

July 1, 2008

Mr. Terry Catlin  
Utah State Office  
Bureau of Land Management  
P.O. Box 45155  
Salt Lake City, UT 84145-0155

**NATIONAL  
TRUST  
FOR  
HISTORIC  
PRESERVATION®**

Dear Mr. Catlin:

For the reasons set forth in the designation proposed by the Southern Utah Wilderness Alliance, the National Trust for Historic Preservation believes that the cultural values of Parowan Gap meet the “relevant and important” criteria of 43 C.F.R. Part 1600. Accordingly, the Bureau of Land Management (BLM) should designate Parowan Gap as an Area of Critical Environmental Concern (ACEC) through an amendment to the Cedar City resource management plan (RMP).

As shown in the proposed designation, the cultural values of Parowan Gap are significant and more than locally important. These significant values include an “extensive and impressive” concentration of rock art within a “core area” of Parowan Gap, which in 1975 the National Park Service listed in the National Register of Historic Places. The broader area surrounding the national historic district and included in the proposed designation also contains significant cultural values, including Traditional Cultural Properties (TCPs) and sacred sites of importance to the Hopi Tribe and Paiute Tribe of Utah.

Recent events have made clear that the cultural values of Parowan Gap require special management attention. In 2005 and again in 2007, BLM offered parcels within the boundaries of the proposed ACEC in oil and gas lease sales. According to the Cedar City Leasing EA, oil and gas development pursuant to these leases would have adversely affected the significant cultural values of Parowan Gap. EA at 41. Although BLM eventually deferred the parcels, the overarching management plan that authorized the lease sales remains unchanged.

Approving the proposed designation would serve several important administrative objectives. First, the designation would ensure that the Cedar City RMP provides Parowan Gap with the “special management attention” necessary to “protect and prevent irreparable damage” to its significant cultural values. See 43 U.S.C. § 1702(a). The designation would also assist BLM in avoiding adverse effects on TCPs and sacred sites, a requirement of Section 106 of the National Historic Preservation Act, 16 U.S.C. § 470f, and E.O. 13007. Finally, the designation would implement a key objective of the Cedar City RMP by providing “maximum protection” to Parowan Gap. Cedar City RMP at 163.

Thank you for considering the proposed ACEC designation for Parowan Gap. Please contact me at (202) 588-6341 if you have any questions or concerns.

Sincerely,



Ti Hays  
Public Lands Counsel

cc: Terry Morgart, Hopi Tribe