December 14, 2007

Ms. Caroline Hall
Preservation Compliance Coordinator
Department of the Interior
National Park Service (Heritage Preservation Services)
1849 C Street, NW, (2253)
Washington, DC 20240

Transmitted Via Electronic Mail
caroline_hall@nps.gov

RE: Programmatic Agreement Among the National Park Service (United States Department of the Interior), the Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers

Dear Ms. Hall,

The American Anthropological Association (AAA), the primary professional society of anthropologists in the United States offers the following comments on the September 2007 first draft of the Programmatic Agreement Among the National Park Service (United States Department of the Interior), the Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers (hereafter, Programmatic Agreement). Founded in 1902, the association represents well over 11,000 members with a strong record of advocacy in protecting anthropological interests. The association appreciates the outreach efforts of Dr. Janet Snyder Matthews, the Associate Director of Cultural Resources, who requested these comments via mail on September 24, 2007.

In summation, the AAA believes that the PA will streamline routine projects where historic properties have already been identified and evaluated for eligibility for the National Register of Historic Properties. In an age of limited financial resources, especially for cultural resource management, such efficiencies are overdue and welcomed.

For those projects in areas where historic properties have not been evaluated, the regular procedures for Section 106 would be followed under this Proposed Assessment, and this is also supported by the AAA, as it would be difficult to streamline projects when the National Park Service may be unaware of what exists in some project areas.
Specific comments on the draft proposal follow below:

p. 2, lines 31 to 35, The AAA believes that consultation with the NCSHPO is a welcome first start, but should there be parallel consultation with the National Association of Tribal Historic Preservation Officers (NATHPO)

p. 2, lines 41-43, Along these lines, AAA believes that NATHPO should be a party to the agreement just as the NCSHPO is.

p. 6, lines 13-24, The National Park Service should be encouraged to include representatives of the American Anthropological Association, state universities, and local tribes or Hawaiian organizations in every Park culture resource management (CRM) team.

p. 6, lines 26-48, re: II(C) – The AAA believes that this training requirement is excellent.

p. 9, lines 14-24, The groups included in consultation with the public should explicitly include “local and national scientific organizations.”

p. 10, lines 2-30, The provision that that the Streamlined Process only applies in situations where identification and evaluation of historic properties within the APE have been previously undertaken is supported by the AAA.

p. 13, line 30, The AAA suggests that the word “exact” be added so the provision reads “when the exact limits of previous disturbance are well known …”

p. 16, lines 20-38, The AAA supports the requirement to have an archaeologist do a post-project inspection of areas subjected to hazardous fuel and fire management activities to verify that these did not impact historic properties (archaeological sites).

p. 16, lines 40-44, The AAA believes its should be made explicit that Environmental Monitoring Units such as weather stations, termite bait stations, and water or air quality stations should not be installed within archaeological sites unless these benefit the historic property.

p. 17, line 48, The AAA suggests “culturally affiliated Indian Tribes” be rewritten to state “culturally affiliated or culturally related Indian Tribes or Tribes with aboriginal lands that encompass the reburial site” so this provision more closely aligns with Section 3 of NAGPRA.

p. 25, line 33, The AAA suggests this be rewritten to read “Program performance issues raised by consulting parties or the public.”
Again, the AAA welcomes the opportunity to comment on this Programmatic Agreement, and we believe you will find them of great use. If you have any questions, comments or concerns, please feel free to contact Mr. Damon Dozier, AAA Director of Public Affairs. Mr. Dozier can be reached at (703) 528-1902 extension 3008 or ddozier@aaanet.org.

Sincerely,

William Davis

Executive Director
American Anthropological Association