



Society of Vertebrate Paleontology

SVP Headquarters • 7918 Jones Branch Drive, Suite 300
McLean, VA 22102, USA
Phone: +1 (301) 634-7024 • Fax: +1 (703) 506-3266
Email: svp@vertpaleo.org • Web: www.vertpaleo.org
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February 1, 2022

Ms. Nicolle Gaddis-Wyatt
Field Manager, Moab Field Office
Bureau of Land Management
Email: utmbmail@blm.gov

Dear Ms. Gaddis-Wyatt,

As leaders of the Society of Vertebrate Paleontology (SVP: <http://vertpaleo.org/>), we are writing about damage to the Mill Canyon Dinosaur Tracksite that appears to have occurred during an upgrade to visitor facilities. SVP is a non-profit global scientific organization with about 2,000 researchers, educators, students, and enthusiasts, whose aim includes protection of vertebrate fossils and fossil sites. We have always enthusiastically partnered with BLM and other agencies to offer professional assistance on matters relating to our mutual goals of preserving and studying paleontological resources on federal lands, including ongoing collaboration on the 2009 Paleontological Resources Preservation Act (PRPA).

Recent reports and photographs from our membership about damage at the Mill Canyon site are disturbing and we fear that irreparable, and avoidable, damage has been done to this scientifically important site. As you know, PRPA Section 6302 requires the Bureau to “manage and protect paleontological resources on Federal land using scientific principles and expertise”. On behalf of our membership, we would appreciate answers to the following questions:

- 1) Was the project’s environmental assessment (EA) ([DOI-BLM-UT-Y010-2021-0092-EA](#)) adequate?
- 2) Did a qualified paleontologist assist the Moab Field Office in preparing and analyzing environmental assessment DOI-BLM-UT-Y010-2021-0092-EA?
- 3) Were the conditions of approval that were listed in the environmental assessment followed when the work was authorized on the site?
- 4) Was a pre-work assessment performed by a qualified paleontologist to document the current condition of the paleontological resources prior to work at the site?
- 5) When will a damage assessment be conducted by a qualified paleontologist to assess recent damage and to prevent future damage to the site?

How can SVP assist the BLM in the future to better manage paleontological resources on public lands? Please let us know if our members can lend their expertise in assessing the damage at Mill Canyon or assist in the scientific aspect of planning on future projects.

Yours sincerely,

Jessica M. Theodor, Ph.D.

SVP President

Margaret E. Lewis, Ph.D.

SVP Vice President

Emily J. Rayfield, Ph.D.

Past SVP President

CC: BLM Canyon Country District Manager, Gary Torres, blm_ut_mb_mail@blm.gov
BLM, Utah State Director, Greg Sheehan, blm_ut_state_director@blm.gov