



NATIONAL TRUST
for HISTORIC PRESERVATION®

Protecting the Irreplaceable®

May 16, 2007

Ms. Selma Sierra
Director, Utah State Office
Bureau of Land Management
P.O. Box 4155
Salt Lake City, Utah 84145-0155

Dear Ms. Sierra:

On behalf of the National Trust for Historic Preservation, I am writing to endorse the Bureau of Land Management's recent decision to reopen the criminal investigation into the unauthorized construction of a system of all-terrain vehicle (ATV) trails in Recapture Wash near Blanding, Utah. I also strongly urge you to take immediate and aggressive action to close the trail system to all forms of motorized use.

As you are aware, Recapture Wash contains a significant concentration of archaeological sites eligible for listing in the National Register of Historic Places. The area potentially affected by motorized use of the trail system alone contains thirty-one eligible sites. Nine of these sites are greater than one acre in size, including the remnants of a multi-story pueblo and ancestral Puebloan community center known as the Recapture Great House. According to archaeologist Donald R. Keller, who completed a cultural resources survey of the trail system in November 2006 per BLM's request, the portion of Recapture Wash encompassing the Recapture Great House merits consideration for a National Register Historic District designation.

Several trail segments cross directly over and adjacent to room blocks, middens, and other components of all nine archaeological sites exceeding one acre in size, including the Recapture Great House. On March 7, 2007, two National Trust staff attorneys visited Recapture Wash and observed the direct damage caused to several sites by the trail system's construction and use. Based on their observations, we believe that the parties responsible for this damage violated the Archaeological Resources Protection Act, which prohibits non-permitted alterations to archaeological resources on federal land.

It is extremely important that BLM hold the responsible parties accountable for their illegal actions in Recapture Wash. Federal lands in and around San Juan County contain hundreds if not thousands of nationally significant cultural resources, many of which are located on the Cedar Mesa Plateau immediately west of Blanding. Tolerating unauthorized behavior like the construction of the Recapture Wash trail system will diminish BLM's ability to protect and preserve these resources in the future. To this end, I urge the Utah State Office and Monticello Field Office to fully participate and cooperate in the current criminal investigation.



*Recipient of the National
Humanities Medal*

Additionally, I formally request that you issue an immediate closure order for the ATV trail system pursuant to 43 C.F.R. § 8341.2. This regulation requires the immediate closure of areas or routes when BLM determines that motorized use is "causing or will cause considerable adverse effects" upon cultural resources. As documented and disclosed to BLM by Mr. Keller, construction and on-going use of the trail system has caused and will continue to cause adverse effects on several cultural sites eligible for the National Register.

Thank you for your prompt attention to the concerns expressed in this letter. Please do not hesitate to contact me directly if you have any questions at (202) 588-6035.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul W. Edmondson", with a stylized flourish at the end.

Paul W. Edmondson
Vice President and General Counsel

Cc: Brett Tolman, United States Attorney, District of Utah
Earl E. Devaney, Inspector General, U.S. Department of the Interior
Rick Healy, Staff Director, Subcommittee on National Parks, Forests, and Public Lands,
House Committee on Natural Resources
Rob Winthrop, Acting Field Manager, Monticello Field Office
Barbara Pahl, Regional Director, National Trust for Historic Preservation