 Utah Rock Art Research Association

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Bureau of Land Management
Price Field Office
Attn: Amber Koski and Jake Palma
125 South 600 West
Price, UT 84501

**Comments on the San Rafael Desert Master Leasing Plan** [**DOI-BLM-UT-G020-2016-0008-EA**](https://eplanning.blm.gov/epl-front-office/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=61781)

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 Price Field Office. We have:

* Paid for and participated in the documentation of rock art
* Participated in clean-up projects
* Participated and cooperated with the field office with site steward programs
* Participated in the development of the West Tavaputs Programmatic Agreement
* Assisted with other projects to maintain and preserve cultural resources

URARA recognizes that there will be areas in the proposed Master Leasing Plan (MLP) area that will be appropriate for oil and gas development. However, we do not think the entire MLP area is appropriate for oil and gas leasing. We have three primary areas of concern:

1. **Cultural Site Locations:**

Cultural sites including rock art in the MLP area tend to be concentrated in, and around drainage systems including canyons and washes cutting through the MLP boundaries. There are concentrations of rock art, lithics, and other habitation artifacts in particular areas within the MLP boundaries. As a result, we are concerned about leasing in the drainage systems and associated plateaus until we have further information, We are aware of washes which are rich in rock art panels including Barrier Canyon Style, early Archaic and Historic Styles.

1. **Wilderness/Scenic Values:**

We believe that oil and gas leasing should be excluded from areas near the canyon rims associated with the Green River, Keg Springs drainage system, and Canyonlands National Park borders in order to preserve the wilderness and scenic values of these areas.

1. **Road Development:**

To the extent that oil and gas development requires the development of new roads, we are concerned that these transportation routes will provide new, or improved, access to cultural resources within the MLP borders. We are especially concerned that new roads not be developed within canyon and wash bottoms.

Disclosure of site locations and descriptions

Due to the public nature of this document URARA will not disclose site locations. However, we are happy to provide this information directly to appropriate BLM personnel for your consideration.

Thank you for the opportunity to comment on this Master Leasing Plan. We look forward to our continued involvement in this process.



Troy Scotter

Conservation and Preservation Committee, URARA