



**National Trust for  
Historic Preservation**  
*Save the past. Enrich the future.*

July 10, 2013

The Honorable Rob Bishop  
United States House of Representatives  
123 Cannon House Office Building  
Washington, DC 20515

The Honorable Jason Chaffetz  
United States House of Representatives  
2464 Rayburn House Office Building  
Washington, DC 20515

The Honorable Chris Stewart  
United States House of Representatives  
323 Cannon House Office Building  
Washington, DC 20515

Via email to: [Fred.Ferguson@mail.house.gov](mailto:Fred.Ferguson@mail.house.gov)

Dear Congressman Bishop, Chaffetz and Stewart:

Thank you for giving us the opportunity to provide information about our priorities for resource designations in Eastern Utah.

As you are aware, the public lands of San Juan County are among the most culturally significant in the country. Cedar Mesa and Montezuma Canyon have archaeological site densities that rival and perhaps exceed those found within many nearby national parks and monuments. Also contributing to San Juan County's cultural significance is the resource diversity, ranging from evidence of Paleoindian occupation more than 11,000 years ago to the Hole-in-the-Rock Trail pioneered by Mormon settlers in the late 19<sup>th</sup> century. Finally, perhaps nowhere in the United States are so many well-preserved cultural resources found within such a striking and relatively undeveloped natural landscape.

For these reasons, we believe that several areas in San Juan County merit consideration for legislative designations. In the attached materials, we outline five such areas in priority order— Cedar Mesa, Montezuma Canyon, Hole-in-the-Rock Trail, Ruin Park and Indian Creek— and provide detailed information, including a map, supporting our

submission. Yet, only 3% of BLM land here has been surveyed for cultural resources, so while we enthusiastically submit the attached ideas for your consideration, the areas proposed do not represent *all* of the important archaeological sites in San Juan County but rather are based on the information known today.

Under separate cover, we also intend to submit our ideas for protection of cultural resource sites in Nine Mile Canyon.

We propose general boundaries for these areas as shown on the attached maps which were drawn to include land that is principally managed by the BLM. However, within these boundaries are a number of SITLA and private land parcels that would not be subject to federal legislative designation.

We are interested in participating in your tour planned for Monday, August 12. Thank you again for inviting our input. We look forward to continuing our participation in this process.

Sincerely,

A handwritten signature in black ink that reads "Barbara Pahl". The signature is written in a cursive, flowing style.

Barbara Pahl  
Western Vice President

## SAN JUAN COUNTY CULTURAL RESOURCE AREAS SUMMARY

### Proposed National Conservation Areas (NCA):

1. **Montezuma Canyon NCA** (approximately 230,000 acres)  
-for its incredible density of Basketmaker and Pueblo archaeological sites and its relationship to the larger cultural landscapes of Hovenweep and Canyons of the Ancients National Monuments in southeastern Utah and southwestern Colorado, and including:
  - Alkali Ridge Area of Critical Environmental Concern (ACEC)
  - Montezuma Canyon
  - Tin Cup Mesa
  
2. **Indian Creek NCA** (approximately 176,000 acres)  
-for its stunning prehistoric and historic rock art and evidence of habitation and stone tool production, as well as its location as an archaeological gateway to the cultural landscape of Canyonlands National Park (Canyonlands), and including:
  - Indian Creek Special Recreation Management Area (SRMA)
  - Lockhart Basin
  - Shay Canyon ACEC
  
3. **Ruin Park NCA** (approximately 25,000 acres)  
-for its remarkably well-preserved and rare free-standing Pueblo architecture that can be "discovered" by visitors in a remote and largely undisturbed setting, and including:
  - Beef Basin SRMA
  - Fable Valley
  
4. **Cedar Mesa NCA** (approximately 562,000 acres)  
-for its internationally famous, significant, and dense concentration of archaeological sites representing 12,000 years of human history, including well-preserved rock art, Pueblo architecture, and research-defining Basketmaker sites, and including:
  - Butler Wash
  - Cedar Mesa SRMA
  - Arch Canyon
  - Grand Gulch
  - San Juan River ACEC
  - Tank Bench SRMA

### Proposed National Historic Trail

1. **Hole-in-the-Rock National Historic Trail**  
-for its memorialization of the undaunted Mormon pioneers who traversed one of the most difficult immigration routes in the U.S.

## **SAN JUAN COUNTY CULTURAL RESOURCE AREAS DETAILED INFORMATION & NCA PROPOSALS**

### ***1. Proposed Montezuma Canyon NCA***

The proposed NCA is loosely bordered by Highway 491 and private land holdings in the north, the Utah-Colorado border in the east, the Navajo Reservation in the south, and Highway 191 and private land holdings in the west. *See Attached Map Figure #1.*

The rich archaeological record demonstrating evidence of human occupation from the Basketmaker II to Pueblo III periods (ca. 1000 B.C.–A.D. 1300), the relative accessibility of Alkali Ridge, Montezuma Canyon, Tin Cup Mesa and surrounding areas, and the proximity to Hovenweep and Canyons of the Ancients National Monuments, make this area a strong candidate for an NCA designation. The NCA would emphasize the connections among all of these significant cultural landscapes and create new conceptual links with the nearby national monuments, helping to draw more visitors across the state line into Utah. This area includes Three Kiva Pueblo, which has been developed and is managed by BLM as a recreation site and which is a destination for educational travel tours led by archaeologists with the Crow Canyon Archaeological Center. This area has the highest documented archaeological site density in San Juan County (approximately 200 sites per square mile). Alkali Ridge is the “type site” for the Pueblo II period (ca. A.D. 900–1100) and “one of the best known and influential examples of scientific archaeological investigation in the Southwestern U.S.” (BLM 2008a). Ongoing investigations into possible connections with Chaco Canyon are underway, including documentation of so-called “Chacoan roads.” The presence of important sites on School and Institutional Trust Lands Administration (SITLA) parcels makes the area a good candidate for potential land exchanges.

Additional details about some notable areas located within this NCA follow:

- **Alkali Ridge, eastern San Juan County (SJC)**
  - Contains a National Historic Landmark (2,146 acres), designated in 1964
  - Contains a BLM Cultural ACEC (39,196 acres) (BLM 2008b)
  - Contains an incredibly high density of archaeological sites that are culturally related to those in Hovenweep and Canyons of the Ancients (CANM) in southeastern Utah and southwestern Colorado

#### *Significant Cultural Attributes*

The Alkali Ridge and Montezuma Canyon areas of eastern SJC contain an outstanding density of archaeological sites (reaching 200 per square mile) that provide evidence for human occupation from the Basketmaker II to Pueblo III periods (ca. 1000 B.C.–A.D. 1300). The site of Alkali Ridge itself is the architectural “type site” for the Pueblo II period (ca. A.D. 900–1100), during which time prehistoric Native Americans transitioned

from living in small family groups in scattered, sunken “pit houses,” to living in large, multi-family groups in multi-story structures and relying on irrigation agriculture. According to BLM, the Alkali Ridge area is “one of the best known and influential examples of scientific archeological investigation in the Southwestern U.S.” and its cultural resources are regionally and nationally significant (BLM 2008a). The area also contains resources of traditional cultural significance to the Ute Mountain and White Mesa Ute and the Hopi Tribe. In addition, the cultural landscape that runs from Alkali Ridge and Montezuma Canyon east to the Colorado border was one of the westernmost manifestations of Mesa Verdean-type Ancestral Puebloan culture, made famous at Hovenweep, CANM and Mesa Verde in southwestern Colorado.

- **Montezuma Canyon, eastern SJC**

- Eligible for the National Register of Historic Places (NRHP) (10,000 acres; BLM 1985)

*Significant Cultural Attributes*

Like Alkali Ridge, the Montezuma Canyon area of eastern SJC contains an outstanding density of archaeological sites (reaching 200 per square mile) that provide evidence for human occupation from the Basketmaker II to Pueblo III periods (ca. 1000 B.C.–A.D. 1300). The area also contains resources of traditional cultural significance to the Ute Mountain and White Mesa Ute, Navajo Nation and Hopi Tribe.

- **Tin Cup Mesa, eastern SJC**

- Eligible for the NRHP (2,610 acres); proposed Tin Cup National Register Archaeological District in BLM 1991

*Significant Cultural Attributes*

Located east of Montezuma Creek, Tin Cup Mesa contains the same kinds of Puebloan masonry structures as those in the Alkali Ridge and Montezuma Canyon areas, as well as in southwestern Colorado. These areas together should be recognized as one related cultural landscape.

### **Suggestions for Management Considerations and NCA Language**

- Recreation
  - In light of the extensive network of existing roads in the proposed NCA, prohibit new road construction, except when necessary for emergency or essential administrative purposes or to access private property.
  - Ensure that existing and new roads (if any) and buffers around them are surveyed for cultural resources; if cultural resources are found, and effects cannot be satisfactorily mitigated, close or relocate roads.
  - Close to off-road vehicle use and limit ORV use to designated roads.

- Interpret a limited number of sites visible from or near existing roads and trails to educate the public about prehistory and appropriate site visitation.
- Strengthen volunteer site stewards program.
- Heritage Tourism
  - Continue to issue special recreation permits for locally guided tours into areas appropriate for visitation by large groups.
  - Educate U.S. and international tourists about prehistory and history of area and about appropriate site visitation.
- Archaeological Research
  - Ensure that valid archaeological research, including site excavations, can be undertaken by qualified parties whose research projects are approved by BLM.
  - Encourage partnerships with universities and research institutions (e.g., Crow Canyon Archaeological Center) to proactively and thoroughly investigate archaeological resources, in particular those that may be located in areas with high potential for conflict with primary land uses (e.g., oil and gas development).
  - Expand Edge of the Cedars State Park Museum or build an additional education and curation facility in which to conserve and interpret artifacts and other materials recovered from sites within San Juan County.
- Grazing
  - Determine whether grazing is compatible with protection of cultural resources and, if incompatible, prohibit or limit grazing accordingly.
  - Where grazing is found to be compatible with the protection of cultural resources, survey concentrated use areas (e.g., tanks, roads, fencelines, shelters) for cultural resources and exclude cattle or relocate stock improvements, as necessary, to protect cultural resources.
  - Before installing or moving grazing features, inventory for cultural resources.
- Oil and Gas Activity
  - Using standard NCA language, protect valid existing rights (VERs), including existing oil and gas leases.
  - Using standard NCA language, withdraw area from future oil and gas leasing.
- Mining
  - Using standard NCA language, protect VERs including valid existing mining claims.
  - Using standard NCA language, withdraw area from location under the hardrock mining laws.

- Using standard NCA language, withdraw area from future disposal of mineral materials.
- Traditional Cultural Use by Native Groups
  - Ensure that Native groups retain access to areas traditionally used for plant collecting, ceremony, visitation, etc.

## **2. Proposed Indian Creek NCA or Expansion of Canyonlands National Park**

This proposed NCA is bounded by Hart Point and the Monticello BLM field office boundary on the east; the Monticello BLM field office boundary on the north; Canyonlands on the west; and the Manti La Sal National Forest on the south. Alternatively, instead of NCA designation, this area could be included in a Canyonlands expansion. *See Attached Map Figure #2.*

Indian Creek and Lockhart Basin are geographic gateways to Canyonlands and enjoy high levels of recreation, including rock climbing. The area contains evidence of habitation by hunter-gatherers and farmers for at least 10,000 years. A diversity of archaeological sites, from rock art to surface artifact scatters to cliff structures, dot the landscape. The accessibility of the area makes it well-suited to visitor education and site interpretation; Newspaper Rock State Historical Monument near the southeast corner of this proposed NCA provides an introduction to rock art. An NCA designation for this area—which contains a high percentage of Wilderness—would enhance protection of the significant rock art and Archaic period (ca. 7000–1000 B.C.) sites in the area, while maintaining visitor access to the park.

Additional details about some notable areas located within this NCA follow:

- **Indian Creek, northern SJC**
  - SRMA (89,271 acres; BLM 2008b)
  - Newspaper Rock State Historical Monument

### *Significant Cultural Attributes*

The Indian Creek area contains significant and rare rock art, dating from the Late Pleistocene to the Historic period. Newspaper Rock, which contains images from prehistoric and historic times, is perhaps the most famous site. It is now designated a State Historical Monument and receives relatively frequent visitation from people traveling to and from Canyonlands, 30 miles to the north.

- **Lockhart Basin, northern SJC**
  - No current cultural resource designations

### *Significant Cultural Attributes*

Lockhart Basin is a “lithic landscape” consisting of unusually well-exposed outcrops of siliceous materials (used prehistorically for making stone tools) and nearby archaeological sites that provide evidence for the working and use of those materials.

- **Shay Canyon, northern SJC**
  - Eligible for the NRHP (<1 acre; BLM 1985)
  - ACEC (1,770 acres; BLM 1991)
  - ACEC (119 acres; BLM 2008b)

*Significant Cultural Attributes*

Shay Canyon is located just north of Newspaper Rock State Historical Monument and contains abundant rock art.

**Suggestions for Management Considerations and NCA Language for an NCA Alternative**

- Recreation
  - Create designated access points and paths to recreation sites, as needed (BLM 2008b).
  - Enforce motorized access on designated routes only.
  - Ensure that existing and new or upgraded motorized and non-motorized routes (if any) and buffers around them are surveyed for cultural resources; if cultural resources are found, close or relocate routes or otherwise mitigate effects.
  - Continue to close climbing areas and access points when use impacts cultural resources (BLM 2008b).
  - Provide increased funds/staff for visitor education and law enforcement.
  - Continue to spread message about appropriate site visitation; target specific interest groups as appropriate (e.g., rock climbers, OHVs).
- Heritage Tourism
  - Develop additional signage in Indian Creek area to interpret sites.
  - Educate U.S. and international tourists about prehistory of area and appropriate site visitation, particularly regarding rock art.
- Archaeological Research
  - Ensure that valid archaeological research, including site excavations, can be undertaken by qualified parties whose research projects are approved by the relevant agency.
  - Conserve and protect rock art, as necessary.
  - Stabilize other archaeological sites, as necessary, to ensure that any walls remain standing and features remain intact.

- Ensure that less visible sites (e.g., artifact scatters in Lockhart Basin) are protected and managed for their research value.
- Wood Collecting
  - Continue to allow wood collecting as long as cultural resources—both highly visible and less visible—are not harmed in the process.
  - Ensure all motorized access is limited to designated routes.
  - Inventory specific collection areas for cultural resources; record and potentially collect surface artifacts or avoid, as appropriate, to ensure no conflict.
- Grazing
  - Make compatibility determination for grazing and cultural resource protection within the NCA.
  - Inventory buffers around existing grazing features that concentrate animals in specific places (e.g., tanks, roads, fencelines, shelters).
  - Fence off sites or move grazing features to reduce or mitigate adverse effects to cultural resources.
  - Before installing or moving grazing features, inventory for cultural resources.
- Oil and Gas Development
  - Using standard NCA language, protect VERs, with “reasonable” restrictions placed on the use and development of VERs within the NCA.
  - Using standard NCA language, withdraw area from future oil and gas leasing.
- Mining
  - Using standard NCA language, protect VERs, with reasonable restrictions placed on the use and development of VERs within the NCA.
  - Using standard NCA language, withdraw area from location under the hardrock mining laws.
  - Using standard NCA language, withdraw area from future disposal of mineral materials.

### **Suggestions for Management Considerations for a Canyonlands Expansion Alternative**

- An alternative to creating an Indian Creek NCA would be an expansion of Canyonlands to the east.
- This Canyonlands expansion area would be managed in accordance with the laws applicable to the National Park System, the National Park Service’s (NPS’) 2006 Management Policies and any superseding direction that may be contained in legislation directing park expansion. The General Management Plan for the Park would be amended to address the newly-designated area.

### **3. Proposed Ruin Park NCA or Expansion of Canyonlands National Park**

The proposed NCA is roughly bounded by Buttler Wash and a Dark Canyon WSA on the east and west, respectively; Canyonlands on the north; and two SITLA parcels on the south. *See Attached Map Figure #3.*

The area is distinguished by unusual, free-standing Pueblo masonry structures and rock art that date largely to the 1000s and 1100s A.D. and were created by prehistoric farmers. Such free-standing structures are rare in SJC. Historically, this area was also used by Utes for winter camps and horse grazing (McPherson 2011). The area currently draws a modest number of visitors looking for a backcountry, archaeological “discovery” experience because of its limited accessibility by only by four-wheel drive vehicle or horseback. These unusual sites in relatively undisturbed natural settings can illustrate a unique relationship between humans and their environment.

While Beef Basin is not currently threatened by an overwhelming number of visitors, its remoteness necessitates periodic motorized access by BLM law enforcement, site stewards, and potentially site stabilization crews to ensure preservation of the standing architecture that dominates the basin. An NCA designation could provide the protective guidelines that Beef Basin cultural resources need, while ensuring that BLM can enforce those guidelines. Alternatively, instead of NCA designation, this area could be included in a Canyonlands expansion.

Additional details about notable areas located within this NCA follow:

- **Beef Basin, northwestern SJC**
  - Eligible for the NRHP (35,000 acres; BLM 1985)
  - Special Recreation Management Area (20,302 acres; BLM 2008b)

#### *Significant Cultural Attributes*

The Beef Basin area of northwestern SJC contains many free-standing prehistoric Pueblo structures—rare in this region of cliff dwellings—that visitors encounter during backcountry trips. The relative remoteness of the area fosters a sense of self-discovery that is valued by many visitors to SJC.

- **Fable Valley, northwestern SJC**
  - National Register Archaeological District proposed in 1991 MRP

#### *Significant Cultural Attributes*

The area contains spectacular intact ancestral pueblo sites including cliff ruins and intact, large pueblos on the remote valley floor.

## Suggestions for Management Considerations and NCA Language for an NCA Alternative

- Recreation
  - Assess the current management plan and amend or re-develop, as necessary, to ensure cultural resource protection if recreation levels increase.
  - Enforce motorized access on designated routes only.
  - Ensure that existing and new access routes (if any) and buffers around them are surveyed for cultural resources; if cultural resources are found, move routes or mitigate effects appropriately.
  - Develop a car campground in Ruin Park for primitive camping and designate primitive car camping areas in Middle Park, House Park, along Beef Basin Loop Road and in other areas as necessary (BLM 2008b).
  - Close dispersed campsites that impact archaeological sites (BLM 2008b).
  - Ensure cultural site visitation is limited to designated trails (BLM 2008b).
  - Educate horseback visitors on hobbling/tying horses well out of range of archaeological sites and then following designated paths to sites on foot.
  - Increase number of BLM law enforcement staff so that coverage of Beef Basin increases.
  - Create partnership with Canyonlands to increase patrol of NCA area.
  - Work with Canyonlands to increase messages about appropriate site visitation.
- Heritage Tourism
  - Develop signage to interpret a limited number of additional sites.
  - If visitation begins to increase substantially, possibly develop locally guided tours into specific limited access areas.
  - Educate U.S. and international tourists about prehistory and history of area and about appropriate site visitation.
- Archaeological Research
  - Ensure that valid archaeological research, including site excavations, can be undertaken by qualified parties whose research projects are approved by BLM.
  - As necessary, stabilize ruins to ensure that walls remain standing and features remain intact.
- Traditional Cultural Use by Native Groups
  - Ensure that Native groups retain access to areas traditionally used for plant collecting, ceremony, visitation, etc.
- Grazing
  - Make compatibility determination for grazing and cultural resource protection within the NCA.

- Inventory buffers around existing grazing features that concentrate animals in specific places (e.g., tanks, roads, fencelines, shelters).
- Fence off sites or move grazing features to reduce or mitigate adverse effects to cultural resources.
- Before installing or moving grazing features, inventory for cultural resources.
- Wood Collecting
  - Ensure only limited collection of dead wood—far from archaeological sites—for campfires.
- Oil and Gas Activity
  - Using standard NCA language, protect VERs, with “reasonable” restrictions placed by BLM on the use and development of VERs within the NCA.
  - Using standard NCA language, withdraw area from future oil and gas leasing.
- Disposal of Mineral Materials
  - Using standard NCA language, protect VERs, with “reasonable” restrictions placed by BLM on the use and development of VERs within the NCA.
  - Using standard NCA language, withdraw area from location under the hardrock mining laws.
  - Using standard NCA language, withdraw area from future disposal of mineral materials.

### **Suggestions for Management Considerations for a Canyonlands Expansion Alternative**

- An alternative to creating a Ruin Park NCA would be an expansion of Canyonlands to the south.
- This Canyonlands expansion area would be managed in accordance with the laws applicable to the National Park System, the NPS’ 2006 Management Policies and any superseding direction that may be contained in legislation directing park expansion. The General Management Plan for the Park would be amended to address the newly-designated area.

#### **4. Proposed Cedar Mesa NCA**

This proposed NCA is bounded by Cottonwood Wash on the east; the Red House Cliffs on the west; the Manti-La Sal National Forest on the north; and the San Juan River on the south. See *Attached Map Figure #4*.

Cedar Mesa contains internationally famous and visually stunning rock art and Puebloan cliff dwellings that draw thousands of U.S. and international visitors each year. This area contains

an incredibly high density of archaeological sites, surpassed only by the Alkali Ridge and Montezuma Canyon areas. The archaeological record of Cedar Mesa, spanning more than 12,000 years, helps researchers continue to define and study formative eras in human prehistory, including (but not limited to) the early agricultural Basketmaker period (ca. 1000 B.C. –A.D. 750) and the Pueblo I through III periods (ca. A.D. 750–1300), during which time the Cedar Mesa region exhibited connections with the famous and powerful culture based in northern New Mexico’s Chaco Canyon. Many areas of Cedar Mesa are significant to the Ute and Hopi tribes, the Navajo Nation, and multiple Pueblos groups (including the Rio Grande Pueblos, Acoma and Laguna, Zuni who now live in new Mexico) (McPherson 2011). Additionally, the Hole-in-the-Rock Mormon trail crosses Cedar Mesa, and historic emigrant settlements, ranching, mining and other industry-related resources demonstrate more recent use of the landscape.

Variations in accessibility and interpretation result in diverse visitor experiences of sites ranging from car-accessible “hardened” ruins interpreted for the public at Edge of the Cedars State Park and in Butler Wash, to the remote and unprotected cliff dwellings and rock art sites located in Grand Gulch. Visitors of all types from near and far learn about common themes of human migration, adaptation to a harsh, arid climate and maintenance of ancestral connections. Sites located in largely undisturbed natural contexts illustrate the close relationship between humans and their environment through time, and are excellent venues for developing educational programs about Utah prehistory, history, archaeology, natural resources and site visitation etiquette.

The large number of visitors to the Greater Cedar Mesa area, coupled with BLM’s lack of adequate resources to educate and manage that number of people, is leading to more and more archaeological site damage. An NCA designation for the entire area—of which a high percentage is Wilderness—would allow for continued motorized access to key interpretive sites and departure points while providing increased funding, personnel, enforcement, and education for BLM management of cultural resources. Furthermore, the proximity of certain NCA-proposed cultural resource areas (e.g., Tank Bench, Butler Wash) to Bluff and Blanding creates abundant opportunities for educating the public about appropriate visitation of cultural resources.

Additional details about some notable areas located within this NCA follow:

- **Butler Wash, south-central SJC**
  - National Register Archaeological District designated in 1981 (2,025 acres)
  - Publicly interpreted Butler Wash Ruin (60 acres; BLM 2008b)

#### *Significant Cultural Attributes*

The area of Butler Wash located in south-central SJC just east of the magnificent Comb Ridge contains outstanding prehistoric rock art (e.g., Procession Panel, Wolfman Panel) and Puebloan cliff structures.

- **Cedar Mesa, south-central SJC**
  - Eligible for the NRHP (350,000 acres; BLM 1985)
  - SRMA (407,098 acres; BLM 2008b)
    - i. Comb Ridge Recreation Management Zone (30,752 or 38,012) (BLM 2008b)
    - ii. McLoyd Canyon–Moon House (1,607 acres); user permit system (BLM 2008b)
    - iii. Includes **Arch Canyon** (7.7 miles long)

*Significant Cultural Attributes*

Cedar Mesa, located in south-central SJC, contains a dense archaeological record of more than 12,000 years of human history. Furthermore, it contains an unusually large concentration of sites from early farmers of the Basketmaker II period (ca. 1000 B.C.–A.D. 500) of the Ancestral Pueblo culture. Much of what is known in the Southwest today about these early farmers is derived from research conducted on Cedar Mesa.

The later Puebloan periods (ca. A.D. 750–1300) are represented by numerous one-of-a-kind, world-renowned standing masonry structures and rock art panels that attract thousands of national and international visitors each year.

- **Grand Gulch, western SJC**
  - National Register Historic District; (37,388 acres; BLM 2008b)

*Significant Cultural Attributes*

Located on the western edge of the greater Cedar Mesa area, Grand Gulch contains abundant rock art and habitation sites—including many with well-preserved organic artifacts—dating to the Basketmaker and Pueblo periods. This is one of the first areas of Cedar Mesa to have been excavated and collected by early 20th century researchers. It was subsequently intensively sampled in the 1960s and 1970s. As such, the area provides a record of temporal changes in site condition unparalleled elsewhere in San Juan County. In addition, Navajo people used Grand Gulch during protohistoric and historic times and left behind remains of temporary shelters and activities.

- **San Juan River, southern SJC**
  - ACEC (4,321 acres; BLM 2008b)

*Significant Cultural Attributes*

Numerous Pueblo structures (e.g., River House Ruin) are located along the San Juan River and are frequently visited by members of commercial rafting tours.

- **Tank Bench, southeastern SJC**
  - Identified as “worthy of ACEC designation” (BLM 2005)
  - SRMA (2,646 acres; 2008b)

### *Significant Cultural Attributes*

Located immediately north and northwest of Bluff, Tank Bench is an area of high traditional values for Native American groups including the Ute Mountain and White Mesa Ute, Navajo Nation and Hopi Tribe. In addition, Tank Bench contains the Bluff Great House and multiple prehistoric roads, all associated with the powerful 10th to 12th-century cultural, economic, and political center of Chaco Canyon in northwestern New Mexico.

### **Suggestions for Management Considerations and NCA Language**

- Recreation
  - Assess the current management plan and amend or re-develop as necessary to address the diversity of recreation activities.
  - Ensure that existing and new routes (if any) and buffers around them are surveyed for cultural resources; if cultural resources are found, move routes or mitigate effects appropriately.
  - Provide increased BLM funds/staff for education and law enforcement to enforce use of designated routes and to limit vandalism.
  - Interpret some additional sites visible from or near existing roads to educate the public about prehistory and appropriate site visitation.
  - Strengthen volunteer site stewards program.
- Heritage Tourism
  - Develop locally guided tours into specific limited access areas.
  - Educate U.S. and international tourists about prehistory and history of area and about appropriate site visitation.
- Wood Collecting
  - Continue to allow wood collecting in general, and inventory and/or monitor collecting in sample areas to identify any potential adverse effects to cultural resources
  - Develop and implement strategies for avoiding adverse effects to cultural resources from wood collecting, including closing specific areas to collecting
  - Ensure all motorized access is limited to designated routes.
- Grazing
  - Focus attention on grazing features that concentrate animals in specific places (e.g., tanks, roads, fencelines, shelters).
  - Fence off sites or move grazing features to reduce or mitigate adverse effects to cultural resources.

- Before installing or moving grazing features, inventory for cultural resources.
- Oil and Gas Activity
  - Using standard NCA language, protect VERs, with “reasonable” restrictions placed by BLM on the use and development of VERs within the NCA.
  - Using standard NCA language, withdraw area from future oil and gas leasing.
- Mining
  - Using standard NCA language, protect VERs, with “reasonable” restrictions placed by BLM on the use and development of VERs within the NCA.
  - Using standard NCA language, withdraw area from location under the hardrock mining laws.
  - Using standard NCA language, withdraw area from future disposal of mineral materials.
- Archaeological Research
  - Ensure that valid archaeological research, including site excavations, can be undertaken by qualified parties whose research projects are approved by BLM.
- Traditional Cultural Use by Native Groups
  - Ensure that Native groups retain access to areas traditionally used for plant collecting, ceremony, visitation, etc.

### **1. Proposed Hole-in-the-Rock National Historic Trail (NHT)**

The proposed NHT runs across the southwestern portion of SJC and continues west into Kane and Garfield counties to Escalante. *See Attached Map Figure #5.*

The NHT would memorialize the Mormon pioneers who, in the winter of 1879, created perhaps the most difficult emigration route in the U.S. The trail connects many SJC residents with their direct ancestors who created the settlement of Bluff and subsequently populated Blanding. As a historic resource and much-visited linear landscape, the Hole-in-the-Rock Trail should be identified in its entirety and then protected so that future generations can continue to appreciate its difficulties and remote beauty. Collaborative efforts should continue among the BLM, NPS, trail groups such as the Hole-in-the-Rock Foundation and other interested parties to identify and manage this nationally significant resource.

Additional details about the trail follow:

- **Hole-in-the-Rock Trail, across southern SJC**
  - Some segments listed in the National Register of Historic Places

- Managed for heritage tourism in consultation with the Utah State Historic Preservation Office, BLM and the Hole-in-the-Rock Foundation
- Interpretation being jointly implemented by BLM, the Hole-in-the-Rock Foundation and other interested entities

*Significant Cultural Attributes*

The trail runs for about 250 miles from the vicinity of Parowan, Utah to Bluff, Utah and is named for the place where the San Juan Mission of Mormon Pioneers constructed a descent to the Colorado River en route to colonizing the area east of it. The Hole-in-the-Rock Trail is a reminder of divinely inspired Mormon tenacity and resourcefulness. This is the route, characterized by difficult ascents and descents in wagons across inhospitable land that was taken by the large party of chosen families who first settled en masse in Bluff, so it represents an invaluable historic resource that has contemporary importance for local residents.

**Suggestions for Management Considerations and NHT Language**

- Recreation
  - Create comparative maps that show the route of the historic trail (as close as can be identified) and the related route currently used by OHVs, to determine any areas of potential conflict.
  - Ensure that level of use of specific portions of the trail is appropriate to trail condition and does not irrevocably damage the trail.
  - Create a management plan that includes BLM, NPS, trails groups and other interested parties in consistently interpreting, monitoring, maintaining and protecting the entire trail, not just the portion in SJC.
- Visually Intrusive Uses
  - Ensure that any visual (in addition to physical) impacts to high potential route segments of the trail (i.e., those that retain historic integrity) are avoided or minimized, in order to protect the historical trail experience, context and viewshed.

## Works Cited

Bureau of Land Management

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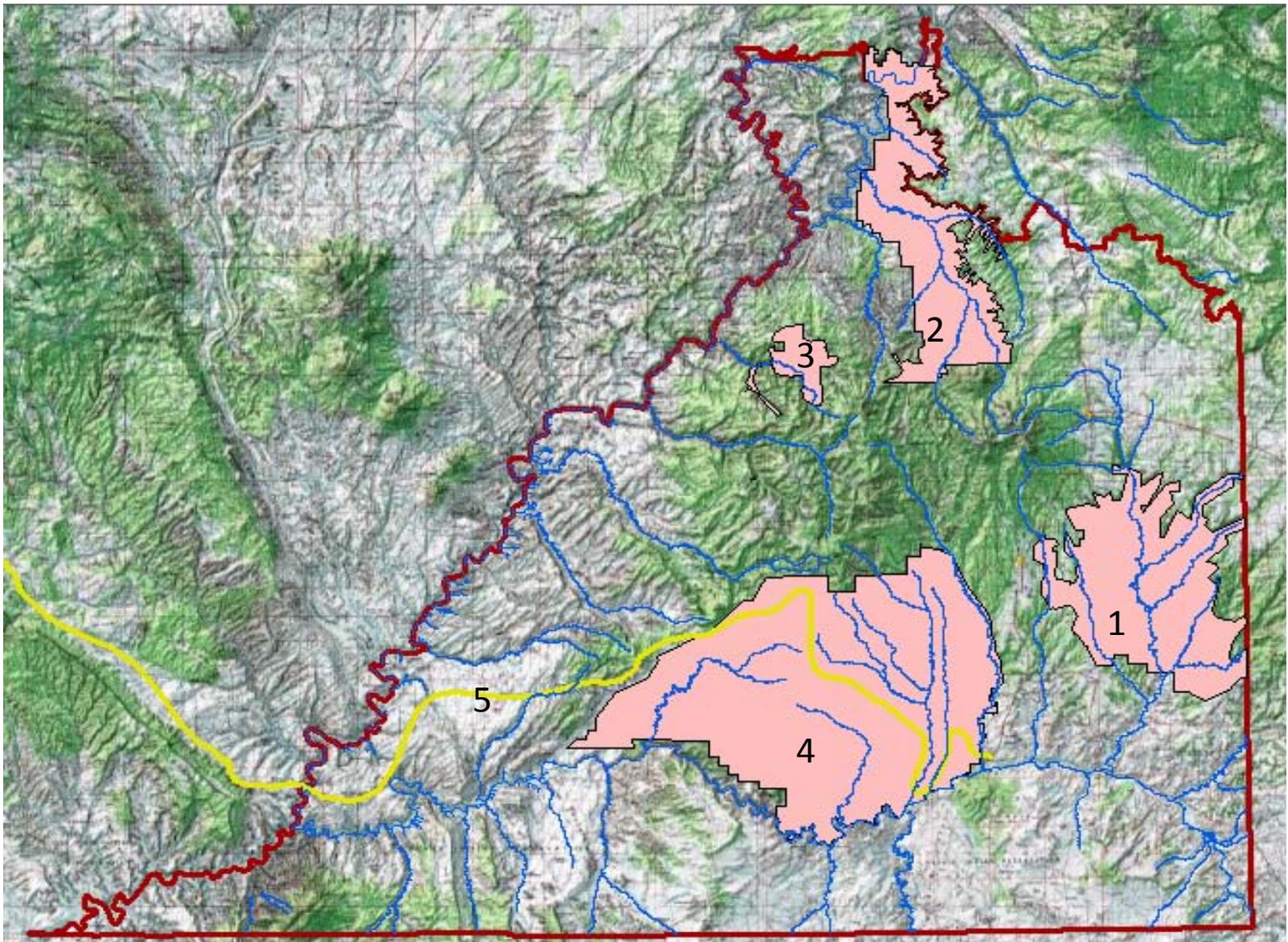
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Red = BLM Monticello FO boundary; Light pink = areas of archaeological significance;  
1 = Montezuma Canyon; 2 = Indian Creek; 3 = Ruin Park; 4 = Cedar Mesa;  
5/yellow line = Hole-in-the-Rock Trail