



May 23, 2016

Director (630)
Bureau of Land Management (BLM)
U.S. Department of the Interior
1849 C Street, NW
Room 2134LM
Washington, DC 20240
Attention: 1004-AE30

Re: Comments on the Draft Proposed Resource Management Planning Rule

Dear Sir:

The Society for American Archaeology (SAA) wishes to submit the following comments on the proposed rule to amend existing regulations establishing “the procedures used to prepare, revise, or amend land use plans pursuant to the Federal Land Policy and Management Act (FLPMA)”. We appreciate the opportunity to provide input on this important issue.

SAA is an international organization that, since its founding in 1934, has been dedicated to the research about and interpretation and protection of the archaeological heritage of the Americas. With nearly 7000 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. SAA has members in all 50 states as well as many other nations around the world.

The BLM controls a vast amount of land in the western U.S., and these lands contain an enormous number of cultural resources, including archaeological sites. Therefore it is heartening to see the Bureau, through this proposed rule, approach land use management and resource protection from a landscape and regional perspective. For too long, cultural resource planning and mitigation activities have been focused at the site-specific level, even though human societies have always made use of landscapes across wide-ranging areas. Scattershot preservation efforts, though valuable for what they do protect, fail to provide an integrated framework that gives current inhabitants of North America a complete picture of how the peoples who came before us lived and interacted with one another and with the lands in which they lived.

Archaeology as a science has only recently begun to make landscape-scale research and preservation goals a priority. With this in mind, SAA convened a task force of experts to examine how policymakers can best incorporate cultural resources, including archaeological sites and materials, into regional / landscape plans. We believe that the task force’s report,

completed last year, addresses precisely the issues that the BLM is attempting to resolve through the proposed rule. We attach the report to this letter.

Regarding the rule itself, it is very important that the language directly reference “cultural resources” as the statutory and regulatory obligations that they are. As other commenters have already mentioned, there is inadequate citation of such in the proposed document.

Again, SAA thanks the BLM for acting on this matter. Please feel free to contact us, should you have any further questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Diane Gifford-Gonzalez", written over a light gray rectangular background.

Diane Gifford-Gonzalez
President