



UTAH ROCK ART RESEARCH ASSOCIATION

PO Box 511324 Salt Lake City, Utah 84141

www.utahrockart.org

July 30, 2020

RE: Fivemile Pass Special Area Designation

<https://eplanning.blm.gov/eplanning-ui/project/1502537/510>

Consulting Party Comments

The Utah Rock Art Research Association (URARA) are pleased to have the opportunity to be a consulting party to and comment on the above noted Special Area Designation.

We have a long history of working with Utah BLM state office, district offices, and each field office, and would like to continue this partnership. Thank you for including us as a consulting party in the development of these activities.

URARA is the largest organization actively engaged in the conservation and preservation of petroglyphs and pictographs (rock art) in the state of Utah.

Our mission is:

- To lead in the preservation and understanding of the importance 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

We are engaged with land managers on federal, state, county, and city lands, assisting with and consulting on land use activities that may impact rock art. We are a resource for government agencies, municipalities, communities, and private land owners, to aid in identifying, preserving, and protecting these cultural resources within their boundaries and/or jurisdictions.

Our concerns for this Special Area Designation are:

- Less than 15% of BLM lands within the State of Utah have been surveyed for cultural resources. Land use activities such as described in the EA for this area have the potential to threaten cultural resources that are known as well as unknown at this time.
- It is also our understanding that all undertakings associated with development in these designated areas go through the NEPA and NHPA – Section 106 processes. However, many of these processes focus only on direct impacts associated within the development area and often ignore the cumulative impacts of human encroachment to threatened cultural resources and historical properties.
- Other impacts of concern are the multiple types of vehicle use near cultural resources, potential pioneered accesses, and other indirect or direct impacts which may occur as a result of increased activities within or outside of the proposed area boundaries. These

impacts that threaten the cultural resources need to be given weight in the development decisions.

- As development proceeds, we request that no ground disturbances such as vehicle accesses, utility installation, underground cables, installation of signs and trail markers, or anything of any nature that might directly or indirectly impact the rock art, take place near or in close proximity to these culture resources.
- Since some of the rock art and historical engravings are on SITLA property adjacent to the boundaries of the area, a cooperative effort to limit access and discourage visitors away from that area just south of the historical railroad bed is recommended or a plan to include this area in the visitor experience with kiosks, interpretive panels and hiking trails.

Thank you for considering our comments in these processes. Ultimately our goal is to preserve cultural resources for current and future generations to enjoy, study, and appreciate.

Respectfully submitted,

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