



November 15, 2018

The Coalition for American Heritage (CAH) appreciates this opportunity to provide its views on the draft Monument Management Plans (MMPs) and Environmental Impact Statement (EIS) for the Shash Jáa and Indian Creek National Monuments, the successor units to the Bears Ears National Monument (NM). While we commend the Bureau of Land Management for preparing the four alternatives outlined in the draft, we cannot at the present time support anything but Alternative A—the ‘no action’ option—in the expectation that Presidential Proclamation 9681 will be overturned by the federal courts.

The Coalition is a member-based organization comprised of heritage professionals, scholars, small businesses, non-profits and history-lovers across the country. Our 300,000 members work together to promote our nation’s commitment to historic preservation. Coalition members are avid students of the artifacts of earlier peoples, the lives they led, the communities they enriched, and the cultural and historic legacies they left for future generations to enjoy. Our members are driven by the principle that preserving historic resources helps stabilize neighborhoods, attracts private investment to cities and towns, creates jobs, generates tax revenues, supports small businesses, and powers America’s heritage tourism industry.

The former Bears Ears NM, whose creation the CAH strongly supported, encompassed a landscape of great 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 we and hundreds of our 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 Bears Ears landscape is believed to exceed 100,000. With Proclamation 9681, most 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 two much-reduced Indian Creek and Shash Jaa National Monuments.

The 1,352,736 acres contained within the old Bears Ears NM were managed under the BLM’s Monticello Resource Management Plan and the U.S. Forest Service’s Manti La-Sal Land and Resource Management Plan. Alternative A would continue the policies contained in those plans for the Shash Jáa and Indian Creek National Monuments. 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 Bears Ears NM will be restored to its full size. To support the imposition of a new management plan for the two smaller NM’s 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 Bears Ears Monument represented.

The CAH strongly encourages the adoption of the 'no action' Alternative A.

Regards,

Coalition for American Heritage
American Anthropological Association
American Cultural Resources Association
Society for American Archaeology
Society for Historical Archaeology