

1132 30th Place SW
 Albany, OR 97321-3419
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Bureau of Land Management
 Vale District Office
 100 Oregon Street
 Vale, OR 97918

Via email: comment@boardmantohemingway.com

RECOMMENDATIONS: Boardman to Hemingway Draft Environmental Impact Statement

The BLM's "National Scenic and Historic Trails Strategy and Work Plan" (NSHT Plan, 2006) set a goal: Protect and sustain trail resources to provide for enriching and inspiring experiences, scenic landscapes, or historic settings. Two objectives for reaching that goal were laid out: 1. Establish and implement national policy and guidance to identify and protect trail resources in conjunction with our multiple-use mandate; and 2. Ensure National Scenic and Historic Trail management is address within the Bureau's planning system. A part of the second objective was to "Monitor Trail Resources: Include an inventory and monitoring program in trail management plans that uses current data standards. With partners, define conflicting use areas, separate inappropriate overlap, and educate public on revised use plan. Engage partners, stakeholders, and volunteers in use regulation and monitoring of trails, as appropriate."

To implement this plan defining conflicting use areas and separating out "inappropriate overlap." **Rather the BLM should identify "inappropriate overlap" before it happens and make plans to avoid it rather than allow the overlap and then try to mitigate for the conflicts.**

As one well-informed Oregon Trail researcher, Stafford Hazelett, points out about the Alkali Springs and Tub Springs area, "It would be appropriate to take notice that there are no other places left along the Oregon Trail where the visible remains of the passage of the mid-19th century families with their wagons are as well-preserved in a setting that has changed so little in the intervening time. It is not like we can suggest that people go see something better somewhere else. Even South Pass has fewer and less authentic remains and more intrusions and disruptions of the setting than the Oregon Trail segments in Malheur and Baker Counties."

The comment made in Ch 3 - p 729 about trail destruction should be removed. It is not the number of trail miles, but the quality of those miles that is most important. **The cumulative impacts to the Oregon Trail and other historic trails should be examined.** How much of the trail has already been destroyed or seriously damaged in the past ten years by transmission lines, wind energy projects, and pipelines? How much of the trail will be damaged or destroyed by the B2H, Gateway West, and future wind projects? When historic trails segments or the view to or from the trail is compromised, it does not recover. **There should be no disturbance of any Class 1 or Class 2 trail ruts or swales for the entire length of the B2H Project.** This is

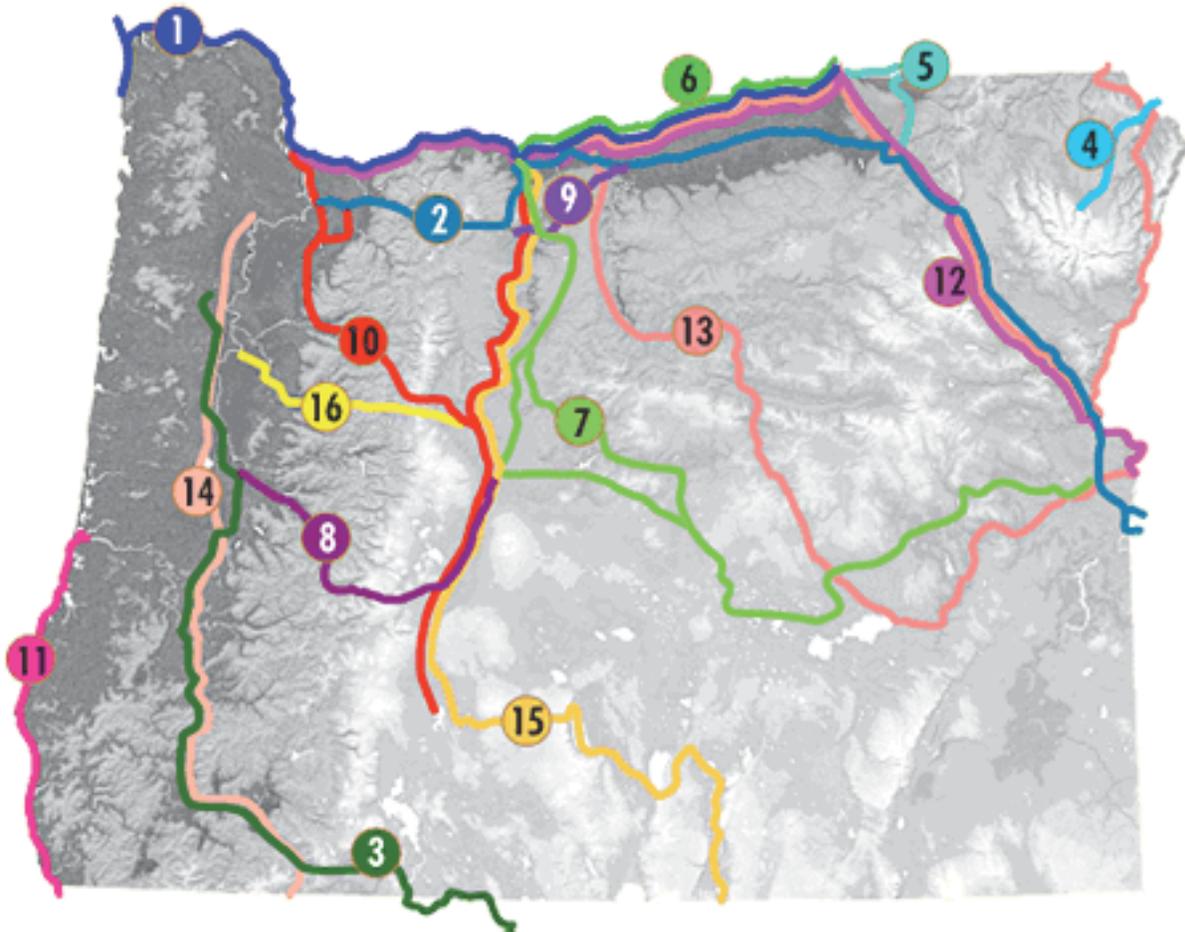
especially true in the Weatherby area as the rest stop was a camping ground with a spring that is now covered. The B2H transmission line should pass far enough to the east of the Oregon Trail that it would not impact this important trail segment. **The Birch Creek trail segment south of Farewell Bend should avoid impacting the Oregon Trail and preserving the pristine view.**



Cloud shaded Oregon Trail going north passing Black-eyed Susans
seen from the Birch Creek BLM parking lot

Tourism is an important industry in Oregon and following the Oregon Trail and visiting the Trail Centers is important to the state and the local economies. The importance for many people is following in the steps of their ancestors or at least seeing the trail they followed. Others enjoy Oregon history of the trail's importance to that history. For the northern states the Oregon Trail made the United States stretch "from sea to shining sea."

Sixteen of Oregon's important trails have been designated as historic trails by the Oregon State Legislature, some of which are also nationally recognized Historic Trails. **This B2H Project impacts eight of them.** The following map shows the route of the trails that would be impacted physically or by the view from or toward at least one of these trails. The Oregon Trail is recognized nationally, but in addition there trail segments in Oregon that have been recognized as so significant that they are listed on the National Register of Historic Places. **One of those segments is the Wells Springs Segments.** Other Oregon Trail High Potential Sites and Segments in Oregon have been recognized and additional segments nominated and will likely be included.



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| 2. Oregon National Historic Trail | 12. Nathaniel Wyeth Route |
| 1. Lewis and Clark National Historic Trail | 13. Benjamin Bonneville Route |
| 7. Meek Cutoff | 6. Upper Columbia Route |
| 9. Cutoff to the Barlow Road | 5. Whitman Mission Route |

The trails in bold print are under NPS study for inclusion as part of the National Historic Trail System.

The Oregon Historic Trail Advisory Council (OHTAC) was established by Executive Order and is composed of nine knowledgeable Oregon residents who are appointed by the Oregon governor and charged with the responsibility to advise the Governor and others and to locate, preserve and encourage the use of these historic trails by Oregonians and visitors. OHTAC goals include collecting and sharing information on locating and marking trails; encouraging local communities and agencies to develop directional and interpretive signs, brochures and maps, and protecting and share these irreplaceable corridors of history. **This letter states the concerns and recommendations of the members of the Oregon Historic Trails advisory Council. The major points are printed in bold type for emphasis.**

On B2H Draft EIS and LUP Amendments page 2-56, both the Proposed Route and the Alternative travel from the Grassland Substation, follow south near Willow Creek along the route of the hills, which would be visible from the Oregon Trail emigrant campsite north of Cecil. Then they pass near Cecil, cross the National Historic Oregon Trail, and

follow the road past the interpretive panels, which tell about the Wells Springs along the Oregon Trail. A better alternative would be to avoid using the Horn Substation and the Grassland Substation. **Instead the Longhorn Substation should be utilized and the Longhorn Alternative (MO4-MO3) used with the transmission line routed in the least obtrusive way near the Oregon Trail and at each trail crossing.** This recommendation assumes that Bonneville Power Co. will be able to build that substation.



Willow Creek emigrant campground north of Cecil

On B2H Draft EIS and LUP Amendments page 2-58 Figure 2-15 **the Glass Hill Proposed Route and the north end of the Glass Hill Alternative should be rerouted to the west to avoid intersecting the National Historic Oregon Trail.**

On B2H Draft EIS and LUP Amendments page 2-61 Figure 2-16 the Timber Canyon Alternative has been moved to the east to avoid the greater sage grouse habitat and does not impact as much on the Sisley Creek-Swayzy Creek segment. The route does cross the Oregon Trail on the Proposed Route north of North Powder. Throughout the B2H Project it is best to find alternative routes even where existing power line routes are followed when there is close contact with the Oregon Trail.

The Proposed Route east of the National Historic Oregon Trail Interpretive Center on Flagstaff Hill would not only cross the Oregon Trail and the Goodale Trail in Virtue Flat, but would be seen for miles destroying the trail experience. The view

from the wagons at the Interpretive Center would be destroyed. The Flagstaff Alternative to the west has been moved farther away and would follow an existing power line, but it would still be visible from some Trail Center locations. The entire Proposed Route that closely follows the Oregon Trail should be avoided. As proposed throughout the B2H route small interpretive signs would help visitors understand what they are seeing along the trail. But they should not be as large as "viewing platforms" would imply. They should not add to the unwanted visual impact of the trail experience. However, the Timber Canyon Alternatine should remove fewer large trees.



Late afternoon in Virtue Flat from the road leaving the Oregon Trail Interpretive Center at Flagstaff Hill near Baker City

On B2H Draft EIS and LUP Amendments page 2-63 Figure 2-17 **the Tub Mountain South Alternative (BA12-CL11-MA9) is a totally unacceptable alternative.** It would cross the National Historic Oregon Trail in several places, especially south of Huntington. If built the transmission line would come into Alkali Flat, east of Alkali Spring, and be visible from the overlook when approaching from the south, at a distance of about five miles to the northeast, or in a nearly direct line looking over Alkali Spring. The line would turn toward that overlook and cross the Oregon Trail and the county road. That will be the most visible viewshed disruption and closest encounter with the B2H line while someone is on the Oregon Trail at a publicly accessible location. **Avoid the use of the Tub Mountain South Alternative.**

On B2H Draft EIS and LUP Amendments page 2-65 Figure 2-18, **both the Proposed Route and the Alternative do avoid the main route of the Oregon Trail, but do cross the Meek Cutoff west of the Oregon Trail crossing into Oregon from Idaho.** An NPS Feasibility Study is under way which will likely result in the Meek Cutoff being included as part of the National Historic Trail System. The Oregon Legislature has already designated the Meek Cutoff as an Historic Trail in Oregon. **Transmission lines should be located in the least obtrusive way to avoid trail corridors and visual impacts and disturbances in several places along the Oregon Trail, the Meek Cutoff, and other recognized federal and state historic trails. Substantial mitigation for disturbances to trail corridors and the visual landscape to and from these historic trails is very important.**

The recommendations related to trail and viewshed preservation also apply to all aspects of the construction and maintenance of the transmission line corridor. Avoid crossing or impacting the Oregon Trail and other historic trails.

It is our expectation that these comments and recommendations will be followed as the Draft EIS is modified and accepted before implementation.

Yours truly,

Glenn Harrison /s/

Glenn Harrison, member
Oregon Historic Trails Advisory Council