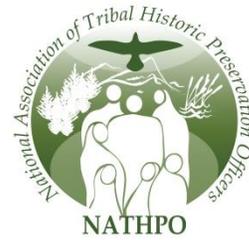




SOCIETY FOR AMERICAN ARCHAEOLOGY



December 19, 2019

William Perry Pendley, Esq.
Deputy Director, Policy and Programs
Bureau of Land Management
U.S. Department of the Interior
1849 C Street, N.W., Room 5655
Washington, D.C. 20240

Dear Mr. Pendley,

The Society for American Archaeology (SAA) and National Association of Tribal Historic Preservation Officers (NATHPO) would like to place themselves on record as strongly opposing the administration's plan to reorganize the Bureau of Land Management (BLM) and disperse to field offices key staff with substantial national policy portfolios, including the preservation of cultural resources on BLM land. This action can only serve to further degrade the BLM's capacity to carry out its statutorily-required missions, and is not supported by tribes, preservation organizations, Congress, or much of the public at large. We urge you to work with the Secretary of Interior to reconsider this counter-productive move.

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 more than 7,500 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.

NATHPO is a national non-profit organization of Tribal government officials who implement the National Historic Preservation Act on tribal land and pertaining to tribally significant places nationwide.

The BLM possesses and manages the largest number of cultural resources owned by any federal agency, even though only approximately 10% of its enormous landholdings have been thoroughly surveyed for these resources. This means that an untold number of sites and objects remain to be discovered, excavated, and cataloged. Yet there is an ongoing failure on the part of the agency to fill key cultural resources staff positions at the national and regional levels in a timely fashion. For example, it has been approximately five years since the BLM had a permanent National Curator/NAGPRA Coordinator. The National Tribal Coordinator position has been vacant since 2017 and is no longer present in the publicly available organization chart.

Additionally, only two out of the twelve State Offices have filled their Tribal Coordinator positions. For the rest, the Deputy Preservation Officers have been performing these duties ad hoc. All these positions are stipulated in the BLM Tribal Relations Manual, and for so many to remain vacant exacerbates the agency's already strained relationships with tribes and fails to uphold the federal trust responsibility to these 573 sovereign nations. Whether this staffing crisis is because of institutional inertia, a desire to speed up extractive activity permits, hostility to heritage protection activities, or a combination of all of these, the erosion of its cultural preservation workforce is compromising the BLM's ability to save these public resources for the benefit of all Americans.

In spite of the lack of full staffing, the Washington Office's Division of Education, Cultural and Paleontological Resources works hard to ensure that there is a national policy for effective stewardship of cultural resources under the requirements of the National Historic Preservation Act (NHPA), the Archaeological Resources Protection Act (ARPA), the Native American Graves Protection and Repatriation Act (NAGPRA), and other key laws. It also directs nationwide efforts to ensure BLM's compliance with responsibilities such as the identification of cultural resources and historic sites under Section 110 of the NHPA, government-to-government consultation with Indian tribes on heritage-related matters, and the proper care of archaeological collections under 36 C.F.R. Part 79, Curation of Federally-Owned and Administered Archaeological Collections, to name just a few.

With this ill-advised plan to shift most of the Washington Office staff to western cities, however, the difficulties already being caused by inadequate staffing are expected to become much worse. It is our understanding that the move will result in the elimination of key leadership positions within the cultural resources program, and that many of the staff persons whose positions will be relocated to places such as Santa Fe, New Mexico, are expected to leave the BLM instead of move. This will result in a further dramatic erosion of the national-level expertise and institutional knowledge that is needed for BLM to meet its requirements under federal heritage preservation laws and regulations.

More than 95% of the BLM's employees already live and work in the western states. It is imperative that there be a vigorous Washington Office for the Division of Education, Cultural and Paleontological Resources, in order to ensure that the BLM manages its cultural resources in accordance with the law. We urge the immediate reversal of this misguided and counter-productive decision.

Sincerely,



Joe E. Watkins, Ph.D., RPA
President, SAA



Shasta C. Gaughen, Ph.D.
Chairperson of Board of Directors, NATHPO