



SOCIETY FOR AMERICAN ARCHAEOLOGY

November 26, 2024

US Department of Labor
Occupational Safety and Health Administration
200 Constitution Avenue NW
Washington, DC 20210

RE: OSHA–2021–0009

The Society for American Archaeology (SAA) appreciates this opportunity to comment on the Occupational Safety and Health Administration’s (OSHA) proposed rule regarding heat injury and illness prevention in outdoor and indoor work settings (PR). Archaeology is a branch of science that requires a great deal of work while outdoors. Avoiding injury and illness to archaeology workers due to prolonged exposure to the sun and heat is a high priority for employers in all sectors of the discipline—academia, the private sector, and government. As such the SAA strongly supports this proposed rule and urges its adoption.

The SAA is an international organization that, since its founding in 1934, has been dedicated to research about and interpretation and protection of the archaeological heritage of the Americas. With more than 6,000 members, the SAA represents professional and avocational archaeologists, archaeology students in colleges and universities, and archaeologists working at tribal agencies, museums, government agencies, and the private sector. The SAA has members throughout the United States, as well as in many nations around the world.

Whether carried out as part of an academic research project, excavations for a federally sponsored undertaking, or site stabilization work in a national park, archaeology often demands extensive outdoor activity. Most of that work takes place in the summer months, meaning many archaeologists can be classified as being outdoor workers on a part-time basis but not eligible for the short-term exemption from the proposed standard.

As the temperatures have risen over the decades and employers have become more cognizant of the potential stresses—as outlined in Tables IV-I and IV-II of the document—experienced by workers, archaeology as a whole is now very concerned about the impacts from heat on its workforce. Archaeology does not have its own classification in the North American Industry Classification System, and its accident and illness statistics are often included in those of other industries, particularly environmental, thus making it more difficult to form an accurate picture

of the reality of our workplaces. We suspect that archaeological work has a higher rate of injury due to heat than other environmental disciplines.

Some archaeological employers provide many of the precautions outlined in the proposed rule to be taken in the event of high heat conditions—water, rest breaks, acclimatization, hazard alerts, etc. A federal standard, however, would be a welcome development for our discipline. The estimated average cost of implementing the new standard—\$3,085 per establishment—is a modest amount of overhead to cover precautions that will make a sizable difference to covered employees. Cultural resource management firms, in particular, are anxious about recruiting sufficient numbers of employees to fill the growing number of openings in the sector, and this rule will provide assurances to both current and prospective workers that their worksites will be prepared for heat-related impacts.

The SAA supports the proposed rule and urges its adoption.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Sandweiss", is written over a light blue rectangular background.

Daniel H. Sandweiss, PhD, RPA
President