



Utah Rock Art Research Association

P.O. Box 511324 Salt Lake City, UT 84151-1324

www.utahrockart.org

November 9, 2020

Re: Twin Bridges Bowknot Helium Project DOI-BLM-G020-2020-0033-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 400 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 are an all-volunteer organization. We don't have staff or an office. But our members actively work with the BLM on issues of cultural resource protection:

- We provide our database of rock art sites to the BLM state archeologists
- We document rock art sites
- We report vandalism and have assisted BLM archeologists in repairing vandalism at rock art sites
- We participate in public feedback processes including the development of Resource Management Plans, Programmatic Agreements, and many Section 106 and NEPA assessments.
- We have members assigned to each Utah BLM field office to try and address the needs of the BLM archeologists with regards to rock art in their district.
- We are working with SHPO and the BLM in the preparation of a standardized Section 110 documentation format so that more rock art sites can be placed within the SHPO databases and that information made available for BLM land management decisions.
- Many of our members are actively involved in site stewardship programs within Utah.

URARA commented on the BLM Price Field Office South December 2018 Oil and Gas Lease Sale on July 25, 2018. At that time we expressed our concerns about Parcel 257 now under consideration for the above noted Twin Bridges Bowknot Helium Project. In summary our concerns are:

- We are aware of two rock art sites within the parcel area proposed for the Helium Project. We will share site locations with BLM archeologists on a confidential basis. We are also aware of archaic tool-making and habitation sites in the area.
- Development in this area would negatively impact the experience of visitors to the Horseshoe Canyon Unit of Canyonlands National Park. The Great Gallery in Horseshoe Canyon is world

famous, is the type site for Barrier Canyon Style rock art, and attracts over 8,000 visitors from all over the world drawn to the rock art, and the remote and scenic nature of the area.

- The NPS advertises Keg Springs, within parcel 257, as alternative dispersed camping for visitors to Horseshoe Canyon.
- Parcel 257 is adjacent to and partially surrounded by the Horseshoe Canyon North Wilderness Study Area (WSA) and is within the view-scape and soundscape of the WSA.
- Additionally, parcel 257 is within the viewshed of prominent, developed overlooks within the Island in the Sky unit of Canyonlands NP, including Grand View Point, that provide spectacular, long distance views of the pristine landscape.
- Lighting from Oil and Gas development on parcel 257 would potentially impact Dark Sky qualities of Canyonlands NP as well.
- The parcel is close to the Labyrinth Canyon Wilderness/Labyrinth Canyon Scenic segment of the Green River and may also degrade the experience of visitors to this area.
- We believe that development in this area would likely improve roads and increase traffic in the area having additional impacts to the broader region outside of the specific development area. Increased visitation tends to lead to damage to cultural sites and illegal OHV use.

URARA requests that the Twin Bridges Bowknot Helium Project DOI-BLM-G020-2020-0033-EA not be approved. We support Alternative C.

Troy Scotter

Conservation and Preservation Committee Chair, Utah Rock Art Research Association