

First Name	Last Name	Submission Date	Feedback
Glenn	Stelter	07/14/26	Under the current permitting process, 23(c), while claiming that a report equivalent in scope would be sufficient to a dissertation, in practice it limits the acceptable documents to academic publications. Being the 'sole author or primary/lead author' is rare in the practice of archaeology outside of academia in cultural resources management (CRM). Most projects, by their nature, are collaborative, as is most scientific research. If the intent of the rule is to limit OAR permitting archaeologists to those that have sufficient academic publications, it should say so clearly. Rule 23 (c)(B) is also troubling. The need to 'support experience with excavation or removal of archaeological or historical materials' all but guarantees there will be more "research" that potentially causes irreparable damage to historic properties and/or cultural resources. There will be, and likely already has been, archaeologists excavating materials for "research" to meet OAR standards for employment, when said research has little to no value to the bettering of our knowledge of the. This is all during a time when we are looking to disturb resources less and less, and deal with the 'grey literature' piling up in SHPOs. This requirement means more aspiring archaeologists will forgo using extant research in lieu of finding another site to dig up, all to make sure they can be employed later. This is, in short, an antiquated take on archaeology in 2026. And last is the bias the current process gives to existing CRMs in the state of Oregon. Firms with OAR archaeologist on file will be able to acquire the permits needed to do the excavations in Oregon. They can then assign archaeologists on staff that meet the academic requirements to a small projects, write it up as research under Section 106, dig some shovel test pits, have the one author write the report (therefore being the sole author) and easily get another archaeologist on the permit. All because they already had someone who could get them the original permit to do so. The process feels biased towards CRM firms who already have an established presence in the state.
Kristina	Stelter	07/14/26	I feel that making it a requirement that you are a sole author on an excavation report is a misunderstanding of how cultural resource management works in the United States. Not only is it nearly impossible, as CRMs work as teams, but it also goes against the current movement in archaeology to leave things in the ground if at all possible. You can have all of the necessary experience spread out around multiple projects, but having to be a sole author on one report that includes all aspects is quite narrow.