion of preservation work, including that dealing with archaeological sites, does not involve the built environment at all.

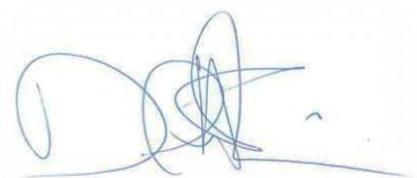
Additionally, descendent communities may have deep associations with a structure that has gone through multiple structural changes, and with resources (including archaeological sites) that the structures were built on top of. The cultural association of the structure may sometimes outweigh the physical building's characteristics. As such, we encourage the ACHP to remember to consult with descendent communities, tribes, and Native Hawaiians to ensure any recommendations take seriously their feedback, concerns, and needs.

If the goal of this review is to improve ACHP's oversight of projects under Section 106, then the Council should consider all of the issues impacting Section 106 implementation, including workforce development, the Secretary's Standards on Professional Qualifications, and cultural landscape preservation, to name just a few. And again, as stated above, the goals must be conducted in coordination with the National Park Service in order to implement change.

We also encourage the ACHP to work closely with preservation organizations on this effort, such as the National Trust for Historic Preservation, the National Association of Tribal Historic Preservation Officers, the National Conference of State Historic Preservation Officers, Preservation Action, the Society for Historic Archaeology etc., as they might be able to help. The SAA, for example, is engaged in a multi-year effort on building programs around archaeological workforce development, which includes bringing greater inclusivity to the profession. The information that professional organizations can provide would greatly inform the ACHP's efforts.

We look forward to closely working with you on this effort.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Sandweiss', with a stylized flourish at the end.

Daniel H. Sandweiss, Ph.D., RPA
President