



SOCIETY FOR AMERICAN ARCHAEOLOGY

January 4, 2024

NPS Information Collection Clearance Officer (ADIR–ICCO)
13461 Sunrise Valley Drive (MS 244)
Reston, VA 20192

VIA email: phadrea_ponds@nps.gov

RE: OMB Control Number 1024–0037

Dear Ms. Ponds:

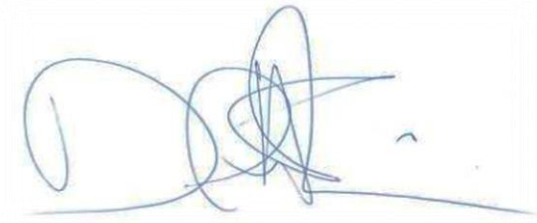
The Society for American Archaeology (SAA) is pleased to provide the following input on the information collection request (ICR) on Archaeology Permit Applications and Reports. On the whole, we believe that the regulatory compliance process as it exists is appropriate and necessary for the proper issuance and tracking of Archaeological Resources Protection Act (ARPA) permits and does not constitute an undue burden on practitioners. There are some areas, in fact, where greater detail and specificity in handling and reporting is warranted.

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 6,000 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.

For the purposes of this ICR and issue 1, the collection of information is absolutely necessary for the proper performance of the functions of the agency with respect to the implementation of ARPA. As for issue 2, the agency's estimate of the time and monetary burden for this collection of information by practitioners appears to be largely accurate, though the cost of doing can vary considerably depending on the specific project. For issue 3, enhancing the quality, utility, and clarity of the information to be collected depends on how the agency plans to disseminate this information; that is unclear in the ICR. With reference to issue 4, in general further digitization of permit applications and subsequent reports is desirable, both as a time-saving measure and in making data on ARPA permits readily accessible to researchers, federal archaeologists, and land and program managers.

Though it is beyond the remit of this ICR, the SAA notes that too often ARPA reports, particularly with collections handling details, are not filed properly or in a timely manner. The agency needs to address this situation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Sandweiss', enclosed in a light blue rectangular border.

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