

## 20 June 2007

RE: Please support Mark Udall's Amendment to the House Interior

Appropriations Bill Regarding R.S. 2477

## Dear Member of Congress:

My name is Jerry D. Spangler and I am a registered professional archaeologist and executive director of the Colorado Plateau Archaeological Alliance, a group of archaeologists, historians and scholars dedicated to the preservation and protection of cultural resources on public lands in the West. I am writing in support of an amendment to the Interior Appropriations Act, sponsored by Rep. Mark Udall of Colorado, which would limit funding for an ill-conceived Interior Department policy allowing the Bureau of Land Management to make administrative determinations of R.S. 2477 "highway" claims across public lands. The amendment would halt the implementation of a policy which threatens landscapes rich in awe-inspiring archaeological sites with unique information about the lives of the earliest Americans.

CPAA has conducted extensive scientific research in the Four Corners states into the degradation of archaeological sites on public lands. This research has demonstrated an unequivocal connection between uncontrolled vehicle access and site degradation through ongoing vandalism and damage from off-road vehicles. In many instances, this damage was precipitated by individuals using obscure trails and remote routes claimed by counties as R.S. 2477 routes. This research also demonstrated that 70 to 80 percent of archaeological sites along routes open to vehicles have been vandalized – certainly a tragic commentary on our nation's respect for our cultural heritage.

The transference of title to R.S. 2477 routes to county control without thorough review under the National Historic Preservation Act (NHPA) and other environmental laws creates a tremendous and unacceptable risk to the heritage resources valued by all Americans. Future maintenance or construction along these routes not only would seriously damage sites located along those routes, but it would facilitate vehicular access to archaeological sites now protected by their isolation.

This risk is more than a hypothetical possibility. Remote archaeological sites in the Grand Staircase-Escalante National Monument have been vandalized as a direct result of a local county claim to and designation of an obscure trail as an open ORV route. In San Juan County, Utah, new ORV routes claimed as county rights of way cut through Ancestral Puebloan villages. And where the routes themselves may not have directly impacted cultural resources, individuals using those routes have used motorcycles and

other vehicles to veer off the trail, irreparably damaging sites, some of them thousands of years old, as is evident throughout Tenmile Canyon near Moab, Utah.

The R.S. 2477 question is unquestionably politically charged with issues of local control and states rights at play. But this issue must be resolved with careful consideration of the damage that will be inflicted upon non-renewable resources like archaeological sites. Thank you for your consideration.

Best Regards,

Jerry D. Spangler, RPA Executive Director