

December 17, 2020

Mr. Ryan Nehl, Forest Supervisor
Mr. Kyle Beagley, Forest Plan Revision Team Leader
Manti-La Sal National Forest

Mr. Nehl and Mr. Beagley,

This is my second set of comments on the Draft Revised Forest Plan dated October 2020. They concern cultural resources on the Monticello Ranger District.

Section 2.8 Cultural and Heritage Resources

Section 106 of the NHPA is the only protection being provided to cultural resources on the Monticello Ranger District in the draft plan, and it is a Federal requirement. Much more in the way of recognition and protective measures for cultural resources and cultural landscapes should be included. The two largest threats to these cultural resources are wildfire and grazing. Nowhere does this draft document discuss a requirement to limit grazing in areas with important cultural resources. Why not? Either you are going to protect cultural resources or you are not.

In the draft plan, the Forest Service seems to be saying that nothing is known about the significance of the cultural resources or the cultural landscapes on the Monticello Ranger District, and therefore a start will be made to identify them sometime in the future. The record shows that over the years more archaeological sites have been recorded than are needed for the Forest Service to recognize their significance by nominating National Register Districts and by nominating of specific sites to the National Register as required by Section 110 of the NHPA (Sec. 110(a)(2)(A)). Back in the 1950s the Monticello Ranger District proposed an "Archaeological Area" for Hammond Canyon (Gunnerson 1960). (I photographed the sign years ago when I was in that area [see photo]). The proposal was not implemented, but even in the 1950s the significance of the cultural resources on the Monticello Ranger District was being recognized. In the late 1960s, an undisturbed archaeological site was found in Woodenshoe Canyon by Forest Service personnel. As a direct result, the first District Archaeologist was hired in 1970. Then in 1971 the Elk Ridge Archaeological Project was started. It lasted until 1974 and "over 2,000 archaeological sites have been located" (DeBloois 1975,vii). In the 50 years since that first District Archaeologist was hired, hundreds of additional archaeological sites have been recorded by subsequent District Archaeologists. The lack of a commitment in the draft plan to use the existing information about cultural resources and cultural landscapes to start providing recognition and protection for them indicates an unwillingness by the Forest Service to admit to the importance of these non-renewable resources.

Section 3.4.1 Elk Ridge Geographic Area: Goals (03) states: "Define, document and nominate a South Cottonwood Wash archaeological district or multiple property listing for listing on the National Register of Historic Places over the life of the plan." Over the life of the plan? The Forest Service already has all of the necessary information to nominate a National Register District. What the Forest Service doesn't have is a commitment to do this. It would require

providing adequate funding to hire either an in-house archaeologist or an outside contractor to write the nomination. Either way, adequate funding is the key. This should be done immediately. In my files I found a copy of a 1992 draft "Request for Proposal: Monticello Ranger District Prehistoric Overview and Abajo Anasazi National Register District Nomination." Obviously nothing became of this attempt at a National Register District nomination. Why?

And nowhere in the draft plan (Sections 2.14, 2.8, 3.4.1) is there mention of the "Record of Decision Modifying Specific Aspects of the January 12, 1993 Record of Decision" for the FEIS for Oil and Gas Leasing on Lands Administered by the Manti-La Sal National Forest. This decision created a "No Leasing" area of about 45,000 acres to protect cultural resources and cultural landscapes on the Monticello Ranger District. (See attached map.) While it was a start, an even larger area should have been protected. Why doesn't the draft plan acknowledge this decision and establish a cultural emphasis area on the District?

I repeat: The Forest Service has more than adequate information on the cultural resources and cultural landscapes on the Monticello Ranger District to start recognizing and protecting them now. It is inexcusable to claim that something will (may?) be done sometime in the indefinite future.

The significance of the cultural resources on the Monticello Ranger District has been ignored for too long. The revised Forest Plan should make some concrete decisions on cultural resource protection, not just vague promises that can be ignored by future Forest Supervisors.

Sincerely,


Owen Severance

c: Regional Forester
Mr. Engelhart
Mr. Neff

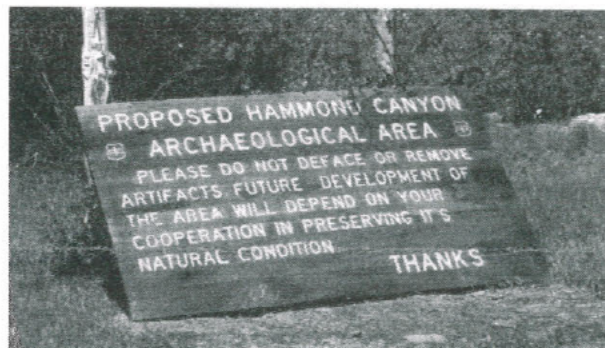
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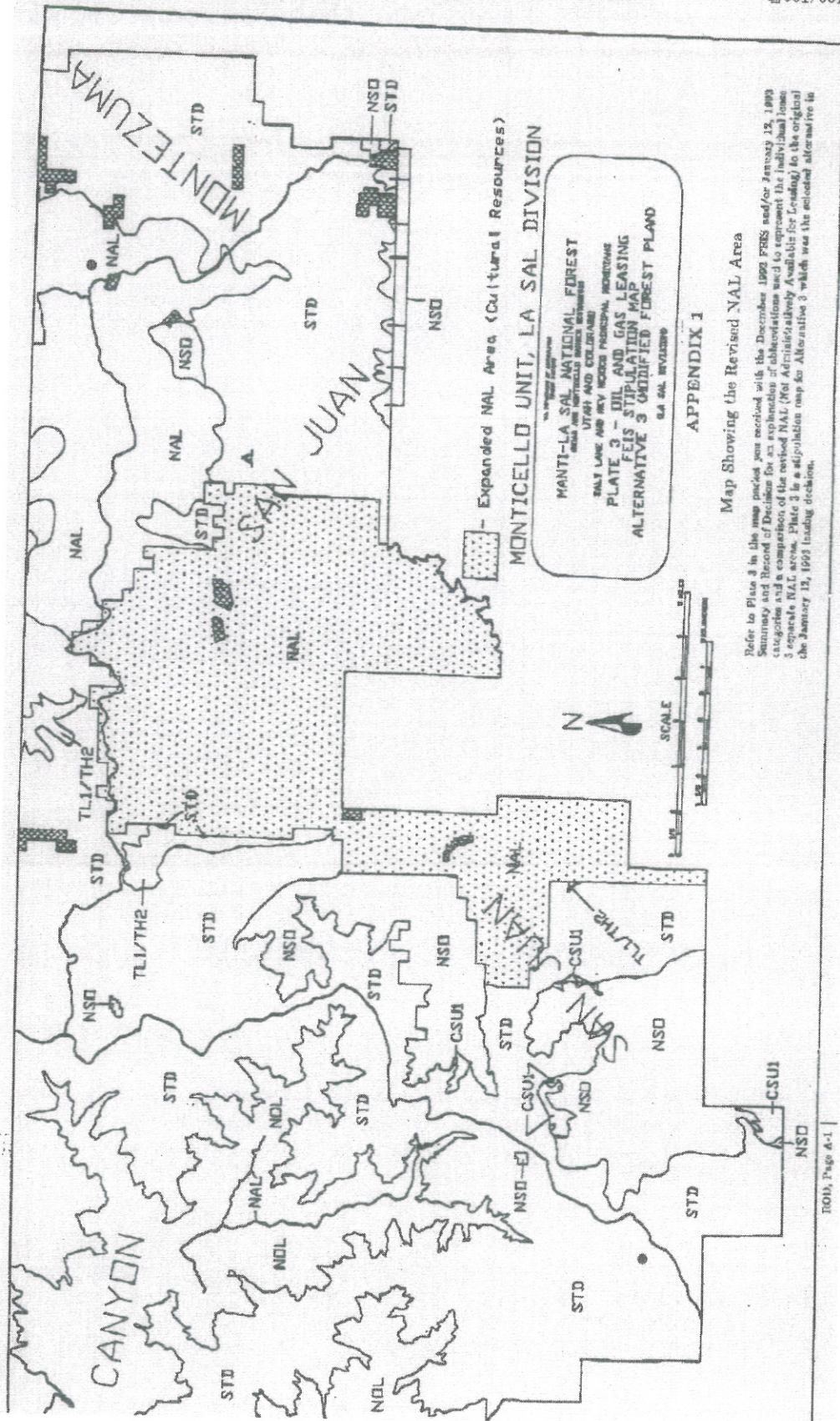
Gunnerson, James H.

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DeBloois, Evan I.

1975 *Archeological Report No. 2*. USDA Forest Service, Intermountain Region, Ogden.





Map Showing the Revised NAL Area