

**National Trust for Historic Preservation
American Anthropological Association / Archaeological Conservancy
American Cultural Resources Association / Archaeology Southwest
National Association of Tribal Historic Preservation Officers
Society for American Archaeology / Society for Historic Archaeology
Society for Vertebrate Paleontology**

November 25, 2019

The Honorable Lisa Murkowski
Chairman
Subcommittee on Interior, Environment, and
Related Agencies
Committee on Appropriations
United States Senate
Washington, DC 20510

The Honorable Betty McCollum
Chair
Subcommittee on Interior, Environment, and
Related Agencies
Committee on Appropriations
U.S. House of Representatives
Washington, DC 20515

The Honorable Tom Udall
Ranking Member
Subcommittee on Interior, Environment, and
Related Agencies
Committee on Appropriations
United States Senate
Washington, DC 20510

The Honorable David Joyce
Ranking Member
Subcommittee on Interior, Environment, and
Related Agencies
Committee on Appropriations
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Murkowski, Chair McCollum, Ranking Member Udall, and Ranking Member Joyce:

As organizations committed to preserving our nation's heritage and protecting cultural resources, we are profoundly concerned by the Department of the Interior's ongoing actions to reorganize the Bureau of Land Management (BLM) and disperse to field offices staff with key national coordinating responsibilities. We urge you to exercise strong oversight of the reorganization and work through the appropriations process to halt actions that would diminish management of cultural resources.

In testimony before the House Natural Resources Committee on September 10 and again in a letter dated September 25, Ed Shepard, President of the Public Lands Foundation, expressed the belief that this reorganization would "functionally dismantle the BLM while ignoring the reality that the BLM is already a western-based agency." We share this concern and believe the reorganization will compromise the BLM's ability to steward cultural resources on public lands for the benefit of all Americans. In addition, Representative Elanor Holmes Norton (D-DC) and other members of Congress have specifically requested a prohibition of funds under any authority to relocate the BLM headquarters outside of the National Capital Region.

The BLM has responsibility for nearly 250 million surface acres of land—roughly 1 in every 10 acres of land in the United States—and more than 700 million acres of subsurface mineral resources. These public lands contain the largest, the most diverse, and the most scientifically important body of cultural resources managed by any federal agency. The BLM's Division of Cultural, Paleontological Resources and Tribal Consultation within the Washington Office has performed an essential role in effective stewardship of these resources, development of budget priorities, and fulfillment of the BLM's responsibilities under the National Historic Preservation Act (NHPA), the Native American Graves Protection and Repatriation Act (NAGPRA), the

Paleontological Resources Preservation Act (PRPA) and other foundational laws. These positions are important for providing timely input on multiple uses of federal lands and ensuring efficient compliance with the law.

Unfortunately, the reorganization appears to have eliminated key leadership positions within the cultural resources program and will relocate other positions, including the Federal Preservation Officer, to Santa Fe, New Mexico. These changes will almost certainly exacerbate significant reductions in staffing and expertise that the program has experienced over the past several years. By all accounts, this reorganization is accelerating staff departures throughout the BLM.

With an estimated 97% of BLM staff already working in the field, it is crucial that BLM maintain an experienced and expert cultural resources directorate in Washington, D.C. to establish consistent policy and collaborate with other program staff in BLM, the Department of the Interior, and other federal agencies. Until now, national program staff for cultural resources have been able to interact with other division chiefs, raise technical issues involving implementation of the NHPA, and address concerns that naturally arise in an agency responsible for managing multiple and at times conflicting uses of our public lands. We believe that having expert and experienced staff located in a headquarters office is critical to harmonize challenges of the multiple use mission of the BLM.

Furthermore, we are concerned that a lack of cultural resources program leadership at a national level will minimize national priorities such as identifying and protecting cultural resources and historic sites as required by Section 110 of the NHPA. According to BLM budget documents, only about 10% of the public lands have been surveyed for heritage resources to Class III standards, meaning the agency has limited data on resource types and densities for about 90% of its land base. We fear this reorganization will reinforce the practice of conducting cultural resource surveys primarily in response to specific development proposals requiring NHPA Section 106 reviews rather than proactively identifying historic places.

In addition to BLM's responsibility to manage archaeological resources, historic properties, and paleontological resources on public lands, the cultural resources program also coordinates and consults with Indian tribes regarding places of historic, cultural, and traditional value. BLM has specific responsibilities to conduct government-to-government consultation with Indian tribes. We are concerned that this reorganization may eliminate the current positions of Tribal Coordinator and Curator/NAGRPA Coordinator, which provide national leadership for BLM field staff. We are also disappointed by the lack of meaningful tribal consultation ahead of this reorganization plan.

Given the importance of the BLM's role in managing our nation's cultural resources, we urge your attention and prompt action to address this issue and ensure that the BLM can effectively implement its responsibilities to manage and protect our nation's cultural resources.

If you have any questions concerning these matters, please contact Tom Cassidy, Vice President of Government Relations for the National Trust at TCassidy@savingplaces.org.

cc:

The Honorable Richard Shelby, Chairman, Senate Committee on Appropriations
The Honorable Patrick Leahy, Vice Chairman, Senate Committee on Appropriations
The Honorable Joe Manchin, Ranking Member, Senate Committee on Energy & Natural Resources
The Honorable Nita Lowey, Chairwoman, House Committee on Appropriations
The Honorable Kay Granger, Ranking Member, House Committee on Appropriations
The Honorable Raúl Grijalva, Chairman, House Committee on Natural Resources
The Honorable Rob Bishop, Ranking Member, House Committee on Natural Resources