

The Society for American Archaeology's Task Forces on Landscape Policy Issues

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The management of cultural resources by federal land-managing agencies in the United States is in the midst of significant change. The Department of the Interior (DOI) is adopting a landscape-scale framework for resource management to improve land-use planning, project compliance, and mitigation of adverse impacts for all resources, including cultural resources. Yet, as DOI agencies move toward landscape-level management and maintenance of public lands, the mechanisms and methods needed to protect and preserve

cultural resources are still being developed. Land-managing agencies in other departments of the U.S. government also are struggling to shift their focus from site-based to landscape-scale management of cultural resources. Addressing issues of landscape-scale management of particular concern to archaeological resources is now of paramount importance, not only for federal land-managing agencies, but also for the future direction of American archaeology.

ABSTRACT

The management of cultural resources by federal land-managing agencies in the United States is moving in the direction of programmatic approaches that consider archaeological resources on a regional or landscape level. In 2014, the Society for American Archaeology (SAA), in response to meetings with federal agencies, established three task forces on issues related to landscape-scale cultural resource management (CRM). The task forces focused on: (1) survey data quality, durability, and use; (2) incorporating archaeological resources in regional land-use plans; and (3) valuing archaeological resources. Revised reports of the task forces are being published in this issue of *Advances in Archaeological Practice*. This paper provides the context and history of the task forces, particularly the CRM challenges facing federal land-managing agencies leading to the selection of topics that are subjects of the published articles.

La administración de recursos culturales (CRM, por sus siglas en inglés) que realizan los organismos federales dedicados a la planeación territorial en los Estados Unidos están desarrollando enfoques programáticos que incluyen a los recursos arqueológicos en la escala regional o del paisaje. En 2014, la Society for American Archaeology, como resultado de las reuniones que sostuvo con organismos federales, estableció tres grupos de trabajo para abordar distintos temas relacionados con la administración de recursos culturales en el paisaje. Los equipos de trabajo se centraron en los siguientes temas: (1) la calidad, durabilidad y uso de los datos de la investigación; (2) la incorporación de recursos arqueológicos en los planes regionales de ordenamiento territorial; y (3) la determinación del valor de los recursos arqueológicos. Los informes revisados que elaboraron los grupos de trabajo se publican en este número de *Advances in Archaeological Practice*. Este artículo provee el contexto y los antecedentes que dieron lugar a los grupos de trabajo. Particularmente, éste mismo analiza los retos a los que se enfrentan las agencias federales de planeación territorial y que se desprenden de la administración de recursos culturales, los cuales inciden en la selección de temas que son el objeto de estudio de los artículos que se publican en este volumen.

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This issue of *Advances in Archaeological Practice* has three articles written by task forces established by the Society for American Archaeology (SAA) to provide professional community positions on three concerns of landscape-scale cultural resource management (CRM) identified by land-managing agencies. The topics—survey data quality, durability, and use; incorporating archaeological resources in regional land-use plans; and valuing archaeological resources—may seem at first glance to have little in common. Archaeologists employed by federal land-managing agencies, however, view all as critically important to the management of archaeological resources at regional or landscape scales and realize that the way in which their agency resolves them will in no small way shape the future of CRM in the United States.

In this brief introduction, I provide the history and context for SAA's role in formulating positions on these topics. The papers themselves are part of this special issue of *Advances in Archaeological Practice*:

- [Archaeological Survey Data Quality, Durability, and Use: Findings and Recommendations \(Wilshusen et al. 2016\)](#)
- [Incorporating Archaeological Resources in Landscape-Level Planning and Management \(Doelle et al. 2016\)](#)
- [Values-Based Management of Archaeological Resources at a Landscape Scale \(McManamon et al. 2016\)](#)

HOW THE TASK FORCES CAME ABOUT

SAA has a long-standing interest in public policy affecting the conduct of archaeology and the preservation and interpretation of the archaeological record. Since it was founded in 1934, SAA has often interceded on behalf of legislation and regulation to protect and properly manage and steward the archaeological record, particularly in the United States. I was honored to be SAA president from April 2013 until April 2015. To ensure that I understood the issues and challenges facing federal agencies in the management, protection, and stewardship of archaeological resources, I, along with David Lindsay, the Manager of Government Affairs for SAA, periodically met with Federal Preservation Officers (FPO) and other representatives of federal agencies responsible for cultural resources.

One such meeting was held on July 15, 2014, when David and I met with Robin Hawks and Kate Winthrop of the Bureau of Land Management (BLM) and Dan Odess of the National Park Service (NPS) at the SAA headquarters in Washington, D.C. Our meeting took place shortly after Secretary of the Interior Sally Jewell released the *DOI Strategy for Improving the Mitigation Policies and Practices of the Department of the Interior* (Clement et al. 2014). The strategy, required by Secretarial Order No. 3330 (Jewell 2013), identified the need to initiate guidance for landscape-scale mitigation under Section 106 of the National Historic Preservation Act (NHPA) as part of a shift from “project-by-project management to consistent, landscape-scale, science-based management of the lands and resources for which the Department is responsible” (Clement et al 2014:i; see also Altschul 2014). At the time, Hawks was the FPO for the BLM, Winthrop was the cultural resources lead on BLM's landscape-

management initiative, and Odess had been charged with directing DOI's effort to develop guidance for landscape-scale mitigation under Section 106 of the NHPA.

As we discussed the issues, several points emerged. First, a major impetus behind DOI's landscape initiative was the increasing pressure on public land, particularly in response to energy development, whether from green energy, such as solar farms; natural gas extraction from shale formations; traditional oil and gas extraction; or movement of energy through pipelines or transmission lines. These large projects often cross administrative and jurisdictional boundaries and pose numerous environmental compliance challenges, such as developing reasonable project alternatives, evaluating and prioritizing resources, and defining mitigation strategies. Landscape-scale data, planning, and resource management strategies were needed to assist with these project-specific compliance challenges.

Second, the DOI's landscape strategy principally focused on natural resources, reflecting managers' familiarity with concepts such as habitat and wilderness, which are not site-specific. The concern expressed by the agency representatives at the meeting was that if archaeologists did not get out in front of the landscape initiative, management of cultural resources would miss the opportunity for more comprehensive and programmatic consideration that would greatly assist NHPA-compliance outcomes and other stewardship goals.

A third point was also clear: neither the BLM nor the NPS had settled on a way forward for integrating cultural resources into a landscape approach to managing resources. The BLM was in the process of conducting a number of demonstration projects that had the potential to move the agency toward programmatic landscape-scale management of cultural resources. NPS, which was just beginning to develop a plan to execute the DOI strategy, was also simultaneously advocating amending the NHPA to include cultural landscape as a property type. The *landscape approach* as advocated by the Secretary, however, which referred to management of multiple resources within large geographic areas, was not the same as the concept of *cultural landscape*, which refers to specific types of historic properties that NPS wanted to add to NHPA.

Even with these challenges, all parties at the meeting readily agreed that moving toward a landscape approach to cultural resource management would be a positive step for CRM and American archaeology. The devil, of course, would be in the details. If a landscape approach leads to doing less, in shorter time frames, with fewer resources, then this would be disastrous for CRM. Alternatively, if landscapes become a tool from which better preservation decisions and outcomes emerge, then CRM will be advanced in a positive direction for years to come. Our common goal, then, was to shape the conversation about incorporating cultural resources into a landscape approach so that federal agencies would be in a position to make the best possible decision about archaeological and cultural resources.

THE “ASK”

Hawks came to the meeting with a request that the SAA develop professional community position statements on four topics. Such statements, she argued, would demonstrate the

importance of cultural resources to high-level agency managers and support BLM cultural resource staff as they endeavored to ensure the best possible outcome in the incorporation of cultural resources in BLM-wide landscape policy and regulation. The four topics were:

1. **Equivalency:** How much is an archaeological site worth? Can federal agencies allow archaeological sites to be destroyed or disturbed in exchange for the preservation of sites of greater or equivalent value elsewhere? These types of tradeoffs are common in dealing with natural resources (e.g., wetlands banking) or in land exchanges where the federal government trade public land for private land of greater value. However, to date, such tradeoffs involving cultural resources remain controversial.
2. **Terminology:** Federal agencies often use terms like “landscape” in very different ways, and laws and regulations have different definitions for terms like “mitigation.” As a result, even within the same agency, a term can have very different meanings to different practitioners when applied to natural as opposed to cultural resources, or NHPA as opposed to the National Environmental Policy Act compliance.
3. **Durability of Survey Data:** In most states, the State Historic Preservation Office (SHPO) requests that areas that have not been surveyed in the last 10-20 years be resurveyed. The result is expensive and greatly frustrating to non-archaeologists who cannot understand why repeated survey is needed. It is also a disincentive to agencies and commercial applicants that might otherwise invest in upfront landscape-scale survey but decide instead that the prudent course is project-by-project compliance-driven survey. There are lots of good reasons to resurvey when we suspect that prior survey data no longer adequately represent the condition of the archaeological record, but the arbitrariness of “use by” dates on survey data is difficult to explain. The issue is not time, but data quality.
4. **Role of predictive modeling:** Federal agencies have used models that predict archaeological site location for more than 30 years in CRM, yet they remain controversial. When can they be used? What can they be used for? What types of data are needed to develop models? These are a few of the questions that surround predictive modeling.

In turn, Odess outlined how NPS might approach the topic of landscape-scale mitigation. He outlined a process by which stakeholders would first determine cultural resource values for a region, classify land parcels into cultural resource sensitivity based on those values, identify areas likely to be developed, correlate cultural resource sensitivity areas with those identified for natural resource, and finally delineate use areas. Although differing in detail, Odess’s thoughts mirror similar efforts in regional planning (Laurenzi et al. 2013).

THE TASK FORCES

After discussion, the SAA Board of Directors decided to establish three task forces. The first was focused on survey data durability, quality, and use. Because survey requirements are established in consultation with the SHPOs, the board selected Richard Wilshusen, then Deputy SHPO of Colorado, as the Chair of the Task Force, with Jim Bruseth (SAA Treasurer and former Deputy SHPO of Texas) as the board liaison. The second task force focused on incorporating cultural resources into regional planning. The BLM concern with predictive modeling was folded into the charge of this task force. William Doelle, President and Chief Executive Officer (CEO) of Archaeology Southwest, which has been at the forefront of cultural resource regional planning, was chosen as the chair of the task force, with Christina Reith (SAA Secretary and State Archaeologist of New York) as the board liaison. Finally, a task force on valuing archaeological resources was placed under the direction of Francis McManamon (former Chief Archaeologist for NPS and Executive Director of Digital Antiquity), with Terry Childs (SAA Board Member and DOI Museum Program Manager) as the board liaison.

The chairs, in consultation with the board liaisons, reviewed and refined the charge I wrote for them, with the final charge approved by the Board of Directors. These charges are attached to each of the three articles as supplemental data. The chairs and board liaisons then selected task force members.

Before beginning work, David Lindsay and I met again with agency representatives at SAA headquarters on October 22, 2014. In attendance were Kate Winthrop (then Acting FPO), Robin Hawks (now Senior Advisor, BLM Directorate of National Conservation Lands and Community Partnerships), and Byron Loosle (Chief, Division of Cultural, Paleontological Resources and Tribal Consultation) representing the BLM; Dan Odess and Stan Bond (Chief Archaeologist) representing NPS; Michael Kaczor (FPO) representing the Forest Service; and Tom McCulloch (Senior Archaeologist and Senior Program Analyst) representing the Advisory Council on Historic Preservation. We reviewed the task force charges and discussed each agency’s concerns, needs, and desired outcomes. There was general agreement that professional community statements on the three topics would be valuable and timely.

The task force submitted their reports at the beginning of March 2015, and they were subsequently accepted by the Board of Directors the following month. Although officially ended, the task forces took up the challenge to revise their reports for publication in a peer-reviewed journal. Articles based on the task force reports were submitted to *Advances in Archaeological Practice* in September, revised as needed, and published in this issue. Under any circumstance, the task forces have worked at incredible speed. If, as I believe they will, these three articles help advance CRM by improving the quality of survey data, bolstering the consideration of cultural resources in the regional planning, and stimulating a discussion of how best to rank archaeological resources in terms of a variety of values and to use these ranks to prioritize possible management outcomes, then the task forces will have been well worth the effort.

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Data Availability Statement

The article is based on meetings held at SAA headquarters on July 15 and August 22, 2015. There are no separate supporting documents.

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