



# OREGON-CALIFORNIA TRAILS ASSOCIATION

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January 18, 2012

Lander Field Office

Attn: RMP Project Manager

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Subject: Comments of the Draft Lander RMP/EIS

The comments presented herein are submitted on behalf of the Oregon-California Trails Association (OCTA). These comments have been approved by OCTA's national board of directors, Mr. Duane Iles, President, and the Wyoming Chapter of OCTA, Mr. Tom Rea, President.

Of the four alternatives, the Oregon-California Trails Association's (OCTA) clear preference is for Alternative B. This alternative provides the protections appropriate for the area surrounding the National Historic Trails. At the same time we find Alternatives A and C unacceptable. Alternative A maintains the status quo which is clearly not sufficient to protect the trails and their setting. Alternative C would permit impacts that would result in a situation far worse than the present situation. Alternative D, the preferred alternative, is acceptable if (1) it is not weakened and (2) certain terminology is clarified as noted below. Alternative D is a reasonable compromise.

The interest of OCTA is the preservation of the Oregon and California National Historic Trails and their setting. The historic importance of these trails to our nation's history has been documented by many writers over the past 150 years. The "cumulative impact analysis" presented in the RMP/EIS (Vol 2, Section 4.10.7) provides additional documentation of the historic trail's importance and of the special nature of the trails in Wyoming and the Lander Field Office area in particular. It would be difficult to state a better case for the protection of the trails than that presented in the "cumulative impact analysis."

Let me now turn to specific comments related to the draft text.

1. Much of the management of the areas adjacent to the trails is tied to the BLM's Visual Resource Management (VRM) system. This "system" is in fact a subjective analysis that depends upon the judgments of the team members assembled for a particular assessment. We note that the results of the assessment are only as good as the team assembled and their training. Inclusion of cultural resource specialists



and persons trained in historic landscapes, not just scenic landscapes, is imperative. How does the VRM system insure that analytic teams have the required expertise?

2. In Alternative D, terms like “minor impact” and “low contrast” are used without definition. Definitions and examples should be provided. The examples need not be all-inclusive, but should allow definition of the impacts to be allowed or disallowed.
3. The utility corridors described in Alternative D are acceptable, but should still be subject to a case-by-case analysis to insure minimal impacts. OCTA has worked with developers in the past to refine routes to avoid undisturbed trail areas. The corridors described in Alternative C are excessive and not acceptable as presented.
4. Section 4.7.12, page 1036. The material seems to refer to the requirements of Section 106 but does not specifically say so. The link to Section 106 should be clearly stated.
5. Page 1043. The statement is made that “Alternative C would result in more adverse impacts to the NHTs than Alternative A or B.” It should be noted that these additional impacts would require additional mitigation under Section 106. Often, this would not be beneficial to either a developer or the trails community.
6. Vol. 2, Section 4.7.1.3.5.4. OCTA supports the creation of a Heritage Tourism and Recreation Corridor extending to five miles on both sides of Hwy 287 as described in this section. However, the management prescriptions are unclear. Under Alternative B the corridor would be an ACEC which includes detailed management prescriptions. What are the prescriptions for the Heritage Tourism and Recreation Corridor?
7. Whether it is designated an ACEC or not, no surface occupancy should be allowed within 0.25 miles of the historic trails for all activities. This maintains consistency with the RMPs of other field offices.
8. The creation of the South Pass Historic Landscape ACEC as described in this document is strongly supported.
9. It is noted (Vol. 1, page 27) that designating Hwy 287 as a scenic byway is not addressed in the RMP because that initiative must come from a local and state

group and none has been made. Other portions of the document note the historic value of the area through which the highway passes. Some encouragement by the BLM might be enough to start the process. A statement to that effect in the RMP would be helpful.

10. Map 122. OCTA has not been provided the opportunity to conduct a detailed review of the trail condition class ratings shown on this map. Furthermore, the scale of the map presented in the RMP is inadequate for this review so we cannot comment on the accuracy of the classifications. An accurate review requires mapping and classification on USGS 1:24,000 scale maps (or better). We welcome the opportunity to conduct this review. Our studies to date indicate that most trails in the area are OCTA MET Class 1 and 2.
11. If the area is visible from the trails, the wind energy avoidance area south of Hwy 287 should be designated an exclusion area.

We appreciate the opportunity to comment on the Draft RMP/EIS. We know it has been a challenge for all involved and we extend our thanks to all who participated.

Sincerely,

A handwritten signature in black ink that reads "David J. Welch". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

David J. Welch  
OCTA Preservation, Wyoming

cc: Duane Iles, Tom Rea