

SOCIETY FOR AMERICAN ARCHAEOLOGY

August 8, 2000

Ted Milesnick
Bureau of Land Management
Planning, Assessment and Community Sport Group (WO-210)
1849 C Street, NW
Washington DC 20240-0001

Re: Draft BLM Planning Guidance

Dear Mr. Milesnick:

The Society for American Archaeology (SAA) welcomes this opportunity to comment on the Bureau of Land Management's (BLM) draft planning guidance. By way of introduction, SAA is an international organization dedicated to the research, interpretation, and protection of the archaeological heritage of the Americas. With more than 6500 members, the society represents professional, student, and avocational archaeologists working in a variety of settings including government agencies, colleges and universities, museums, and the private sector. Since its inception in 1934, SAA has endeavored to stimulate interest and research in American archaeology; advocate and aid in the conservation of archaeological resources; encourage public access to and appreciation of archaeology; oppose all looting of sites and the purchase and sale of looted archaeological materials; and serve as a bond among those interested in the archaeology of the Americas.

First, SAA would like to commend the BLM on some of the general directions for planning established in these guidance documents. The emphasis on integrating BLM's planning efforts with those of other federal agencies and state, local and tribal jurisdictions and the new emphasis on ecosystem-scaled planning should enable the BLM to address archaeological resource protection more effectively. The scale of prehistoric societies and the nature of prehistoric land use often mean that decisions about these resources are best made at a regional or ecosystem scale.

Additionally, SAA finds the possibility that these new guidance documents will make BLM land-use planning more flexible and more amenable to timely changes and updates very positive. Under the current planning structure it can sometimes be difficult, if not impossible, to make changes to reflect changing situations, even when all parties agree that the change is needed.

In terms of cultural resources, and specifically archaeological resources, the one great lack that SAA sees in both the Land Use Planning Manual and the Handbook is the absence of emphasis on proactive aspects of cultural resource management. For example, the summary of the requirements of the National Historic Preservation Act (NHPA) in 1600(.03)L focuses entirely on the responsibility of federal agencies to consider the effects of proposed actions on historic properties. One of the most serious weaknesses in the current practice of cultural resource

management within the BLM is the exclusive focus on the *reactive* component of NHPA – Section 106 – and the lack of attention to the *proactive* component – Section 110. SAA fears that if this issue is not addressed in the planning guidance, the current allocation of resources will continue in future planning efforts.


The objectives established for land use plans in the manual include “Provide on a continuing basis an inventory of all public lands and their resources and other values.” Although this objective cites FLPMA, Section 201(a), it should also cite NHPA Section 110(a)(2), which requires federal agencies to establish “a preservation program for the identification, evaluation, and nomination to the National Register of Historic Places, and protection of historic properties.” This section further instructs agencies to manage and maintain historic properties in a way that “considers the preservation of their historic, archaeological, architectural, and cultural values.” A clear statement in the planning manual that land use plans should include proactive provisions for identifying, evaluating, and managing cultural resources is essential to ensuring that BLM managers devote resources and personnel to the activities required by Section 110 of NHPA.

The other issue that SAA would like to raise concerns archaeological research as an allowable action in land-use plans. It is SAA’s contention that archaeological research is a valid use of the public lands that contributes to the long-term public interest. Archaeology provides public enjoyment, contributes to education, and informs all of us about the human condition, enabling us to learn from the successes and failures of past human societies.

In addition, archaeological research can contribute significantly to informed land-use decisions. As Section III.A.2. of the Handbook notes, “effective land-use planning requires knowledge and understanding of the lands and resources involved.” Given the vast tracts of land managed by the BLM and the immense number of archaeological sites on those lands, in many areas the BLM has only the sketchiest knowledge of the archaeological resource base and little or no contextual information within which to make decisions about managing those resources. The activities of researchers on the public lands can provide land managers with invaluable data and the context within which to incorporate those data in planning decisions. For these reasons, SAA request that BLM include specific acknowledgment of research, and particularly archaeological research, as a valid and important use of the public lands to be considered in land-use plans.

The Society for American Archaeology would like to thank BLM for the opportunity to comment on this draft guidance, which has the potential to have an important effect on the archaeological heritage of our country.

Sincerely,



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