



June 6, 2016

Mr. Cliff Schleusner
Chief
Wildlife and Sport Fish Restoration Program
U.S. Fish and Wildlife Service
P.O. Box 1306
Albuquerque, NM 87103

c/o Ms. Susan MacMullin
susan_macmullin@fws.gov

Dear Mr. Schleusner:

As a consulting party and signatory to the Amity Pueblo Memorandum of Agreement (MOA), the Society for American Archaeology (SAA) provides the following comments on the *Historic Properties Treatment Plan (HPTP) for Mitigation of Construction Impacts at Amity Pueblo (AZ Q:15:74{ASM})*, as prepared by Northland Research, Inc. in May 2016. We appreciate the continuing opportunity to provide input on this important issue.

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 nearly 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.

After carefully reviewing the document, SAA has quite a few concerns about the research design. First, it is our understanding is that all of the planned work is going to be conducted on artifacts from the berm, which is essentially a huge, disturbed, spoil pile. The research questions and data needs outlined in the HPTP, however, state that answers to these inquiries will require the “the recovery of artifacts and human remains from primary deposits at Amity Pueblo” such as “masonry rooms, pithouses, floor assemblages, inhumations and cremations.” *If primary deposits are required for analysis, and all of the artifacts that will be analyzed are from subsequent secondary deposits (the berm and spoil pile), how is Northland Research able to connect the two?* The research design seems overly ambitious, and perhaps even misguided, given the disturbed nature of the material to be recovered via the HPTP under the MOA. *Further clarification from Northland is needed to better understand this disconnect between the research questions and the material culture and features available to address those inquiries.*

Second, *the HPTP appears to lack any research questions pertaining to population demographics and cultural affiliation or ethnicity*. From prior consultation on this subject, SAA was under the impression that one of the main reasons why analysis of the human remains, funerary objects and other material culture needs to occur, and is being permitted by the Tribes, is that some understanding as to the cultural affiliation of these individuals, as well as information on gender, age, status and/or socio-cultural roles is needed. *This research agenda is important for both repatriation and reburial to occur in a culturally appropriate manner. However, the proposed research questions do not appear to address these topics, nor will they provide the necessary insights.*

Third, the City of Eagar wants the site to be pre-treated with water to control the dust before the screening commences. SAA is concerned that this requirement has not been discussed with the Tribes. *It is important that any treatment to be applied to the landscape, soils, ancestral remains, and/or material culture is deemed an acceptable action per the Tribes.* In addition, if such an action is found acceptable by the Tribes, the water being applied to the site *must be clean*—it cannot be “gray” water.

Fourth, the HPTP discusses the placement of clean fill dirt over the pond area, as well as any other disturbed areas, but does not discuss how the cultural layer will be demarcated from the fill soil. *We are concerned that, if there will be no demarcation, this could result in future disturbance to the buried cultural layers.* Several time-honored practical methods of marking such demarcations are available, and the *HPTP should stipulate which of these will be used.*

Fifth, the HPTP states that the consulting Tribes have requested minimal cleaning and analysis of the human remains and material culture removed from the area. However, the document does not explain what constitutes "minimal cleaning and analysis." Further details about the processing methods to be employed and the nature of any recordation to be used are required for the Tribes and others to be able to assess whether the Northland methods meet these expectations. A list of analyses that *will* (versus *will not*) be undertaken would meet this need.

Sixth, there is no mention of the recovery of burial matrix. *Additional clarification is needed on this point, as well as consultation with the Tribes about their desires with regard to the matrix.*

Seventh, the HPTP states that a minimum number of personnel will be allowed on site. It then goes on to note that Tribal representatives will be allowed on site as needed or requested. It was our understanding that the Tribes had *already requested to be present*, as Tribal monitors or other representatives, and that *such access has not only been granted, but also codified in the MOA*. Thus, SAA recommends that *the HPTP be rewritten to state that Tribal representatives have been granted access to the site for the duration of the project, as the consulting Tribes deem necessary and appropriate.*

Finally, and on a different but directly related topic, *SAA is concerned that it has not been receiving the necessary project-related documents directly from the USFWS, or receiving those in a timely fashion.* As both a consulting party on the Amity Pueblo project and a concurring party to the Project’s MOA, SAA expects to receive all documents for our review at the same

time they are sent to the other consulting parties and MOA signatories. All correspondence, documentation, and information pertaining to Amity Pueblo should be provided to me electronically at dianegg@ucsc.edu and copied to David Lindsay at david_lindsay@saa.org, as well.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane Gifford-Gonzalez".

Diane Gifford-Gonzalez
President

CC:
Advisory Council on Historic Preservation
Arizona Game and Fish Department
Arizona State Museum
The Hopi Tribe
The Navajo Nation
Pueblo of Acoma
Pueblo of Zuni