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Wyoming State Parks & Cultural Resources

State Historic Preservation Office
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January 20, 2011

Donald A. Simpson, State Director
U.S. Department of the Interior
Bureau of Land Management
P.O. Box 1828
Cheyenne, WY 82003-1828

Re: Lander Draft Resource Management Plan and Draft Environmental Impact Statement

Dear State Director Simpson:

Thank you for the opportunity to comment on the Bureau of Land Management (BLM) Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Lander Field Office Planning Area. The Wyoming State Historic Preservation Office would like to offer the following comments on the RMP.

Overall, the SHPO is supportive of Alternative D for the management of cultural resources and the National Historic Trails in the Lander Field Office. Throughout the development of the DRAFT RMP, our office worked as a cooperator with BLM to develop the document and we appreciate BLM's consideration of our comments.

It has recently come to our attention there is a need to identify additional utility corridors to facilitate potential development in the field office and other areas of Wyoming. We concur with the Governor's recommendation for a *modified* Alternative C for utility corridors; please refer to Governor Mead's comments dated January 20, 2012. The three mile proposed corridor currently proposed in Alternative C, in proximity to or that crosses the National Historic Trails is excessive in our opinion. We would suggest limiting the disturbance to the east side of the existing Bison Basin road to an area not to exceed 1/8 mile of disturbance for new construction. We would also suggest BLM only permit underground utilities along this right-of-way and not allow any above ground utilities or facilities that would cause an adverse effect to the National Historic Trails. Development along the Bison Basin road would require mitigation of adverse effects under 36CFR800 and the consideration of cumulative effects by the agency. However, with the need to identify an additional corridor for underground utility development and due to the existing disturbance from the Bison Basin road, this location is the most logical next area to consider when the other designated corridors are either at capacity or are not feasible.

An emphasis on the preservation of the National Historic Trails west of the Bison Basin Road is a priority for the State of Wyoming and consideration of limiting any future actions west of the Bison Basin road is supported by both the SHPO and the Governor's office.

As with all development in the field office and as discussed in the RMP, the BLM will require proponents to use techniques to reduce the visibility of any disturbance along the National Historic Trails. This may include, but not be limited to, boring under trail remains for distances to avoid any physical disturbance and adverse visual effect; crossing the trail in previously disturbed areas; contouring the disturbance to match the original land form as much as possible; using techniques to establish the native vegetation as quickly as possible, etc. The



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SHPO strongly supports the use of BLM's best management practices to reduce visual effects to historic properties.

We support the Lander Field Office's management plan to ensure an NSO along the National Historic Trails except for in places where there are designated utility corridors or other types of existing disturbance.

In Section 7000 "Special Designations (SD) – Congressionally Designated Trails" Records 7003 – 7006, Alternative D appears to propose a new management allocation. The trails outside the South Pass Historical Landscape ACEC would be managed as a "Heritage Tourism and Recreation Corridor." Please provide a definition of this designation and any additional information on BLM's management requirements for this type of designated corridor.

We are unclear as to the difference between the ACEC designations and those properties designated as NLCS landscapes. Could you please provide us with additional information on the differences between these designations?

Again, thank you for this opportunity to provide our comments and we look forward to working with you and your staff in preserving Wyoming's important cultural resources.

Regards,



Mary Hopkins

Wyoming State Historic Preservation Officer

Cc: Jerimiah Rieman and Aaron Clark, Governor Matt Mead Policy Advisors
Milward Simpson, Director, State Parks and Cultural Resources
Sara Needles, Division Administrator, Cultural Resources



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