Utah Rock Art Research Association

June 10, 2017

BLM Price Field Office
Attention: Nicole Lohman
125 S 600 W
Price, UT 84501

Dear Nicole:

Thank you for the opportunity to review and comment on the Predictive Model for the San Rafael Desert area of the Price Field Office (PFO).

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 300 members have professional, academic, and avocational interest in Utah rock art. Combined, our membership represents the largest body of knowledge regarding Utah rock art. We have worked with the Price Field Office (PFO) as a consulting party and have an extensive history of collaborating with the BLM throughout Utah.

At this point, URARA has been reviewing and responding to Class II predictive models for the past year. Our concerns have been articulated in our responses to the models developed for the Fillmore, Richfield, Moab, Monticello field offices and the Price San Rafael Swell region. Rather than rearticulate the details of these responses we'll summarize our concerns by saying that any good statistical model is based on the quality of site data available for analysis and the quality of the variables used in the creation of the model.

The implications of the site data set are shown within this Class II model. The initial probability model for this area showed that it was almost all low probability for cultural resources.[1] We are concerned that a focus on the data only within this area and the additional surveys conducted for this Class II comprising only .0006% of the area resulted in a substantially different map.[2] We wonder what the statistical model would look like if the BLM actually had a reasonable set of data on which to make decisions. The current model is based on surveys of less than 4%[3] of the area, much of which is in one area and doesn't represent the region in general.[4]

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[1] Price_MLP_Class_II_report_05032017 page 33
[2] Price_MLP_Class_II_report_05032017 page 89
[3] Price_MLP_Class_II_report_05032017 page 35 (17402/450841)+.0006
[4] Price_MLP_Class_II_report_05032017 page 12

We understand the requirement to build a model based on GIS data sets. We just don't believe that GIS data sets were always relevant to site location decisions of prehistoric peoples. A local, and more modern, example may help demonstrate our concerns. If the Mormon settlers had relied on GIS data sources they would have certainly settled in the Utah County area rather than Salt Lake County. Utah County had better soil, water, terrain cover, and access to food. But the settlement decision was impacted by factors that could not be predicted by GIS factors such as prophetic proclamations, the influence of scriptural references and fur traders met along the route, and the exhaustion of pioneers who had just traveled 1300 difficult miles. Imagine the implications: Utah Lake City and fresh water taffy???

Ultimately, however, the value of the model is in the accuracy of its predictions. We admit that our experience in this area is very limited and, as a result, our observations are incomplete. We developed a map based on our observations indicating the areas likely from our viewpoint to have the highest density of cultural resources. We provided a copy of the map to the BLM on a private basis for the San Rafael Desert MLP and would be happy to do so again for this Class II. We will be happy to discuss our observations and specific site data with BLM personnel. We would expand your some of the high probability canyons to include surrounding bench areas. This observation is similar to some of the consulting party discussions of the flawed Monticello Class II statistical model that is currently being revised. Your map also neglects areas we consider rich in cultural resources. We also believe a few areas noted as high probability may be overstated. Overall, the current model is a substantial improvement over the previous model but is inaccurate as it stands.

We are concerned about how the BLM will use this predictive model for planning decisions within the PFO. The current predictive model is simply a guess at the locations of cultural resources. We support the use of a predictive model which consulting parties concur has high predictive value for cultural resources. Such a model could be used in macro level planning decisions. For example, if there are two routes to a destination one going through a low cultural resource sensitivity area and one going through a high cultural resource sensitivity area it makes sense to start Section 106 work in the low sensitivity area. However, the predictive model cannot supplant actual on-the-ground data collection as required by Section 106 of the National Historic Preservation Act before that road is actually developed. Likewise, the predictive model might provide guidance for leasing decisions but it shouldn't take the place of a more thorough Master Leasing Plan and thoughtful leasing decisions based on real data.

Thank you for your consideration of these comments.

Troy Scotter
URARA Conservation & Preservation Committee