



Partnership for the National Trails System

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Sent Via Email

Re: Comments on the BLM Streamlining Planning and NEPA process

Dear Director Nedd:

I am writing on behalf of the **Partnership for the National Trails System (Partnership)** regarding the “**Streamlining BLM Planning and NEPA**” process currently underway. Our comments are most pertinent to these three questions that you posed:

- **FOCUSED ANALYSIS: HOW CAN THE BLM REDUCE DUPLICATIVE AND DISPROPORTIONATE ANALYSES?**
- **USER-FRIENDLY PLANNING: HOW CAN THE BLM HELP STATE AND LOCAL GOVERNMENTS, TRIBAL PARTNERS, AND OTHER STAKEHOLDERS UNDERSTAND AND PARTICIPATE IN THE PLANNING PROCESS?**
- **BEING GOOD NEIGHBORS: HOW CAN THE BLM BUILD TRUST AND BETTER INTEGRATE THE NEEDS OF STATE AND LOCAL GOVERNMENTS, TRIBAL PARTNERS, AND OTHER STAKEHOLDERS?**

Please accept and fully consider the following comments and recommendations on ways to improve these processes, making them more transparent, more efficient, less contentious and thereby less costly.

Partner Organizations

Affiliate Members:

American Discovery Trail Association
Carson Valley Trails Association
National Frontier Trails Museum
Back Country Horsemen of America
Kansas City Area Historic Trails Association
Tahoe Rim Trail Association
Smoky Hill Trail Association

National Scenic Trail Organizations:

American Hiking Society
Appalachian Trail Conservancy
Appalachian Mountain Club
Arizona Trail Association
Connecticut Forest & Park Association
Continental Divide Trail Coalition
Continental Divide Trail Society
Florida Trail Association
Ice Age Trail Alliance
Natchez Trace Parkway Association
North Country Trail Association
Pacific Crest Trail Association
Pacific Northwest Trail Association
Potomac Heritage Trail Association

National Historic Trail Organizations:

Ala Kahakai Trail Association
E Mau Na Ala Hele
Anza Trail Coalition of Arizona
Anza Trail Foundation
Heritage Trails
Camino Real Trail Association
El Camino Real De Los Tejas
Chesapeake Conservancy
Iditarod National Historic Trail, Inc.

Lewis & Clark Trail Heritage Foundation
Lewis and Clark Trust
Mormon Trails Association
Nez Perce Trail Foundation
National Pony Express Association
Old Spanish Trail Association
Oregon California Trails Association
Overmountain Victory Trail Association
Santa Fe Trail Association
Trail of Tears Association

The Partnership for the National Trails System is a tax-exempt, non-profit federation of 34 non-profit organizations that work in direct partnership with the Bureau of Land Management, National Park Service, Forest Service and other 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.

We believe that resource management planning is a key tool for proper management of the public lands and especially for the Partnership, it is a key tool for the proper management of the National Scenic and Historic Trails. The full compliance and adherence to the Bureau's planning procedures and process and the proper application of FLPMA, the National Trails System Act (NSTA), other pertinent legislation, and Executive Orders is critical to the future of the public lands, their resources, and in particular, the National Scenic and Historic Trails.

Members of our staff and our member organizations have been involved with the development of Resource Management Plans for over 30 years and have therefore seen the transformation of planning over that time. We are very pleased to see establishment of the National Landscape Conservation System (NLCS) and the National Trails directives established to guide the management and planning of these areas (i.e., MS-6100, MS-6250, and MS-6280). Continuation and improvement of planning processes that integrate the requirements of FLPMA with that found in NLCS designating legislation, and the National Trails System Act are essential for the conservation and preservation of the natural, cultural, historic, and scenic resources integral to the national scenic and historic trails in particular and the public lands in general.

It is absolutely critical that all planning and NEPA compliance undertaken by the Bureau be conducted with ample time allowed for public comment and ample time to fully review those comments before decisions are made.

The National Trails System Act establishes National Scenic and Historic Trails as inherently public/private shared management resources. Nonprofit trail organizations comprised of citizen volunteers and professional staffs are essential to developing and sustaining these public trails. The BLM must recognize that nonprofit citizen organizations and other public agencies are full and essential partners in all aspects of management – including planning – of National Scenic and Historic Trails. This shared responsibility is clearly authorized by the National Trails System Act.

By authorities in the National Trails System Act (16USC1241) referenced below and thru long term agreements, 501c3 nonprofit trail organizations collaborate as "**managing partners**" to develop, protect, and sustain the 30 National Scenic and Historic Trails administered by the Bureau of Land Management, National Park Service, and the Forest Service. In this role of **managing partner** these organizations provide a wide range of services including building and maintaining tens of thousands of miles of trail; recruiting, training, and managing tens of thousands of volunteers; raising funds to acquire lands for the trails; executing programs and events; advocating for resources for the trails within IRS published limits; engaging local, regional, and state government agencies to help manage sections of the trails; and otherwise continuously seeking additional sources of funding, in-kind help, and material resources to develop and sustain the National Trails. In most cases these nonprofit partners contribute significantly greater resources to the collaborative management of these National Trails than the

Bureau of Land Management, the National Park Service, and the U.S. Forest Service are able to provide. Collectively these organizations provide more than 1 million hours of volunteer labor annually, as well as professional staff time and millions of dollars of financial contributions to sustain these trails.

The Partnership and its member organizations should be seen as groups with special interest and standing, apart from the general public in BLM's planning process, and as described presumably interested in BLM planning proposals and actions that are related to the National Scenic and Historic Trails.

Ongoing planning and NEPA compliance by the Bureau should embody the direction and spirit of that found in the National Trails System Act (16 U.S.C. 1241 and 1250):

- “The Congress recognizes the valuable contributions that volunteers and private, nonprofit trail groups have made to the development and maintenance of the Nation's trails. In recognition of these contributions, it is further the purpose of this Act to encourage and assist volunteer citizen involvement in the planning, development, maintenance, and management, where appropriate, of trails.
- Each Secretary or the head of any Federal land managing agency may assist volunteers and volunteer organizations in planning, developing, maintaining, and managing trails. Volunteer work may include, but need not be limited to--
 - (1) Planning, developing, maintaining, or managing (A) trails which are components of the national trails system, or (B) trails which, if so developed and maintained, could qualify for designation as components of the national trails system; or
 - (2) Operating programs to organize and supervise volunteer trail building efforts with respect to the trails referred to in paragraph (1), conducting trail-related research projects, or providing education and training to volunteers on methods of trails planning, construction, and maintenance.”

Only one of the 30 National Scenic and Historic Trails – the Appalachian Trail -- is “complete” enough to be fully available for the public to use and benefit from it as intended in the National Trails System Act. The 29 other congressionally authorized trails are in various stages of completion. There are large gaps in the national scenic trails that are intended to be continuous footpaths and only a fraction of the several thousand “high potential sites and segments” identified along the national historic trails (and a limited number of national scenic trails), are fully preserved to protect the scenic, historic, and cultural resources for which they were authorized.

Planning and NEPA compliance undertaken by the Bureau should provide for protecting the rights-of-way corridors for National Scenic and Historic Trails, especially on Federal lands. The values of National Trails include: (1) visitor experience opportunities and settings, and (2) the conservation/protection of scenic, natural, historical, and cultural qualities of the corridor. National Trail Comprehensive Plans (Section 5(e) (f)) components, and the selection of the NTSA rights-of-way (Section 7(a)) point to the need for resource management plans to map the extent of the National Trails corridors and apply to each described corridor appropriate plan components to protect National Trail values that embody the nature and purposes for which that Trail was designated by Congress.

Further, Executive Order (E.O.) 13195 states: "Federal agencies will . . . protect, connect, promote, and assist trails of all types. . . . This will be accomplished by . . . protecting the trail corridors associated with National Scenic Trails . . . to the degree necessary to ensure that the values for which [the] trail was established remain intact."

Accordingly, resource management plans for administrative units through which a National Scenic or Historic Trail passes need to address the nature and purposes of the corresponding Trail in accordance with the programmatic requirements of the National Trails System Act, as amended, and National Scenic and Historic Trail Comprehensive Plans prepared thereunder (16 USC 1244(e) and (f)).

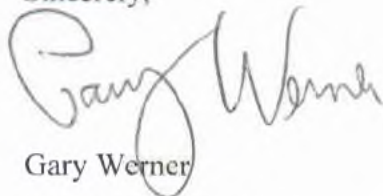
Land management planning undertaken by the Bureau must promote closing the gaps along the National Scenic Trails and preserving the integrity and historic settings of the "high potential sites and segments" along the National Historic Trails. Any revisions to the Bureau's planning protocols and procedures must acknowledge and enable the special characteristics of the National Scenic and Historic Trails by creating a framework for truly collaborative planning that fosters consistent preservation and management across jurisdictions, engages citizens, as well as managers from other agencies, in every stage of the process as co-managers, and strategically guides actively targeted land acquisition to complete these National Trails.

The Bureau can help foster more participation in planning for the National Trails and build trust and better integrate the help in managing these trails that our nonprofit trail organizations and their citizen land stewards can provide by:

- Providing more training for citizen stewards in the procedures and protocols detailed in the National Trails directives established to guide the management and planning of these areas (i.e., MS-6100, MS-6250, and MS-6280);
- Accelerating the inventorying of the natural, cultural, historic, and scenic resources integral to the national scenic and historic trails and involving qualified citizen stewards in this process;
- Accelerating the delineation of the management corridors for the national scenic and historic trails across public lands required by the National Trails System Act;
- Integrating and coordinating the planning along the entire length of each national scenic and historic trail so that there is consistent preservation and management of the natural, cultural, historic, and scenic resources integral to them.

The Partnership appreciates the opportunity to provide these comments and hopes that you find them helpful to improve the Bureau's planning and NEPA compliance processes.

Sincerely,



Gary Werner

Executive Director