



SOCIETY FOR AMERICAN ARCHAEOLOGY

March 7, 2022

Ms. Eve Barnett
Office of Intergovernmental and External Affairs
Office of the Secretary
U.S. Department of the Interior
1849 C Street, N.W.
Washington DC 20240

Dear Ms. Barnett:

The Society for American Archaeology (SAA) thanks the Department of Interior for providing the opportunity for input on the administration's America the Beautiful (ATB) initiative to conserve 30% of the nation's lands and waters by 2030, as well as the ATB's American Conservation and Stewardship Atlas (Atlas).

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 thousands of 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. SAA has members throughout the U.S., as well as in many nations around the world.

Our comments will be broken down into two sections—those concerning the ATB initiative overall, and those focusing on the Atlas.

Regarding the ATB overall:

Everyone knows how important it is for the nation to preserve its natural resources. But it is equally important to preserve our irreplaceable cultural heritage. Without an understanding and appreciation of our past, our comprehension of the present and our future will be greatly diminished, and the society and culture that our children and grandchildren inherit will be much the less for it. To paraphrase an

old adage—if you don't know where you've been, you have no idea where you are, and even less of where you're going. It is essential that we conserve our natural resources, and all of the benefits that come with them. At the same time, we must also work to preserve our cultural resources – archaeological, historic, and historic architecture - that are contained within the natural environment. Our heritage and our natural world are inextricably linked.

To name just one example, when we consider the massive challenge posed by climate change—something that our distant ancestors also had to face—there are few better resources to consult when devising solutions than the archaeological record – both prehistoric and historic. The clues contained in archaeological sites and materials can tell us how past generations handled the impact of a changing natural climate—and thus be of enormous help to us today. For example, by investigating the physical remnants flora and fauna in a particular region, bioarchaeologists can determine how the natural environment in that area changed over the centuries. Researchers then cross-reference that information with evidence of ancient human lifeways in that location, thus revealing how human cultures adapted to the natural changes taking place around them.

We recommend that two steps be taken. First, cultural resources must be included in the planning and deliberation of the ATB. This includes adding specific language about historic preservation, archaeological sites, and cultural resources to both the initiative and any future regulations that support it. Second, to save our past and inform our future, cultural resources must be identified, conserved, and interpreted, which, in turn, requires sufficient numbers of trained and experienced archaeologists. Currently, the Federal government has too few people on staff to support the existing Federal archaeological responsibilities. As of 2020, there were only about 300 more archaeologists working in the Federal agencies (n=1371) than there were in 2000 (n=1068). Project backlogs are already extensive. Additional responsibilities are expected to skyrocket with passage of the Great American Outdoors Act and the Infrastructure Investment and Jobs Act. More archaeologists at all experience levels will be needed very soon, especially if the ATB is to be added to the mix. To achieve the President's goals for America the Beautiful and ensure the protection of our heritage for future generations, the U.S. needs more archaeologists, including in the federal agencies.

Regarding the Atlas:

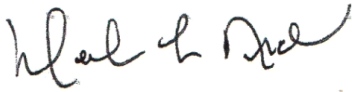
The SAA believes that two specific points need to be made. First, it is imperative that every effort is made to ensure that the Atlas includes information on **cultural**,

as well as natural resources, that are to be protected by the ATB. Significant cultural resources protected by the ATB need to be listed and documented in the Atlas, just as with significant natural resources.

Second, with the above being said, some of the heritage resources that will be impacted by the ATB could be of a highly sensitive nature that should not be widely available in a publicly-accessible database. Confidentiality regarding Native American sacred sites, burial places, and other locations of “properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization” (36 CFR 800.16[1][1]) need to be maintained to ensure that the Atlas is not misused to violate sacred sites and landscapes.

The SAA lauds the goals of ATB and shares its sentiment that American landscapes are precious and merit protection. Those landscapes include our cultural heritage, and we strenuously urge that the language of the ATB—and the contents of the Atlas—reflect these intertwined realities to the maximum extent practicable.

Sincerely,

A handwritten signature in black ink, appearing to read "Deborah L. Nichols". The signature is fluid and cursive, written in a professional style.

Deborah L. Nichols, Ph.D., RPA
President