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December 8, 2017

Grand Mesa, Uncompahgre, and Gunnison National Forests
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To whom it may concern:

The following input and comments are submitted by the Old Spanish Trail Association (OSTA) in regard to the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) plan revision effort and, at this time, in specific response to the comment period regarding the "DRAFT Forest Assessment Report" phase of the planning project. We appreciate this opportunity to comment and engage in this process.

By way of introduction, the Old Spanish Trail Association (OSTA) is the formal non-profit organization established for efforts related to the Old Spanish National Historic Trail (OSNHT) including research, public information, education, and interpretation, planning, management, and preservation. In "recognition of . . . contributions" that "private, nonprofit trail groups have made to the development and maintenance of the Nation's trails", including the Old Spanish Trail Association, the National Trails System Act (NTSA) specifically states "it is further the purpose of this Act to encourage and assist volunteer citizen involvement [by reference including such groups as OSTA] in the **planning**, development, maintenance, **and management**, where appropriate, of trails." (emphasis added) (16 U.S.C. §1241(c)). Clearly, the NTSA directed significant importance to involvement of trail organizations, including the OSTA, in any planning and management for - specifically, in this instance - the OSNHT. Furthermore, the OSTA, and its assistance in contributing to the administration and management of the OSNHT is officially acknowledged, and supported by and through, a long standing cooperative agreement and yearly task agreements with the OSNHT Co-Administrator, the National Park Service (NPS), and in addition,



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through explicit project agreements and implicit acknowledgement in its dealings with the other Co-Administrator, the Bureau of Land Management (BLM). Therefore, we emphasize the importance of special attention by all federal land management agencies, including the Department of Agriculture and the United States Forest Service (USFS) in involving and considering OSTA's comments on federal land management planning, and protection of OSNHT lands, resources, and values.

We find it quite important to express our concern that the USFS planning process thus far, as demonstrated by the Draft Forest Assessment Reports has little substantive information or planning regarding the OSNHT, and in fact contains numerous statements that we consider to be erroneous. A particularly egregious example are statements in the Draft Report on Designated Areas that little is known about the Trail corridor and Trail conditions, and the implication that the land management agency in this particular instance, the USFS, is waiting on its management actions related to the Trail for the completion of a "Comprehensive Management Plan" by the federal Co-Administrators of the Trail, the BLM and the NPS. Regardless of the long overdue "comprehensive plan for the management, and use of the trail" required of the Co-Administrators and Secretary of the Interior "[w]ithin two compete years of the date of the enactment of legislation designating" (see 16 U.S.C. §1244(f)) the OSNHT (enacted and designated by Congress and the President in 2002; see Public Law 107-325, 116 Stat. 2790), federal land management agencies, including the USFS, are still bound by the mandated intent, goals, and protective provisions of the NTSA. As mentioned, the OSNHT was statutorily authorized as a National Historic Trail to be administered and managed pursuant to the NTSA by enabling legislation congressionally passed and executed in 2002 (see Pub. L. No. 107-325 & 16 U.S.C. 1244(a) (23)). The OSNHT designated routes **were established at the time** "as generally depicted on the maps numbered 1 - 9 as contained in the report entitled 'Old Spanish Trail National Historic Trail Feasibility Study,' dated July 2001". 16 U.S.C. 1244(a) (23) (A). The entirety of those routes were continuously included as part of the OSNHT based on the whole Trail meeting the NTSA historic criteria for said routes as assessed in the Feasibility Study. There should be no confusion regarding the routes of the OSNHT currently requiring management consideration as mandated by the NTSA, and as applicable, by other federal laws.

Current legal requirements of federal land management agencies should, therefore, be clear. But, the situation is somewhat complicated by the fact that the OSNHT Co- Administrators are currently in the process of developing and releasing what is termed a "Comprehensive Administrative Strategy" (CAS), that may be enacted at any time. It is our understanding that said CAS, and the Co-Administrators, may enact certain realignments of the OSNHT as part of finalizing the CAS. The NTSA allows for National Trail administrators to do such. (see 16 U.S.C. 1246(b)). It is our position that the USFS should conduct its planning taking the routing of the OSNHT as designated in the 2001 NPS Feasibility Study into account, but should also take any NPS/BLM Co-Administrator realignments proposed to take effect with finalization of the CAS into account in its plan.

Based on our review, USFS planning for the GMUG as related to the OSNHT is confined to Gunnison National Forest lands. The Trail does not cross the Grand Mesa or Uncompahgre national forests.

The following, are our comments on what seem to be the most pertinent Draft Forest Assessment reports with particular relationship to the management of OSNHT lands, resources, and values, and goals and objectives of the NTSA. Please realize that our comments on any particular assessment report, may well



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have applicability to other assessment reports as well. Unfortunately, we have been unable to review all the reports we consider to be most applicable to the OSNHT (including the Recreation, Scenic Character, and Areas of Tribal Importance reports) so it is our hope that you will extrapolate from our input in this letter to improve upon said additional reports in regard to how they relate to the OSNHT.

Specific Comments on “Draft Forest Assessments: Designated Areas”

- p.11 – Old Spanish National Historic Trail section:

- 1st paragraph, 3rd sentence. The description of the relevant portion of the OSNHT is erroneous. The particular and relevant section of the Trail is not part of the East Fork route of the North Branch. As designated, it does not cross Cochetopa Pass, but North Pass (see Co-Administrator ArcGIS map at http://www.arcgis.com/home/webmap/viewer.html?url=https://services1.arcgis.com/fBc8EJBxQRMcHlei/ArcGIS/rest/services/OLSP_NHT/FeatureServer/0&source=sd). The section should be rewritten as follows: “The congressionally designated North Branch of the Trail runs through the planning area, entering the Gunnison Basin over North Pass and generally following the Highway 50 corridor to Grand Junction.”
- Related to 1st paragraph, 3rd sentence. USFS planners should also be aware that the NPS/BLM Co-Administrators have proposed additional OSNHT alignments in the CAS that are relevant to the Gunnison NF planning area. These include OSNHT routes over Cochetopa Pass and also across the north slope of Sawtooth Mountain. They are not replacements for the North Pass designated route, but refined, and additional routes. Such proposed realignments, or added alignments can be referenced at <https://parkplanning.nps.gov/document.cfm?parkID=454&projectID=12591&documentID=74912>.
- 1st paragraph, 4th sentence. To our knowledge there is no comprehensive “[i]nventory of the Trail corridor” occurring at this time. Neither, is there a “Comprehensive Management Plan” under development. This sentence should possibly be rewritten as follows: “An Old Spanish National Historic Trail Comprehensive Administrative Strategy is under development by the National Park Service and the Bureau of Land Management, the designated administrative agencies for the Trail.”
- 1st paragraph, final sentence. Relevance to Gunnison NF only; not others.

- p.11 – Conditions and Trends on National Scenic and Historic Trails section:

- 2nd paragraph. The legally designated route of the OSNHT has been mapped. The origin of that legal designation is the NPS Feasibility Study of 2001 – previously referenced. It can be viewed at http://www.arcgis.com/home/webmap/viewer.html?url=https://services1.arcgis.com/fBc8EJBxQRMcHlei/ArcGIS/rest/services/OLSP_NHT/FeatureServer/0&source=sd.
- 2nd paragraph. The condition of Trail landscapes, resources and other values along the designated route, as mapped, and mandated for protection by the NTSA should be readily ascertainable by USFS as the responsible land management agency. **PLEASE NOTE that protected OSNHT lands, resources, and values should include: any related historic or archeological resources related to the Trail; relatively undisturbed landscapes along the Trail capable of providing**



the public with vicarious experiences reminiscent of the Trail’s historic period – 1829 – 1848; natural resources supporting such landscape vicarious experiences, appropriate recreational opportunities for the public’s retracement of the Trail; and, preclusion of any activities or allowances that may degrade the foregoing.

- p.21 – “Existing Forest Plan Direction for Designated Areas – Forest Wide Goals and Objectives”
 - Clearly, the existing forest plan did not include consideration and provisions regarding the OSNHT as it was executed prior to enactment of the OSNHT in 2002. It should be made clear, however, that this forest plan revision will fully include provisions for the proper management of OSNHT lands, resources, and values.
 - Although we see planning discussions for various designated areas, such as SIAs, we do not see such planning for the OSNHT corridor. This should be included.

- p.34 – “Are there published documents or proposals that identify an important need or potential for a designated area?” section.
 - This section should include discussion regarding the NPS/BLM OSNHT Co-Administrator CAS. The Draft CAS can be referenced at:
<https://parkplanning.nps.gov/document.cfm?parkID=454&projectID=12591&documentID=74062>.

- p.41 – “Are there other proposals for designated areas before Congress, in proposals from collaborative efforts or from previous plans?”
 - This section should include discussion regarding the NPS/BLM OSNHT Co-Administrator CAS and its map book proposals for refinements and additions to the OSNHT in the planning area, previously mentioned.

- p.44 – “Are their known opportunities to highlight unique recreational or scenic areas in the plan area to provide for sustainable recreation opportunities?” section.
 - This section should include information on all potential, appropriate recreational opportunities along the OSNHT, both designated and proposed route alignments, for retracement of said National Trail and connecting trails to other unique experiential areas. Outdoor recreation is a major goal of the NTSA for NHTs, including retracement trail opportunities and connecting trails.

- p.44 – “Is there scientific or historical information that suggests a unique opportunity to highlight specific educational, historic, cultural, or research opportunities?” section.
 - Most definitely, the presence and history of the OSNHT presents such opportunities that land management agencies have an obligation to pursue in their effectuation of NTSA goals and objectives. Education and interpretation are major goals.

- p.46 – “National Scenic and Historic Trails” section.
 - 4th bullet, 2nd sentence. Again, no Comprehensive Management Plan exists, is being developed, or is foreseen in the near future to our knowledge.



- This section should include consideration for signing, interpretation, and recreational uses related to the OSNHT. And, include statements about preclusion or avoidance of degrading activities and uses (including no ORV use along Trail corridor other than where it may have existed and been authorized prior to designation of the Trail (2002)).

- p. 47, et. seq. – “References Cited”

- This section should include references to the NPS Feasibility Study of 2001 (<https://parkplanning.nps.gov/document.cfm?parkID=454&projectID=12591&documentID=38207>), and the NPS/BLM Draft CAS of 2016 (<https://parkplanning.nps.gov/document.cfm?parkID=454&projectID=12591&documentID=74062>).

Specific Comments on “Draft Forest Assessments: Cultural and Historic Resources”

- p. 2 – “Use of Best Available Science” section.

- This paragraph should include references to OSNHT administrative documents – the 2001 Feasibility Study, and the 2016 Draft CAS. It should also, possibly include a reference to the BLM American Recovery and Reinvestment Act study on National Historic Trails, a portion of which addressed the OSNHT in the Gunnison, CO area. (BLM, “National Historic Trails Inventory Project, prepared by AECOM, May, 2012 / more information available from BLM Co-Administrator, Rob Sweeten).

- p.5 – “Context for Historic Occupation and Use” section.

- The opening paragraph makes no distinct mention of the Old Spanish Trail period of use (1829-1848) or adjoining relevant periods and the travel and trade that occurred over the North Branch Route, and through the Gunnison NF. This historic period should be highlighted given the presence of the designated OSNHT, a historically based, congressionally designated land management area. Much information exists in the NPS Feasibility Study, including a bibliography of multiple sources on this history.

- p.5 – “Transportation” section.

- 1st paragraph, 2nd sentence. This paragraph references the Armijo Route of the OSNHT, however, that route did not pass through the planning area. The route of the OSNHT that passes through the planning area is the North Branch route, and it is its history that is most relevant to this planning effort.
- 1st paragraph, 2nd sentence. The sentence focuses on woolens and slave trading on the OSNHT, and omits mention of two other critically important trade elements related to the Trail – mules (and horses) on all Trail routes and on the North Branch, furs. Recommend rewriting this portion of the sentence as follows: “carrying woolens, furs and Indian slaves for trade in Mexico’s California territory and returning mules (and horses) and Indian slaves to Mexican Santa Fe.”

- p.6 – “Transportation” section.



- 1st paragraph. This paragraph references OSNHT cultural resource surveys being conducted by the GMUG forests. We are very interested in these and would ask to be informed of such and any information that may be developed. The NPS/BLM Co-Administrators should also be informed.
- p.10 – “Information Gaps” section.
- By all appearances significant information gaps exist in regard to information on the OSNHT. This should be acknowledged and highlighted as an area for prioritized work.
- p.12-13 – “Table 1. Heritage Program managed to standard measures.”
- “Cultural Resource Inventory” block. “Goal” should identify OSNHT surveys and inventories as high priority.
 - “Cultural Resource Evaluation and Official Designations” block. “Goal” should identify national register property identifications and evaluations related to the OSNHT as a high priority.
 - “Condition Assessment and Allocation” block. “Goal” should identify condition assessments of cultural and historic resources along the OSNHT as a high priority.
 - “Stewardship and Protection” block. “Goal” should identify full protection of all OSNHT resources and values as a high priority.
 - “Public Outreach and Benefit” block. “Goal” should identify public interpretation and educational efforts regarding the history and ethnography of the OSNHT as a high priority.
- p.14 – “National Register Listed Properties and Priority Heritage Assets”
- This section should list identification and evaluation, and possible nomination of OSNHT related properties as a high priority.
- p.16 – “Special Interest Areas” section.
- It occurs to us that the OSNHT corridor should possibly also be listed as an SIA.
- p.16 – “Resource Conditions” section.
- The OSNHT should be monitored, and mentioned as being monitored, regardless of National Register status, due to the mandated protections of the NTSA.
- p.22 – “Potential Need for Plan Changes to Respond to Cultural and Historic Issues” section.
- Existence of the OSNHT, its corridor and resources should be mentioned here as needing related plan changes. The OSNHT is a congressionally designated historic area. Its existence stands on its own as a matter of importance in federal planning, regardless of National Register eligibility.
- p.24, et. seq. “References” section.
- References to OSNHT documents should be included. And, possible references to bibliographic information in such documents specifically addressing history/cultural topics.

That constitutes our comments at this time. We look forward to involvement in the forthcoming phases of the plan revision. Our principle contact on this initiative will be Association Manager, John Hiscock, who can be reached by telephone at 435-689-1620, or e-mail at ostamgr@gmail.com, or mail at: John



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Hiscock, Association Manager, P.O. Box 324, Kanab, UT 84741. Our Colorado leaders on our Board of Directors and local chapters of OSTA will also be kept informed. Please let us know of any questions you may have.

Sincerely,



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