



January 18, 2012

VIA E-MAIL (BLM_WY_LRMP_WYMail@blm.gov)

RMP Project Manager
Bureau of Land Management
1335 Main Street
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Re: Comments on the Draft Resource Management Plan and Environmental Impact Statement for the Lander Field Office Planning Area

To Whom It May Concern:

Thank you for the opportunity to comment on the draft resource management plan and environmental impact statement (Draft RMP/EIS) for the Bureau of Land Management's (BLM's) Lander Field Office Planning Area (LFO). We applaud the LFO for spending significant time meeting with stakeholders and developing this document, as well as for considering ground-breaking ways for managing and protecting historic trails, in particular, on BLM lands. The LFO and surrounding BLM lands contain some of the most pristine sections of historic emigrant trails in the country, including the Oregon, California, Mormon Pioneer, and Pony Express national historic trails (NHTs). As stewards of the National Landscape Conservation System, the BLM has a responsibility to manage lands within the system – including the national historic trails – in “a manner that protects the values for which the components of the system were designated.” [Omnibus Public Land Management Act Sec. 2002 (c)]. We are pleased to see the LFO working to do so in its preferred alternative, such as through expanded management corridors and strict visual resource management standards around trails, as well as creation of a South Pass Historical Landscape area of critical environmental concern (ACEC). At the same time, we respectfully offer some suggestions for modifying the Draft RMP/EIS to further protect cultural resource values.

Interests of the National Trust

Congress chartered the National Trust in 1949 as a private nonprofit organization to “facilitate public participation” in historic preservation and to further the purposes of federal historic preservation laws. 16 U.S.C. §§ 461, 468. With the support of nearly 200,000 members around the country, the National Trust works to protect significant historic sites and to advocate historic preservation as a

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fundamental value in programs and policies at all levels of government. In addition to our headquarters in Washington, D.C., the National Trust operates thirty historic sites open to the public, two field services offices, and numerous field offices throughout the country. The National Trust also maintains a list of America's Most Endangered Historic Places, to which eleven properties are annually added. In 1995, the National Trust placed South Pass on this list, due to the lack of adequate protection of this pristine area of emigrant trails from development.

I. The Draft RMP/EIS Should Incorporate Some of the Cultural Resource Protections from Alternative B into its Preferred Alternative D.

We find Alternatives A and C to be unacceptable because of their likely strong adverse impacts on cultural resources. In contrast, we strongly support Alternative B. The Preferred Alternative (D) is acceptable, albeit our second choice, as long as the terminology mentioned below is clarified and the alternative is strengthened by incorporating some of the ground-breaking measures offered in Alternative B.

Recommendations:

The National Trust recommends that the BLM revise Preferred Alternative D to include the following stipulations from Alternative B:

- [Conduct] assessments in areas where cultural...resources are threatened by development and [prioritize] endangered sites for additional protections. Draft RMP/EIS at 46 and 115.
- Use Class I Regional Overview to proactively identify areas of high, medium, and low probability for the discovery of cultural sites. Conduct non-project specific Class III inventories in areas of high development potential and of high probability for cultural resource sites. Draft RMP/EIS at 116.
- [Increase] protection for the sacred, spiritual, and/or traditional cultural properties by managing these areas with surface restrictions and avoidance within 3 miles. Draft RMP/EIS at 46.
- Manage the NHTs as [Visual Resource Management (VRM)] Class II within 15 miles of the trails and as VRM Class III at all designated NHT crossings. Draft RMP/EIS at 48.
- Develop cultural resource management plans for each property in consultation with affected tribes. Complete ethnographic studies, archeological surveys, and stewardship programs to better manage the properties. Draft RMP/EIS at 118.
- All proposed actions within areas managed as VRM Class I and II visual resources require a visual simulation prior to analysis and/or mitigation design. Draft RMP/EIS at 125.

II. The Draft RMP/EIS Should Define What is Meant by a “Minor Project”.

For mineral and realty actions, “minor” versus “major” actions and rights-of-way are contrasted but are not defined.

Recommendations:

The National Trust recommends that the BLM define what it means by “minor” and “major” actions and rights-of-way (ROWS) and provide specific criteria for how projects are categorized as such.

III. The Draft RMP/EIS Should Explicitly Define Management Elements of the Preferred Alternative’s Heritage Tourism and Recreation Management Corridor.

The Preferred Alternative’s proposed Heritage Tourism and Recreation Management Corridor is not defined in the Draft RMP/EIS.

Recommendations:

The National Trust recommends that the BLM clearly define the management elements of the Preferred Alternative’s proposed Heritage Tourism and Recreation Management Corridor. How will the BLM manage this area differently than an ACEC or a special (recreation) management area?

IV. Visual Resource Assessments Called for in the Draft RMP/EIS Should Conducted by Appropriate Specialists.

The Draft RMP/EIS contains numerous references to current and future visual resource management (VRM) class designations, and the BLM depends on those designations to manage areas around NHTs. Yet, the VRM system is actually a relatively subjective analysis whose outcome depends on the training and skills of the individuals who conduct visual resource assessments.

Recommendations:

To ensure that assessments and resulting VRM classes are as balanced and accurate as possible, teams assembled to perform the assessments should include cultural resource specialists, landscape architects, and people generally trained in cultural and historic landscapes, not just scenic landscapes.

IV. Conclusion

We commend the BLM on taking the time to consult with stakeholders and recognizing its responsibilities to cultural resources, particularly NHTs as units of the National Landscape Conservation System. We also commend the BLM on selecting a preferred alternative that contains relatively strong measures for protecting significant cultural resources. The final form of this RMP/EIS has the potential to set the standard for management and protection of NHTs across the U.S. - and certainly within Wyoming and the adjacent Rock Springs Field Office which manages the incredibly significant South Pass emigrant trails landscape - so we urge the BLM to continue to take its responsibilities for cultural resource protection very seriously as it revises this document.

Please contact us at (303) 623-1504 with any questions or concerns regarding these comments. Thank you again for the opportunity to comment on the Draft RMP/EIS.

Sincerely,



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Public Lands Advocate



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