



**NATIONAL ASSOCIATION
OF TRIBAL HISTORIC
PRESERVATION OFFICERS**

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June 10, 2024

Jacob Palma
Field Manager
Monument Planning
BLM Monticello Field Office
365 North Main Street
Monticello, UT 84535

Dear Field Manager Palma,

The National Association of Tribal Historic Preservation Officers (NATHPO) has the following comments regarding the Bureau of Land Management and U.S. Department of Agriculture's Forest Service's Bear Ears National Monument Draft Resource Management Plan (RMP) and Draft Environmental Impact Statement (EIS).

NATHPO is the only national organization devoted to supporting Tribal historic preservation programs. Founded in 1998, NATHPO is a 501(c)(3) non-profit membership association of Tribal government officials who implement federal and Tribal preservation laws. NATHPO empowers Tribal preservation leaders protecting culturally important places that perpetuate Native identity, resilience, and cultural endurance. Connections to cultural heritage sustain the health and vitality of Native peoples.

Our organization strongly supports the draft RMP and we are thrilled that it was completed in collaboration with the five Tribes of the Bears Ears Commission: the Ute Indian Tribe, Ute Mountain Ute Tribe, Zuni Tribe, Hopi Tribe, and the Navajo Nation. The draft RMP is the product of two years of collaborative work by the Tribes' traditional knowledge holders, Tribal Historic Preservation Officers (THPOs), elected Tribal leaders, and federal land planning staff and leadership at the BLM and the Forest Service.

The establishment of the Bears Ears National Monument and the draft RMP process are an example of how the Federal government should work with Tribal Nations to protect and preserve cultural resources and sacred places. In particular, we appreciate that the BLM and USFS recognize that Bears Ears both tells the story of these Tribal Nations and is an essential part of their futures.

Bears Ears is the first national monument proposed by an alliance of Tribal Nations. The draft management plan would continue the Monument's precedent setting history by incorporating Indigenous knowledge and providing significant protections for the places that tell the stories of the Tribal Nations. Importantly, the draft plan both has a broad definition of cultural resources and recognizes the inherent connection between cultural and natural resources.

NATHPO strongly supports the plan's restrictions on activities that are incompatible with places that are central to the foundational stories of several Tribal Nations. "The Shash Jaa' (Bears Ears) area isn't just a geographical space; it's the heart of our cultural identity, a sanctuary for prayer, offerings, communal gatherings, and the sustenance of our resources," Bears Ears Commissioner and Navajo Nation Council member Curtis Yanito said. "Its landscapes hold the stories of our forebears and the essence of our traditions, guiding us as stewards of our ancestral homeland."

PROTECTING NATIVE PLACES

The establishment of the Bears Ears National Monument and the draft RMP should not be an anomaly, but rather a stark reminder that Tribal Nations' cultural resources and sacred places extend well beyond the current boundaries of their nations. NATHPO strongly urges the Biden Administration and future administrations to respect Tribal Nations' efforts to establish National Monuments that protect their ancestral lands and to support a robust and integral role for Tribal Nations in the management and protection of these places.

While it is important to celebrate this draft RMP that respects Tribal sovereignty, I would be remiss if I did not note that federal funding must match the roles that Tribal Nations are playing in the establishment and management of National Monuments. Tribal Historic Preservation Officers (THPOs) play a central role in both activities, but have been underfunded for decades.

In Fiscal Year 2025, THPOs are receiving on average \$104,000 from the Historic Preservation Fund (HPF). NATHPO strongly supports a reauthorization of the HPF that would require that:

- THPOs receive a minimum of 20 percent of the HPF each year, and;
- the National Park Service reviews whether THPO funding is keeping pace with the annual increase in the number of THPOs and adjusts the funding accordingly.

We also urge that the Administration propose budgets and Congress pass appropriations bills that reflect the important role that THPOs play in protecting the places that tell the stories of Tribal Nations. These are not ancillary issues but rather central to an overall effort to respect Tribal sovereignty and guarantee that the establishment of the Bears Ears National Monument and its management is the beginning of a new chapter in the relationship between the Federal government and Tribal Nations. Thank you for considering our comments on the draft rule.

Sincerely,

A handwritten signature in black ink that reads "Valerie J. Grussing". The signature is written in a cursive, flowing style.

Valerie J. Grussing, PhD
Executive Director