

National Trust for Historic Preservation ◊ American Anthropological Association
American Cultural Resources Association ◊ Archaeology Southwest ◊ Arizona Preservation Foundation
Cienega Watershed Partnership ◊ City of Kingman, AZ ◊ Coalition for American Heritage
Colorado Plateau Archaeological Alliance ◊ Conservation Lands Foundation ◊ Friends of Cedar Mesa
Friends of Organ Mountains Desert Peaks ◊ Friends of the Agua Fria National Monument
Friends of the Cliffs ◊ Modern Phoenix ◊ Montana Preservation Alliance
National Association of Tribal Historic Preservation Officers ◊ Nevada Preservation Foundation
Site Steward Foundation ◊ Society for American Archaeology ◊ Society for Historical Archaeology
Washington Trust for Historic Preservation

February 6, 2017

Dear Representative:

As organizations committed to preserving our nation's historic and cultural resources, we urge you to OPPOSE the Congressional Review Act resolution (H.J. Res. 44) to nullify the Bureau of Land Management's final planning rule, commonly referred to as BLM Planning 2.0.

The Congressional Review Act is the wrong tool to address resource management planning. While no regulation is perfect, using the Congressional Review Act to overturn the Planning 2.0 rule would have far-reaching implications for cultural resources and management of our public lands. This resolution of disapproval would prohibit the BLM from developing any "substantially similar" regulation in the future. The result would be to replace the new regulation with BLM's prior planning rule, which is more than 30 years old and does not incorporate current technology and streamlining practices to maximize efficient and effective decision-making. Locking in inefficient and outdated regulations does not serve any users of our public lands.

The BLM's Planning 2.0 rule is designed to bring much needed efficiency, predictability, and transparency to BLM's management of multiple uses on public lands. The rule is carefully crafted to collect state and local government, tribal, and public input early in the planning process. In addition to making BLM's planning more efficient, improving available information allows project developers to consider potential impacts to environmental, cultural, and historic resources at the outset rather than being surprised by stakeholder concerns and information identified late in the process. The rule also improves the planning process by reducing the need for costly and time-consuming supplements that can delay decision-making and inhibit private sector investment.

The BLM's Planning 2.0 rule updates procedures for developing individual resource management plans that guide actions and decisions on the nearly 250 million surface acres and more than 700 million acres of subsurface mineral resources that the agency manages. These lands contain the largest, most diverse, and scientifically most important body of cultural resources of any federal land management agency, including well over a million historic, archaeological, and other cultural sites. Our organizations remain committed to promoting a responsible land management planning process that enhances public involvement, improves transparency, and promotes sound, efficient decision-making based on full information, including better data on cultural resources on our public lands.

If the resolution passes, it will make management of our public lands less efficient and less effective. Again, we urge you to OPPOSE the Congressional Review Act resolution to overturn the BLM Planning 2.0 rule.

Sincerely,

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