



Director (210)
Attn: Protest Coordinator WO-210
P.O. Box 71383
Washington, D.C. 20024-1383

November 15, 2019

The Coalition for American Heritage appreciates this opportunity to file this protest against the Bureau of Land Management's (BLM) proposed Resource Management Plan (RMP) and final Environmental Impact Statement (EIS) for the Grand Staircase-Escalante National Monument and Kanab-Escalante Planning Area. SAA cannot support anything but Alternative A—the 'no action' option—in the expectation that Presidential Proclamation 9681 will be overturned by the federal courts, and protests the BLM's selection of Alternative E.

The Coalition for American Heritage ("Coalition") is an advocacy coalition that protects and advances our nation's commitment to heritage preservation. The Coalition collectively represents more than 350,000 cultural resource management professionals, academic archaeologists and anthropologists, and other subject-matter experts with an interest in historic preservation.

The former Grand Staircase-Escalante National Monument (GSE) encompassed a 1.88 million acre landscape of enormous importance to both the scientific knowledge and cultural heritage of the United States, and the many peoples who have lived here over the millennia. As thousands of our groups' members noted in comments provided to the Department of Interior during its 2017 review of large-scale Monuments created after 1996, the number of both known and as-yet undiscovered archaeological sites present on the GSE landscape is believed to exceed 100,000. With Proclamation 9681, many of those irreplaceable sites, along with numerous cultural resources and tribal sacred places, now enjoy far less protection than those that reside within the boundaries of the much-reduced National Monument.

The Coalition's interest in this matter stems from the fact that the Archaeological Resources Protection Act of 1979 ("ARPA") and the National Historic Preservation Act ("NHPA"), do not ensure that archaeological resources and their surrounding context are preserved for scientific study, as does the Antiquities Act. The President's Proclamation has opened vast tracts of land that formerly were part of the Monument to possible mining, off-road vehicle use, and other activities that greatly increase the risk that archaeological resources and their contexts will be forever damaged or destroyed. The proposed RMP and final EIS would bring those possibilities closer to reality.

Alternative A would continue the policies contained in the original GSE National Monument management plan. We believe that this will be the best course of action to take in terms of protections for archaeological and cultural resources until Proclamation 9681 is overturned by the courts, at which time the GSE NM will be restored to its full size. To support the imposition of a new management plan for the reduced NM would help to legitimize an executive action of highly questionable legality, one that reversed the optimal and appropriate protection of heritage resources that the original GSE Monument represented.

The Coalition strongly protests the State Director's selection of Alternative E, and encourages the adoption of the 'no action' Alternative A.

If you have any questions or concerns please contact the Society for American Archaeology's Manager, Government Affairs, at 202-319-4049.

Sincerely,

American Anthropological Association
Archaeological Institute of America
Society for American Archaeology
Society for Historical Archaeology

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