



22 March 2014

Thomas Tidwell
Chief, USDA Forest Service
ATTN: EMC – Administrative Reviews
1400 Independence Ave. SW
Mailstop 1104
Washington, D.C. 20250-1104

Re: ***Objection to Land Management Plan 2014 Revision Shoshone National Forest***

Mr. Tidwell:

The Park County Historic Preservation Commission (Park County, Wyoming) would like to submit an objection to the ***Land Management Plan 2014 Revision Shoshone National Forest*** (responsible official: Daniel J. Jirón, Regional Forester Region 2). The Commission submitted substantive written comments to the draft plan (LTR#1050 by former Commission Chair Matthew Hall). The text of this objection was approved by unanimous vote of the Commission during our 20 March, 2014 meeting.

The Commission enthusiastically supports the six goals, five objectives, eight standards, and nine guidelines for heritage resources (pp. 91-94 Shoshone Land Management Plan) in the Plan. With the addition of heritage staff to implement these procedures, these will make important contributions to documenting and protecting these non-renewable Forest heritage resources. We are also pleased to see that our specific concerns about expansion of the Kirwin Historic Management Area (Area 4.5A) are addressed in the current Plan.

However, we still have a fundamental concern that was not addressed in the heritage resources Management Approach (pp. 94-95) and the associated Monitoring protocol (pp. 198-199). Specifically as stated in our 21 November 2012 letter, we are concerned that the Plan does not effectively address a workable management approach or monitoring guidelines for the hundreds of “NRHP eligible sites on the Forest [that] may not receive the protection they need under the Priority Heritage Assets focused management direction presented in the Draft Plan.” The Wyoming State Historic Preservation Office (LTR#0696) expressed similar concerns with the Priority Heritage Assets (PHA) emphasis of the draft plan. I also provided personal comments on the Draft Plan that noted that the PHA focus is troubling from a professional archaeological perspective (LTR#0969).

The 2014 Plan management approach provides the basis criteria for selection of PHA’s and notes that the PHA list is dynamic and updated annually (p. 95). Two of the five “monitoring drivers” for heritage resources deal exclusively with sites on the PHA list, with 20 percent of the sites on the PHA list being targeted for condition assessment every year, and negative impacts to at least one PHA being mitigated each year (p. 198). The foundation for our concern is a lack of basic information on the number of PHA sites currently listed or any goals for how many sites should be on the list for the life of the plan. Nowhere in the Plan or EIS is the current number of sites on the PHA list given. This is disconcerting since a 20 percent annual assessment rate sounds like a very laudable goal, but without knowing how many properties this percentage is drawn from, the 20 percent value is so vague that it approaches meaninglessness.

Information presented in the Final EIS for the Shoshone Plan (p. 583) states that the “Shoshone has 1,506 recorded sites. Of this total, 469 sites have been determined ‘Eligible’ for listing in the National Register of Historic Places, 595 sites have been determined ‘Not Eligible,’ and 442 sites remain to unevaluated.” Given that both eligible and unevaluated sites merit condition monitoring and impacts mitigation, this means that at the time the Plan was prepared, 1091 heritage sites should have been in the sample population. The only recent indication of how many sites are on the Shoshone PHA list is provided in the *Forest Plan Monitoring Report for fiscal year 2009 Shoshone National Forest*, which states that at that time the specialists for the Forest “have also identified eight Priority Heritage Assets (PHA)” (Shoshone planning staff 2011, p. 29). Given the dynamic nature of the list, we would anticipate that it has increased in number since 2009, but even if it has doubled (N=18), that means that assessment and monitoring of PHA sites is being done on only 1.7 percent of the sites (18 of 1091) that warrant such condition evaluation. The annual monitoring rate of 20 percent sounds much less proactive if it is indeed only 20 percent of less than 2 percent of the eligible or unevaluated sites on the Forest.

We see this abridged monitoring and assessment program that deals only with an apparently small PHA list as being inconsistent with at least two components of Forest Policy 2364.03 (as summarized in Shoshone Plan EIS pp. 581-582). These include:

- Monitor, assess, and document the physical conditions of and human or environmental threats to National Register eligible or listed historic properties on a frequent and systematic basis.
- Implement management treatments that protect, conserve, stabilize, rehabilitate, restore, and enhance cultural resources based on their National Register qualities and values, their importance to cultural groups, and their recommended management allocation.

The policy does not say monitor, assess and document condition and threats to **a very few** of the National Register eligible sites, which is what appears to be the case with the current Plan. By restricting systematic monitoring and assessment to the restricted number of sites on the Shoshone’s PHA list, the overwhelming majority of eligible and unevaluated sites are given no specific course of action for evaluation, protection, or damage mitigation.

Our suggestion for a necessary improvement/change to the plan is that in addition to the annual evaluations and threat mitigation to sites on the PHA list, there should also be specific annual monitoring goals and sampling design developed in the Plan to address other eligible properties on the Forest. We recommend that an additional heritage resource objective be added (Plan p. 92) that, similar to the 200 acres Section 110 survey (HERT-OBJ-02) and the 5 percent post-fire survey (HERT-OBJ-05), that establishes an annual baseline sampling criteria and objective for assessment and mitigation of a set percentage of the Forest’s non PHA, eligible sites. The non-PHA site assessment should also be added to the heritage monitoring drivers (Plan p. 198-199).

We would like to thank you for the opportunity to both comment on, and provide objections to the Shoshone Forest planning process. We appreciate the dedication and hard work that the planning team and all members of the Shoshone Forest staff have put into to planning process and into stewardship of our region’s resources and look forward to continuing to work with the Forest in the future.

Sincerely,



Lawrence Todd
Chair, Park County Historical Preservation Commission
Park County Court House
1002 Sheridan Ave.
Cody, WY 82414

Phone: 307 868-2169
Email: ltodd@lamar.colostate.edu