



November 12, 2018

The Honorable Doug Ducey  
Governor  
1700 W Washington Street  
Phoenix, AZ 85007

Dear Governor Ducey:

Recent reports in state and national news have brought to light examples of what appear to be systemic violations of state laws protecting Native American cultural resources and archaeological sites, and the mistreatment of department staff on the part of the department of Arizona State Parks and Trails (ASPT). The Society for American Archaeology (SAA) is very concerned about these allegations and has recommendations on how to proceed.

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 hundreds of members in Arizona, all 49 other U.S. states, and many nations around the world.

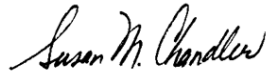
The preservation of our shared cultural and historic resources is an imperative reflected in both state and federal law. Thus, it is very upsetting to learn the ASPT may have knowingly and systematically disregarded state and federal historic preservation laws by allowing the construction of recreational facilities on state lands, including Lake Havasu, without proper environmental analysis that would have required archaeological investigations and stakeholder consultation. More disturbing still are allegations that the Director and Deputy Director forced the former department archaeologist to sign a letter disavowing concerns he had expressed about these practices to outside parties. Our public laws specifically require the transparent engagement of the public and Native American tribes to ensure sound and balanced decision making.

We commend and support your decision to suspend ASPT Director Sue Black, and Deputy Director Keegan. We recommend the immediate halt of any activities that were approved without proper analysis. We strongly urge you to appoint an independent investigator to determine 1) how many development projects were carried out on state lands without proper cultural resources evaluations as required by state law; 2) whether or not ASPT carried out projects in conjunction with other state agencies without the knowledge of the ASPT archaeologist; and 3) whether it is true the ASPT archaeologist was required to sign a letter, under duress, containing declarations contrary to his professional opinion and violating his ethical responsibilities. We further recommend comprehensive archaeological investigations of

any properties that may have been adversely affected in order to assess, record, and determine the extent of the damage to historic properties. Affiliated tribes must be afforded an opportunity to visit these locations to consult on the extent of the damage and seek recommendations for mitigation. Finally, SAA strongly urges the mitigation of adverse impacts to any resources identified in the process.

It is vital that responsible authorities get to the bottom of this matter, and take corrective action, as quickly as possible. We will be monitoring this matter closely and would appreciate any updates you can provide. Thank you for your attention to this critical issue.

Regards,

A handwritten signature in black ink that reads "Susan M. Chandler". The signature is written in a cursive, flowing style.

Susan M. Chandler, RPA  
President