



October 9, 2024

Advisory Council on Historic Preservation 401 F Street NW, Suite 308 Washington, DC 20001

Dear Members of the Advisory Council:

On behalf of the <u>Archaeology Division</u> of the <u>American Anthropological Association</u>, we write in strong support of the letter to you on September 30, 2024, from Preservation Partners, signed by the Society for American Archaeology, the Society for Historical Archaeology, and other important organizations in the field of historic preservation about your "Program Comment on Accessible, Climate-Resilient, and Connected Communities." We join with our sister organizations to respectfully ask that you withdraw this program comment.

Current protocols for reviews under Section 106 of the National Historic Preservation Act (NHPA) are effective and efficient. We are concerned that your program comment will diminish this system and will put our irreplaceable archaeological and historical sites at risk.

We especially want to emphasize the importance of the consultation process, including the participation of State Historic Preservation Offices (SHPOs), Tribal Historic Preservation Offices (THPOs), descendant groups, local communities, and other stakeholders. Archaeological and historic sites, and the landscapes in which they are situated, are nonrenewable cultural resources that deserve the protections they have by law. Furthermore, they are fundamental to heritage and community identity in the present.

We believe strongly that stewardship of cultural resources and historic sites is essential for building resilient and connected communities and infrastructure for the future, and that this stewardship is compatible with—not a hindrance to—smart growth and infrastructure development.

Sincerely,

Whitney Battle-Baptiste, Ph.D.

President, American Anthropological Association

Ruth M. Van Dyke

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President, Archaeology Division, American Anthropological Association

Chris Rodning, Ph.D.

President-elect, Archaeology Division, American Anthropological Association