United States Department of the Interior

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Memorandum

To: Kristin Yannone, RMP Project Manager, BLM

From: Cheryl Eckhardt, Environmental Compliance Specialist, NPS

Subject: National Park Service comments on the Draft Environmental Impact Statement for the Lander Resource Management Plan Revision Project, Wyoming

Thank you for the opportunity to review and provide National Park Service (NPS) comments on the Bureau of Land Management's (BLM) Draft Environmental Impact Statement for the Lander Resource Management Plan Revision Project in Wyoming.

**National Historic Trails**

The National Trails Intermountain Region (NTIR) office of the National Park Service administers the Oregon, California, Pony Express, and Mormon Pioneer National Historic Trails, which share a corridor through the BLM's Lander Field Area. We appreciate the opportunity to participate as a cooperating agency in this planning process and to comment on the draft Lander Resource Management Plan Revision.

Importantly, this BLM plan explicitly recognizes that National Historic Trails (NHTs) exist within a landscape context, a setting that is "an essential component in determining whether a particular trail segment contributes to the trail's overall significance." Nineteenth century wagon trails were routed largely in response to rivers, wetlands, hills, ridges, vegetation, and other natural features along the way, and these landscapes shaped the emigrants' westering experience. Historic trails cannot be understood or authentically experienced in isolation from their geographic setting. Yet, many older RMPs ignore that reality, sequester trail ruts between quarter-mile buffers, and allow development to occur right up to the buffer boundaries. So long as the old wheel ruts are retained, the thinking goes, the trail is adequately managed. Lander's document, in contrast, affirms that "historic setting is critical to providing a quality experience for visitors." It analyzes the impacts not just on wagon wheel ruts, but also on the associated landscapes, and it offers management alternatives that would help protect those landscapes. This is a crucial and positive shift in thinking about historic roads and trails.

Further, this plan gives heritage resources and extractable resources balanced consideration. Older RMPs tend to treat national historic trails as low-value recreational features to be narrowly

defined, managed around, and readily compromised for supposedly higher purposes. Some more recent RMPs help NHTs by embedding them within protective Areas of Critical Environmental Concern, but ACECs have aroused strong opposition from other interests that see them as too restrictive. In lieu of those options, this RMP's proposed alternative, Alternative D, addresses the NHTs as valuable heritage, recreational, and economic assets deserving of the same thoughtful, integrated management that is accorded to other BLM resources. Here, historic trails become neither exclusive preserves nor sacrifice areas. Alternative D is a good, balanced compromise that the National Park Service can support.

The plan's Cumulative Impacts analysis (Section 4.10.7) addresses NHTs not just in the immediate planning area but along the length of the resource, as should be done. Table 4.58 compares 28 high-potential segments of at least 25 miles' length on the Oregon, California, Pony Express, and Mormon Pioneer National Historic Trails. Staff at NTIR are aware of plans for developments that could have or have already had adverse impacts on over one-third of these high-potential segments. Table 4.59 lists eight high-potential trail segments in Wyoming: we are aware of plans that have had or could have adverse effects on nearly all of these. Intact trail across Wyoming, Idaho, and Oregon is being segmented by numerous large transmission lines and pipelines. BLM has identified nearly 2 million acres of public lands in Wyoming, Colorado, and Utah as appropriate for applications for shale oil and tar sands development, and thousands of more acres of public land in Utah, Idaho, Nevada, and California are being opened to solar and geothermal energy development. Future renewable energy developments on these lands are likely to affect significant national historic trail resources.

But wind energy developments and their associated infrastructure are poised right now to incur adverse impacts to intact remnants of the four NHTs between eastern Wyoming and western Oregon. Central Wyoming has high potential for wind energy development, and proposals for such developments, even in sensitive areas like South Pass, are proliferating. These are among the most urgent concerns for historic trails in the Lander resource area. Not only are wind turbines tall and lighted, as the RMP analysis points out, but they are sky-lined along ridge-tops, which makes them highly visible at long distances; colored bright white, which reflects the sun and contributes to their visibility; and have moving parts that catch the eye and create audible intrusions. Wind turbines also require new feeder lines to carry energy to the grid, and each new line has the potential of attracting proposals for more utilities and creating a de facto utilities corridor.

Altogether, reasonably foreseeable cumulative impacts to the four NHTs and their setting within the Lander resource area and across the West are imminent and far-reaching. The Cumulative Effects analysis touches on these points but still may understate the full extent of the impacts to trails that will result from energy developments during the life of the revised RMP.

Alternative B, of course, would best protect the NHTs from these impacts, but such a strong conservation alternative is widely seen as untenable in these economically volatile, energy-hungry times. If implemented as written, though, Alternative D will go a long way toward avoiding or softening many of the anticipated development impacts to the NHTs. Again, the proposed alternative offers a moderate, reasonable balance between the extremes of pro-preservation Alternative B and pro-utilization Alternative C.

In order for this balance to be maintained, however, it is critical that the integrity of these important NHT segments not be further compromised by the designation of above-ground utilities corridors beyond those identified in the proposed alternative. NPS support for this alternative is predicated upon the long term commitment of BLM's management team to adhere to their proposed actions. In particular, the western PacifiCorps Transmission Line Corridor shown in Alternative C, map 107, would open up the South Pass HP segment to extensive visual intrusions. The efforts of Altamont Gas Transmission Co. to bypass existing utilities corridors and build a new pipeline through South Pass a few years ago aroused tremendous public controversy, resulting in South Pass being named to the National Trust's "Eleven Most Endangered Places" list for 1995 and the World Monument Fund's "Monument Watch" in 1998. Such publicity and opposition could erupt again if a utility corridor were to be proposed for this area.

Likewise, Alternative C's Bison Basin Corridor would cross trail in two locations and then would require some sort of continuation beyond its currently mapped truncation at Highway 287 near Sweetwater Station. Extension to the north, east, or west would take the corridor through Sixth Crossing and past the new visitor center operated by the Church of Jesus Christ of Latter-day Saints. Extension eastward along Highway 287 toward Jeffrey City would take the corridor down the length of the Sweetwater Valley along the South Pass High Potential Trail Segment.

Certainly, if Alternative D were to be modified with the addition of these or other new corridors, further analysis, revision, and release of a second public review draft of the RMP would be in order.

The greater South Pass High Potential Segment is arguably the most iconic, significant, and historically precious stretch of the four-trail corridor across the West. South Pass is a National Historic Landmark. Every American schoolchild learns about this pass in the Rocky Mountains and its role in our nation's expansion. The proposed alternative, as written, would help to safeguard this important place in our history.

In conclusion, the Lander BLM Field Office is to be commended for its balanced approach and thoughtful treatment of NHT resources. This work is already generating broad discussed among the trails community, and land managers in other states are looking to it as a likely model for their own planning efforts.

Thank you for considering these comments from the National Park Service. If you have any questions regarding these comments, please contact Lee Kreutzer, Cultural Resource Specialist at 801-741-1012 ext. 118 or Lee_kreutzer@nps.gov.

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