



The Honorable Ryan Zinke  
Department of the Interior  
1849 C Street, N.W.  
Washington, DC 20240

May 25, 2017

Dear Secretary Zinke,

We urge you to protect our national monuments as you carry out President Trump's Executive Order of April 26<sup>th</sup> 2017, *Review of Designations Under The Antiquities Act*. The Antiquities Act, signed into law by President Theodore Roosevelt in 1906, allows presidents to designate "historic landmarks, historic and prehistoric structures, and other objects of scientific interest." The Antiquities Act was a careful compromise between the rights of government agencies to shelter vulnerable resources on federal land, the property rights of landowners and industries, and the preservation concerns of historians and archaeologists. Nearly every U.S. President, beginning with Theodore Roosevelt and regardless of political party, has used this executive privilege to preserve cultural sites of the highest national importance.

National monuments are a cornerstone of tourism to our nation. During the 2014 federal government shutdown, many national monument sites were kept open with state funding due to their critical importance to local economies.<sup>1</sup> In 2016, our national parks drove \$35 billion in economic output and welcomed over 330 million visitors. National monuments protect places that tell the story of how America was created; archaeological sites associated with the continent's earliest inhabitants; sacred sites associated with ongoing Tribal religious observation; places of important scientific research; and spaces where all Americans can come together and experience the wonders of our natural environment. If lost or damaged, we would endanger our national tourism industry and put at risk the cultural heritage that allows us to understand who we are as Americans.

National monument designations do not come with uniform restrictions on development; on the contrary, the national monument system is flexible and responsive to multiple and compatible land uses in keeping with local preferences. At their creation, monuments are assessed for their unique resources, and activity types may be allowed or limited in response to the nature of these resources. In many national monuments, grazing, logging, hunting and fishing, recreation, rights-of-way, and even continuation of existing oil and gas leases are explicitly or implicitly permitted

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<sup>1</sup> National Parks Conservation Association, "Nearly 90 Tourism, Cultural Heritage, Conservation, and National Parks Groups Fight House Attack on National Monuments," Mar. 25, 2014 (<https://www.npca.org/articles/588-nearly-90-tourism-cultural-heritage-conservation-and-national-parks-groups#sm.00010f874kr64cnrt9c24b6h79ybn>).



by monument designations.<sup>2</sup> Over time, as these monuments are studied and continually assessed, appropriate land uses may be revised in response to new information. Rather than revising boundaries or seeking to reverse national monument designations, we urge the Department of the Interior to use this flexibility to achieve its goals.

Hasty and often illegal incompatible uses on national monuments, however, have from time to time endangered the important cultural and economic resources within monuments, through miles of logging deforestation, looting of Native American burials and important archaeological sites, and damage to threatened vegetation.<sup>3</sup> There are only 151 national monuments across the nation, but their contribution to America's unique cultural richness cannot be overstated, and they are vulnerable to damage that in some cases is irreversible.

One challenge that greatly constrains the capacity of the federal government to identify and revise compatible uses of national monuments is an incomplete understanding of the resources located on these properties. While national monument boundaries are carefully selected to delineate the smallest area compatible with saving resources of national and global significance, national monuments contain much more than the theme, time period, or rare resource they were created to protect. A geological monument may also cover land with important native sites, or a historic ranching designation might also contain sites related to industry. Section 110(b)2 of the National Historic Preservation Act states that agencies should make sure that any historic resources on their land that are eligible for the National Register of Historic Places should be "managed and maintained in a way that considers the preservation of their historic, archaeological, architectural, and cultural values." Greater funding and emphasis on Section 110 cultural resources assessments would enable the Department of the Interior to design well-balanced multiple use guidelines for each individual monument and to uphold the original

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<sup>2</sup> Headwaters Economics, "Permitted Uses in Western National Monuments," May 16, 2013 ([https://headwaterseconomics.org/wp-content/uploads/NatlMon\\_Permitted\\_Uses.pdf](https://headwaterseconomics.org/wp-content/uploads/NatlMon_Permitted_Uses.pdf)).

<sup>3</sup>See, e.g., Max Greenberg, "Looters, vandals threaten some of America's great archaeological sites in Bears Ears," *The Wilderness Society*, Aug. 24, 2016 (<http://wilderness.org/blog/looters-vandals-threaten-some-americas-great-archaeological-sites-bears-ears>); Jim Mimiaga, "3 Cited for Illegal Monument Logging," *The Journal*, Mar. 12, 2014 (<https://the-journal.com/articles/18372>); Engaging Places, LLC, "El Morro National Monument Damaged by Vandalism," Dec. 13, 2011 (<https://engagingplaces.net/2011/12/13/el-morro-national-monument-damaged-by-vandalism/>); Associated Press, "Marana man gets probation, fine for national monument damage," *AZ Central*, Feb. 25, 2016 (<http://www.azcentral.com/story/news/local/arizona/2016/02/25/marana-man-gets-probation-fine-for-national-monument-damage/80922152/>); Deseret News, "Fossil damaged at Dinosaur National Monument," Sep. 6, 2014 (<http://www.deseretnews.com/article/765659263/Fossil-damaged-at-Dinosaur-National-Monument.html>).



Antiquities Act balance between governmental oversight, public use of federal lands, and historic preservation.

Our national monuments are a critical element of the cultural patrimony that we pass down to our next generations. The history, archaeological sites, and rare places they protect are irreplaceable. At the same time, we recognize the importance of enhancing the public quality of life by allowing sustainable public access and use in these amazing places.

We appreciate your care and consideration of America's historic, cultural, and scientific treasures, and welcome the opportunity to assist you however we can during your review of our national monument system.

Sincerely,

*American Anthropological Association  
American Cultural Resources Association  
Archaeological Institute of America  
Coalition for American Heritage  
Crow Canyon Archaeological Center  
Preservation Action  
US/ICOMOS  
Society for American Archaeology  
Society for Historical Archaeology*

### **American Anthropological Association**

AAA is the world's largest association for professional anthropologists, with 10,000 members. Based in Washington, D.C., the Association was founded in 1902, and covers all four main fields of anthropology (cultural anthropology, biological/physical anthropology, archaeology, and linguistic anthropology). Our members are employed in higher education or are students of anthropology, and others work in the public, private, and non-governmental sectors. AAA publishes 22 journals, offers career planning and professional development services, supports college and university departments, awards numerous prizes and fellowships, sponsors a paid summer internship program, a summer field school in ethnography and occupational therapy, and stages research conferences.

### **American Cultural Resources Association**

ACRA is the national trade association supporting and promoting the common interests of cultural resource management (CRM) firms. Our member firms have a vital role in the National Historic Preservation Act Section 106 process, helping clients by identifying and assessing historic and cultural resources prior to development, and by recommending responsible



solutions that appropriately balance preservation values with development goals. ACRA's member firms employ thousands of CRM professionals nationwide, working in historic preservation, archaeology, anthropology, architectural history, and historical and landscape architecture.

### **Archaeological Institute of America**

AIA promotes archaeological inquiry and public understanding of the material record of the human past to foster an appreciation of diverse cultures and our shared humanity. The AIA supports archaeologists, their research and its dissemination, and the ethical practice of archaeology. The AIA educates people of all ages about the significance of archaeological discovery and advocates the preservation of the world's archaeological heritage.

### **Coalition for American Heritage**

The Coalition for American Heritage advocates for the national historic preservation program and federal support for disciplines critical to identifying, protecting, interpreting, and sharing lessons from the past to inform the future.

### **Crow Canyon Archaeological Center**

The Crow Canyon Archaeological Center is a unique research and education not-for-profit dedicated to understanding and teaching the history of the ancestral Pueblo people of the American Southwest. The Center conducts long-term archaeological research with a focus on the Mesa Verde region in southwestern Colorado. The Center's staff teaches about archaeology, history, and culture through a variety of public experiential archaeology programs and travel study adventures. Crow Canyon also partners with American Indians to enrich our understanding of past and present American Indian cultures and shares that knowledge with others.

### **Preservation Action**

Preservation Action is a 501(c)4 nonprofit organization created in 1974 to serve as the national grassroots lobby for historic preservation. Preservation Action seeks to make historic preservation a national priority by advocating to all branches of the federal government for sound preservation policy and programs through a grassroots constituency empowered with information and training and through direct contact with elected representatives.

### **Society for American Archaeology**

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 5,000 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.



### **Society for Historical Archaeology**

With more than 2,300 members, SHA is the largest organization in the world dedicated to the archaeological study of the modern world and the third largest anthropological organization in the United States. Members come from a dozen countries, and most are professional archaeologists who teach, work in museums or consulting firms, or have government posts. Our members also include many of the world's underwater archaeologists through the Advisory Council for Underwater Archaeology.

### **US/ICOMOS**

US/ICOMOS is a membership based non-profit organization that is part of the worldwide ICOMOS network of people, institutions, government agencies and private entities that support the conservation of the world's heritage.