



Colorado Plateau Archaeological Alliance

23 September 2014

Ahmed F. Mohsen
Price Field Office
Bureau of Land Management
125 South 600 West
Price, Utah 84501

Dear Mr. Mohsen:

The Colorado Plateau Archaeological Alliance (CPAA) appreciates the opportunity to comment on the Nine Mile Canyon Special Recreation Management Area Management Plan Scoping Document, dated August 26, 2014. Since 2005, CPAA has advocated for cultural resources on public lands in the West to encourage land management practices that facilitate the long-term preservation of archaeological resources for their scientific and educational values, as well as their intrinsic heritage values to modern American Indian groups.

As traditionally applied in the NEPA planning process, “scoping” is that part of the process that identifies issues and concerns that should be addressed in an actual draft management plan. In this instance appears the BLM is requesting public comment on the actual scoping document itself, whereas the request for public input on the issues that should be addressed in a management plan is not clearly articulated (it is actually deeply buried on Page 5 and is easily missed). The BLM’s on-line information regarding this Scoping Document does not clearly explain to the public exactly what a Scoping Document is or the nature of public input being sought. The lack of clarity as to exactly what information is being sought makes it difficult for interested parties (those not already steeped in the NEPA planning process) to participate in the development of a recreation plan for Nine Mile Canyon.

The objectives outlined in the Scoping Document offer an adequate baseline from which to begin discussions, but these issues should not be considered comprehensive. There are several points where a draft management plan could be improved and/or augmented to address other recreation management issues and concerns.

- 1) On Page 5 Paragraph 1 it states the EA will update the 1995 planning document. This 1995 document is approaching 20 years old and it could not have foreseen changes in recreational use over that time. Any updates to the 1995 plan should address issues and recreational trends prevalent in today’s world, including:
 - A major issue that has emerged in recent years is the recreational use of unmanned aerial drones by private individuals to identify and photograph archaeological sites in remote settings. These images are frequently posted on the Internet, and sites once protected by their isolation and difficult access are now becoming widely known. It is inevitable that some of these sites, despite their difficult access, will be

adversely affected by individuals using ropes and climbing gear to gain access to them. If and how to manage drones should be considered in the management plan.

- Another issue that should be addressed is what is commonly referred to as “extreme sports,” simply defined as extreme forms of recreation involving activities such as off-trail mountain biking and motorcycle riding, free climbing into seemingly inaccessible topographic locations, and endurance races through seemingly impassable terrain. Organized events can certainly be managed through special recreation permits. But more of a concern is the unorganized extreme sports activities by individuals or small informal groups where permits are typically not required and where individuals might be unaware of the sensitive nature of cultural resources impacted by those activities.
 - CPAA has been told (although we have not observed this directly) that helicopters have recently been used to gain access to archaeological sites in lower Nine Mile Canyon where standing prehistoric architectural sites are common. The issue of helicopter access and aerial sightseeing should be considered in a draft management plan (the National Park Service has a long history of managing aerial sightseeing activities in park air space that could provide a baseline for this discussion). Issues to be addressed could include whether or not it is appropriate for helicopters to touch down, whether the turbulence from the rotors could destabilize masonry walls and the extent of an appropriate set-back or no-fly zone, and whether there are areas where aerial sightseeing is appropriate but other areas where it is not.
- 2) Trespassing by recreational users remains a major concern of landowners in the canyon that is not adequately addressed in the Scoping Document. On Page 5, first bullet, it states the BLM will work “collaboratively with affected user groups and organizations, tribal governments, state and local officials, and other interested parties ...” In light of the fact that many of the most popular cultural sites in Nine Mile Canyon are located on private lands (e.g., Warrior Ridge, Nutter Ranch, Rasmussen Cave), this statement should be augmented to include collaboration with private landowners.
 - 3) Related to the private property issue, the objectives could be augmented to include opportunities or partnerships with private landowners to establish conservation easements wherein certain high-value recreation sites could be protected from future development. This issue might already be included in the document’s preliminary issue of “land tenure adjustments” but if that is the intent of that statement it should be more clearly stated.
 - 4) The Scoping Document indicates priorities will be established for stabilization of archaeological and historic sites. It should be noted that almost all historic structures in the canyon are located on private lands, and this would require collaboration and partnership with private landowners.
 - 5) The Scoping Document indicates the management plan will address livestock grazing within and near developed recreation sites. This statement could be augmented to include management of livestock grazing at *all* high-value recreation locations where livestock are causing direct and irreversible adverse effects to cultural resources. As currently written, the management of livestock grazing only at developed sites would seem to preclude management of livestock impacts at undeveloped recreation sites.

- 6) The preliminary issues identified in the Scoping Document should be expanded to include a discussion on priorities and opportunities for backcountry use (and whether or not backcountry use is even appropriate, or whether it should require a special backcountry permit similar to those required by the state of Utah in Range Creek Canyon). Certainly related to this issue is the management of big game hunting on public lands, including hunting in backcountry settings.

- 7) One issue of great concern to CPAA is the “preliminary” issue stated on Page 5 that the plan will address “opportunities and priorities for developed and primitive camp sites and dispersed camping.” We appreciate the fact this issue will be addressed, and camping will certainly be a difficult issue on which to find consensus. Current proscriptions on camping in the canyon are currently ignored by the public, and camping will like continue given the absence of any information in Nine Mile Canyon or on the BLM web site as to where camping is allowed (or not allowed). We believe carefully managed camping is preferable to current non-management of camping. For much of the past decade, CPAA has conducted baseline inventories in Nine Mile Canyon that include high-visitation areas along the road and low-visitation areas removed from the road (see citations below). Our research has found:
 - The Nine Mile Road has been a travel corridor from at least 1883, and archaeological sites along the road have been severely impacted, presumably by individuals traveling on that road. A significant portion of these sites are visible from the road itself, or they are easily accessible from the road (<100 meters). Because they remain visible from the road, it would be nearly impossible to deter future visitation here.
 - Archaeological sites removed from the road (above the second cliff level) are largely in pristine condition with minimal evidence of any public visitation. These sites are rarely visible from the road.
 - Collectively, these data suggest that malicious impacts to archaeological sites (e.g., graffiti, looting, vandalism) are largely confined to the first and second cliff levels, and that those with malicious intent rarely venture very far from the road. This also suggests that different strategies should be developed for management of sites next to the road versus those in more remote settings.
 - Our research has also demonstrated that malicious impacts have historically occurred at or near locations where individuals remain for longer periods of time (more than a couple of hours), such as historic campsites along the Nine Mile freight road in the late nineteenth and early twentieth centuries, and near historic ranches. Extreme caution should be exercised if the BLM chooses to develop formal campgrounds in any location where archaeological sites are located in the immediate vicinity. Camping in some areas of Dry Canyon might be appropriate, whereas camping in other areas like Water Canyon would not be appropriate.
 - Dispersed camping in backcountry settings so remarkably rich in pristine and undisturbed archaeological resources, where mischief can occur far out of view of

anyone else, would probably not be appropriate without significant restrictions and conditions.

- The most of the ideal camping spots in Nine Mile Canyon are located on private properties. The BLM should state its intent to collaborate with private landowners that choose to allow camping to ensure that camping activities do not cause irreparable harm to archaeological resources on private lands.

We recognize the planning process will require a balancing of competing interests and agendas, and we accept that compromises are a part of that process. As this process moves forward, we hope the BLM will keep in mind that the reason Nine Mile Canyon is a high-use recreation area – one that requires a special recreation management plan – is largely because of its remarkable cultural resources that draw visitors from all over the world. Archaeological resources are non-renewable, any recreation plan developed as part of this plan must prioritize the long-term preservation and protection of cultural resources for their future scientific, educational, heritage, and recreational values. We appreciate the opportunity to work with the BLM as part of the process.

Best Regards,

Jerry D. Spangler, MA RPA
Executive Director
Colorado Plateau Archaeological Alliance
2529 Jackson Avenue
Ogden, Utah 84401
801-392-2646

**CPAA Publications Directly Relevant to SRMA Discussions
(all reports on file with the Price Field Office)**

- 2014 – *The Devil's Due: Class III Cultural Resources Inventory in the Devils Canyon Area of Nine Mile Canyon, Carbon, County, Utah.* Colorado Plateau Archaeological Alliance, Ogden, Utah.
- 2013 – *Devil's Playground: Site Documentation and Comparative Analysis of 42Cb3162 With Complete 1931 Claflin Emerson Expedition Field Notes.* Colorado Plateau Archaeological Alliance, Ogden, Utah.
- 2012 – *Fremont, Freighters and Flagpoles: An Archaeological Inventory of the North Side of Nine Mile Canyon Between Gate Canyon and Pete's Canyon.* Ogden: Colorado Plateau Archaeological Alliance.
- 2012 – *The Upper Fringe: Archaeological Inventory in Upper Nine Mile Canyon, Carbon County, Utah.* Colorado Plateau Archaeological Alliance, Ogden, Utah.
- 2011 -- *Formal Site Documentation and Analysis of Visitor Impacts at Warrior Ridge (42Dc1), Duchesne County, Utah.* Colorado Plateau Archaeological Alliance, Ogden, Utah.
- 2011 -- *Of Owls and Cranes: A Cultural Resource Inventory of Section 35, Township 11 South, Range 14 East, Middle Nine Mile Canyon, Duchesne County, Utah.* Colorado Plateau Archaeological Alliance, Ogden, Utah.
- 2011 -- *The Pete's Canyon Complex: Formal site Documentation and Analysis of Visitor Impacts in Nine Mile Canyon, Duchesne County, Utah.* Colorado Plateau Archaeological Alliance, Ogden, Utah.
- 2011 -- *The Nutter Ranch Project: Investigations in the Gate Canyon Area of Nine Mile Canyon, Duchesne County, Utah.* Colorado Plateau Archaeological Alliance, Ogden, Utah (in prep.)

- 2009 – *The Nutter Ranch Project: Preliminary Report of the 2008 Intuitive Surveys*. CPAA manuscript on file, Price Field Office, Price, Utah.
- 2006 – *Chasing Ghosts: An Analysis of Vandalism and Site Degradation in Range Creek Canyon, Utah*. *Utah Museum of Natural History Occasional Papers* 2006:1. Salt Lake City.