



## SOCIETY FOR AMERICAN ARCHAEOLOGY

February 5, 2002

Kate Stevenson  
Associate Director, Cultural Resources, Stewardship and Partnerships  
National Park Service  
1849 C St., NW, Room 3128  
Washington, DC

Dear Ms. Stevenson:

Thank you very much for taking the time from your schedule to meet with myself, SAA members Vin Steponaitis, Lynne Sebastian, and SAA Manager, Government Affairs, Stuart Binstock. It was a pleasure to finally have the opportunity to meet you. Thank you also for arranging to have Dr. Stearns there. His presence greatly facilitated our meeting with you and with our meeting with him and his staff later than day.

Let me summarize our discussions, beginning with NAGPRA:

- (1) SAA expressed its concern that some agencies might be stretching the all-important concept of "cultural affiliation." SAA position is that affiliation must be determined in a way that is consistent with the statute. Obviously, the Kennewick decision will establish an important precedent here.
- (2) SAA also expressed its opinion that the Secretary of the Interior lacks statutory authority under NAGPRA to promulgate regulations on Culturally Unidentifiable Human Remains. Writing regulations without legal foundation could open the door to needless litigation and conflict. You welcomed SAA's opinion on this and you should receive that soon if you have not already.
- (3) We also discussed the need for guidance on the scientific study of human remains. In a letter to then-SAA president Keith Kintigh in 2000, you suggested that guidance would be forthcoming, but we understand that it might have to take a backseat for the time being to NAGPRA Federal Register notices and other matters. In the interim, however, you agreed that it would be possible to post your 1998 Congressional testimony (on the Hastings amendment to NAGPRA) on the NPS website.
- (4) We also discussed the possibility of archaeology being included in NPS's Cooperative Ecosystem Study Unit (CESU) program. I have since investigated this program through my own university (which is a member of the Great Plains and Rocky Mountain units) and believe that it could be extremely beneficial to all concerned if archaeology could be included in this existing program. We also discussed this possibility later with Frank McManamon and his staff, and intend to follow up that discussion. Any information or names of contact persons that your office could provide to SAA would be greatly appreciated.
- (5) SAA also pointed out that NPS has a number of accomplishments to its credit in the area of cultural resource preservation and management and that this is largely due to the several Archaeological Centers. In light of this, SAA expressed its concern over the Bush administration proposal that more NPS activities be out-sourced; we were especially concerned about the three NPS archaeological centers. However, you assured us that it was unlikely that the current administration's government-wide review of its contracting policies would result in their closure.
- (6) Finally, you informed us that funding for HPF is anticipated to be flat for the foreseeable future. SAA expressed its concern that the separate funding for tribal historic preservation offices is not adequate to the tasks that face tribes and should be increased.

An additional issue that was not raised during our meeting but that is important to us is that HPF funds cannot be spent on curation. That limitation is a policy decision that many would like to see NPS reconsider, especially since a large percentage of the fund's dollars are appropriated for purposes other than Preservation. Since, by law, HPF funds are available for purposes of NHPA, it seems logical that some funds could go toward collections deriving from Section 106/110 activities. Such a change in NPS policy could help solve the curation crisis that NPS has documented.

Again, it was a pleasure to meet you and SAA appreciates having had the opportunity to express its views and concerns. I look forward to seeing you again in the future. Please do not hesitate to contact me or the SAA office if you would like any further information or have any questions for SAA.

Sincerely,

/s/

Robert L. Kelly  
President