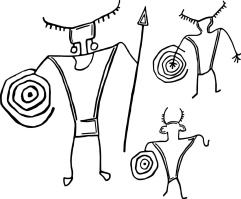
[](http://www.utahrockart.org) Utah Rock Art Research Association

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BLM Price Field Office

Attention: Chris Conrad Field Office Manager

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Price, UT 84501

**CONSULTING PARTY REVIEW FOR THE PRICE FIELD OFFICE CLASS II STATISTICAL MODEL FOR TRAVEL MANAGEMENT PLAN**

In our opinion, the consulting party review for the Price Field Office Class II Model for Travel Management Plan appears to have been a “tick the box” exercise allowing the field office to quickly move into travel planning without providing useful data for consulting parties.

The Utah Rock Art Research Association (URARA) has commented on every class II model developed by Utah BLM field offices in the past couple of years. In each of those cases a detailed report on the model has been provided to consulting parties. This was important for two reasons:

1. Comments of the consulting parties have produced improvements in the models over time. The Monticello model is different, and better, than the original Fillmore model.
2. Class II models are mathematical exercises by computer programs which have never set foot in the field office. They have never seen a rock art site, a lithic, a habitation site, or a cowboy camp. They are dependent on the quality of the input data, variables, modeling technique, and model testing. It is important for consulting parties to be able to review these aspects of the model to have any assurance of its validity.

Unfortunately, Price is the only field office not to provide a report on the statistical model to the consulting parties. It did provide a report on the Class II model developed for the San Rafael Desert MLP. However, it was clearly stated that this model was not used for developing the Price Field Office model as “it didn’t work” for the rest of the field office. As a result, the inclusion of the San Rafael Desert MLP is simply “filler” supplied to the consulting parties. You could have provided the Moab Class II report which would have been equally useless.

It could be argued that the one page aggregate model map supplied to the consulting parties is sufficient information for the consulting parties to provide comment. Ultimately, the map is the “proof in the pudding.” However, URARA finds the one page maps provide insufficient detail to evaluate the quality of the underlying model. When we worked with other consulting parties during the Monticello Class II process we requested more detailed views of the map. As a result, the consulting parties identified serious deficiencies. Areas of high probability cultural resources such as Montezuma Canyon, Howenweep, and Cedar Mesa were identified as low probability in the map. It was clear that the model was not accurately predicting site probabilities based on known data. This kind of evaluation is impossible with low resolution, one page maps. Additionally, we have difficulty commenting on aggregate maps because we are really only experts in one area: rock art. To provide useful comments we need to see the rock art specific class II map for the field office.

Model testing was discussed at the consulting party meeting. We were told that the model was tested in three ways:

1. By testing performed for the San Rafael Desert MLP. Since this model was not used to develop the Price Field Office model it is unclear why testing done to validate it has any impact on the Price Field Office model.
2. By comparison to the Montgomery/Patterson class II statistical model developed for the Molen Reef area of the field office. We were told in the consulting party meeting that the Price Field Office model showed the same probabilities as were developed in the Molen Reef model. However, it is our understanding that the Patterson class II statistical model was determined to be ineffective in modelling the Molen Reef. So, why a comparison to it would provide valid testing is difficult to understand.
3. By URARA supplied data. We are always happy to provide information to the BLM and are thrilled when the government finds it useful. However, we are not clear which dataset the BLM used. If it was our data provided on the Molen Reef then it represents a small geographical area of the field office and would not provide valid testing outside of that area.

We appreciate the BLM’s desire to fill their mandate under the court settlement to complete Class III surveys for their travel planning efforts. But speed is no excuse to sidestep a useful consulting party process.

Yours truly,

Troy Scotter

URARA Conservation and Preservation Committee