Tom McCulloch

From: Laura Dean
Sent: Tuesday, June 06, 2006 10:33 AM
To: Tom McCulloch; Julia King
Subject: FW: Comments on "Policy Statement Regarding ...Burial Sites... etc"

Laura Henley Dean, Ph.D.
Program Analyst/Archeologist
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW
Suite 809
Washington, D.C. 20004
main 202-606-8503
fax 202-606-8672

From: Archaeology Report
Sent: Tuesday, June 06, 2006 9:28 AM
To: Laura Dean
Subject: FW: Comments on "Policy Statement Regarding ...Burial Sites... etc"

From: A.K. Rogers [mailto:matmus1@maturango.org]
Sent: Mon 6/5/2006 12:32 PM
To: Archaeology Report
Subject: Comments on "Policy Statement Regarding ...Burial Sites... etc"

Dear Sirs:

Having participated in consultations in the past, I offer the following comments on the subject draft policy statement:

1. Principle 4, second sentence.
Current reading: "Federal agencies shall consult with Indian Tribes..."
Suggested revision: "Federal agencies shall consult with the tribal governments of Indian Tribes..."
Rationale: The agency should be consulting with those who have the duly constituted authority to speak for the Tribe, not all the various dissidents and splinter groups. Consulting with the latter weakens the authority of the Tribal government.

2. Principle 4, general.
Is it the intent to require consultation with tribes which are not federally recognized? The principle as written is not clear on this point. Either way, it should be made explicit.

3. Principle 6, first sentence
Current reading: "The Federal agency official is responsible for making decisions..."
Suggested reading: "The Federal agency official has sole responsibility for making decisions...'
Rationale: It should be made absolutely clear where the buck stops.

Thank you for the opportunity to comment.

Alexander (Sandy) Rogers, MA, MS
Curator of Archaeology and Staff Archaeologist
Maturango Museum
100 E. Las Flores Ave.
Ridgecrest, CA 93555
(760) 375-6900