

Partnership for the National Trails System

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January 20, 2012

VIA E-MAIL (LRMP_WYMail@blm.gov)

RMP Project Manager
Bureau of Land Management
1335 Main Street
Lander, WY 82520

Re: Comments on the Draft Resource Management Plan and Environmental Impact Statement for the Lander Field Office Planning Area

To Whom It May Concern:

On behalf of the Partnership for the National Trails System (PNTS), 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 national historic and scenic 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 well as nearly 100 miles of the Continental Divide National Scenic Trail. As stewards of the National Landscape Conservation System, the BLM has a responsibility to manage lands within the System – including the national historic and scenic 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. At the same time, we respectfully offer some suggestions for modifying the Draft RMP/EIS to further protect cultural, historic, and natural resource values.

Interests of the Partnership

The Partnership for the National Trails System (PNTS) is a tax-exempt, non-profit federation of 34 non-profit organizations, including the Oregon-California Trails Association (OCTA), Continental Divide Trail Society (CDTS), and Continental Divide Trail Alliance (CDTA), that work in direct partnership with Federal and state agencies to help sustain and manage America's 30 national scenic and historic trails. The Partnership exists to foster information exchange among the trail organizations, to provide skill-building training for volunteers and staff, to

coordinate their public policy advocacy, and to advise Federal agency managers about issues relating to the National Trails System.

The Partnership was incorporated in 2001 and received tax-exempt 501(c)3 status from the Internal Revenue Service in 2003.

Alternative B of the Draft RMP/EIS Provides the Best Protection for the National Trails and the Natural, Historic, and Cultural Resources Associated With Them and Should Be the Chosen Alternative.

The Partnership for the National Trails System (PNTS) commends the staff of the Lander Field Office for explicitly recognizing the significance, importance, and value of the segments of the Continental Divide National Scenic Trail (CDNST) and of the Oregon, California, Mormon Pioneer, and Pony Express National Historic Trails (NHTs) under its stewardship in the draft RMP/EIS. The draft RMP/EIS states that “This zone [part of the trail in the Lander FO jurisdiction] contains some of the most wide-open and undeveloped landscapes available on the *entire* CDNST.” (Emphasis added). Similarly in describing the segments of the four NHTs included in the draft RMP it states that “It is a route considered to be one of the *most pristine segments of these trails in the entire nation.*” (Emphasis added)

These statements acknowledge the critical role that their **setting** plays in providing and preserving the integrity and quality of these Congressionally authorized national trails and the value of the experience they provide to people using them. Certainly there are other places on the CDNST that provide equal or more spectacular scenery and there are more dramatic wagon ruts and swales on other segments of the NHTs. What makes the segments of these five national trails within the jurisdiction of the Lander FO so special is the expansive landscape - the setting – surrounding them that is so little altered from the time of their historic use. The heart of that landscape is South Pass – one of the iconic places of the American West – where the CDNST intersects the four NHTs.

For people interested in the history embodied in the four NHTs these segments provide easily recognized tangible evidence of the passage of thousands of wagons, horses, mules, oxen, and people through this landscape in the 19th Century. But the segments also offer the opportunity for the contemporary visitor to see the landscape in very much the condition that the emigrants saw it more than 150 years ago. That experience is not possible along these four NHTs when viewing short stretches of ruts and swales preserved in Kansas City or in highway waysides in Nebraska. Although their motive may not be tracing history the experience is similar for hikers or equestrians using the CDNST – they are seeing a landscape that the emigrants, and the Native Americans before them, saw, uncluttered by the distractions of our modern world. Put simply, the experience of the American West like it was in historic times that can be had along the five national trails within the jurisdiction of the Lander FO cannot be had as well anywhere else along them. This quality of the landscape of these five national trails is a rare condition that warrants special protection.

The segments of the five national trails and their associated natural, cultural, and historic resources within the Lander FO jurisdiction are thus very special components of our American Heritage that warrant special protection. Within the Bureau of Land Management's multiple-use management mandate there is recognition that all areas of land are not identical; some lands have very special, unique, even rare, resources. Multiple-use management does not mean nor require that every acre should be managed for all possible uses. Most of the areas of Public Land opened for mineral extraction or oil and gas or renewable energy development have de facto been given over to just one of the many possible multiple-uses to which they might be put. Just as the mineral resources exploited are not distributed equally across the landscape the national scenic and historic trails and the landscapes so critical to their integrity occur in very specific places. If disturbed or destroyed they cannot be replaced or recreated somewhere.

To protect these special places and resources Congress established the National Landscape Conservation System (NLCS) in 2009. The national scenic and historic trails on Public Lands are components of the NLCS. The resource conservation mandate inherent in the NLCS is best implemented by **Alternative B in the draft Lander RMP/EIS**. Because of the quality and integrity of the resources and landscapes of the five national trails within the scope of this RMP it is appropriate and proper to accord them the maximum protection possible. This is best accomplished by the proposed management approaches detailed in **Alternative B**. **On behalf of the Partnership for the National Trails System I urge that Alternative B be chosen as the Lander RMP.**

The Draft RMP/EIS Should Be Strengthened in the Following Ways.

- The designation of **Heritage Tourism and Recreation Management Corridors** along the 5 national trails is a very appropriate way of recognizing the importance and value of these components of our American Heritage. However, to be effective they need to be clearly defined and the management actions to implement and protect them must also be clearly defined. This designation recognizes the quality of experience that visitors to the historic and scenic trails are seeking and that the trail segments within the jurisdiction of the Lander FO can so spectacularly provide, if they are managed properly. The width of the special management corridors along the trails stipulated in **Alternative B** should be adopted and implemented.
- Similarly the **Special Recreation Management Area (SRMA)** designated along the CDNST is appropriate and necessary to provide proper protection for the integrity of the trail and quality of the experience of those using the trail. However, the management actions to protect the trail and its resources need to be detailed. For guidance in doing so the PNTS recommends following the "nature and purposes" of the trail explained in the *2009 CDNST Comprehensive Plan* and consulting with the USDA Forest Service's CDNST Administrator.
- The establishment of the **South Pass Historic Landscape ACEC** is an appropriate and essential step to protecting the integrity of the specific cultural and historic resources found there and just as importantly protecting the integrity and quality of the landscape of this iconic place in the history of the West.

- The **Visual Resource Management (VRM) system** to be used to manage the protection of the landscapes surrounding the five national trails is a valuable approach that probably meets the needs of providing high quality and aesthetic recreation experiences. However, this approach does not seem to adequately address preserving and enhancing the **“historic setting”** of the four NHTs. **“Historic setting”** is one of several terms used, but not defined, in the draft RMP/EIS. This term and others listed below needs to be defined in the document. Once “historic setting” as a concept is clearly understood some method for classifying and evaluating the historic setting of the four NHTs should be added to the assessments undertaken through the VRM approach. Where the two approaches might yield different management prescriptions those prescriptions deriving from the “historic setting” classification and evaluation should be favored.
- Terms frequently used in the draft RMP/EIS, but not defined should be defined. These terms include: **“heritage resources,” “minor impact,”** and **“low contrast.”** In the case of **“heritage resources”** it is important to have a clear understanding, perhaps with examples, of just which resources are included within this term. For **“minor impact,”** and **“low contrast”** without clear definitions of them and examples to which they would apply it is virtually impossible to judge whether management decisions justified by them actually will result in protection of the critical natural, cultural, and historic resources and/or the “historic setting” of the national trails.
- To protect against further fragmentation of the expansive landscapes along the national trails it is essential that any new utilities be confined to the utility corridors described in Alternative D. Any new utilities must also be analyzed on a case-by-case basis to insure there are minimal impacts to the national trails.

Alternatives A, C, and D Do Not Adequately Protect the National Trails and Their Settings.

While the ¼ mile wide corridor on either side of the NHTs as a special management protection zone was a bold approach to preserving the integrity of these trails in 1987, to rely on this narrow corridor in 2012, as **Alternative A** proposes to do, no longer provides the quality of protection these trails deserve. The size and scale of current wind turbines, solar arrays, and transmission lines renders a ½ mile wide protection corridor essentially useless to preserve the integrity and quality of these trails and their historic settings.

With its emphasis on resource extraction and consumption, **Alternative C** most directly threatens the integrity and quality of the national trails both by allowing the possibility of wind turbine placement near the trails and by the number of utility corridors allowed to cross them.

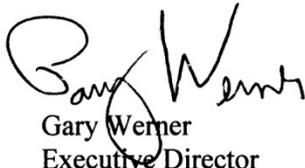
Alternative D is a compromise combining elements of Alternatives B and C. Alternative D provides much better protection for the national trails and their landscape settings than do either Alternatives A and C, but provides significantly less protection for the landscape settings than Alternative B. Alternative D is at best a second choice.

Conclusion

We commend the BLM on taking the time to consult with stakeholders and to recognize its responsibility for protecting the national scenic and historic trails, as units of the National Landscape Conservation System. The final form of this RMP/EIS has the potential to set the standard for management and protection of national scenic and historic trails across the Public Lands and certainly within Wyoming and the Rock Springs BLM Field Office which manages the incredibly significant South Pass emigrant trails landscape. The PNTS urges the BLM to take its responsibilities for cultural, natural, and historic resource protection very seriously in this document and to continue the bold preservation steps taken in the previous RMP for the national scenic and historic trails by adopting the standards and prescriptions of **Alternative B**.

Thank you again for the opportunity to comment on the Draft RMP/EIS. Please include the PNTS in all future actions taken regarding this RMP/EIS.

Sincerely,

A handwritten signature in black ink that reads "Gary Werner". The signature is written in a cursive style with a large initial "G" and "W".

Gary Werner
Executive Director
Partnership for the National Trail System