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Archaeological and Historical Research Services

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Appropriations Committee
Connecticut General Assembly

Dear Sir or Madam:

I am writing to express my concern over Governor Rell's proposal to downsize the Commission on Culture and Tourism (CCT) and move it into the Department of Economic and Community Development (DECD). My concerns relate to the impacts the proposed changes would have regarding historic and archaeological resources and the ability of the state to spend state and federal monies efficiently and effectively.

Many if not most people in Connecticut do not realize that the CCT includes the State Historic Preservation Office (SHPO). When the Connecticut Historical Commission was merged with CCT several years ago, those of us in the historic preservation community were concerned that the removal of the word "history" would render the historic-related functions of the SHPO all but invisible. Federal law requires that every state have a SHPO. The SHPO's role is critical to state projects: every project which uses state or federal money and/or which requires a federal permit, such as an Army Corps of Engineers permit, must be reviewed by the SHPO for potential impacts to important archaeological (below-ground) and historical (above-ground) resources. The SHPO determines whether the projects will or may impact archaeological/historical resources, and makes recommendations regarding studies to identify and/or mitigate impacts to these resources. No state or federally-funded project may proceed without first being reviewed by the SHPO and no project may be completed without SHPO approval of steps taken to protect archaeological/historical resources. Archaeological/historical resources are reviewed as environmental resources, and are essential components of Environmental Impact Evaluations, Environmental Assessments, and Environmental Impact Statements. If a state does not have a SHPO, or the SHPO is not functioning properly, the federal government takes over the state review process, essentially meaning that project timelines are extended by a year.

In order for the SHPO to function effectively, it must be independent. Because it must review every DECD project, it would be a conflict of interest for the SHPO to be a part of DECD, or any large state agency, particularly those that carry out projects which require environmental review. It is difficult to see how Connecticut will manage to spend stimulus money well if the SHPO review process is hampered by embedding it in a large agency.

I think all of us agree that cuts are necessary in these difficult times, but hobbling the SHPO, which is a key cog in the wheel of environmental review, would seriously diminish our ability to move development and transportation projects along smoothly at a time when efficiency has never been more important to Connecticut's economy and citizens.

Sincerely,

Mary G. Harper
President

MGH/rlb