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DEPARTMENT OF NATURAL RESOURCES

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July 19, 2016

Kirk Nicholes
Alton Coal Development, LLC
463 North 100 West, Suite 1
Cedar City, UT 84721

Subject: Site 42KA2043 Eligibility Reassessment; Proposed Barricade and Monitoring at Site 42KA1313; all associated with ongoing activities on the South Private Lease Area of the Coal Hollow Mine, Kane County, Utah.

Dear Mr. Nicholes:

The Utah Division of Oil, Gas and Mining (DOG M) Coal Regulatory Program has received notification Alton Coal Development identified the potential need to use an extended portion of their permit area for borrow material. Implementation of this proposal would impact site 42KA2043, which was recommended Eligible for the National Register of Historic Places (NRHP) in a 2005 re-inventory report produced in association with environmental compliance efforts for the Coal Hollow Mine Project. At this time, DOGM has re-assessed the eligibility of the site and the proposed effects to the site associated with project implementation. The Utah SHPO concurred with this determination in correspondence dated July 11, 2016. Therefore, proposed use of the Pit 10 area for the Coal Hollow Mine South Private Lease Area will have a determination of No Historic Properties Affected with regard to site 42KA2043.

First recorded in 1980 by Northern Arizona University, the site comprised approximately 500 flakes of lithic debitage (primarily cherts, with basalt and obsidian), two bifaces, five scrapers, six sherds of ceramic exhibiting fingernail incising, one fragment of a Desert side-notch point, and one trough metate fragment. No features were noted, and the recorder indicated the site, likely a temporary camp site, did not exhibit sufficient data potential to recommend it be considered Eligible for the NRHP. No formal Utah State Historic Preservation Office (SHPO) concurrence is on file relating to the 1980 recommendation.

A revisit of the site in 2005 found the overall size had increased, and 12 utilized flakes, six projectile points (no noted cultural or temporal affiliation were documented), five bifaces, one core fragment, the previously noted Desert side-notch point, metate fragment, and fire cracked rock, as well as the 500+ pieces of debitage were recorded. No ceramics were noted during the 2005 revisit, and no features were identified at the site. Although the site lacked evidence of subsurface features, it was subsequently recommended Eligible according to a 2005 cultural resource inventory (Stavish 2008) as it was deemed "likely to contribute of (sic) such research domains as site function, chronology, subsistence, material cultural and spatial organization," (IAMCS 42AK2043 updated 2005). This recommendation was supported by SHPO, and the site was deemed Eligible for the NRHP under Criterion D.

To date, a total of eleven other sites exhibiting similar characteristics have been excavated for the purposes of data recovery within the South Private Lease Area of the Coal Hollow Mine. The application of a common set of research questions focusing on chronology, subsistence, material culture, and spatial organization have been applied to more diverse sites with limited success. According to the report prepared after the testing of the first eight sites within the Coal Hollow Mine South Private Lease Area, "the temporally ambiguous, but clearly repetitive, nature of the sites presents clear problems in interpreting changes in subsistence, mobility, and site function in a clear and meaningful manner. Future archaeological research in the Alton Amphitheater should focus on prehistoric sites with cultural features, intact cultural horizons, or with the potential to provide absolute dates," (Stavish 2010).

Based on a review of the composition of site 42KA2043 represents one of these repetitive sites, exhibiting no clear, intact cultural horizons and lacking features. It does not appear as if the excavation of this site will provide additional, previously unknown or unavailable information useful in furthering the understanding of the prehistoric occupation and utilization of the Alton Amphitheatre. It is the



determination of DOGM site 42KA2043 is Not Eligible for the NRHP under any criteria. It is the professional opinion of the DOGM archaeologist any potential data available at site 42KA2043 would not provide new or additional information useful to a further understanding of the following beyond that which has been provided in previous site visits and documentations:

- Site function - a temporary, short-term camp location
- Chronology - with the exception of the Desert side-notch point and the Paiute brownware ceramics, no recorded projectile points provide definitive cultural affiliation; based on the DNS and ceramics, the site most likely represents a use period post-dating 1000 Before Present (BP), most likely proto-historic/contact period (800-200 BP)
- Subsistence – with no identified features and only a single metate fragment, the likelihood of identifying sufficient faunal or botanical remains to make conclusive statements pertaining to subsistence patterns is very limited
- Material culture – while brownware ceramics were noted at the site (n=6) in 1980, they were not present in subsequent revisits; other noted artifacts on the site lack definitive cultural affiliation and do not provide additional data useful in understanding material cultural traditions of the prehistoric peoples of the region
- Spatial organization – again, no features were noted at the site, which appears to be a temporary camp with limited use

A second site, 42KA1313, is addressed in the proposed report, and recommended treatment measures include barricading and monitoring to avoid site disturbance as it is located on lands under the jurisdiction of the Bureau of Land Management and outside of the approved permit area. It is the opinion of DOGM these avoidance measures are appropriate and must be in place to ensure no unanticipated Adverse Effects to site 42KA1313; SHPO concurred with DOGM in correspondence dated July 11, 2016.

Sincerely,



Daron Haddock
Coal Program Manager

References Cited

Stavish, Patricia

- 2008 *Cultural Resource Inventory of Alton Coal Development's Project Area, Kane County, Utah*. Montgomery Archaeological Consultants, Inc. Report U-05-MQ-1568bp on file with Utah SHPO, Salt Lake City, Utah. (See also Report U-05-MQ-0346)
- 2010 *Archaeological Data Recovery at Sites 42KA2042, 42KA2044, 42KA2068, 42KA6104, 42KA6105, 42KA6106, 42KA6107, and 42KA6108 Kane County, Utah*. Montgomery Archaeological Consultants, Inc. Report U-10-MQ-0504bp on file with Utah SHPO, Salt Lake City, Utah.