



SOCIETY *for* HISTORICAL ARCHAEOLOGY

April 9, 2025

The Honorable Brooke Rollins
Secretary of Agriculture
1400 Independence Ave SW
Washington DC, DC 20250-0002

Dear Secretary Rollins,

The Society for Historical Archaeology (SHA) is writing to express its concern with and objection to the Secretary's Memorandum 1078-006, Increasing Timber Production and Designating an Emergency Situation on National Forest System Lands. Implementation of this Memorandum will have an adverse impact on the U.S. Forest Service's ability to protect historical and archaeological sites and Native American sacred places under its care. Moreover, rather than streamlining governmental functions, this Memorandum has the potential to delay and increase costs for the types of Forest Service actions listed in the Memorandum.

Formed in 1967, the Society for Historical Archaeology is the largest scholarly group concerned with the archaeology of the modern world (A.D. 1400-present). The main focus of the Society is the era since the beginning of European exploration. SHA promotes scholarly research and the dissemination of knowledge concerning historical archaeology. The SHA is specifically concerned with the identification, excavation, interpretation, and conservation of sites and materials on land and underwater.

The SHA supports the effective stewardship of our nation's national forests, carrying out timber production and reducing the risk of wildfires while also protecting our nation's historical, archaeological, and cultural heritage through compliance with Section 106 of the National Historic Preservation Act (NHPA). Maintaining this balance between project delivery and historic preservation has been the responsibility of the Forest Service's Heritage Program for decades, a responsibility that Heritage Program staff have executed efficiently and effectively. As a result, Forest Service projects and programs have been delivered on time and on budget due to the diligence of Heritage Program staff. In addition, the Heritage Program has been able to protect significant cultural resources on public lands from vandalism, theft, fire, and other threats, ensuring that future generations can understand the American stories present on the landscapes of our national forests, and managing these resources for public use, enjoyment and education.

The effective and efficient delivery of Forest Service projects and programs, however, is now threatened by the recent layoffs of Heritage Program staff (as SHA noted in our March 10, 2025, letter to the Department). Further, implementation of the emergency Section 106 consultation process, as directed by the Secretary's Memorandum, on top of the reduction of Heritage

Program staff, has the potential for dramatically increasing the number of unanticipated discoveries of historic, archaeological, and Native American sacred sites during Forest Service project and program delivery. The direct outcome of such unanticipated discoveries will be extensive project and program delays and increased costs, conflicts with Tribes and other communities whose significant places are found throughout our nation's forests, and the loss of significant historical, archaeological, and cultural sites of value to all Americans.

One special strength of the Heritage Program has been its strong relationship with Tribes. Implementing the emergency process stipulated under the Section 106 regulations, per the Memorandum, will impact these sacred sites and greatly diminish the ability of Tribes to effectively consult with the Forest Service on a government-to-government basis, damaging decades of trust built between the Forest Service and Tribes. The result will be controversy and litigation.

We strongly urge you to reconsider deploying emergency authority provided under Section 106 of the NHPA, as the outcome will be the opposite of the reasons for deploying this authority as stated in the Memorandum. In addition, SHA again urges you to reconsider reduction in Heritage Program staff and filling open positions as quickly as possible. To do otherwise is to ensure greater inefficiency and uncertainty in Forest Service project and program delivery, and the degradation of our nation's irreplaceable archaeological, historical, and cultural heritage.

Sincerely,

Rich Veit

Richard Veit, Ph.D., RPA

President, Society for Historical Archaeology