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March 2, 2015

Ms. Gretchen Ward, Chief of Planning
National Trails Intermountain Region
National Park Service
P.O. Box 728
Santa Fe, NM 87504

Dear Ms. Ward –

On behalf of the members of the Oklahoma Cattlemen's Association (OCA), I appreciate the opportunity to provide comments on the *Chisholm and Great Western National Historic Trails Feasibility Study and Environmental Assessment*. OCA members have several concerns with the study and assessment. We respectfully request that the comment period be extended in order to publicize the study to landowners along the trail routes. Before any designation is further considered, we urge the National Park Service to consult with cattle and land owners along the proposed trail and complete all management and compliance plans and strategies. Until further understanding of the proposal by the study and until more landowners are consulted, OCA is opposed to designating the trails as National Trails.

OCA was not made aware of the study until mid-February. On the first page of the study in paragraph three, the study acknowledges that Section 5(b) of the National Trails System Act requires cooperation with many entities including 'public and private organizations'. Indeed, on page 136 of the study no national, state or county cattlemen's associations are listed as being notified of the feasibility study. From both a historical and landowner perspective, cattlemen's organizations should have been a primary contact for this study.

Further, OCA members are very concerned about the future implications of this designation based upon the uncertainty of what compliance actions may be required. As example we offer two sections from the Study:

- According to the "Purpose and Need for Action" section of the Summary page (iii), "If national historic trails are designated, a comprehensive management plan and further environmental compliance documents would be completed through subsequent planning."
- 'Environmental Consequences' on page 111 state "Future actions must be preceded by site-specific compliance and consultations with the Environmental Protection Agency, US Fish and Wildlife Service, tribal and state historic preservation officers, the Advisory Council on Historic Preservation, concerned American Indian tribes, and other state and federal

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agencies. It is anticipated that such documents would reflect a considerable shift in emphasis from a qualitative to quantitative analysis.”

OCA cannot endorse and will adamantly oppose any designation without a complete and thorough understanding of the exact requirements and compliance plans.

We appreciate and agree that the legacy of the Trails is unique and important. More important is the protection of the multi-generational family ranches that have worked hard to preserve the land and legacy of cattle production. These food producing families represent the future of rural Oklahoma and serve as the true stewards of the grass, water, wildlife and other important natural resources.

We thank you for the opportunity to comment on this feasibility study and appreciate your consideration of a significant extension. Oklahoma Cattlemen’s Association stands in opposition to the designation until further clarification of plans and compliance strategies.

Sincerely,



Michael D. Kelsey
Executive Vice President