AMERICA'S 11 MOST ENDANGERED HISTORIC PLACES NOMINATION FORM

I. GENERAL INFORMATION

Name of site: National Landscape Conservation System (NLCS)

City: n/a **County:** n/a

State: The System includes 26 million acres in 12 western states: Alaska, Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming.

U.S. Congressional District and Representative (if known): See list of Congressional districts that include parts of the NLCS (attached)

2. OVERVIEW SUMMARY (250 words):

America's little-known National Landscape Conservation System (NLCS) offers a unique means to experience historic and cultural sites in their original outdoor context. Designated in 2000, the NLCS encompasses 26 million acres of "the best of the Bureau of Land Management's lands," including National Monuments, Conservation Areas, Wilderness, Historic Trails, and Wild and Scenic Rivers. The System harbors thousands of cultural sites dating from several thousand years ago to the Western frontier era.

The crucial NLCS "vision" is to protect entire landscapes of cultural and natural values, rather than preserving only disconnected islands cut off from their surroundings. The NLCS lets visitors see the West through the eyes of the first Americans and pioneers.

The NLCS' incredible cultural and historic resources are in jeopardy. The System is under-funded, under-staffed, and under-inventoried. Its resources and landscapes already evidence damage from vandalism, looting, illegal off-road vehicle use, grazing, and development. BLM continues to lose resources before identification can occur because it has inventoried only a fraction of the NLCS. Without addressing these problems, we will continue to lose the resources significant to our national heritage, represented in a "landscape" context, which—once lost—can never be replicated.

A NTHP listing would leverage endeavors by the coalition that seeks to protect the NLCS, including efforts to raise public and Congressional awareness of the System and its needs. A listing would press the BLM to assume its new mandate of conservation on NLCS lands—a challenge, given the agency's historical emphasis on extractive uses. Finally, a listing would help the coalition and the BLM expand partnerships with archaeologists, historians, and volunteers.

3. ADDITIONAL SITE INFORMATION

3.1 Date(s) of construction: The National Landscape Conservation System was designated in June 2000.

3.2 Type of structure/site (check the one that best applies):
Cultural Landscape.

3.3 National, state, and/or local landmark designations (choose all that apply):
Other: The 26 million acre NLCS contains thousands of historic and cultural sites, including thousands of National Register and National Register-eligible sites. Still other sites in the System merit or have state/local designation.

3.4 Who is responsible for sustaining the site financially?
The U.S. Congress, via the federal appropriations process; also the Department of the Interior's Bureau of Land Management (BLM) as the land manager through its choices about how to deploy the funds it receives.

3.5 Who has legal control and/or the authority to approve projects related to the site?
The Bureau of Land Management has authority over the System as a whole and most of its units. The BLM co-manages several units with other Federal and state agencies, including the U.S. Forest Service and the National Park Service.

3.6 Have you previously nominated this site to the National Trust's list of America's 11 Most Endangered Historic Places?
No.

4. DESCRIPTION OF THE SITE'S SIGNIFICANCE

4.1 Describe the site's significance, including its historic, cultural, artistic, social and/or architectural value. Specify if the property is unique or is representative of many similar types of sites and, if applicable, what other sites could easily be compared to it.

> Our ancestors, the hist'sinom, left their mark upon the land through their rock art, settlements, pottery shards, and sacred sites; they are buried in the canyons and plateaus of the Grand Staircase. Their spirit voices silently echo through the canyons, while the soft canyon breezes whisper to remind us of the sacredness of the land. Our spiritual core, as well as our ancestral ties, is in these very canyons which have been set aside as a National Monument.
>
> -- Wilfred Numkena, Hopi, from Visions of the Grand Staircase-Escalante

To experience cultural sites in a landscape virtually unchanged for hundreds—if not thousands—of years is increasingly rare. In the Bureau of Land Management's "National Landscape Conservation System," however, that special experience is still possible. In places like Agua Fria National Monument in Arizona, part of the National Landscape Conservation System, a hiker or archaeologist can discover one of hundreds of ancient dwellings and burial sites scattered across the desert and canyons—in a land that looks just as it did thousands of years ago. They can see what early Native Americans saw: the same landscape in which they hunted, cooked, and

traveled. Similarly, a Hopi can experience the canyons in Grand Staircase-Escalante and other areas of the NLCS just as they looked to their ancestors.

The little-known National Landscape Conservation System (NLCS) offers a unique means to enjoy and study historic and cultural sites in their original outdoor context. The System's lands and resources spark the imagination. Yet preserving these contextual historic settings, despite the recent creation of the NLCS, continues to be a challenge because of a lack of funding, a lack of recognition, vandalism and looting, development, and damage from irresponsible recreation.[1]

America's Western public lands harbor countless historic and cultural sites, but the canyons, mountains, and deserts around those sites are increasingly subsumed by subdivisions and shopping centers, carved by roads, scarred with logging tracts or studded with oil rigs. While U.S. cities grew at 8.7 percent from 1990-2000, Western municipalities grew at a median rate of 19 percent. Some of the fastest growing urban areas in the West border or surround NLCS lands, including Palm Springs, Tucson, Phoenix, and Las Vegas.[2]

Troubled by such erosion and wholesale loss of the American Western landscape and its historic, cultural and natural resources, Secretary of the Interior Bruce Babbitt created the National Landscape Conservation System in June 2000. The System brings together the best of the Bureau of Land Management's (BLM's) 264 million acres—specifically, all of the BLM's national monuments, national conservation areas, wilderness areas, wilderness study areas, wild and scenic rivers, and national scenic and historic trails. In total, the System encompasses 26 million acres, roughly the equivalent of Washington State. (*See* Map of the NLCS and Table of NLCS units). The mission of the National Landscape Conservation System, which is distinctly different from BLM's overall multiple-use mission, is to conserve, protect, and restore these nationally significant landscapes that have outstanding cultural, ecological, and scientific values for the benefit of current and future generations[3].

The Cultural and Historic Resources in the NLCS

The National Landscape Conservation System harbors some of the most important prehistoric, historic, and cultural resources on public lands in the United States. The historic and cultural resources found in the NLCS range from intact community systems of prehistoric Native American pueblos dating from several thousand years ago to the remains of the Western frontier era migration and gold rush.

Native American Cultural Resources in the NLCS

Many sites in the NLCS are significant to Native American tribes as traditional cultural properties or places still considered important for cultural practices today. For example, Painted Rock in California's Carrizo Plains National Monument is considered a sacred area for the Native American Chumash and Yokut people. Other ruins in Carrizo's grasslands include lithic flake scatters, temporary and extended-stay camps, house and seasonal village sites, pictographs and petroglyphs, and remnants of agricultural activity—all testimony to several thousand years of occupation by various indigenous groups. Near Las Vegas, Sloan Canyon, a 48,438 acre National Conservation Area, contains more than 1,700 drawings in 300 panels, some 2,000 years old, left by Anasazi, Patayan, and Numic people. Southern Arizona's San Pedro Riparian National

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[1] U. S. Department of the Interior Bureau of Land Management. *America's Priceless Heritage: Cultural and Fossil Resources on Public Lands* (November 2003).
[2] Glaeser, E. & Shapiro, J. *City Growth and the 2000 Census: Which Places Grew, and Why* (Harvard University and the Brookings Institution: 2001).
[3] U.S. Department of the Interior Bureau of Land Management. Internal Memorandum, June 9, 2000.

Conservation Area harbors rock art created by Hohokam artisans more than 600 years ago. Many resources in the NLCS affiliated with Native Americans are not archaeological sites or historic buildings, but natural features which also deserve protection—like buttes considered sacred by the Paiutes in the Northern Arizona National Monuments.

Another part of the NLCS, Agua Fria National Monument, contains a major portion of a classic period community, the Perry Mesa Tradition culture, dating from 1150-1400 AD, within a largely unaltered setting. This area can yield important information about the entire cultural system because it protects a complete community. The archaeological remains include more than 280 sites, many of which are 50 to 100 room, multi-storied pueblos, situated on the edges of the plateau. Others are smaller pueblos, field houses, agricultural features (such as terraces, check dams, gridded gardens), rock-art panels, resource procurement sites, and defensive sites.[4] The Yavapai, Hopi and other tribes regard the area in and around the Monument as traditionally significant.

Nearly all NLCS units have significant cultural resources similar to the above examples. The limited number of acres surveyed within the NLCS hint at the staggering number of cultural resources still to be discovered. For example, the BLM and the Navajo Nation Archaeological Department endeavored in 1998 to conduct a survey per Section 110 of the National Historic Preservation Act of the 800,000-acre Kaiparowits Plateau within Grand Staircase-Escalante National Monument. The study surveyed 16,000 acres in 160-acre blocks and documented 710 archaeological sites and 816 isolated occurrences. Of the 710 archaeological sites, 514 were considered eligible for the National Register.[5]

Historic Resources in the NLCS

Historic sites, trails, and resources from the 16th-20th century eras of Western exploration and migration are another important part of the NLCS. The NLCS includes, for example, the El Camino Real de Tierra Adentro National Historic Trail in New Mexico. Called the "royal road to the lands of the interior," this trail was traveled in 1598 by New Mexico's first Hispanic colonists, and comprises 404 of the 1,200 miles that reach present-day Mexico City. The Oregon Trail served as the main westward route for emigrants for much of the 1800s. Today, most of the Trail has disappeared under highways and towns, but in the NLCS more than 300 miles still exist, as well as 125 related historic sites. From the same era, parts of the Pony Express Trail, which brought information from the east to the newly settled west, are still evident in the NLCS, including 120 historic sites and 50 pony express stations or station ruins.

Rivers in the NLCS also capture elements of American western cultural heritage. The NLCS includes 38 National Wild and Scenic Rivers with numerous significant prehistoric and historic resources, set in historic landscapes rarely preserved in the development-driven West. For example, sections of the Klamath River, running from northern California into Oregon, afford views of at least 40 prehistoric sites, including camp and burial grounds of the Shasta Nation and Klamath Tribes. The West Little Owyhee, within the high plateau region of southeastern Oregon, is also noted for its important cultural sites. The Rio Chama in New Mexico runs through a canyon that contains remains from the PaleoIndian, Archaic, and Prehistoric pueblo periods. And in California, the "giant gap" section of the North Fork American River, where cliffs rise 2,000 feet above the water, looks the same as it did when it attracted the attention of artists like Thomas Moran and Lorenzo Latimer in the 1800s.

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[4] Department of the Interior, National Register of Historic Places Nomination Form, 1995.

[5] Geib, P, et al. *Kaibabitsinungwu: An Archaeological Sample Survey of the Kaiparowits Plateau* (October 2001) 1-7.

A Unique System of Public Lands and Cultural Resources

The National Landscape Conservation System is unique, not only because each unit houses incredible cultural resources, but because the System represents one of the last opportunities to preserve a collection of lands and historic landscapes significant to our national heritage. The term *landscape* is the key. The vision of the system is to protect the integrity of *entire landscapes* of cultural and natural values, instead of preserving only disconnected islands that are cut off from the surroundings that sustain them.

Cultural and historic resources in the NLCS are found in dramatic canyons, on cliffs and sweeping grassland vistas, along trails and wild rivers all little changed in thousands of years. Just one example is the Upper Missouri Wild and Scenic River, which is considered by the BLM to be the premier component of the Lewis & Clark Historic Trail. This part of the Missouri is the last substantial piece of the river that looks much as it did when Lewis and Clark traveled the waterway in 1805.

Though the NLCS's resource conservation agenda suggests similarities to the National Park System (NPS), the differences between the systems are significant. The NLCS creates large, connected wildlife habitat for big game and endangered species, and tries to leave cultural corridors intact. And, unlike the National Park System, the NLCS promotes little or no infrastructure or roads within its units. The NLCS is intended to be a self-guided visitor experience, with sites that accommodate, rather than encourage, visitation. Visitor facilities are to be placed in gateway communities instead of within a Monument or Conservation Area boundary. Compare, for example, Colorado's Hovenweep National Park with a nearby NLCS unit, Canyons of the Ancients National Monument. At Hovenweep, a visitor can drive to and admire spectacular Anasazi cliff dwellings surrounded by a boardwalk, road, parking lot, and campground. Just a few miles away, at the Painted Hands Ruin in Canyons of the Ancients, a visitor must hike on dirt trails to marvel at similarly spectacular ruins, which are surrounded not by modern facilities but by sky, mesas, and cacti.

Another important distinction between the NPS and the NLCS is that many areas in the NLCS remain open to grazing and some to hardrock mining and energy development (although in most of the NLCS energy development is limited to the valid leases in existence before the unit's designation). These ongoing uses, and the damage they cause to cultural sites, are challenges for BLM (*see Section 5.3, "Obstacles to Site Protection."*)

Americans hold dearly to the idea of the West as a wild place of majestic space, mountains, deserts and roaring rivers, of Native Americans, traders, emigrants, gold seekers, explorers. This is the West that made a distinguishing mark on American history and culture. The National Landscape Conservation System evokes that West—a West of limitless opportunity, independence, and perseverance, the West in McMurtry's *Lonesome Dove*, Stegner's *Angle of Repose*, the paintings of Remington, Bierstadt, Church, and Catlin. Even as the reality of the West today is one of rapid growth, transformation, sprawling cities, and subdivisions, the National Landscape Conservation System preserves part of our rich American history, and provides an outdoor museum for historians, archaeologists, paleontologists, hikers, rafters, and all Americans alike.

5. DESCRIPTION OF THE SITE'S THREAT

5.1 Indicate up to five principal threats to the site in descending order of magnitude (1 being the greatest and 5 being the least.

Human Threats:

1. Lack of financial resources
2. Lack of public awareness
3. Vandalism/looting
4. Population/development pressure
5. Inadequate planning

5.2 Select the one that best describes the type of urgency.
Pattern of destruction is evident.

5.3 Describe the current physical condition of the property, the threats to the property, and the rate of deterioration.

The NLCS is under-funded, understaffed, and under-inventoried for historic and cultural resources. These three serious problems leave the System's wealth of cultural and historic resources susceptible to extreme danger of damage, theft, and vandalism, and leave the landscapes that surround them vulnerable to damage as well.

Among the most significant causes of deterioration of cultural resources and landscapes in the NLCS are:

Unauthorized and Uncontrolled Use
The BLM lacks staff and interpretation programs to prevent destructive unauthorized and uncontrolled use of NLCS lands, waters, and historic landscapes. Off-road vehicle (ORV) activity is a major problem; ORV use is growing dramatically across BLM lands, including the NLCS. Ownership of dirt bikes and all-terrain vehicles has risen from about 20,000 to more than 100,000 since 1988 in the state of Utah alone. The State of California, with millions of acres of NLCS land, is number one in all-terrain vehicle sales.[6] ORV use can destroy fragile, irreplaceable historic resources.

Visitor numbers are rising in many NLCS units, as people learn about these special areas, and as populations grow in the West, bringing remote areas with cultural sites now within reach of more hikers, ORV users, and local residents. This is both a huge opportunity for education and outreach about the importance of historical resources, and a huge management challenge. The number of visitors to the five BLM National Monuments in Arizona, for example, has doubled since 2000. In Colorado's Canyons of the Ancients National Monument, the Sand Canyon Trail--which leads to numerous cultural sites—is used today by 17,000 hikers, mountain bikers, and horseback riders annually, compared to a few hundred in the late 1980s. The number of floaters launching from Coal Banks landing to enjoy the Wild and Scenic stretches of the Missouri River and the surrounding National Monument has increased from 2,000 in 1997 to about 6,000 per year today.[7]

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[6] U.S. Consumer Product Safety Commission. *All-Terrain Vehicle (ATV) Safety Crisis: America's Children at Risk, Major Findings* (August 20, 2002) *and* Natural Trails and Water Coalition. Letter to Rebecca Watson and Kathleen Clark (April 3, 2003).
[7] Personal communication. BLM Lewiston Field Office (January 18, 2005).

Visitation and recreation can cause severe impacts to archaeological sites and other cultural resources. These impacts include surface artifact thefts, artifact piling, casual digging in rubble piles and trash middens, deliberate digging for profit, compaction of rubble piles due to trampling, compaction and accelerated erosion of the surrounding ground surface, fire scars, destabilization of standing walls, stacking of wall rubble, multiple trailing, and graffiti. In addition to direct impacts associated with visitation, a variety of other recreation-related impacts can occur at archaeological sites, including: driving on sites; camping on sites; contaminating archaeological sites with modern charcoal and foreign objects (e.g., crystals, seeds, human ashes); constructing campfire rings with architectural rubble; setting wildfires by burning toilet paper or improperly extinguishing camp fires; moving masonry rubble to clear tent sites; securing tents with rocks from rubble piles; and disposing of garbage and human waste within site areas.[8]

Lack of Field Enforcement

Studies in National Parks and National Forests have shown that a ranger in uniform is the most effective means of deterring "non-compliant visitor behavior."[9] Unfortunately, almost all NLCS units lack adequate law enforcement staff. BLM has approximately 200 BLM law enforcement officers—for all of BLM lands, not just the NLCS—some of whom patrol an area as large as 1.8 million acres. In Arizona's Ironwood Forest National Monument, for example, two law enforcement officers patrol 129,000 acres that are home to a significant system of cultural and historic sites spanning a 5,000 year period. (Three areas within the monument, the Los Robles Archeological District, the Mission of Santa Ana del Chiquiburitac, and the Cocoraque Butte Archeological District are listed on the National Register of Historic Places.) The two law enforcement officers cope with numerous unauthorized and uncontrolled uses: trash dumped illegally; target shooting with handguns and high-powered rifles; drug smugglers and illegal immigrants who use the Monument as a point of entry, leave behind trash, and carve new roads; and all-terrain vehicles and dirt bike use through washes and wildlife corridors.

Theft and Vandalism

"Throughout the decades, the BLM public lands have been an easy target for thieves and looters," acknowledged the BLM in a 2003 report on its cultural and fossil resources. Since 1993, vandalism on public lands has increased 70 percent.[10] For example, vandals used charcoal to deface five 2,000 year old pictographs in Oregon's Badlands, a wilderness study area in the NLCS in 2003. In 1997, vandals destroyed a Western natural wonder—the Eye of the Needle, an 11 foot sandstone arch located near the Upper Missouri Wild and Scenic River in Montana, which drew the attention of Lewis and Clark during their historic expedition in 1804-1806. On BLM land across the "Four Corners" States, where more than 150,000 sites have been recorded, between 30-50 percent of all sites have been looted, while among the larger and more significant sites the percentage of looted sites may be closer to 90 percent.[11]

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[8] Cinnamon, Steven K. *Potsherd Survey to Determine Impacts of Visitor Use and Grazing*, Paper presented at the Science in the National Parks Conference (July1986). O'Hara, Michael F., III and Craig J. Johnson. *Archaeological Site Monitoring at Wupatki National Monument*. (1998). Roos, C. *The Impact of Inadvertent Vandalism to the Cultural Resources of the Upper Basin*, Kaibab National Forest, Northern Arizona. Unpublished undergraduate thesis, Department of Anthropology, University of Cincinnati n.d.

[9] Van de Kamp, M., Johnson, D., Swearingen, T. *Deterring Minor Acts of Noncompliance: A Literature Review*. Technical Report NPS/PNRUW/NRTR-92/08 (National Park Service Cooperative Park Study Unit, College of Forest Resources, University of Washington 1994) 37-39, 91.

[10] U.S. Department of the Interior Bureau of Land Management. *America's Priceless Heritage: Cultural and Fossil Resources on Public Lands* (2003) 6.

[11] U.S. DOI BLM 2003.

As noted above, BLM lacks law enforcement staff to maintain a physical presence around backcountry areas rich with cultural resources. Canyons of the Ancients National Monument, where vandalism is an ongoing problem, has just two law enforcement for 164,000 acres, and receives more than 90,000 visitors a year.[12]

Roads and Poor Transportation Planning

Visitors need access to enjoy, appreciate, and learn in the NLCS. But such access must be tempered with the understanding that roads and the access they provide to cars and off-road vehicles in sensitive areas can damage fragile archaeological and historic objects, fragment the historic landscapes, and diminish wildlife habitat. The BLM has not developed a systemic approach to spatially analyze the impacts of transportation networks on the cultural and natural resources of the NLCS, or to use such analysis in determining where roads and off-road vehicle use should occur, as part of the Resource Management Planning process. Unfortunately, some Resource Management Plans (RMPs) that have been completed close very few roads. For example, at Steens Mountain Cooperative Management Area, a NLCS unit in eastern Oregon, the agency's RMP proposed for closure only 7 miles of the 2,300 miles of roads in the planning area.

In the area now known as Agua Fria National Monument in central Arizona, as far back as the 1970s, there was speculation that the relative ease of access to the large pueblos on Perry Mesa via the existing road network was a significant factor contributing to the sites' destruction. Ironically, when researchers attempted to test the hypothesis that proximity to roads was a significant predictor of archaeological site condition, they found that a clear correlation between distance to roads and resource condition could not be demonstrated because "so few sites … are located more than a few hundred meters from roads."[13] Nevertheless, they determined that controlling access by eliminating roads and requiring longer travel time may be an effective way to deter damage to archaeological sites over the long run.

Encroaching Real Estate Development

Suburban growth, and even the "rural sprawl" that occurs far from major cities, puts increasing pressure on NLCS units—both directly damaging resources, and altering historic viewsheds. For example, the BLM and the nonprofit Grand Canyon Trust have not been able to secure funds to complete the purchase of a 26 acre private inholding in Grand Staircase-Escalante National Monument that is "commercially-zoned" land. Without those funds, conservationists and the agency agree it is impossible to safeguard the grandest of the Monument's canyons from motels and fast food restaurants.

Adjacent development is also an issue. In 2003, a residential and commercial development was proposed which would directly border an NLCS unit in Arizona: Ironwood Forest National Monument. The developers' original proposal includes more than 19,000 acres of development, with 67,000 housing units and five commercial centers.

The construction, which was stalled by the local zoning commission, would have destroyed a portion of the Los Robles Archaeological District, native vegetation and rare wildlife habitat, and threatened the last viable bighorn sheep population in the Tucson Basin. Medium to high density housing would have been less than one mile from a national archaeological district in the

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[12] Department of Interior Bureau of Land Management. Data from the Recreation Management Information System. (Report prepared 6 July 2004).

[13] Ahlstrom, R., Adair, M., Euler, T, and Euler, R. *Pothunting in Central Arizona: The Perry Mesa Archaeological Site Vandalism Study* (Cultural Resources Management Report No. 13, USDA Forest Service, Southwest Region and USDI Bureau of Land Management, Arizona 1992).

Monument, which includes important and fragile rock art sites. The BLM Monument Manager warned that a city built next to ancient treasures could devastate the archaeological sites.

Unfortunately, priceless 1,500-year-old Hohokam sites were destroyed in earthmoving operations that began before the proposal was rejected, causing nearly $9 million of damage to prized archaeological sites on hundreds of acres of adjacent state land.

Grazing and Mineral Development

Much of the NLCS is open to grazing, which can directly harm cultural resources. In Vermilion Cliffs and Grand Canyon-Parashant National Monuments, a joint BLM and Forest Service evaluation of 2,200 cultural sites found grazing to be the second most prevalent cause of disturbance, after natural erosion.[14] The impacts of cattle trampling on surface artifacts are well documented. Numerous case studies demonstrate that cattle can and do impact artifact assemblages by breaking, crushing, churning and redistributing surface artifacts, often to the point that the artifacts lose their ability to convey meaningful information. Impacts can be amplified when cattle seek shade under standing structures; consequently, cattle may rub against and destabilize standing walls. Cattle also alter the natural distribution and abundance of native and culturally-introduced plant species at sites.

Despite many limitations to mineral and energy development in the NLCS, cultural resource protection efforts do sometimes conflict with energy development, particularly in places like Canyons of the Ancients National Monument where BLM is required by law to allow development of energy leases that existed at the time of the unit's designation—though it is required to do so with an eye to minimizing impacts to resources. Unfortunately, the BLM does not always give adequate attention to preservation when making land use decisions. For example, a court held in March 2004 that leases issued by the BLM in the Upper Missouri River Breaks National Monument were done so without first examining the potential impacts to cultural resources and applying appropriate restrictions.

Even the BLM has recognized the serious risk of losing the cultural resources on its lands, including the NLCS:

> The BLM manages the largest, most diverse and scientifically most important body of cultural resources of any federal land managing agency. These resources, which represent the BLM's 'Great Outdoor Museum,' span virtually the entire spectrum of human experiences since people first set foot on the North American continent more than 13,000 years ago. This 'Great Outdoor Museum' provides a unique opportunity for BLM to document the full sweep of western prehistory and history, and tell the complete story of people on the western lands. No other federal land managing agency can make this claim. However, BLM's ability to relate the complete and unbroken story of western land use and occupancy can only be realized if a representative and relatively pristine body of cultural resources is preserved into the next millennium. *At this moment in time, so much of the cultural resource base is at risk that it will soon lack sufficient integrity and representativeness to relate anything more than anecdotal accounts of western land use.* [15]

Despite the recognized threat to the integrity of cultural resources, BLM has been unable to address the risk of destruction.

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[14] Department of Interior Bureau of Land Management and U.S. Department of Agriculture Forest Service. *Man Models, Management* (1989) 266.

[15] Department of Interior Bureau of Land Management. *Strategic Paper on Cultural Resources at Risk* (June 2000) 3.

Almost any unit illustrates the deteriorating physical condition and threats common throughout the NLCS. Three snapshots:

- **Grand Canyon-Parashant National Monument and Vermilion Cliffs National Monument, Arizona**

These adjacent NLCS units rise above the Grand Canyon in a geologic formation known as the Colorado Plateau. Vermilion Cliffs is a wonderland of 3,000-foot rock walls, wind-sculpted hoodoos, rivers, hanging gardens, grottos, vaulted rock amphitheaters and countless sites left by prehistoric Anasazi, Fremont, Pauite, and other inhabitants. In Grand Canyon-Parashant, 2004 cultural resource surveys recorded many sites dating from 10,000 years ago to the last half of the 1800s, as is the case with some Paiute camps that contained metal and glass artifacts obtained from either the U.S. Army or contact with Anglo-American settlers in the area. A 1989 study of 2,200 cultural sites in these two areas—still considered the best analysis of condition of sites in the area--found that a little less than a third are listed as eligible or potentially eligible for the National Register, and just over a third have not been evaluated.

The same 1989 study identified some of the major causes of loss and damage to cultural sites: it found that natural erosion accounts for 40 percent of all disturbed sites, followed by—in descending order—grazing, vandalism, construction, and range improvement.[16] More recently, archaeologists have noted how significantly visitors and illegal off-road vehicle users jeopardize these treasures. Arizona archaeologist Peter Bungart is particularly concerned for sites where American Indians of various cultures lived and roamed which are now along dirt roads and illegally created trails. "We did find evidence where ATVs did drive through archaeological sites and features ... the problem is ATV people just don't stay on roads. Some of them are pretty damaging," Bungart said.[17]

The BLM's lack of knowledge about the resources and their exact locations is another huge threat to these Monuments' cultural resources. Less than 3 percent of the entire area has been inventoried for cultural resources. BLM's inability to conduct appropriate cultural resource surveys undermines their efforts to draft a resource management plan for the area that will protect cultural sites from recreational activities. BLM has yet to assess which of the 7,524 miles of roads[18], especially the illegal roads, should be made available for recreational access without harming cultural sites using available data, landscape fragmentation metrics, and spatial analysis.

Even BLM's efforts to defend against vandalism with fences or protective barriers have fared poorly in parts of Vermilion Cliffs and Grand Canyon-Parashant National Monuments; Antelope Canyon, for example, has been repeatedly fenced and clearly marked as an archaeological site. After each fencing the barrier has been torn down and the site vandalized.[19]

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[16] U.S. Department of the Interior Bureau of Land Management and U.S. Department of Agriculture Forest Service. *Man, Models, Management* (1989) 266.
[17] Personal communication (November 2004).
[18] The Wilderness Society. *Protecting Northern Arizona's National Monuments* (2004) 1.
[19] U.S. Department of the Interior Bureau of Land Management and U.S. Department of Agriculture Forest Service. *Man, Models, Management* (1989) 313.

- **Canyons of the Ancients National Monument, Colorado**

Canyons of the Ancients National Monument contains the highest known density of archaeological sites in the nation, with more than 6,000 sites identified, some covering 10 acres or more. Less than 7 percent of the Monument has been surveyed, and BLM estimates that there are 20,000 to 30,000 sites within the Monument's 164,000 acres. Only one site—1,000 year old Lowry Pueblo—has been fully excavated and interpreted.

With only two law enforcement rangers to monitor Canyons of the Ancients, and one staff archaeologist, BLM relies heavily on volunteer site stewards through a program facilitated by the San Juan Mountains Association. Even with that resource, the Monument's cultural resources suffer from serious problems of vandalism, pothunting, and violations by ORV users. Over the past two years, BLM has investigated at least half a dozen incidents of illegal digging and vandalism, including graffiti scratched into prehistoric masonry walls and adjacent sandstone cliffs, campfires built into masonry rooms and alcove sites, and illegal digging in trash middens, rooms, and kivas. "In one case, as a result of an apparent party, wall stones at a site were used to create a ring of chairs, a campfire built in a room in front of a rock shelter, and trash was strewn about," said Laura Kochanski, Monument archaeologist.[20]

- **Grand Staircase-Escalante National Monument, Utah**

A forthcoming BLM study in this almost 2 million acre area notes that more than 7,000 archaeological and historical sites have been recorded, the majority of which are considered eligible to the National Register of Historic Places. The BLM expects that there are thousands more sites that have not yet been identified; cultural resource surveys have covered only a fraction of the Monument area. In some areas site densities of up to 70 sites per square mile have been recorded.

Sites in Grand Staircase-Escalante cover the time span from 8,000 B.P. to the mid-20th century. Recorded prehistoric sites include lithic scatters, lithic sources, food collection and processing locations, camps, hearths, roasts, rock shelters, cairns, petroglyphs and pictographs, middens (prehistoric trash dumps), ceramic scatters, and architectural sites such as dwellings, subterranean, semi-subterranean, and free-standing storage structures, granaries, pit houses, masonry surface residential structures, and less substantial brush structures. Historic sites include trails, roads, cabins, mines and mining related improvements and equipment, vehicles, camps, dumps, can scatters, line shacks, inscriptions, glyphs and signatures, and stock improvements such as tanks, walls, fences, troughs, and corrals.

The BLM has found that most of these sites are sensitive to disturbances, which in include natural weathering and erosion, as well as destruction from livestock. BLM staff have observed trampled sites, displaced artifacts, abraded and erased pictographs and petroglyphs, and spattered fecal material on rock art elements. Vandalism and looting are problems as well.

Obstacles to Protecting the NLCS

Protecting Cultural Resources is a New Job for the BLM

If the BML is to succeed as the steward of the NLCS, this agency, which has historically focused on resource extraction, must shift its management approach to these public lands. In general,

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[20] U.S. Department of Interior Bureau of Land Management. "*Canyons of the Ancients National Monument*." Brochure. (2003).

Congress requires BLM to manage most of its more than 264 million acres for "multiple-uses," obligating BLM to balance extractive uses, such as energy development, with recreational uses, and with conservation. In pursuing one objective, the agency often comes in conflict with another. For example, grazing may be detrimental to the objective of protecting a cultural site or wildlife habitat.

Now, however, on the 26 million acres of the NLCS, the BLM is obligated to embrace conservation as the highest priority, and to preserve cultural resources from a landscape perspective—a new concept for any public lands agency, and a particular challenge for the BLM. Many within the BLM at all levels still perceive of their mission for NLCS as a multiple use, rather than a conservation mission. Long-established management procedures and priorities are slow to change, and protection of cultural and historic resources often takes second priority to energy development and ORV use.

A Lack of Recognition by the Public, the Administration, and Congress

Few Americans have heard of the NLCS, which is just five years old. Focus groups have shown that the System is almost entirely unknown by the general public. Without this broad support, it is a challenge to galvanize Congress to give the BLM adequate funding for resource protection (*see below, and "Invest in an American Treasure," attached*).

Many of those who do learn of the NLCS—most often of its 15 National Monuments—mistakenly assume that National Monument designation or inclusion in the NLCS provides strict protection for the areas' cultural and natural resources. In fact, the BLM has significant discretion in the development of resource management plans to emphasize recreation, grazing, mineral development, or conservation.

Bare-bones Funding

Since 2001, the NLCS has received just $38-42 million in annual funding. That's approximately 2 percent of BLM's $2 billion budget, and less than half of the allocation to the oil and gas development and other minerals management programs (to which BLM allocates over $100 million).[21]

NLCS funding is far lower than funding for comparable land management agencies. The projected 2005 budget for the NLCS of $39 million translates to approximately $1.50 per acre, compared to the roughly $4 per acre that goes to the National Wildlife Refuge System and roughly $18 per acre for the National Park Service. BLM's cultural resource management appropriation in FY 2004 was $15.5 million – for all BLM lands, not just NLCS.[22]

Lack of funds undermines the BLM's ability to hire enough rangers, archaeologists, historians, or volunteer and partnership program coordinators to protect cultural and historic resources —to sign trails, close roads near cultural resources, restore areas, prosecute vandals, interpret resources, and stabilize sites. For example, BLM has approximately 150 cultural and fossil specialists in BLM who are responsible for a projected 4-4.5 million archaeological and historic properties, thousands of paleontological localities, and millions of museum objects.[23]

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[21] The Wilderness Society. *Bureau of Land Management Budget— Let's Fix It* (2004).

[22] Department of Interior Bureau of Land Management. *Preserve America Report*, Executive Order No. 13287 (2004): 6.

[23] Department of Interior. *America's Priceless Heritage* (2003):6.

Even the newly completed Resource Management Plans that include concrete steps for the protection and research of cultural and historic resources, heritage tourism, interpretation, and archaeological research may not be implemented due to funding shortages. "You'd hope that as the planning money comes down, you'd rachet up the money for (plan) implementation," says Rob Roudabush, Group Manager for National Monuments and National Conservation Areas within the NLCS." That's not happening, he warns.[24]

Additionally, the current budgeting process for BLM lacks transparency and accountability on how money is used for NLCS units. Instead of providing budgets for each NLCS unit, or even the System as a whole, the BLM must draw its funding from roughly 20 separate agency accounts, divided among programs such as recreation, wildlife, and range management. This not only makes for complex bookkeeping, but also means the NLCS must compete for funding with hundreds of other agency projects. Without a structure that promotes a transparent process for allocating funds to the NLCS, both within the Administration and for the benefit of the Congressional Appropriators, BLM cannot ensure funding for critical programs and staff, like archaeologists, monument managers, and enforcement officers.

Minimal Information on Cultural Resources/Lack of Surveys for Planning

Only 1-10 percent of most NLCS units have been inventoried for cultural resources, and only 6 percent of all BLM lands.[25] Despite awareness that the NLCS contains abundant resources, BLM has conducted very limited surveys—surveys which would help to better understand the resources and inform planning for their protection and use.

The limited number of recent proactive surveys conducted within NLCS units has produced staggering findings. In 2001, BLM and the Navajo Nation Archaeological Department contracted with a private archaeologist to a conduct a Section 110 analysis of the Kaiparowits Plateau within Grand Staircase-Escalante National Monument in southern Utah. The study surveyed 16,000 acres in 160 acre blocks and documented 710 archaeological sites and 816 isolated occurrences. Of the 710 archaeological sites, 514 were considered eligible for the National Register. The archaeologist estimated that there are more than 10,000 archaeological sites within the 800,000 acres, which represents less than half of the total acreage of Grand Staircase-Escalante.[26] Looking at Vermilion Cliffs and Grand Canyon Parashant National Monuments, another BLM report concluded: "Our knowledge about where cultural resources are located is based on the idiosyncratic interests of individual researchers and, especially within the last two decades, the vagaries of resource development… thus, although about 4,000 components have been recorded on the Arizona Strip, we still cannot state confidently where sites are likely to be found and where they are probably absent."[27]

In June, 2000, BLM published the *Strategic Paper on Cultural Resources at Risk* as a follow-up to an audit conducted by the Office of Inspector General (OIG) that identified critical weaknesses in BLM's cultural resource management. One of the major weaknesses identified in BLM's cultural heritage work was a lack of proactive inventories and follow-up efforts, including stabilizing sites, interpreting sites, and preparing historic contexts, project plans and National Register nominations. The OIG found that BLM lacks a long range plan to survey areas for the

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[24] Nijuis, M. "BLM's Crown Jewels Go Begging," *High Country News* (October 25, 2004).

[25] Department of Interior Bureau of Land Management (2004) 11.

[26] Geib, P. et al. for the Bureau of Land Management. *Kaibabitsinungwu: An Archaeological Sample Survey of the Kaiparowits Plateau* (October 2001)1-7.

[27] Department of the Interior Bureau of Land Management and U.S. Department of Agriculture Forest Service (1989) 269.

purpose of understanding human behavior and land use. Not surprisingly, the OIG found that BLM cultural heritage staff spend 70-99 percent of their time on Section 106 compliance work, as opposed to proactive cultural program work. The amount of acreage inventoried in response to proposed land uses amounts to almost 500,000 acres, while that surveyed to gain an understanding of human uses of the land equals less than 5,000 acres.[28]

This weakness was attributed to "flat staffing level maintained by [BLM] cultural program for the past 25 years, especially compared to the National Park Service and U.S. Forest Service which manage less land and fewer cultural resources." The U.S. Forest Service, which has a similar mission, manages 27 percent less acreage than BLM but employs 28 percent more cultural heritage specialists. NPS manages less than one-third the acreage of BLM but employs more than five times the number of cultural resource personnel. Such a staffing shortage, coupled with BLM's ever increasing Section 106 compliance workload, means that cultural resources continue to be subject to degradation, vandalism and loss without appropriate documentation for scientific value, and are underutilized to promote education and scientific values. Even though BLM's *Strategic Paper* discusses all BLM lands, its conclusions are even more critical for lands that have specific protective mandates—like the National Landscape Conservation System.[29]

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[28] Department of the Interior Bureau of Land Management, *Strategic Paper on Cultural Resources at Risk* (June 2000)1-7.

[29] Department of Interior Bureau of Land Management (2000) 1-3.

6. DESCRIPTION OF ACTION PLAN

6.1 Describe any previous measures that community activists, government officials, and other groups have taken to protect the site, and note the reasons these measures have not been fully successful.

A growing coalition of community activists and groups has formed to protect both the NLCS as a System, and each individual unit. The "NLCS Coalition" is comprised of more than 50 local, regional, and national non-profit groups, including conservation groups large and small, historical preservation organizations, archaeologists, and landscape architects, among others. (*See attached list.*)

The coalition first came together in 2002 in response to Congressional efforts to limit Presidential authority to designate National Monument status to areas possessing significant historical and/or scientific values under the Antiquities Act of 1906. Since successfully defending the Antiquities Act, most NLCS Coalition members have had to focus their energies in defense of individual NLCS units, rather than on promoting protection of the larger system.

The Coalition, as well as individual groups, has waged constant and generally successful battles to prevent changes in boundaries of monuments, block developments along rivers, and fight diminishment of BLM staff. For example, the Montana-based "Friends of the Missouri Breaks National Monument" successfully defeated bills that would have reduced the monument's boundaries. Led by half a dozen Arizona groups, the Coalition in 2004 blocked a BLM effort to eliminate managers who provide critical leadership at the Arizona Monuments. And, many groups visit Washington, DC at least once a year through a Coalition-organized "outreach" week to increase Congressional awareness of the special values of the little known, newest System of public lands.

Most critically, coalition groups have engaged in the multi-year process to develop "Resource Management Plans" for more than 20 NLCS National Conservation Areas and National Monuments. These plans provide the detailed guidance for how the BLM will manage and protect each place; for example, how the BLM will protect cultural resources, where ORVs will be allowed, and what areas will be restored or afforded protection as wilderness. Besides encouraging public participation in the planning process, and encouraging conservation-oriented measures in the plans, groups are pressing the BLM to actively implement the commitments it makes in plans that have recently been completed. In 2005 and 2006, plans will be finalized for at least 12 NLCS units, including the Arizona National Monuments, Carrizo Plain National Monument, Upper Missouri River Breaks National Monument, and Sloan Canyon National Conservation Area.

The Coalition continues to inspire new partnerships. Recently, The Wilderness Society, with the support of the National Trust for Historic Preservation and the Arizona Archaeological Council (a new partner) organized archaeological surveys in Vermilion Cliffs and Grand Canyon-Parashant National Monuments. The surveys were conducted to identify cultural resources that are highly susceptible to damage, destruction, pothunting, and vandalism because of their proximity to dirt roads. The surveys yielded information about previously unrecorded sites, as well as information about the impacts of roads on archaeological sites. Although this project was successful, it underscores a systemic problem for most NLCS units: BLM's lack of staff and resources—and in some cases lack of commitment to the protection of cultural resources—that prevents this type of proactive survey from being carried out by the BLM, despite its value to the Resource

Management Planning process. Efforts by the Coalition and other groups can only minimally address the lack of survey work that plagues the NLCS.

Despite these successes, the NLCS remains a vulnerable initiative. The coalition has struggled with the enormous challenge of building broad public awareness of the new NLCS. Another challenge is the BLM's continued reluctance to commit to conservation rather than a multiple use paradigm. Finally, the coalition's current emphasis on the environmental attributes of the NLCS has limited the success of its efforts. The majority of the coalition's members focus on—and are skilled advocates for--the natural resource attributes of the System. A greater diversity of groups, including more groups that emphasize cultural preservation, would help educate a national audience about the values of the NLCS.

6.2 Has a preservation or management plan been prepared for the property?
Resource Management Plans (RMPs) exist for parts of the National Landscape Conservation System, including about half the National Monuments and National Conservation Areas. Others are underway and due to be completed in 2005 and 2006. However, few of these units have constructed a cultural resource management plan in coordination with the RMP process.

These plans are prepared by the Bureau of Land Management, through a public process.

6.3 Excluding financial support and publicity, describe how inclusion on the list of America's 11 Most Endangered Historic Places might assist in the efforts to safeguard the site. Include any ideas for possible forms of collaboration between the National Trust for Historic Preservation (NTHP) and the site nominator—including outreach to non-preservation organizations and diversity groups.

Pressure on BLM to Manage NLCS for Conservation
The BLM needs to know that the leading historic preservation and conservation groups—and their members—are watching closely to make sure the rich resources of the NLCS are not lost. A listing as a NTHP most endangered place would help to spur the BLM to embrace a greater conservation ethic. A listing will help change BLM's focus on multiple use land management, and provide public pressure on the BLM to incorporate its new responsibility for the public's national heritage. The listing would help foster internal pride in the BLM about NLCS, and embolden conservation-minded NLCS/BLM managers and planners to make conservation-oriented decisions even when they conflict with other user interests and politics within the Department of the Interior. For example, greater NLCS visibility will provide pressure for stronger, conservation-oriented Resource Management Plans—plans that close roads in canyons and sensitive areas where vandalism occurs, and plans that include detailed cultural resource management agendas.

A listing would also pressure the BLM to invest more of its resources in cultural/historic resource protection in the NLCS—in programs for science, interpretation, research, proactive inventories, public education—rather than in mineral extraction and oil and gas development.

Boost in Public and Congressional Recognition of the NLCS Values
A listing could lead to stronger public and Congressional recognition of the NLCS's historic landscapes and historic and cultural resources, which are important to our national heritage. Increased visibility from a NTHP listing could serve as a springboard for Congressional action and would help the agency secure the funding needed to manage the NLCS as a world class conservation system. It could also put to rest any future attempts to dismantle the NLCS, or

specific monuments (such efforts have been made at Grand Staircase, for example) by securing the status of the NLCS as a true national treasure.

More and Varied Partnerships with the NLCS Coalition to Protect Cultural Resources
Perhaps most importantly, a listing would facilitate and encourage better and increased partnerships to leverage increased funding and motivate the public to participate in the protection of our national heritage.

BLM will never have all the funding or all the staff it needs to protect and understand cultural resources. A listing by the National Trust will help the existing Coalition members, including The Wilderness Society and others to garner the interest of new groups and constituencies, filling the gap until Congress does. For example, dozens of volunteer site stewards are trained to look for and report vandalism, pothunting, and other damage at Canyons of the Ancients National Monument, through a site stewardship program sponsored by San Juan Mountains Association based in Durango, Colorado. A National Trust listing will help the NLCS Coalition encourage existing groups to institute similar volunteer programs in other NLCS units—and engage those new groups as educated supporters of the NLCS.

A listing as a "most endangered place" would also leverage efforts by The Wilderness Society and other partners to engage volunteers from state archaeological councils in surveying NLCS areas to promote better transportation planning, as carried out in November 2004 in northern Arizona.

It would also help the BLM with its own extensive partnership efforts around NLCS and cultural resources. The BLM recognizes the value of volunteers to monitor historical and archaeological sites, noting in a 1989 report that "site stewardship not only fulfills and important need, but also provides an opportunity for the public to get involved in historic preservation."[30]

Current and Future Collaboration with the National Trust.
For the last two years, The Wilderness Society has worked directly with the National Trust, particularly with the National Trust's Law Department, on cultural resource issues within the NLCS. In fact, the National Trust is part of the NLCS Coalition, and is considered an important partner because of the credibility it provides in analysis and discussion of cultural resources issues. Our collaboration with the National Trust has come in the form of joint comment letters on management plans, joint press releases, co-organized Congressional fact-finding trips, and Administrative and Congressional meetings to inform and discuss NLCS issues, especially funding issues. The National Trust also joined in a lawsuit with The Wilderness Society as amici in support of the Administration's use of the Antiquities Act to create National Monuments that are part of the NLCS.

One example of our recent collaborative work: the National Trust teamed with The Wilderness Society to address the lack of cultural resource surveys within NLCS units. The National Trust was an important participant in and sponsor of the volunteer surveys done for Grand Canyon-Parashant and Vermilion Cliffs National Monument in 2004. This survey project has sparked the interest of many groups as a model of how effective partnerships between national organizations, archaeologists, and possibly the BLM can lead to important information that helps the BLM manage the NLCS. We hope to expand this project in collaboration with the National Trust and other organizations in the future.

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[30] DOI BLM (1989) 313.

7. NOMINATOR INFORMATION

Nominator: (Organization and/or individual submitting the nomination)

Circle one: Mr.

First Name: Bill **Last Name:** Meadows

Institution/Organization: The Wilderness Society

Institution/Organization's Web site: www.wilderness.org

Does the web site include information on site nominated? Yes. See: http://www.wilderness.org/OurIssues/Monuments/
See also: www.discoverNLCS.org, a site which The Wilderness Society created and manages for the NLCS Coalition.

Title: President

Address: 1615 M Street NW

City: Washington **State:** DC **Zip:** 20036

Telephone Number: 202-429-2607 **Fax:** 202-429-3958

Email: bill_meadows@tws.org

Discussed nomination with a National Trust representative? YES

If yes, who: Mike Smith, Public Lands Counsel, Washington, D.C. and other members of the National Trust's Law Department staff, including Elizabeth Merritt, Deputy General Counsel and Anita Canovas, Associate General Counsel.

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Signature: _____ **Date:** _____

8. OWNER INFORMATION

Is the owner of the property aware of the nomination to America's 11 Most Endangered Historic Places?

Yes. We discussed the nomination with BLM/NLCS staff member Rob Roudabush; contact information is below.

Does the owner endorse the nomination to America's 11 Most Endangered Places? Unknown.

Circle one: Mr.

First Name: Rob **Last Name:** Roudabush

Institution/Organization: Bureau of Land Management

Institution/Organization's website: www.blm.gov

Does the website include information on site nominated? YES; see www.blm.gov/nlcs/

Title: Group Manager, National Monuments and National Conservation Areas, National Landscape Conservation System

Address: 1849 C Street NW, Suite 301-L Street

City: Washington **State:** DC **Zip Code:** 20240-9998

Telephone number: 202-452-5085 **Fax number:** 202-653-2154

Email: Rob_Roudabush@blm.gov

9. MEDIA CONTACT INFORMATION

Contact Person: Ms.

First Name: Wendy Last Name: Vanasselt

Institution/Organization: The Wilderness Society

Title: Project Director, National Landscape Conservation System

Address: 1615 M St. NW

City: Washington **State:** DC **Zip Code:** 20036

Telephone Number: 202-429-7431 **Fax number:** 202-429-3945

Email: wendy_vanasselt@tws.org

10. PHOTOGRAPHY RELEASE

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Photographer's printed name	Signature	Date
Nominator's printed name	Signature	Date

(If photographer is unknown or cannot sign, nominator takes full responsibility.)