

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
COLORADO STATE OFFICE
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LAKEWOOD, COLORADO 80215-7093

December 4, 1998

In Reply Refer to:
8100/4100 (CO-931) P

EMS Transmission 12/04/98
Instruction Memorandum No. CO-99-007
Expires: 09/30/99

To: All Field Offices

From: Deputy State Director, Resource Services

Subject: Interim Historic Preservation Guidelines for Rangeland Management Programs

This directive outlines guidance for protecting historic properties potentially affected by grazing and range management practices with emphasis placed on issuance of permits within grazing allotment boundaries and applied only to Bureau of Land Management's (BLM) lands. Because this issue has national implications this guidance is considered interim until such time as national direction is provided. Separate direction for National Environmental Protection Act (NEPA) requirements are contained in the BLM Handbook H-1790-1.

Beginning in the mid-1970's and continuing into the 1980's, BLM, nationally, completed an aggressive program of collecting resource data, including heritage resource data, and preparing planning unit Environmental Impact Statements (EIS). This guidance was prompted by the Natural Resources Defense Council lawsuit in 1974 which found that BLM had not adequately considered the environmental impacts of its grazing program.

During this period the BLM and Advisory Council on Historic Preservation (ACHP) negotiated a Programmatic Memorandum of Agreement (PMOA) for the grazing program. For Section 106 purposes an undertaking was defined to include both general grazing and range management program activities considered in EIS's, and also specific decisions proposed in the future, such as to renew longstanding grazing privileges, to change numbers or classes of livestock, to construct range improvement facilities, and other actions with potential to affect historic properties.

Some of the primary points of the 1980 PMOA with the ACHP and the National Conference of State Historic Preservation Officer's (SHPO) are:

(a) simply authorizing livestock operators to continue to graze limited numbers of domestic livestock on public rangelands does not call for survey (Class III). Rather, an appraisal of existing inventory data (Class I), supplemented in selected places with a sample survey (Class II), is an adequate basis for considering the potential effects of continued, dispersed livestock use of the rangelands;

(b) range improvements and other activities involving specific ground disturbance will be surveyed (Class III). Also if changes are being proposed that are likely to increase the chances of disturbance, these also will require a Class III survey, and finally

(c) the BLM's staff, using their training and experience, and the BLM's manual standards, is able to make appropriate judgements about applying these and related decision-making principles without ACHP consultation, and with less frequent SHPO consultation than would normally be required under the standard 36 CFR 800 procedures.

Until recently, work has primarily focused on specific range project inventories like stock ponds and vegetative treatments which cover substantial acreage. Recent revisions to BLM's Manuals 8100 through 8160, and the National Programmatic Agreement of 1997 further our efforts in meeting the BLM's policies and procedures for section 106 compliance relative to livestock grazing and range improvement projects.

In meeting the requirements addressed above it will be necessary for field archaeologists to be involved in the issuance of all grazing permits, renewals, and transfers. The range staff should submit a cultural resource request with an NEPA number, and clean 7.5 minute map showing the allotment boundaries to the field archaeologist. The archaeologist will then complete a literature review and assessment by allotment or geographic landscape. The data must be sufficient to address potential effects within individual allotments. In gathering the data the field archaeologist should consult the range staff and other staff specialists and use their knowledge of the environment, known water sources and treatment areas, known cultural values, and areas subject to impacts and cumulative effects. The assessment should discuss:

- previous inventories in the allotment, amount of coverage and the results;
- the distribution, diversity, density, and significance of the historic properties from known sources;
- those properties known to be of a fragile and sensitive nature which could be further impacted by grazing actions;
- the data gaps and potential for finding historic properties.

If the data is determined to be insufficient to reasonably evaluate heritage resources within the allotment, it may be necessary to complete a field reconnaissance or Class II inventory. As an aid

in assessing impacts and need for additional discretionary inventories it may be useful to prioritize the allotment on a projected high, medium, and low sensitivity scale.

The generated information should describe:

- all direct, indirect and cumulative impacts to cultural resources from grazing activities within the allotment;
- the potential for finding additional fragile resources which could reasonably be expected to be impacted by grazing and any needs for specific field inventories.
- This information will form the basis for NEPA documentation, and Section 106 compliance. This includes development of mitigating measures and permit stipulations to protect significant cultural properties arrived at in consultation with the SHPO. Decisions to undertake additional inventories must be made by the Field Office Manager in consultation with the cultural resource specialist. The Deputy Preservation Officer is available to provide technical, policy, or review assistance as needed.

The attached tables are provided to assist in organization of the data. These forms may be modified to suit your purposes.

For the traditional range improvement projects and other construction activities involving specific ground disturbance it will still be necessary to complete a Class III survey (see Manual Section 8110.21C). Examples of these actions include fencing, corrals, water developments (all of which concentrate animals and intensify trampling), and vegetative manipulation (e.g., chaining and management ignited fire).

If there are questions concerning this direction, please contact Rich Fike at (970) 240-5303 or Johnny Riel at (303) 239-3717.

Signed by
Frank Salwerowicz
Deputy State Director,
Resource Services

Authenticated by
Don Snow
EMS Operator

Attachments (2) - Cultural Resource Information for Range allotments
Project Log for allotments

cc: Rich Fike, CO-034
Johnny Riel, CO-932

CR REPORT #

BUREAU OF LAND MANAGEMENT

CULTURAL RESOURCES INFORMATION FOR RANGE ALLOTMENTS

NEPA NUMBER:

ALLOTMENT NAME:

ALLOTMENT NUMBER:

TYPE OF ACTION:

ACREAGE:

LEGAL DESCRIPTION (T, R. SEC):

COUNTY:

USGS TOPO QUAD:

UNIT NAME:

CULTURAL RESOURCES LITERATURE REVIEW RESULTS

Percentage of Allotment Previously Inventoried	Report Numbers	Number of Sensitive or Eligible Sites Present ⁽¹⁾	Number of Sites Requiring Mitigation ⁽²⁾	Estimated Potential for Additional Sensitive or Eligible Sites (Low , Medium or High) and Rationale
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RECOMMENDATIONS

Percentage of Allotment to be Inventoried	Date Inventory Completed (or to be completed)	Report Number	Number of Sites Requiring Mitigation*	Date Mitigation Completed (or to be completed)
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Class II

"Sample"**TURAL RESOURCES INFORMATION FOR RANGE ALLOTMENTS**
BUREAU OF LAND MANAGEMENT
UNCOMPAHGRE FIELD OFFICE
LITERATURE SEARCH FORM

PROJECT NAME:

PROJECT NUMBER:

RESEARCHER:

DATE:

TOWNSHIP:

RANGE:

PROJECT NUMBER

PROJECT NAME

OAHP COMPUTER FILES

SITE NUMBER	SITE TYPE	SECTION	ELIGIBILITY
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1. If appropriate, attach a narrative detailing site types and locations. Because of the proprietary information present in such a narrative, it should be withheld from public review.
2. If necessary, attach a narrative describing mitigation measures for each site found in the literature review or the sampling or intensive inventory.