



SOCIETY FOR AMERICAN ARCHAEOLOGY

May 16, 2011

Forest Service Planning DEIS
C/O Bear West Company
132 E 500 S
Bountiful, UT 84010

RE: Proposed Forest Planning Rule

To Whom It May Concern:

The Society for American Archaeology (SAA) appreciates this opportunity to provide comments on the U.S. Forest Service's proposed Forest Planning Rule (Rule) and Draft Environmental Impact Statement (DEIS).

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.

In general, the SAA supports the proposed Rule (Alternative A in the DEIS), with certain modifications, as an improvement in the protection of cultural resources in National Forests over both the 1982 Planning Rule and the 2000 Planning Rule Transition Procedures. In addition, we believe that some of the consultation and monitoring provisions contained in Alternative E of the DEIS have merit and should be considered in future revisions of the Rule, though we recognize that implementing such policies may not be fiscally possible at this time.

Specifically, the Forest Service is to be commended for recognizing the important role that science plays in land management planning by requiring in Section 219.3 of the Rule that the responsible official take into account the best available scientific information, and to determine what information is the most accurate, reliable, and relevant to a specific decision or action.

SAA supports the requirement in Section 219.4 for the responsible official to engage the public, including Indian Tribes and Native Alaskans, in the planning process. The provision discussed in Section 219.1 for withholding, under the Freedom of Information Act, certain information regarding reburial sites, or other information that is culturally sensitive to Indian Tribes, is an important provision of the proposed Rule. Nevertheless, the document does not go far enough in identifying the unique government-to-government relationship between Tribes and the Forest Service. We believe the Forest Service should develop language in the Rule that better addresses and fosters this relationship.

We strongly believe that for management plans developed under the Rule to be effective in protecting heritage values, Section 219.7(c) (requiring plan development to include the identification and consideration of cultural resources), Section 219.8 (requiring plan components to contribute to sustaining cultural and historic resources and uses), and Section 219.10 (requiring that plan components provide for the protection of cultural and historic resources) will all need to be scrupulously implemented by Forest Service officials. In addition, the planning rule could be improved by providing a definition of cultural and historic resources that explicitly links these to historic properties and traditional cultural properties as defined in the National Historic Preservation Act.

Finally, we note that adequate funding will need to be made available if the effective and responsive management plans the proposed Rule seeks to create are to be achieved. This will require a strong commitment on the part of the administration, Congress, and stakeholders.

The SAA thanks the Forest Service, and looks forward to working with the agency in the future to preserve and protect cultural resources in our National Forests.

Sincerely,

A handwritten signature in blue ink that reads "William F. Limp". The signature is written in a cursive, slightly slanted style.

William F. Limp
President