



## SOCIETY FOR AMERICAN ARCHAEOLOGY

15 January 2007

John Nau III, Chairman  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue NW, Suite 803  
Old Post Office Building  
Washington, DC 20004

Dear Mr. Nau,

The Society for American Archaeology (SAA) welcomes the opportunity to comment on the reports produced by the several panels of the Preserve America Summit. The SAA also wants to thank First Lady Laura Bush and you for organizing the summit.

As you know 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 more than 7000 members, the Society represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. The SAA has members in all 50 states as well as many other nations around the world.

SAA has a very strong and deep interest in historic preservation in the United States and in the world more generally. Archaeology has been central to historic preservation in the United States since before the passage of the Antiquities Act in 1906. Since its founding in the 1930s, SAA and its members have continued that central role, including being advocates for and participants in the passage of crucial Federal preservation legislation and in many other ways. While our interest is based on principle, it is also because in much of the United States, the vast majority of historic properties are archaeological localities spanning at least 14,000 years in age.

SAA is pleased with the energy, interest, and focus on historic preservation issues the summit represents. We support many of the panels' specific recommendations. The Society views the summit as an opportunity to increase the effectiveness of the Nation's cultural preservation programs. By increasing their effectiveness we mean increasing both their productivity and efficiency.

Before discussing the individual reports, the Society has two more general concerns. First, we are disappointed in the poor representation of archaeology across the panels. While some archaeologists participated, their small numbers did not reflect the importance of archaeology and archaeological sites. Many of the issues addressed by the panels directly or indirectly affect archaeological sites and the practice of archaeology within the context of historic preservation. The absence of archaeologists deprived the panels of crucial expertise during their deliberations thereby reducing the value and applicability of their findings.

Second, while SAA supports and applauds many of the panels' recommendations, it is implementation that is decisive. One example is in the area of Federal-Private partnerships. In principal, historic preservation benefits from partnerships and collaboration among stakeholders. However, such partnerships cannot replace the Federal government's legal and moral responsibilities for the Nation's heritage nor can they replace federal funding of heritage programs. They can supplement and expand that funding as they can support, amplify, and improve government action. In Section 106 decision making, to take a single example, such a partnership could not take on the decision making powers that legally rests with the agency.

Turning to the individual reports:

### **Determining What's Important**

The panel identified some problems with the current National Register of Historic Places (NRHP) process, but we believe their proposed solutions are weak or poorly articulated.

We do have points of agreement:

SAA agrees with the panel report's emphasis on the importance of protecting significant cultural resources that meet the NRHP eligibility criteria but which are not actually listed on the *National Register*. This issue has been of particular concern in recent years. It is a favorite topic of opponents of Section 106, so the report's call for strong protection of three *National Register* nomination categories—proposed, eligible, and listed historic resources—is laudable. SAA also supports the proposal for providing incentives for archaeologists to undertake complete NRHP nominations. SAA agrees with the report's conclusion that there are various barriers preventing the NRHP from being a true reflection of American society, and also with the report's rejection of the concept of multiple Registers. Such a move would be problematic from a statutory and regulatory standpoint, but more importantly would segment the historic preservation community during a time of increasing federal budgetary uncertainty.

However, SAA is concerned with the report's implication that the solution to the problem of inclusion is some sort of hybrid between the "labor-intensive scholarships of improved, contextualized nominations" and "a system that can respond positively when the people decide something is important." The NRHP recognizes those sites and resources that meet a national level of significance. In order to maintain that standard, a certain degree of research and background work in submitting a nomination is and should be required. A dilution of the standards required for listing on the NRHP for certain categories of nominations, or any nomination, would be a step back, not forward. The answer is to find ways to help traditionally under-represented communities "navigate the preservation bureaucracy."

### **Building a Preservation Ethic**

SAA strongly supports the report's call for collaboration among all stakeholders, from government offices to educational institutions to community-based organizations. We see as a second important and positive feature of the statement is its argument for the engagement of all Americans in preservation activities, from all levels of society and all ages. Specifically, SAA agrees

with the report's call for professional development for history educators and integrating history lessons with other school subjects; the enactment of policies and the creation of training programs at the local level to address preservation as a community; the inclusion of many types of historic resources in the preservation ethic, including family histories and local values; the recruitment of the retiring baby-boomer generation for involvement through continuing education and volunteer opportunities; and the expansion of the use of media to popularize preservation values.

SAA is concerned with the report's somewhat loose definition of "history," which is used many times and in many different ways. It is important that historic preservation focus not only on "traditional" history, and built historic resources and their profitable reuse, but also address the nation's multifaceted cultural heritage, including its vast archaeological heritage.

Also, although the statement notes the importance of Native Americans in historic preservation, one sentence in particular: "Another consideration is American Indians. Their story, unquestionably important in the study of American history, should be told to native populations as well as the general public." could be interpreted as patronizing. It suggests they need to be instructed about their own past by professional historians and other preservationists. SAA strongly urges this statement be altered to encourage historians and other preservationists to actively work with Native Americans and incorporate Native American viewpoints into *their* work. It is equally if not more important that Native Americans tell their story to the general public.

SAA approves of the report's call for the establishment of a clearinghouse on history education. However, the "Teaching Tools" section in the report needs to include the SAA, Society for Historical Archaeology, and Archaeological Institute of America websites, all of which have important public education resources.

### **Protecting Places That Matter**

SAA strongly agrees with this report's main thrust: namely, that the National Historic Preservation Act ought to be fully implemented. The report's array of recommendations for improving heritage resource protection, including an inventory of the "entire nation's historic legacy", is commendable. However, in SAA's view, many if not most of these suggestions would require substantial increases in funding, particularly for chronically under-funded programs authorized by the NHPA. The report does address this reality to some extent, but it deserves to be of greater focus. It is also essential to stress that much of this legacy is represented by archaeological sites rather than buildings. The call to inventory the "entire nation's historic legacy" seems to assume that legacy is buildings. The key to increased funding for heritage protection is increasing public interest in, and concern for, the nation's cultural resources. The report needs to place greater emphasis on the fundamental connection between public support and funding, and consequently the importance of public education about heritage resources and how to protect them.

### **Fostering innovation**

SAA supports a number of the panel's suggestions, including charging the National Center for Preservation Technology and Training to serve as a national clearinghouse for information exchange; creating new financial vehicles for heritage resource development; and encouraging the

inclusion of heritage education in national and state social studies standards and curricular frameworks.

We are concerned, however, about some of the wording of the report. It could be misread to suggest that the private sector (not the Federal government) is primarily responsible for providing fiscal support to foster innovation, and that the private sector should be responsible for generating and funding a “national marketing strategy”. As mentioned in comments on other Summit reports, we are also concerned about the possibility that what constitutes American "history" and "heritage" will over-emphasize Euro-American history at the expense of indigenous, African-American, Latino, and Asian-American perspectives.

### **Involving all cultures**

As mentioned in our comments on other reports, SAA agrees with this panel’s concern that the National Register’s listings represent an accurate reflection of America and her people. SAA agrees with the panel’s recommendation that the Register’s current listings be evaluated to identify areas of under-representation. In keeping with one of the objectives of the SAA, “to advocate and to aid in the conservation of archaeological resources,” SAA also approves of the panel’s call for more outreach and education to assist the members of different communities in using the NHPA process to preserve their traditional cultural resources.

### **Participating in the Global Preservation Community**

SAA applauds the report’s call for increasing U.S. participation in, and financial support and leadership of, various international institutions and organizations concerned with heritage issues. These include, but are not limited to, the World Heritage List, ICCROM, ICOM, ICOMOS, and UN World Tourism Organization. SAA also supports the panel’s call for the ratification of the 1954 Hague Convention for the Protection of Cultural Property in Armed Conflict. This is an action the SAA has been urging the Senate to take for a number of years. We also strongly support the recommendations that Federal agencies review and consider their heritage impacts abroad. Federal agencies sometimes do not follow Federal laws and regulations abroad. The U.S. government (and American firms) would substantially burnish its reputation overseas if it sought to recognize and protect the heritage of other nations as well as it does here at home. Finally, the report’s call for increased foreign tourism to cultural heritage destinations in the U.S. and increased participation of foreign heritage professionals in the U.S. and vice versa are all sound.

SAA is very concerned about the report’s silence on the issue of the trade in illegally-procured antiquities. While we recognize and appreciate the important actions taken by the U.S. in this area to date (largely through the Cultural Property Implementation Act), SAA believes that stronger efforts are needed in this matter if we are to improve our standing when it comes to international historic preservation. Existing heritage programs strongly emphasize spectacular sites, and while that’s understandable from a public relations / tourism perspective, SAA urges the panel to recognize that non-monumental historic sites are equally as deserving of protection, and can be just as attractive as tourist destinations.

Finally, the report provides few details as to how to achieve the goals it mentions. While this is always the hard part, it is necessary that concrete steps be laid out in order for the program to have a reasonable chance of implementation.

### **Improving infrastructure**

The current “infrastructure” of historic preservation statutes and programs has succeeded to some extent in 1) identifying and preserving many historic and cultural resources; 2) ensuring that government take the preservation of historic and cultural resources into account in its decision-making, and 3) in raising the public’s knowledge of and support for preservation as a concept. A great deal remains to be done. More resources need to be identified and preserved, and known resources need better stewardship.

SAA in principle supports the report’s suggestions for streamlining and performance-based management, for closer integration of tribal governments and Native Hawaiian organizations into preservation decision-making, and better training and support for historic preservation professionals. The latter issue is very important, as numerous federal and state historic preservation experts are retiring, and not being replaced. The key is how those concepts are carried out. SAA supports thoughtful streamlining that increases effectiveness (which we understand to mean both increasing efficiency and productivity) while we cannot support increased efficiency if that means less money and reduced protection and management.

We are not certain that the existing infrastructure needs a complete overhaul. Centralization of preservation activities into a single bureau or department would likely be a costly undertaking, with efficiency benefits realized years down the road, but this is probably the only organizational innovation that will solve all the identified problems. The National Park Service, which has many other duties, cannot take responsibility for all of the good ideas in this report. Indeed, the report is silent about what agency will actually carry out all of its many recommendations. It may be time to begin planning for a new bureau within the Department of the Interior, one charged with the array of preservation tasks that are currently either scattered between agencies or not carried out at all.

SAA agrees with the report’s call for a fully-funded NHPA “core” preservation program, and suggests that more funding and tangible institutional and political support for existing programs will yield greater results for preservation activities than simple “flow chart” re-organization with no new funding. Greater funding and tangible institutional and political support, more than anything else, is what is needed. For archaeology, this means more money for research and stabilization of existing sites, cataloging of new sites, proper curation of collections, etc.

SAA also notes that the report mentions “the archaeological problem” with regards to compliance, and recommends that the Council focus on this issue. With respect, SAA points out that the Council has, to its credit, already begun this process as part of the Task Force on Archaeology’s review of archaeology in the historic preservation process.

## Coordinating the Stewardship and Use of Our Cultural Patrimony

SAA applauds the panel's efforts to address this very important issue. For many years, SAA has advocated for greater resources to improve the curation of the huge number of archaeological artifacts currently in collections.

SAA agrees with the report's findings that the nation's cultural collections are in danger, including archives, library resources, museum pieces, historic sites, scientific research collections, archeological repositories, and other resources; that national, state and local efforts to conserve cultural collections should be undertaken and sustained; that the private sector also has to play an important role in conservation; that cultural institutions and collections should be included in state emergency preparedness plans; that working artists and cultural institutions are essential to the vitality of a community; and that collaborations across disciplines and institutions will result in a stronger voice and more effective advocacy for stewardship of our cultural patrimony.

SAA is generally supportive of the report's suggestions, including providing information about the seven regional preservation field service programs across the nation that offer cultural organizations disaster assistance, and encouraging greater use of local networks of organizations that provide preservation assistance and information. One suggestion—requiring cultural institutions to have their own disaster plans—would be more problematic. While it might sound good on paper, such an action would be difficult to implement. Would there be federal funding to assist institutions in meeting such a mandate? Increased funding for federal collections, and more grants funding for the curation of non-federal collections, would have a far more direct and immediate impact on the problem.

Again, the Society for American Archaeology appreciates this opportunity to comment on the outcomes of the Preserve American summit. The Society looks forward to the crucial work of implementation.

Yours truly,



Kenneth M. Ames  
President  
Society for American Archaeology