



SOCIETY FOR AMERICAN ARCHAEOLOGY

January 15, 2021

President-elect Joe Biden  
Vice President-elect Kamala Harris  
Office of Presidential Transition  
1401 Constitution Ave, NW  
Washington, DC 20230

Dear President-elect Biden and Vice President-elect Harris:

Thank you for your attention to our letter of December 4, 2020, which outlined some of the priorities facing cultural resources policy that we believe to be of vital importance to your incoming administration. Since that time, the situation has worsened. The Trump Department of Interior (DOI) has released its fall 2020 Agency Statement of Regulatory Priorities, giving a summary of its regulatory reforms under Trump's administration, and [announced](#) its objectives and priorities for FY 2021. We have also seen a number of 11<sup>th</sup>-hour rulemakings on the part of the current administration, such as a proposal that FAST-41 be incorrectly applied to gas and mining leasing. Taken together, these developments can only be characterized as reckless, and they endanger our non-renewable natural and cultural resources.

On behalf of our members, the Society for American Archaeology (SAA) implores your administration, as soon as it takes office, to begin the work of undoing this damage and ensuring that the federal government meets its statutory obligations to ensure that our natural and cultural resources are used wisely and preserved for future generations.

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 nearly 7,000 members, 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. SAA has members throughout the U.S., as well as in many nations around the world.

SAA has two primary concerns. First, President Trump's published agenda for the Department of Interior, and the last-minute flurry of rulemakings, are at odds with the Department of Interior's public responsibilities for identifying, recovering, preserving, and celebrating our nation's cultural heritage. These responsibilities are spelled out in a number of laws: the National Historic Preservation Act, the National Environmental Policy Act, the Archaeological Resources Protection Act, the Archaeological and Historic Preservation Act, and the Native American Graves Protection and Repatriation Act, and their implementing regulations along with several Executive Orders.

Second, the federal government is in the vanguard of heritage conservation, and if it does not carry out its responsibilities in this area, it is unlikely that states, localities, or the private sector will do likewise. Our history in documents, oral accounts, and material remains tells the story of those who came before us, and without it, present and future generations of Americans' understanding of their place in history will be

greatly diminished. The Trump administration has forsaken this role. With new rules such as the U.S. Forest Service's document easing restrictions on oil, gas, and logging activity in National Forests; the Executive Order including mining in the FAST-41 streamlining category; and the new National Environmental Policy Act (NEPA) regulations, the current president has heavily prioritized logging, and mineral and oil and gas extraction, instead of balancing these uses against many other public duties— Native American consultation, recreation, land preservation, endangered species conservation, and heritage resource protection.

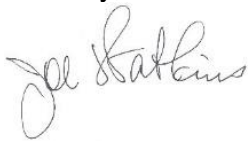
The DOI regulatory agenda barely mentions cultural resources preservation at all. The past four years has greatly advantaged extraction industries at the expense of responsible stewardship, while mostly ignoring strong public opposition. SAA is especially concerned about a recent news report that the Department of the Interior has apparently ducked House oversight, especially with respect to resource extraction. Professional and scientific [opposition](#) to the reduction of the Bears Ears and Grand Staircase-Escalante National Monuments was ignored, as was the 98% of public comments that were opposed to the move. The same was true for the strong opposition to the [changes](#) to NEPA. Only intense and unified local and national opposition prevented the sale of oil and gas extraction leases close to the Chaco Cultural National Historical Park, which is also a UNESCO World Heritage Site.

To be clear, the SAA and its members support regulatory reform. We have stated in numerous comments on proposed rulemakings and Executive Orders over the past four years that the archaeological community *favors* regulatory changes that *balance* resource use and conservation. We support reforms that enhance regulatory efficiency and transparency, while ensuring that 1) the nation's natural and cultural resources are effectively preserved for the benefit of present and future generations, and 2) the public's input on these important matters is given strong consideration.

It is essential that your administration, with future Secretary of the Interior Deb Haaland, act with great urgency to reverse the course set by President Trump and restore the regulatory fabric that protects our irreplaceable natural and cultural assets.

Again, thank you for your consideration of our concerns in this important matter.

Sincerely,

A handwritten signature in cursive script that reads "Joe Watkins".

Joe E. Watkins, Ph.D., RPA  
President

CC: Darryl LaCounte, Director, Bureau of Indian Affairs  
William Pendley, Acting Director, Bureau of Land Management  
Brenda Burman, Commissioner, Bureau of Reclamation  
Margaret Everson, Acting Director, National Park Service  
Aurelia Skipwith, Director, U.S. Fish and Wildlife Service