

Dedicated to preserving our unique and irreplaceable historic & cultural resources

Bureau of Land Management, Wyoming State Office
5353 Yellowstone Rd.
P.O. Box 1828
Cheyenne, WY 82003-1828.

2010 JUL 15 AM 10:00
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE
CHEYENNE, WY

14 July 2010

Dear Land Management Professionals:

I am writing today on behalf of the Alliance for Historic Wyoming to protest the proposed oil and gas lease sale on August 3, 2010 of several parcels of land in the South Piney Creek area of Sublette County, Wyoming. The Alliance for Historic Wyoming (AHW) is a statewide nonprofit organization dedicated to preserving Wyoming's diverse historic and cultural resources. We work with citizens around the state and across the country who are concerned about ensuring these irreplaceable historic resources exist for future generations.

In particular, we are writing to protest the proposed sale of parcels **WY-1008-074** and **WY-1008-075**. Available information indicates that these parcels lie immediately adjacent to or directly on portions of the Lander Trail, an historically significant national emigrant trail that is eligible for listing on the National Register of Historic Places (NRHP) and is a recognized alternative route of the Oregon Trail National Historic Trail. Any federal undertaking that might affect these nationally historic trails must be undertaken in accordance with the National Historic Preservation Act (NHPA) which requires that, first and foremost, the federal agency should work to avoid all adverse effects to NRHP-eligible properties. Clearly, any industrialization of these historic trails or their surrounding landscape will create and significant adverse effect to the historic Lander Road. It is simply not possible to adequately mitigate such impacts and, therefore, in order to avoid the adverse effects that would ensue from possible oil and gas development on these parcels, they should be withdrawn from the proposed sale.

Most BLM projects have incorporated a quarter-mile NSO buffer near the historic emigrant trails. However, this is simply not adequate to protect the setting of these important sites. Any industrial development between one-quarter mile and the visual horizon near these trails can be expected to constitute a major impact on the trail. The associated wells, pipelines, roads, tanks, dust, and related noise would further degrade the important viewshed that lends these historic trails their unique character and aesthetics. Only in an undisturbed state can these historic properties be properly appreciated and a potential lease sale astride or adjacent to these trail segments clearly threatens that status. Oil and gas development on either of these lease parcels will destroy the viewshed of the Lander Road, at a minimum, thereby disrupting permanently the public's ability to enjoy these areas in their natural state. It also does not appear that the BLM has conducted pre-leasing NEPA analysis to

1036 Monte Vista Drive, Casper, WY 82604 E-mail: contact@HistoricWyoming.org
The Alliance for Historic Wyoming is a 501(c)(3) nonprofit organization

Board of Directors: Barbara Dobos ⊕ Sarah Egolf ⊕ Mary Humstone ⊕ Katherine Longfield ⊕ Jason Marsden ⊕ Tom Rea ⊕ Misty Stoll ⊕ Lesley Wischmann

determine the environmental impacts that oil and gas development might have along this important trail corridor.

The Mission Statement of the BLM's National Scenic and Historic Trails Strategy and Work Plan is:

... to connect people to the land and its scenic wonders, our heritage, our cultures, and our communities. Through partnerships, community involvement, citizen action and agency commitment, the BLM will administer and manage the diverse network of Congressionally-designated trails and associated landscapes. In order to provide for enriching and inspiring experiences, the BLM, in fulfilling our multiple-use mandate, **will protect and sustain trail resources while fostering visitor enjoyment, appreciation, and learning opportunities.** (Emphasis added.)

Every year, more and more people from across the nation and the world are discovering the joys of exploring their heritage on the national historic trails. Heritage tourism continues to represent the fastest growing sector of the tourism industry which, as you know, represents a significant part of Wyoming's economic base. In this state, we have been blessed with the best remaining remnants of the historic emigrant trails extant anywhere in the nation. This is widely known among those who pursue heritage tourism and contributes significantly to our state's tourism income. If Wyoming becomes known as the state where there used to be great trails but where, sadly, they have now become irrevocably impacted by industrialization, the state and local economies that depend heavily on these tourism dollars stand to be negatively impacted. Every bit of visible development along these trails lessens the heritage tourist's ability to fully enjoy their trails experience and learn from our historic past. Oil and gas leases in this area are simply not compatible with the resource goal of the BLM's National Scenic and Historic Trails Strategy and Work Plan to "protect and sustain trail resources to provide for enriching and inspiring experiences, scenic landscapes, or historic settings." Siting oil and gas development immediately adjacent to this historic trail will clearly not enhance opportunities for trail users to enjoy the diverse and unique phenomena which occur along the trail. These lease parcels should be issued only with No Surface Occupancy stipulations for the entire viewshed of the historic trail or site, or should be withdrawn permanently from this and all future lease sales.

These trails are a vital part of the history of the West and preservation of not only the trails, but their accompanying viewsheds and aesthetic qualities, is important to our understanding of the growth and development of our state, the West, and our country. These trails provide glimpses into the lifestyle of the Old West and connect us to our past, thereby also helping us to confront the challenges we face today. For all these reasons, these trails need to be preserved by withdrawing these parcels from the proposed lease sale.

We are also concerned about the possibility that any industrial activity in this area may disturb suspected gravesites in the area. As you surely understand, a large percentage - some estimates are as high as 10% - of those who traveled west on the emigrant trails died en route. Because of the circumstances surrounding these deaths, the bodies were often interred hurriedly and without any

1036 Monte Vista Drive, Casper, WY 82604 E-mail: contact@HistoricWyoming.org

The Alliance for Historic Wyoming is a 501(c)(3) nonprofit organization

Board of Directors: Barbara Dobos ⊕ Sarah Egolf ⊕ Mary Humstone ⊕ Katherine Longfield ⊕ Jason Marsden ⊕ Tom Rea ⊕ Misty Stoll ⊕ Lesley Wischmann

lasting memorials. Over the years, any number of these unmarked pioneer graves have been discovered on and alongside the historic trails in Wyoming. People familiar with the area proposed for these lease sales believe that there may well be a significant number of such unmarked graves on or near these parcels. To disturb these final resting places for a short-term gain would be a tragedy.

The necessity to provide special protections for these historic trails -- protections which satisfy the NHPA requirement that adverse effects first be avoided -- should preclude including these parcels in the proposed sale. Unless adequate pre-leasing NEPA analysis is conducted which proves that these segments of the trail will not be adversely affected by any subsequent exploration, these parcels should be withdrawn. Absent this type of analysis and adequate pre-lease stipulations, the BLM may find that they lack the power in the future to protect these resources and adhere to the requirements of NHPA. If BLM is limited in its ability to protect these resources it will be unable to fully meet its duty to "protect other natural resources and the environmental qualities" when surface operations are proposed and to ensure that plans of operation are "sound from both a technical and environmental standpoint," as required by the federal regulations governing lease sales. In addition, the Mineral Leasing Act requires the BLM to "regulate" oil and gas activities "in the interest of conservation of surface resources." Leasing these parcels, with the attendant impacts on the NRHP-eligible Lander Road, is clearly not consistent with this mandate.

In addition, we understand that these lands have been designated as Class II under the BLM's Visual Resource Management criteria. This VRM level restricts activities to those which will "retain the existing character of the landscape." Certainly, oil and gas drilling will have a seriously disruptive impact on the "existing character of the landscape." In order to protect the integrity of the BLM's own Visual Resource Management criteria, these parcels should be withdrawn from the proposed lease sales.

In light of all these concerns, we strongly urge you to withdraw parcels **WY-1008-074** and **WY-1008-075** from the August 3, 2010 lease sale.

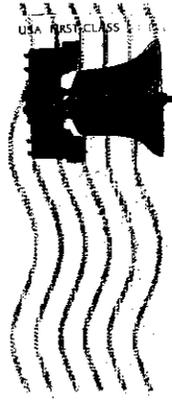
Thank you for considering our concerns.

Sincerely,



Lesley Wischmann
Alliance for Historic Wyoming
Board of Directors

Alliance for Historic Wyoming
712 South Second Street
Laramie, WY 82070



CHEYENNE WY 820
14 JUL 2010 PM 11

Bureau of Land Management, Wyoming State Office
Oil and Gas Lease Sales
5353 Yellowstone Rd.
P. O. Box 1828
Cheyenne, WY 82003-1828

82003#1828 B023

