



September 24, 2019

Bureau of Land Management
Canyon Country District Office
82 East Dogwood Street
Moab, Utah 84532
Attn: Lance Porter
VIA EMAIL: blm_ut_monument@blm.gov

RE: DOI-BLM-UT-0000-2018-0007-RMP - EIS

Dear Mr. Porter:

The Coalition for American Heritage submits the following comments regarding the proposed target shooting closure at locations within the Bears Ears National Monument. While we support the intent of the proposed closure as a means of protecting sensitive cultural and sacred sites and objects, we also must point out that this action is part of a series of inappropriate and illegal steps taken by the administration with regards to National Monuments.

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 proposed closure of target shooting at campgrounds, developed recreation sites, petroglyph sites, and structural cultural sites on Bureau of Land Management (BLM) lands within the Bears Ears National Monument would be welcome progress in providing greater protection for threatened heritage resources that are by their very nature irreplaceable. Nevertheless, we cannot help but remind the BLM that, as we pointed out in comments filed in November 2018 on the proposed management plans for the Shash Jáa and Indian Creek National Monuments, it is our contention that Presidential Proclamation 9681—which shrank the Bears Ears and Grand Staircase-Escalante National Monuments—was issued without any authority granted to the President under the Antiquities Act. It is our further belief that the federal courts will overturn Proclamation 9681 in lawsuits filed against the administration by concerned stakeholders. Coalition member group, the Society for American Archaeology, is an amicus supporter of those suits.

When the administration's actions are rendered invalid by the judiciary, the Bears Ears and Grand Staircase-Escalante National Monuments will be restored. Once that occurs, we urge the BLM to implement the target shooting closure it has outlined in the current proposal, as our shared cultural past deserves protection from all types of human-caused damage, including target shooting, be it deliberate or accidental. Until the court's opinion is known, the Coalition encourages BLM to maintain target shooting closures at sensitive cultural and sacred sites in order to protect our national heritage.

Thank you for your attention to this issue.

Sincerely,

A handwritten signature in blue ink that reads "Marion F. Werkheiser". The signature is written in a cursive style with a large, sweeping initial 'M'.

Marion Werkheiser
Policy Director
Coalition for American Heritage