



Utah Rock Art Research Association

P.O. Box 511324 Salt Lake City, UT 84151-1324

www.utahrockart.org

December 11, 2018

BLM Monticello Field Office
Attention: Clifford Giffen
365 North Main,
Monticello, Utah 84535

**RE: March 2019 Competitive Oil and Gas Lease Sale Determination of NEPA Adequacy
DOI-BLM-UT-Y020-2019-0004-DNA**

Dear Mr. Giffen:

We have reviewed the Determination of NEPA Adequacy for the Monticello Field Office March 2019 Competitive Oil and Gas Lease Sale and respectfully submit the following comments on the BLM's determination that the lease sale would have no effect on cultural resources.

Who We Are: URARA is the leading organization in the state of Utah advocating for the preservation, documentation, and study of Native American petroglyphs and pictographs (rock art). Our membership includes rock art enthusiasts, professional archeologists, anthropologists, geologists and others. We spend time in the field and are building a rock art database to support our preservation concerns. We have partnered with the BLM on many projects to these ends. Our members have documented sites in every region of Utah. Currently, we are working with the BLM to protect rock art sites in the Moab area, the San Rafael Swell and Nine Mile Canyon, including work on National Register of Historic Places nominations and graffiti mitigation. We have responded to all district resource management plans, participated in the Nine Mile Programmatic Agreement, and participated in other programmatic agreement development. We are also currently working with the Monticello Field Office to document rock art in Shay Canyon.

Statement of Concern: The Utah Rock Art Research Association understands that the proposed March 2019 oil and gas lease sale has designated nineteen parcels totaling approximately 32,067.42 acres located in the Monticello Field Office (MtFO) area. We understand that the BLM is using the March 2018 Competitive Oil and Gas Lease Sale, Environmental Assessment (EA), DOI-BLM-UT-Y010-2017-0240-EA (March 2018 EA) to determine NEPA Adequacy, which recommended a decision of **No Adverse Effect**.

Our primary concern, as stated in our comments to the March 2018 EA, is the location of the scattered lease parcels in the Montezuma Creek, Alkali Ridge, and Recapture Creek areas. The

Protect, Visit, and Study Rock Art

high cultural value of these areas has been recognized for nearly a century. These areas have a long habitation history including occupation by Basketmaker II, Basketmaker III, Pueblo I, Pueblo II and Pueblo III cultures. The largest Pueblo villages in Utah are located in the Montezuma Creek system. We are aware of previous oil and gas exploration and development in the area as evidenced by drill pads and exposed pipes throughout the drainages and believe that any **new oil and gas development threatens to further degrade these unique cultural resources**. URARA believes the high concentration of archeological and rock art sites in the Montezuma Creek, Alkali Ridge, and Recapture Creek areas are a significant national and state resource whose value far outweighs the scattered oil and gas leases proposed in this sale.

The high cultural value of the Montezuma Creek, Alkali Ridge, and Recapture Creek areas has been recognized for nearly a century. These areas have a long habitation history including occupation by Basketmaker II, Basketmaker III, Pueblo I, Pueblo II and Pueblo III cultures. The largest Pueblo villages in Utah are located in the Montezuma Creek system. A prehistoric road, stretching from the San Juan River to as far north as Lowry Pueblo, has been documented adjacent to ruins in aerial photographs. Tributaries from this road extend to many ancient village sites. We are aware of previous oil and gas exploration and development in the area as evidenced by drill pads and exposed pipes throughout the drainages and believe that any **new oil and gas development threatens to further degrade these unique cultural resources**. URARA believes the high concentration of archeological and rock art sites in the Montezuma Creek, Alkali Ridge, and Recapture Creek areas are a significant national and state resource whose value far outweighs the scattered oil and gas leases proposed in this sale.

We understand that the BLM must determine a reasonably foreseeable development (RFD) scenario to understand the potential impacts to cultural resources. But, while we understand that the acreage of the RFD is based on past development in the area, **we believe that the BLM's current assumptions do not adequately predict the potential for adverse effect in culturally rich areas**. The criterion does not weigh the cumulative impact of exploration, seismic testing, well drilling, pipe construction, and transportation corridors on cultural resources both inside and outside the lease parcel. In particular Montezuma Creek and its tributary canyons contain a very high density of rock art and other cultural sites. Montezuma Creek is, and has been for thousands of years, the main travel corridor into and out of this area, which is why so much rock art and other cultural sites are located here, and we believe that it will be impossible to access the proposed lease parcels without adversely impacting cultural sites. In Nine Mile Canyon, a similar transportation corridor to oil and gas parcels on Tavaputs Plateau, adverse effect to rock art adjacent to the road from a combination of dust, vibration, and increased visitor use was not considered sufficiently in environmental assessments. The March 2018 lease sale presents a similar situation in Montezuma Creek where the road is adjacent to cliffs with a high concentration of rock art and nearby archeological habitation sites. We believe that the impact on cultural resources from the development of access roads and pipelines to the lease parcels has not been sufficiently considered in the determination of No Adverse Effect.

Protect, Visit, and Study Rock Art

In addition the **determination of No Adverse Effect does not adequately take into account the cultural importance of setting**, particularly for rock art sites. Many rock art sites are located where they are because of the surrounding landscape, including views from the site as well as views of the site from the surrounding area. Placing even a small well pad within this cultural landscape would have visual as well as auditory adverse effects.

We believe that the **cumulative effects of exploration and development of oil and gas fields in areas of high concentration of cultural resources will inevitably damage rock art and archeological resources**. High concentrations of rock art sites and other cultural sites have been observed by URARA members and others in many of the Monticello FO parcels. The BLM's own analysis in Attachment C – Interdisciplinary Team Checklist to the March 2019 Competitive Oil and Gas Lease Sale DNA recognizes the cultural importance of this area when it states the “preliminary analysis using the cultural resources planning model (Beck et. Al., 2017) indicates that, in the **vast majority of the Monticello FO parcels, there is a high probability of the presence of cultural resources.**”

While we oppose the sale of these lease parcels we strongly support BLM's position that any future undertakings related to parcels that are leased will not be approved by the BLM until its obligations to consider cultural resources under NEPA, NHPA and other authorities specific to those future undertakings have been completed. Consideration of impacts to rock art and other cultural resources, and adverse effects to historic properties must be taken into account during the approval stage of site specific development plans. **URARA requests consulting party status** for these reviews.

Thank you for your consideration.



Werner Duecker
Utah Rock Art Research Association
Contact: 970-685-9630
wdeck.wd@gmail.com