

February 2, 2000

CAET-USDA  
Attention: Planning rule  
U.S. Forest Service  
USDA  
200 East Broadway, Room 103  
P.O. Box 7669  
Missoula, MT 59807

To Whom It May Concern:

The Society for American Archaeology (SAA) welcomes this opportunity to comment on the Forest Services National Forest System Land and Resource Management Planning proposed rule (*Federal Register*, Volume 64, Number 192, pages 54073-54112).

SAA is an international organization dedicated to the research, interpretation, and protection of the archaeological heritage of the Americas. With more than 6,500 members, the society represents professional, student, and avocational archaeologists working in a variety of settings including government agencies, colleges and universities, museums, and the private sector. Since its inception in 1934, SAA has endeavored to stimulate interest and research in American archaeology; advocate and aid in the conservation of archaeological resources; encourage public access to and appreciation of archaeology; oppose all looting of sites and the purchase and sale of looted archaeological materials; and serve as a bond among those interested in the archaeology of the Americas.

The proposed rule focuses appropriately on ecological and social sustainability and provides the Forest Service with an excellent opportunity to integrate heritage resource management and natural resource management. Unfortunately, the proposed rule fails to take advantage of this unique opportunity and dilutes the role of heritage management in the planning process. Our view is that consideration of heritage resources is fundamental to ecosystem management. SAA finds it disturbing that the proposed rule at Section 219.26 provides no role for heritage management in planning whereas the previous rule at Section 219.24 gave heritage resources an explicit role in planning. At the least, SAA encourages the Forest Service to restore heritage resources to the place it held under the previous rule, that is, the importance of heritage resources in planning is explicitly acknowledged by virtue of its own *Section* designation.

Regarding Section 6(g) of the National Forest Management Act (NFMA) guidelines for the identification of land suitability and Section 6(k) of NFMA that requires the identification of lands not suitable for timber production, SAA suggests that the Forest Service consider the following recommendations.

-Section 6 (g) might be broadened to include the identification of *land unsuitability*, especially in those cases where there is strong likelihood that recreation, resource extraction, and so forth would impact heritage resources (see also Section 219.26 Identifying and Designating Suitable Uses).

-Section 6(k) needs to include a similar extension, for example, lands not suitable for recreation.

SAA urges that changes be made in the Key Elements of Planning section. In keeping with the idea of sustainability, especially with respect to the concept of other values and to maintaining the historic range of variability, degradation of heritage resources is assured unless archaeologically sensitive areas are identified and set aside (protected and excluded from various uses) under Section 219.27 Special Designations. Establishing *research cultural areas* to accompany *research natural areas* would facilitate the gathering of information for Ecological Sustainability goals (Section 219.20), especially with regard to ascertaining the effects of human activities.

SAA is troubled that the proposed rule would maintain the current cooperative relationship with state fish and wildlife agencies. This relationship burdens the Forest Service with the responsibility for dealing with the consequences of wildlife management-related activities -- such as the establishment of hunting camps, hunters' trash dumps, animal carcass remains -- that have tremendous impacts on heritage resources from which states are absolved. Actually, the continuation of such relationships prevents the Forest Service under Section 219.12 from executing its responsibilities as a trustee, from ensuring the creation/maintenance of esthetically and culturally pleasing surroundings, and from preserving important historic, cultural, and natural aspects of our national heritage.

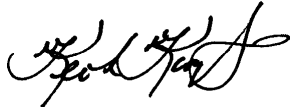
SAA would like to point out that a potentially important aspect of Section 219.21 is the concept of vulnerability analysis because many heritage resources are at risk or become vulnerable in the face of various land uses. SAA believes that the challenge for the Forest Service, which does not seem to be addressed in the proposed rule, is one of prioritizing risks, i.e., does the Forest Service want to sacrifice the principle of sustainability knowing that recreation, state-regulated wildlife management, and resource extraction activities (e.g., unregulated wood-cutting) can profoundly affect heritage resources? SAA urges the Forest Service to place heritage resources at the core of such analysis.

SAA also strongly supports the idea of Science Advisory Boards (Section 219.25) although the concept must be broadened to include archaeologists, especially those who work in national forests, and other heritage management professionals.

The proposed planning rule provides the Forest Service with an unprecedented opportunity to place **both** heritage resource management and natural resource management at the core of ecological stewardship. By adopting the aforementioned changes to the proposed rule, SAA believes that federal efforts to secure the protection and conservation of Americas rich and diverse cultural heritage would be enhanced greatly.

If SAA can assist the Forest Service in any way, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Kintigh', written in a cursive style.

Keith Kintigh, Ph.D.  
President