

BLM Preservation Board Report

December 6-9, 2011

Washington, DC

In attendance: Bureau of Land Management (BLM) Preservation Officer Robin Hawks (formerly Robin Burgess) (WO), Deputy Preservation Officers (DPO) Robert King (AK), John Sullivan (ES), Gary Smith (MT), Tom Burke (NV), Stan McDonald (OR), Byron Loosle (UT), Kirk Halford (WA), and Ranel Capron (WY), Field Managers, Beth Maclean (AK), and Will Runnoe (ID), District Manager Chris McAlear (NV), and field office (FO) Specialists Diana Hawks (AZ) and G. L. "Buck" Damone (WY). DPOs Signa Larralde (NM) and Tim Smith (CA) were unable to attend.

Additional BLM attendees were Richard Hanes (WO), Jerry Cordova (WO), Michael Thomas (WO), Jeanne Moe (MT), Kate Winthrop (WO), John McCarty (WO), Cynthia Herhahn (NM), Duane Dippon (WO), Lucas Lucero (WO), Emily Palus (WO), and Leslie Courtright (WO) for portions of the meeting. Attending in person from outside the BLM, was Bambi Kraus, President, National Association of Tribal Historic Preservation Officers, Nancy Schamu, Executive Director, National Conference of State Historic Preservation Officers, Nancy Brown, BLM Liaison, Advisory Council on Historic Preservation, Elizabeth Merritt, Deputy General Counsel, National Trust for Historic Preservation, and Michael Smith, Department of the Interior, Office of the Solicitor, and Stephen Fosberg, Consultant.

Welcome

The Board was welcomed to Washington by Ed Roberson, Assistant Director for Renewable Resources and Planning. Ed brought greetings from the Director and from Deputy Director Pool and thanked the Board for all it does for the BLM. He noted the many historic elements of the Main Interior Building and explained the organization of the Directorate of Renewable Resources and Planning. He spoke of the importance of the work of the Board and BLM DPOs and the challenges of meeting the demands of the BLM workload. He noted the importance of the streamlining authorized by the BLM national programmatic agreement (PA) and the support we had from the Department to complete the revision of the PA. He also emphasized the importance of tribal consultation to the Department and the BLM, and said that BLM Tribal Coordinator, Jerry Cordova, had given a training session at the last Executive Leadership Team meeting.

Department of the Interior, Tribal Consultation Policy & Implementation Discussion

Richard Hanes, Jerry Cordova, and Bambi Kraus briefed the Board on the DOI Tribal Consultation policy and companion Secretarial Order. Jerry pointed out that the BLM set the model that the Department of Interior (DOI) followed for its outreach at the initiation of policy development and that the DOI and the BLM received similar comments. Jerry also pointed out that the BLM's commitment of an Assistant Director and Division Chief to the effort was appreciated by the tribes. Jerry reported on the session on tribal consultation and relationships that he gave to the Executive Leadership Team (ELT) and Colorado Management Team.

Richard Hanes led the Board through the key consultation principles in the DOI policy and the key requirements in the Secretarial Order and emphasized the paramount importance of tribal relationships. He noted that many BLM offices are already following the recommended practices, but that others will need to make adjustments. This is particularly true for management ownership of consultation responsibilities. Richard led a discussion on implementation of the DOI policy, in particular what should be included in an Instruction Memorandum (IM). He noted that some changes to the 8120 Manual Section, *Tribal Consultation Under Cultural Resource Authorities* and companion handbook, will be needed and that the BLM must also decide whether to bring back an updated version of the old 8160 Manual Section, *Native American Coordination and Consultation* and H-8160-1 Handbook, *General Procedural Guidance for Native American Consultation*, perhaps as part of the 1600 series. Bambi asked if we were looking at consultation practices as well as policy and invited the BLM to participate in the National Association of Tribal Historic Preservation Officers annual meeting in May. Bambi also noted that the National Congress of American Indians had posted information about the President's Summit on their web site. The Board asked Richard to ensure that all programs with tribal consultation responsibilities were committed to implementation of the new policy.

Heritage Outreach Updates

Robert King, Michael Thomas, and Jeanne Moe briefed the Board on the Homestead Act celebration, the Secretary's Latin American experience initiative, and Project Archaeology, respectively.

Robert distributed Information Bulletin (IB) 2011-082 announcing the commemoration of the 200th Anniversary of the Government Land Office (GLO) and the celebration of the 150th anniversary of the Homestead Act, and brought the Board up to date on preparations—now on the home stretch. Robert has developed national and state—specific information. Derrick Baldwin is developing the web site which will include basic information on homesteading, its impact on modern land management, and role in American history. There will be national conferences in Nebraska and Tennessee, involving Board members. The Public Lands Foundation is a partner in these efforts.

Michael Thomas briefed the Board on his progress with the Secretary's Latino Heritage initiative. Michael had been doing research on BLM resources to identify those that have a Latino connection and are appropriate for public access and interpretation. Eligibility for the National Register of Historic Places (National Register) is an additional consideration but not a requirement under this initiative. He thanked the DPOs for responding to his request for information on good candidates within their jurisdictions.

Jeanne briefed the Board on development of Project Archaeology products as Section 106 mitigation measures. She further suggested that mitigation for multiple projects could be combined to fund curricula of interest to a broader geographic area than site or project-specific materials. Byron Loosle suggested that recent law enforcement operations will be developing a communication plan that will include collections and suggested that Project Archaeology could be part of that plan. Jerry Cordova suggested that Native American, as well as Anglo-American, teachers and students are a potential audience.

Jeanne also briefed the Board on the new National Landscape Conservation System 15-Year Strategy. She discussed the key goal to, "conserve, protect, and restore, across landscape boundaries, together with partners, with a commitment to conservation excellence." She stressed the need to coordinate during budget development and the need to articulate how Project Archaeology supports the overall heritage education and youth initiatives of the BLM. Chris McAlear suggested reaching out to AmeriCorps and the Student Conservation Association.

Programmatic Agreement Roll-Out & Implementation

Robin reported that the BLM, the ACHP, and the NCSHPO have reached agreement on a draft revision. A letter from the Director has been prepared and will be posted on the BLM external web site with the draft revision in preparation for signature in February. The letter will include a summary of comments and BLM responses. Robin asked the Board to review their previous recommendations on a roll out and implementation strategy.

Implementation will focus on ensuring that our policies and practices are consistent with our responsibilities for four key stakeholders that have specific roles in the NHPA Section 106 process:

- SHPOs, through BLM-SHPO protocol reviews and revisions.
- Tribes, through implementation of the new DOI tribal consultation policy and those provisions of the revised PA that reiterate the provisions of the new policy as it relates to agency responsibilities under NHPA.
- Consulting Parties, through strategies outlined in BLM-SHPO protocols and developed locally with recurring consulting parties; and the
- Public, through coordination of NHPA Section 106 and National Environmental Policy Act (NEPA) compliance.

Robin and Nancy Schamu of the National Conference of State Historic Preservation Officers (NCSHPO) then went through the draft PA provisions for BLM-SHPO protocol revision, especially the 16 items required in BLM-SHPO protocols. Nancy emphasized the need to be practical as well as conscientious in developing protocols that met the new provisions. The Board asked for an email notification that they could share with their management teams.

Recreation and Section 106: Travel Management

Diana Hawks briefed the Board on two recent court orders on lawsuits on the Upper Missouri River Breaks National Monument and the Arizona Strip District resource management plans (RMP), that addressed NHPA Section 106 compliance for route designations, and their implications for a revision of IM 2007-030. Diana described the process that she had followed for the Grand Canyon-Parashant and Vermilion Cliffs National Monuments in the Arizona Strip District RMP/Environmental Impact Statement (EIS) and the basis on which the Arizona District Court found they had not violated the NHPA in approving those plans. The process used was consistent with IM 2007-030 and both Courts cited the IM in their decision that the BLM had consulted with the SHPO and made a reasonable and good faith effort to identify resources. Diana emphasized the importance of completing the revision and reissuance of the IM as soon as possible because of pending and upcoming field office travel management plans and RMPs that include travel-related decisions. She thanked

Board members for their comments on the draft revision and said she would share a completed revision of the IM following her return to the office. This is a continuing action item.

Range and Section 106: Livestock Trailing

Dan Haas and Kimberly Hackett gave a presentation on a proposed IM on the NEPA requirements for the issuance of crossing permits, or "bills," across BLM land. The IM is targeted at the 2012 grazing year. Crossings are less than one percent of the total permitted Animal Unit Months (AUM). However, fourteen "bills" issued by BLM Idaho were appealed to the Interior Board of Land Appeals (IBLA) and the settlement agreement committed to applying with all applicable laws and regulations. Historically the BLM gave temporary authorization for crossings, or (if the crossings were within the season of use) addressed them as part of permit renewal. The states of Wyoming and Idaho have most crossing permits, followed by Colorado and Nevada. Dan Haas said that the Field Offices in Colorado are concerned about meeting the NHPA Section 106 workload that the crossing permits will entail. The Board discussed the area of potential effect for crossings. The BLM's permit only addresses the BLM portions, and the Board determined that the "rule of reason" would govern their decision on which areas of private land would be affected by the BLM's decision. Ranel noted that there are livestock trails in Wyoming that the SHPO considers eligible for the National Register, and raised the question of whether a historic use is an undertaking with the potential to affect this type of resource. Kimberly will share the revised draft as soon as it is available for distribution.

Renewable Energy Lessons Learned

Kate Winthrop and Nancy Brown briefed the Board on Section 106 Lessons Learned. Nancy Brown summarized the special features of consultation as opposed to public comment. She noted the extreme importance of sufficient and well trained staff that is familiar with the BLM policies and process. She noted that some BLM staff are over-whelmed and over-taxed, and suggested that the BLM consider temporary adjustments in staff assignments to help equalize workload. Nancy talked about the importance of partnerships with SHPOs, THPOs, and Tribes and noted that these entities may also have difficulty in fulfilling their 106 responsibilities without additional resources. Nancy urged that BLM offices initiate the 106 process early and ensure that 106 is completed prior to signing a Record of Decision (ROD). Nancy brought the Board's attention to the ACHP guidance on reasonable and good faith effort and on renewable energy, and ongoing work to develop guidance on traditional cultural landscapes. She also emphasized the ability of the ACHP to assist field offices with procedural decisions. Nancy concluded by stressing the importance of incorporating the 106 and tribal consultation processes into the overall project schedule, documentation, and celebrating successes.

Kate Winthrop gave a report on the Western Renewable Energy and Historic Preservation Workgroup (WREHPWG) that has been created by the BLM and the ACHP. The interagency group met twice, most recently on October 13, 2011, and has developed the following ideas for action:

- Talking points for use in all outreach efforts
- Hand-outs for proponents on NHPA Section 106 and tribal consultation, to be handed out at pre-application meetings
- Outreach to industry including incorporation of NHPA Section 106 information in ROW training
- NHPA Section 106 and NEPA coordination guidance
- BLM internal communication through participation of WO-240 in the ROW Project Managers Workshop and of the ROW Branch Chief, Lucas Lucero, in the Preservation Board meeting.

Implementation of the DOI tribal consultation policy and continued development of BLM landscape level approaches will be long term efforts that contribute to improving our processes. Kate also handed out the list of 2012 Renewable Energy Priority Projects as of November 22, 2012.

Solar Programmatic Environmental Statement update and next steps

Linda Resseguie and Stephen Fosberg, BLM Solar Archaeologist, gave an update on the Solar Programmatic EIS on the proposed development of a solar program. The goal of the program would be to identify priority solar energy zones (SEZ) and exclusion areas for solar development and amend land use plans to identify mitigation measures. The PEIS comment period for the Solar PEIS closed May 2, 2011 and over 80,000 comments were received. In the light of concerns raised about the preferred alternative and the need for a balance between development within Solar Energy Zones and flexibility for industry, the BLM issued a Supplemental PEIS with a comment period to close on January 27, 2012. The WO has signed an IM (2012-032) that identifies state office actions necessary for completing the NHPA Section 106 and tribal consultation for this proposed action. The IM also forwards the draft PA for this project. Linda noted that 4 public meetings were planned, two of which have occurred. More information is available at <http://solareis.anl.gov>. Signature of the ROD is scheduled for September 2013.

Stephen Fosberg briefed the Board on the status of the NHPA Section 106 process for the Solar PEIS. The final report from the ethnographic study contractor is due on December 19. Tribes have identified places of cultural and religious importance and tribal governments have vetted the information that will be posted on the Solar PEIS web site. Stephen also briefed the Board on the content of IM 2012-032. The IM includes the proposed solar programmatic agreement (SPA) and a copy of the letter to tribes with an interest in solar states and a question and answer document. Stephen also described the intention of awarding a contract for further archaeological survey in the SEZs using a 5% sampling design. The deliverables will include maps of cultural sensitivity zones. Linda offered to schedule a conference call to discuss the contents of IM 2012-032 and the Board said it would be very helpful.

PA Implementation: NEPA & 106

Robin and Michael Smith of the DOI Solicitors office briefed the Board on the IM developed collaboratively with the WO-210 and the DOI Solicitors on coordination of NEPA and NHPA Section 106 compliance processes. Coordination will increase the efficiency of the overall environmental review process. The IM includes the matrix that Robin introduced at the June 2011 Board meeting and a question and answer document that addresses such topics as the difference between NEPA and NHPA Section 106 requirements, when the BLM needs to complete the NHPA Section 106 process, and NHPA Section 106 requirements for land use planning. The Board asked that we identify both WO-210 and WO-240 as originating offices. Michael answered questions and said that the surname package was currently at the DOI Solicitors Office.

Ethno-Geographic Assessments

Richard Hanes, Jerry Cordova, and Stan McDonald led a discussion on the use of ethno-geographic assessments to supplement government-to-government consultation. Richard introduced a proposed the new term, "ethno-geographic assessments" to help align these assessments of the social values associated with geography, with the BLM's landscape level approach to land management. Richard distributed a sample statement of work prepared by the BLM tribal liaisons work group, together with Rob Winthrop, John McCarty and himself, and asked the Preservation Board to review it. He asked the Board for recommendations on adapting it for use at different scales appropriate for small footprint projects (locales), large complex projects (areas), and landscape level planning efforts. He also asked for suggestions on criteria that may be used to determine when ethno-geographic studies are appropriate. Stan McDonald then presented a review of the authorities, standards and guidelines under which we identify and evaluate historic properties of traditional religious and cultural importance to Indian Tribes. He discussed the identification, evaluation and consideration of traditional cultural properties in the NHPA Section 106 process, and distributed training materials on Traditional Cultural Places & Indian Sacred Sites prepared by Gary Stumpf. Michael Johnson's draft criteria were noted as a good starting point for this effort. A workgroup of Jerry Cordova, Tom Burke, Robert King, Gary Smith, Diana Hawks, Chris McAlear, and John McCarty will consolidate the Board's comments on the statement of work and develop proposed criteria beginning with Michael Johnson's earlier work on this subject.

Action Item: 12-11-1, Ethno-geographic Assessments. The Preservation Board will review the statement of work prepared by the Tribal Liaisons; and a work group composed of Jerry, Mike, Stan, Tom, Bob, Gary, Diana, Chris & John McCarty will develop criteria for conducting ethno-geographic assessments at different scales as a supplement to government-to-government consultation. They will begin by reviewing Michael Johnson's draft criteria, which Michael will post on the SharePoint.

Visual Resources Management: Analyses of Effects to Historic Properties

Kirk Halford, Jenna Gaston, Renewable Energy Coordinating Office archaeologist, and John McCarty gave a presentation on the adaptation of Visual Resources Management (VRM) to quantitative assessment of adverse effects in the NHPA Section 106 process. This approach addresses the tangible aspects of visual effects as opposed to VRM sensitivity ratings that may result from ethno-geographic assessments. Jenna presented a draft form on Degree of Effect, for recording and quantifying adverse visual effects based on site integrity, distance, National Register of Historic Places context, and contrast. Jenna asked the Board to review the form and provide comments. John reported that he is working with Argonne on the visibility of wind towers and transmission towers and that other research on visibility exists. These studies and existing research provide useful baseline data for future assessments. John also explained that distance needs to be considered in combination with other information. For example, the presence of absence of a backdrop can dramatically change visibility. John noted that this and other offshoots of the standard VRM classification should be developed collaboratively with the VRM community. Diana Hawks suggested that the form be revised to include a section on integrity of "setting" as well as "site" and recommended that field offices complete the proposed form as a team effort. Nancy Brown cautioned the Board on the importance of being precise and not equating "scenic quality" with "adverse effects" or "indirect effects." This is a continuing action item from the June 2011 meeting.

Rights-of-Way Program

Lucas Lucero, Rights-of-Way Branch Chief, and Kate Winthrop gave presentations on the Rights-of-Way program, specifically as it relates to electric transmission lines. They then led a discussion on the need for NHPA 106-specific guidance. Lucas presented the authorities and background for the Electric Transmission Lines program, including the Memorandum of Understanding among 9 Departments and Agencies to improve and expedite permitting of Rights-of-Way (ROW). He emphasized the criticality of the transmission lines for resolving a lack of capacity in the west and building out the renewables. Lucas also discussed the challenges of the ROW permitting process and the efforts that the BLM is making to meet those challenges, including screening applications prior to formal submittal through pre-application meetings with stakeholders. Lucas explained the organization of the ROW office and the role of the Renewable Energy Rapid Response Team, led by the White House Council on Environmental Quality and Departments of the Interior and Energy. He said that his Division is proposing development of a national transmission support team with resource specialists. That proposal is being reviewed by the Executive Leadership Team. Lucas said there was an IM underway on NEPA for ROW applications. Robin asked that the IM reference the key recommendations for NHPA Section 106 improvements that would be detailed in the NHPA 106-specific IM. The Board cautioned that resource specialists selected for a support team needed to be familiar with the BLM and the Section 106 process.

Kate Winthrop then gave a presentation on the 106 process for large, complex, and urgent projects and asked the Board if additional guidance was needed to ensure the BLM meets its compliance responsibilities for these projects as efficiently as possible. She added that the immediate concern was the ongoing priority projects, but the long term goal is to institute good policies and practices for this class of undertaking. Kate listed the key challenges of the 106 process and how we are addressing them through a multi-pronged effort that includes the DOI tribal consultation step-down, ethno-geographic assessments, WREHPWG efforts to educate applicants in the 106 process and tribal consultation, and NEPA and NHPA coordination. Kate recommended that the proposed IM emphasize the pre-application procedures, use of regulations vs. BLM-SHPO protocols, best practices, appropriate use of phasing of resource identification, and project monitoring. The Board concurred that an IM would be helpful.

PA Implementation: Consulting Parties

Gary Smith and Betsy Merritt of the National Trust for Historic Preservation (NTHP) led a discussion on involvement of consulting parties in the NHPA Section 106 process. Gary noted that involvement of consulting parties, as defined by the 36 CFR part 800 regulations was a key component of implementing the PA revision and reminded the Board that he had led a work group of Dan Haas, Richard Hanes, Diana Hawks, and Stephen Fosberg to develop policy in the past. He also mentioned that the Board discussed the option of national agreements with key preservation stakeholders to identify when to invite them into specific 106 reviews in June but that the Board had rejected that strategy in favor of local responsibility.

Betsy discussed the NTHP mission to facilitate public participation. She also emphasized the benefits of consulting parties in developing creative solutions for concluding the NHPA Section 106 consultation and in fostering general acceptance of the results. She said that while she strongly encourages agencies to be inclusive in inviting consulting parties and responding to requests for consulting party status, agencies have discretion. She recommends that prospective consulting parties be very specific about their interest in a project and she encourages agencies to consider whether the interest has an appropriate nexus with the project. She said that the NTHP is interested in projects that are of national significance and/or precedent-setting and is in the process of updating their written criteria. In response to questions, she clarified that the NTHP brings a national perspective to specific project but represents itself and not the general public. Betsy encouraged Board members to develop an understanding on a local level regarding the interests and thresholds of prospective consulting parties. Betsy also noted there is nothing wrong with agencies looking carefully at entities that request consulting party status. Betsy also noted that traditionally the BLM has relied on the NEPA public comment process to meet its responsibilities for public involvement in the NHPA Section 106 process. She explained the differences between agency responsibilities under NEPA and NHPA and said that the draft IM on coordination of NEPA and NHPA Section 106 will be a very helpful tool. Betsy handed out NTHP and ACHP materials with recommendations on how to make consultation effective.

Action Item: 12-11-2, Consulting Parties. Gary, Ranel, and Buck will work with Betsy Merritt and Michael Smith to update the draft consulting parties IM in order to assist State Offices in their review and revision of the BLM-SHPO protocols, as required by the revised Programmatic Agreement commitments regarding consulting parties. The IM will clarify the applicability of the Federal Advisory Committee Act to Section 106 consultations.

Training

Stan McDonald gave the Board an update on the BLM Cultural Heritage Training Program. He said that the 8100-01 Fundamentals for Managing BLM's Cultural Heritage Program, is recommended for in-class offering in 2012 with assistance for participant travel. At the same time, 15 individual modules have been filmed and are expected to be deployed through the National Training Center's Knowledge Resource Center and /or DOI

Learn by the end of the year. Additional modules are scheduled for filming in FY12, subject to budgets and travel ceilings. Two distance learning classes on tribal consultation are available at <http://krc.blm.gov> and additional classes on BLM Indian Trust responsibilities have been designed and are being adapted for distance learning. The existing class on historic period resources will be converted to distance learning in FY12.

BLM FY2012 Priorities

WO-240 Deputy Division Chief Emily Palus gave an update on the BLM Cultural Heritage Program budget, including the FY12 Budget request and the current status of the DOI appropriation. Emily also briefed the Board on the significance of a Continuing Resolution, if that should be the BLM's funding authority through the fiscal year. Finally Emily briefed the Board on the status of the FY13 and FY14 budget processes. Emily asked the field to coordinate with their NLCS counterparts in building budget requests and performance targets.

Cultural Resources Data Sharing Partnership update

Kirk Halford introduced the new Cultural Resources Data Sharing Partnership (CRDSP) national coordinator, Cynthia Herhahn and the new BLM Geographic Information Systems (GIS) lead, Duane Dippon. Duane briefed the Board on the BLM's transition to Enterprise GIS Architecture and the role of the Data Advisory Committee (DAC) and the Data Advisory Work Group (DAWG) and said that the DAC Chairman, Deputy Director Mike Pool, had asked them to remove barriers that prevent access to data across the BLM. Duane said that he understood the program's need to protect site locations and the importance of our data sharing partnerships with SHPOs. He said the intent was to aggregate data sets and not to build a national data set. Programs can set specific standards, including a reduced number of fields for national roll ups, so data will roll up whether it was collected in-house or by consultants. The Board provided information to Duane on the CRDSP standards and Federal Geographic Data Committee (FGDC) cultural resources data standards efforts. Duane also noted the DOI goal of reducing the number of servers.

Cynthia introduced herself and emphasized the importance of participating in the national GIS strategy for our ability to meet the data demands of large scale interstate projects. She stressed the value of the CRDSP as a method of maintaining data across jurisdictions. She said our need for maintaining confidentiality isolates us and stressed the importance of developing appropriate scales and protocols for sharing cultural data with programs. Cynthia and Duane strongly recommended that each Board member participate in ongoing work flow exercises, so the role of cultural data is incorporated. This also helps identify which programs benefit the most at the local level.

Tribal Consultation and 106 Issues Integration

Buck Damone and Ranel Capron briefed the Board on how BLM offices respond to requests from Tribes for reimbursement of travel expenses. Buck performed an informal survey of 16 field offices in 7 states regarding tribal consultation practices. He found that each field office consulted with an average of 10.7 tribes, 3.8 of which were consulted on a regular basis. Four field offices had consultation protocols and these were usually the field offices with the lowest overall NHPA Section 106 workload. Buck found that consultation meetings frequently involve field trips to project locations and that proponents and/or BLM field offices sometimes pay per diem and/or travel. Inconsistency in this practice among the field offices has become a roadblock to effective consultation meetings. Buck and Ranel noted that the new DOI tribal consultation policy does not address the subject of compensation and made a plea for clarification on when reimbursement is appropriate, whether cost recovery funds may be used, and how reimbursement costs should be paid.

Native American Grave Protection and Repatriation Act Update

Emily Palus updated the Board on the status of implementing the DOI corrective action plan developed in response to the findings of the Government Accountability Office (GAO) audit of agencies compliance with the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA). The GAO made 6 recommendations and the WO makes weekly progress reports to the BLM Leadership. She reported that the BLM needs assessment for ensuring complete implementation with NAGPRA prepared in response to recommendation 1 was used by the DOI as a the model for all of the bureau and office submissions, and that she had compiled and drafted the DOI's consolidated submission. Emily also reported that the NAGPRA Review Committee met on November 9, 2011 and, at the Committee's request, the BLM provided an update on Spirit Cave, which the Nevada State Office prepared, and a general update on BLM's implementation efforts, which the WO prepared. Finally, Emily asked that staff ensure that NAGPRA plans of action be part of excavation project plans.

Emily also used this opportunity to briefly mention the BLM's continuing implementation of the DOI Action Plan implementing recommendations from the Office of the Inspector General Audit on Interior Museum Collections. She reported that the BLM had entered into an agreement with the Army Corps of Engineers (COE), St. Louis District's Mandatory Center of Expertise for the Curation and Management of Archaeological Collections to develop and administer a survey of non-federal repositories holding BLM collections and collect

information on size, scope, and collections data. The WO and COE would develop the draft survey, which will be circulated to the States for review and comment prior to implementation.

Lastly, Robin asked Emily to report on the recent initiation of an audit on historic buildings, which she did, reporting that the GAO has just opened a review of Federal management of historic buildings, and that so far it appeared the focus would be on the National Park Service. However, the BLM WO Cultural and Engineering programs were providing information in response to the GAO's request for information.

Cultural Resources Permit Discussion

Tom Burke led the discussion on permitting. He summarized the issues we have identified related to permitting: forms, signature authority, special conditions, monitoring, and enforcement. He then led a discussion on what the Board thinks we are prepared to address in the near term through issuance of an IM. The Board indicated an interest in clarifying permitting authorities. It also indicated readiness to address use of the DOI permit application and permit forms and develop a set of standard BLM permit conditions. Emily Palus and Leslie Courtright said they would assemble a list of stipulations related to collections and curation facilities. The Board noted that additional permitting improvement efforts would be incorporated into changes to the 8110, 8120 and 8150 Manual Sections. This is a continuing action item from the December 2010 meeting.

Action Item Review:

The Board reviewed the new Action Items and Robin agreed to develop a draft Action Item list for the Board's review and approval. The draft will update continuing items to reflect the current status and next steps. Robin also asked the Board to review the draft Site Steward Information Bulletin one more time to ensure that we have the right information and model documents included.

June 2012 and December 2012 Meetings: The June meeting will be held June 5-7, 2012 in Lewistown, Montana. Gary and Zane Fulbright are planning a field excursion to Coopers Ferry. The December meeting will be held December 4-6 in Washington, DC, and the WO will investigate alternative venues. The Wyoming state office has volunteered to be the June 2013 meeting host. Robin will schedule off-quarter conference calls and additional calls on specific subjects as needed.

Field Trip: The Board had a tour of the historic U.S. Botanical Garden by Sharon Hanes on Thursday afternoon. Rooted in the nation's heritage, the United States Botanic Garden was established in 1820 by an act of Congress after lengthy lobbying to create a national botanic garden by many, including George Washington, Thomas Jefferson, and James Madison. USBG is part of the U.S. Capitol complex, though most assume it is a part of the Smithsonian complex being located on the east end of the National Mall at the foot of the U.S. Capitol. USBG greatly expanded in 1850 to house the historic botanical collections gathered by the U.S. Exploring Expedition to the American West and South Seas in 1838-42 under command of Admiral Charles Wilkes. USBG has been in continuous operation and open to the public since that time. The current conservatory was built in 1933. Some plants from Wilkes' original collection still survive.

On Friday morning, the Board took a tour of the White House. The cornerstone for the White House was laid in 1792 and architect James Hoban was selected by competition. President John Adams moved into the unfinished house in 1800, and every President since has occupied it. During the War of 1812, the British set fire to the White House, James Hoban, was appointed to rebuild it, and President James Madison moved back in 1817. The South and North Porticos were constructed in 1824 and 1829, President Theodore Roosevelt began a major renovation in 1902, and a second major renovation was carried out by President Harry Truman.