

From: Bowman, Randal
To: [Nikki Moore](#)
Cc: [John Ruhs](#); [Kathleen Benedetto](#); [McAlear, Christopher](#); [Aaron Moody](#)
Subject: Re: Mojave Trails NM Initial Data Request Exec Summary, Data Summary, New Information Request Responses
Date: Tuesday, June 20, 2017 4:22:06 PM

I don't care about format, so whatever is easiest for you.

On Tue, Jun 20, 2017 at 5:17 PM, Nikki Moore <nmoore@blm.gov> wrote:

Hi, I can provide clarification. Would you like the responses individually as you go through them, or compiled, or both?

Nikki Moore
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On Jun 20, 2017, at 5:08 PM, Bowman, Randal <randal_bowman@ios.doi.gov> wrote:

I have few questions on this, and will be going through the others in the coming days now that the public comment review is going smoothly, so may have more.

On the historic preservation answer to the additional questions, options for protection of resources -

- National Historic Preservation Act, (NHPA) The National Historic Preservation Act has no regulatory means to require Historic Properties be avoided. It requires following a process that is transparent and if a proposed undertaking cannot be designed in order to avoid adverse effects to a historic property, then the Government must go through a consultation process to resolve the adverse effects. This law prefers and recommends avoidance or minimizing effects, but it has no regulatory means to require avoidance.

- Could BLM as the managing agency not avoid any historic properties on its own initiative. Similarly, for these two -

- [Paleontological Resources Preservation Act, \(PRPA\)](#) does not require public involvement and transparency.
- [Archaeological Resources Protection Act, \(ARPA\)](#) addresses theft and damage to cultural resources that are of archaeological importance. It does not apply to project approvals or the protection of cultural resources.

- couldn't BLM provide for no development in areas with significant resources eligible for PPRA and ARPA protection through the management plan? This would seem address both of the cited issues, although its not clear to me why the agency would want public involvement and transparency on these two issues given the risks of looting.

On Wed, Jun 14, 2017 at 8:53 AM, Moore, Nikki <nmoore@blm.gov> wrote:

Hi Randy,

We have completed our review of the initial responses provided in response to the April 26, 2017 Executive Order 13792 and initial data request for the Mojave Trails National Monument. Please find attached an executive summary and data summary. These two summary documents along with the requested data and supporting sources of information have been uploaded to the respective Google Drive folder for the Mojave Trails National Monument.

Per your request, I have also attached the responses to the new, additional information requested in a word document. ("Mojave Trails_New Information Request_6_12_2017")

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