



March 18, 2013

The Honorable Rob Bishop
Chairman, Subcommittee on Public Lands
and Environmental Regulation
House Natural Resources Committee

The Honorable Raul M. Grijalva
Ranking Member, Subcommittee on Public Lands
and Environmental Regulation
House Natural Resources Committee

Dear Chairman Bishop and Ranking Member Grijalva:

The subcommittee recently held a hearing to review several public lands management bills, one of which was H.R. 716, a bill to convey a portion of the Fort Vancouver National Historic Site to the City of Vancouver, Washington. The Society for American Archaeology (SAA) would like to take this opportunity to express its concern with this legislation.

SAA is an international organization that, since its founding in 1934, has been dedicated to the research about and interpretation and protection of the archaeological heritage of the Americas. With more than 7,000 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. SAA has members in all 50 states as well as many other nations around the world.

Specifically, H.R. 716 would remove approximately seven acres from the Fort Vancouver National Historic Site, and deed that land to the City of Vancouver. The land to be transferred contains the Pearson Air Museum complex, which includes historic buildings listed on the National Register of Historic Places. Pearson Field was an Army Air Corps facility in the 1920's. It is our understanding that the genesis of the bill is a dispute between National Park Service (NPS) and a non-profit organization, the Fort Vancouver Trust, over a cooperative management agreement for the museum.

Though a full archaeological investigation has never been done for the entire parcel, NPS characterizes the Pearson Air Museum acreage as a "highly sensitive archaeological site". The known sites include a Hudson's Bay Company (HBC)-era dwelling, a mid-19th century U.S. Army structure in the same vicinity as the HBC dwelling, and archaeological deposits tied to the World War I dry kiln building of the Spruce Mill, near the historic hangar. Further, a military magazine site that features prominently in the Civil War history of the post has been documented as existing within the boundaries of the property in question, though it has not yet been tested archaeologically. Given all of this, as well as the parcel's proximity to a known cemetery, there is a good possibility that as-yet unknown historic and pre-contact Native American resources, including un-located human internments, exist within the land to be transferred.

Removing the acreage from federal ownership could create potentially troublesome future outcomes, as the cultural resources within the property would no longer receive federal protection under the Archaeological Resources Protection Act and the Native American Graves Protection Act, and the application of the National Historic Preservation Act and the National Environmental Protection Act would be diminished. Further, conveyance would sever the government-to-government consultative relationship between NPS and those Native American tribes with cultural ties to Fort Vancouver.

The federal government must ensure that the parcel's archaeological, historical, and cultural resources, both known and as-yet undiscovered, be afforded the maximum amount of protection, even should a conveyance take place. SAA believes that a transfer would not only constitute an undertaking under NHPA, thus requiring a comprehensive review under Section 106 of the Act, but that it would also trigger a NEPA review. If the current language of H.R. 716 precludes such actions, we strongly urge that the bill be amended to require them, and that the deed of transfer contain legally enforceable conditions. These include that conveyance not occur unless and until the City and Trust demonstrate a long-term financial commitment to the preservation of the parcel and its assets; and that the professional qualifications of the staff assigned to manage the land be adequate to ensure the protection of the property's cultural resources.

Thank you for your time and consideration of this important matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "William F. Limp".

William F. Limp, Ph.D.
President