



SOCIETY FOR AMERICAN ARCHAEOLOGY

November 8, 2023

Manager
BLM Paria River District
669 US Highway 89A
Kanab, UT 84741

RE: GSENM RMP Project

The Society for American Archaeology (SAA) appreciates this opportunity to provide comments on the Bureau of Land Management’s (BLM) draft Resource Management Plan (RMP) and draft Environmental Impact Statement (EIS) for the Grand Staircase-Escalante National Monument (Monument, or GSENM). The SAA, along with many other organizations and tribes, fought for the restoration of the Monument and are pleased to see the BLM taking the next step in properly managing this land and its natural and cultural resources.

The SAA is an international organization that, since its founding in 1934, has been dedicated to research about and interpretation and protection of the archaeological heritage of the Americas. With more than 5,500 members, the SAA represents professional and avocational archaeologists, archaeology students in colleges and universities, and archaeologists working at tribal agencies, museums, government agencies, and the private sector. The SAA has members throughout the United States, as well as in many nations around the world.

The restoration of the Monument was critical for the preservation of a substantial—and irreplaceable—portion of the North American archaeological record, along with the living Native American spiritual and cultural identities associated with the landscape and all it contains. The 1.865 million acres within the Monument in Southern Utah are unparalleled in terms of the scope and comparatively intact state of their archaeological resources. President Clinton’s and President Biden’s establishment proclamations declare that this Monument’s primary purpose is to protect its historic and scientific objects, including its landscapes, which constitute a mélange of spatially and temporally overlapping natural and cultural vistas. The original RMP emphasized that the Monument was “created to protect a spectacular array of historic, biological, geological, paleontological, and archaeological objects” and that “all other considerations are secondary to that edict.” By 2017, researchers, including SAA members, had recorded 3,985 archaeological sites in the Monument, but the number was probably closer to 6,000 due to backlogs and missing records. To date, only 6% of the Monument has been comprehensively

surveyed,¹ and studies² suggest that there could be more than 100,000 precontact sites with archaeological significance in the Monument, many of which may also be important to Native Americans.

In the first RMP, the BLM stated that it would protect archaeological resources in their original context and could deny proposed development activities that threaten adverse impacts to such resources. The new RMP must incorporate the same approach to conserve the archaeological record. Keeping archaeological resources in their original context is essential to maintaining the integrity of the archaeological record and tribal ties to the cultural landscapes of their ancestral homelands. The alternative plan designs presented in the draft RMP offer an array of methods to do this, but the challenge is finding the best features of each to construct a composite plan that will successfully protect these resources. We offer the following comments to assist in defining a plan that accomplishes this goal.

The challenge of designing a plan that implements Biden Proclamation 10286's mandate to protect designated historic and scientific objects is hindered by the fact that archaeologists have only surveyed about 6% of the Monument, and, as acknowledged at the 10/25/2023 RMP Virtual Public Meeting, the BLM has not completed an inventory of the known objects the proclamation must protect.

With this uncertainty, the plan must use threat avoidance to limit the exposure of these archaeological and cultural resources to livestock grazing, Off-Highway Vehicle (OHV) operations, Rights of Way (ROW) road construction, recreational threats, and looting by minimizing development and uses that disturb the landscape while maximizing measures that protect and preserve known and unknown cultural resources for future generations. This requires managing and, where necessary, restricting discretionary uses, as in Alternative D, designating Areas of Critical Environmental Concern (ACEC) similar to Alternative B, and managing resources using a tiered, landscape-focused area strategy, as in Alternative C. It also should incorporate the following principles:

- Livestock grazing tramples and erodes the cultural landscape, so it must be limited to the current allotment permits defined in Alternative D, the minimum required under Proclamation 10286, and hedges or fencing used where needed in existing allotments.
- As dramatically demonstrated in Recapture Canyon and elsewhere, irresponsible OHV travel destroys cultural sites and landscapes and must be limited to carefully selected, authorized routes as defined in Alternative D.
- Building roads for ROWs disturbs the landscape and facilitates motorized access to remote regions of the Monument and must also be constrained to those required by law or regulation as defined in Alternative D.

¹ Appendix D11.1.

² Madsen, David, *A Preliminary Assessment of Archaeological Resources Within the Grand Staircase-Escalante National Monument, Utah* (Circular 95, Utah Geological Survey, 1997; <https://ugspub.nr.utah.gov/publications/circular/C-95.pdf>).

- The draft plan indicates recreation is the dominant use of Monument lands. High recreational traffic threatens the cultural landscape and archaeological record with unintentional damage and opportunistic or purposeful vandalism. As in Alternative D, the plan must limit facilities to carefully defined Recreation Management Areas (RMAs).
- The plan’s management strategy must consider the uncertainty in the distribution of the cultural objects that the proclamation requires the Monument to protect. How the plan designs its education, landscape-based area management, and effective ACEC and RMA features is essential to its success.

As the first line of defense against artifact disturbance and collection by an uninformed public, the RMP must include sound on-site and online educational programs, which are fundamental to responsible visitation and object protection. The plan should outline how the BLM intends to interact with and educate the public about the Monument’s purpose and benefits concerning archaeological and cultural resources: these resources are nonrenewable and deserve to be protected. Before 2017, the presentations, public meetings, and school field trips carried out by BLM personnel changed local conceptions of the value of the Monument’s natural and cultural resources. This aspect of the agency’s mission at Grand Staircase-Escalante must continue and expand, if possible. The Monument’s “Visit with Respect” video is an excellent start that the plan should expand to include Native voices explaining their past and present ties to these lands. A robust visitor education program pairs well with a landscape-focused area management strategy like Alternative C’s.

The experience at Canyons of the Ancients National Monument shows that tiered-usage, landscape-focused area management strategies, like that in Alternative C, effectively balance visitor access and experience with cultural resource protection. Alternative C’s engagement and education in the front country and passage areas, accompanied by online content, prepare visitors for responsible and respectful exploration of the back country and primitive areas. The table of general use categories on pages D2 to D7 distinguishes between historic and prehistoric site categories. This is a common, convenient, ingrained, and colonialist way of temporally organizing site types. As used here, except for consultations, it’s a distinction without a difference, excluding in some cases categorizing ancient sites like Pueblo roads. All sites are historic in the broad sense of the word and as used in the Antiquities Act, which is the basis for Proclamation 10286. Also, here and in the subsequent cultural resource management plan, you should, with tribal consultation, strictly limit (developed) public usage designations to front country and passage sites. Visitors should use self-directed exploration in the backcountry and primitive area sites.³

ACECs are a double-edged sword. They provide increased management attention and protection to resources, including cultural resources, but non-cultural resource management that disturbs the ground can also disturb the archaeological record. Even though ACECs are intended in part to protect cultural resources, they can’t fully contribute to the proclamation’s mandate if they only require a minimal surface survey and incomplete proclamation object inventory. In the

³ Appendix D1.

longer term, the plan must include commitments for additional archaeological activities to inventory the remaining 94% of the Monument and identify proclamation objects requiring increased protection. If the BLM only does this in response to NHPA Section 106 compliance or Section 110 obligations, as it states in Appendix D11.1, the 100,000-site estimate means it could leave most of the proclamation cultural objects unrecorded and unprotected. At a minimum, the BLM should comply with ARPA and record archaeologically significant sites, even if they aren't eligible for the National Register of Historic Places. Education alone will not protect the proclamation cultural objects that haven't been inventoried. Ideally, the entire Monument should be surveyed and inventoried. This is a vast and potentially expensive task. However, conducting drone lidar, photogrammetry, and other remote sensing surveys coupled with a site predictive model and pedestrian surveys can speed things up. Using cooperative agreements or other mechanisms to partner with academic and nonprofit archaeological organizations that bring funding and labor could be a less costly path forward here. For the proposed plan, ACEC cultural resource protection must be informed by a completed inventory of known objects and consultation with tribes to assess the potential for archaeological and cultural resources in portions of the cultural landscape not surveyed and inventoried. If ACEC importance and relevance selection rules permit, it would be wise to use a predictive model to identify likely important and relevant sites that the BLM can ground-truth for creating or including in ACECs.

To protect lands included in designated RMAs, the plan should require desired cultural protection outcomes to be considered in addition to desired recreation outcomes in designing RMAs. Adding well-designed, desired cultural protection outcomes will help control recreational impacts on the archaeological record.

While not mandated in the proclamation, we strongly encourage the inclusion within the RMP of a tribal co-management approach, such as the tribal commission used by the Bears Ears National Monument. The current draft RMP includes shared tribal stewardship within the context of advisory committee consultation. However, this will not adequately recognize the substantial tribal role in the Monument's creation and restoration or the need for their presence in its ongoing management.

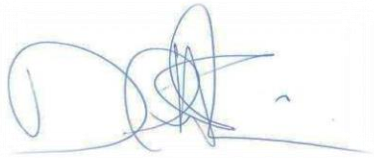
On a related note, both a tribal land management plan, like that for Bears Ears, and cultural and archaeological landscape concepts must be part of the RMP. The Bears Ears Inter-Tribal Coalition Land Management Plan provides the foundation of the soon-to-be-released Bears Ears National Monument draft RMP, and the GSENM proposed plan would benefit from a similar Indigenous perspective to guide the definition and stewardship of a landscape-focused area management strategy. In particular, an Indigenous landscape perspective will help the BLM construct planning features that protect the Monument landscape as an object, as envisioned in the Biden proclamation. The draft plan focuses on protecting cultural sites, but culture and the archaeological record don't end at the boundaries of sites. They extend into the natural landscape to connect to other sites and resources. To the extent these connections leave traces on the land or in the collective memory of living cultures, they must be preserved.

Finally, and while this may be beyond the scope of the RMP, the fact is that the BLM cannot effectively implement any plan without adequate staff. A sufficient number of archaeologists and law enforcement officers is critical to implementing any plan and reaching the Monument's

stewardship and research goals. The SAA recognizes that this situation is not unique to Grand Staircase-Escalante, but the Bureau needs to engage with stakeholders. We encourage the BLM to explore site stewardship volunteer programs and partnerships with academic and nonprofit organizations.

We look forward to working with you in the months ahead on this important document.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Sandweiss', enclosed in a light blue rectangular border.

Daniel H. Sandweiss, PhD, RPA
President