



SOCIETY FOR AMERICAN ARCHAEOLOGY

February 28, 2020

Mr. Doug Stephens
Heritage Program Manager
United States Forest Service
201 14th Street SW
Washington, D.C. 20250

Dear Mr. Stephens:

This letter serves to provide the opinion of the Society for American Archaeology (SAA) on the Proposed Draft National Programmatic Agreement for Phasing Section 106 of the National Historic Preservation Act (NHPA). We appreciate the opportunity to provide our feedback on this important proposal.

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, we appreciate the USFS being proactive in attempting to make the implementation of Section 106 for projects on National Forest land more efficient and effective, and in reaching out to the larger cultural resources preservation community. Nevertheless, we share the concerns outlined by other organizations regarding some of the specifics of the document, and the real-world impact they could have on heritage resources should this nationwide programmatic agreement be deployed.

To that end, and in the interest of brevity, we attach the redline review of the document, prepared by our colleagues at the National Trust, which we have reviewed and to which we agree. The resolution of the issues highlighted by their legal team will go a long way toward resolving the difficulties seen in the USFS proposal.

We look forward to working with you in bringing this issue to a successful conclusion.

Sincerely,

A handwritten signature in black ink that reads "Joe E. Watkins". The signature is written in a cursive, flowing style.

Joe E. Watkins, Ph.D., RPA
President