



Utah Rock Art Research Association

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Bureau of Land Management
Vernal Field Office
170 South 500 East
Vernal, UT 84078
Sent via email (UT_Vernal_Comments@blm.gov)

Comments on the Vernal November 2016 Leasing Plan DOI-BLM-UT-G010-2016-0033-EA

The Utah Rock Art Research Association (URARA) is the largest organization dedicated to Utah rock art. Our mission is:

- To lead in the preservation and understanding of the value of rock art
 - To encourage the appreciation and enjoyment of rock art sites
 - To assist in the study, presentation, and publication of rock art research
- Our members have professional, academic, and avocational interest in Utah rock art.

URARA has a long history of working with the Vernal Field Office. We have:

- Documented rock art in the area
- Participated and cooperated with the field office with site steward programs
- Participated in the development of the West Tavaputs Programmatic Agreement and subsequent associated activities
- Assisted with other projects to preserve cultural resources

URARA is concerned about the inclusion of several parcels within Alternative A of the Environmental Assessment (EA).

We oppose the inclusion of leases 009 and 010 located within the Nine Mile Canyon corridor. The EA notes the following:

Two proposed parcels are within the Nine Mile Canyon corridor. Nine Mile Canyon is significant for the numerous cultural resources and the archaeological information that has been acquired from that area. These parcels, 009 and 010 are surrounded by over 100 cultural resources within one mile of the parcel boundaries with hundreds of more sites throughout the canyon. Many of these resources have been or are being listed on the National Registry of Historic Places because of their significance as part of the archaeological record.

However, this description fails to note the additional 40 sites, eligible for the National Register of Historic Places, within the lease borders themselves.

We appreciate that non-surface occupancy stipulations associated with these leases provide protection of sites within the lease parcels. However, the BLM must also consider indirect impacts associated with potential development of these leases. It is unclear to us where the actual drilling will occur, where roads will be developed for drilling, where pipelines and other gathering facilities will be located, how traffic associated with development and maintenance of potential wells will be routed, and the associated visual and auditory impacts associated with all of these activities.

We are concerned about leases 004 and 005 in the Argyle Canyon area. We are not aware of cultural sites associated with these leases but are concerned about indirect impacts associated with roads, gathering lines, pipelines, and traffic. If these were routed north through Argyle Canyon then we would be supportive of these leases. However, we expect that they will be routed through Nine Mile Canyon. If this is the case, we oppose these leases.

Nine Mile Canyon is a special area with an extraordinary concentration of cultural sites. It is also well known by the public and easy for them to access. Our conversations with employees of the Carbon County Tourism Office indicate that Nine Mile Canyon is the most requested area in the county for tourism information and that there has been a great increase in visitation since the road has been paved. The Price and Vernal BLM field offices are in the process of developing a Special Recreation Management Area (SRMA) plan for the canyon. This SRMA was specifically designated "to protect high-value cultural values and scenic quality."¹ Oil and gas development, even if done through non-surface occupancy, is at odds with both of these components of the SRMA. We believe that leasing plans should be deferred until the SRMA is completed and likely in the future as well.

We are concerned about leases 069, 070, 071, and 142 in the Steinaker Reservoir area. This is an area of high cultural site concentration. We appreciate that non-surface occupancy stipulations associated with these leases provide protection of sites within the lease parcels but are concerned about indirect impacts associated with roads, gathering lines, pipelines, and traffic. We appreciate that the proximity of these leases to Vernal means that the public has access to, and has likely impacted, sites in the lease area. But we do not think that lease development should increase access or impact to sites in the area.

Thank you for the opportunity to comment on this leasing plan. We also appreciate the excellent, concise summary of cultural resources associated with the leases found in Sheet 1 of the Cultural Resource Summary (Page 175) of the PDF document.

Troy Scotter
Conservation and Preservation Committee, URARA

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http://www.blm.gov/style/medialib/blm/ut/vernal_fo/planning/rod_approved_rmp.Par.12251.File.dat/VernalFinalPlan.pdf page 35