

From: Bill Wade [mailto:jwbillwade@earthlink.net]
Sent: Sunday, May 18, 2008 3:01 PM
To: 'Mary_Bomar@nps.gov'
Cc: 'dan_wenk@nps.gov'
Subject: URGENT: LIBH Visitor Center Construction

Dear Director Bomar:

We have taken note of the growing controversy over the proposed expansion of the visitor center at the Little Bighorn Battlefield National Monument, Montana. The visitor center was built in 1952 and, like the large visitor center and cyclorama at Gettysburg, reflected the philosophy of then-Director Conrad Wirth that visitor centers should be placed as close to the resource as possible – in this instance the Bloody Angle where Pickett's charge climaxed. At Little Bighorn it is at the very base of Last Stand Hill and in the heart of the battlefield. Since enactment of the National Historic Preservation Act of 1966, the nation's philosophy of historic preservation has radically shifted. The National Park Service adapted to the new philosophy and moved away from the central concepts of the Wirth era.

At Gettysburg the old visitor center and cyclorama are being demolished and a new visitor center placed out of sight but still not far from the Bloody Angle. At Little Bighorn, the visitor center has for years been considered an unacceptable intrusion on the cultural landscape. This is reflected by the General Management Plan of 1986, revised in 1995, calling for a new visitor center that does not visually intrude on the cultural landscape. Now, Superintendent Cook of LIBH proposes to enlarge the old visitor center to accommodate immediate needs. This striking contrast in management decisions directly violates one of your underlying principles in the 2006 Management Policies – “one national park system.” Meanwhile, an “interim” FONSI (Finding of No Significant Impact) – interim to imply ultimate accomplishment of the General Management Plan – has been completed and approved on April 21, 2008, by Intermountain Regional Director Michael Snyder, thus freeing construction to proceed with the enlargement.

Public Employees for Environmental Responsibility (PEER) has conducted an analysis of this FONSI and we agree with their analysis that it is deeply flawed, entirely inadequate to support a determination of no significant impact. The instances in which it reflects a failure to apply fundamental policies of the NPS Management Policies, NPS-28, the Advisory Council on Historic Preservation's procedural regulations and criteria of adverse effect, and even the 1916 Organic Act are too numerous to burden this letter.

Some of the most serious flaws need no citation but appear obvious enough in themselves to invalidate the FONSI. For example, the proposed enlargement is described in only a few confused sentences that defy understanding by even those familiar with the building, a flaw compounded by the absence of any drawings to illustrate the changes. Another flaw is the record of failure to follow the regulatory procedures for consultation with the State Historic Preservation Officer (later, in a change of jurisdiction, the Crow Tribal Historic Preservation Officer). Each was simply presented the preferred alternative and

asked for concurrence. Finally, the objective of the GMP to remove the visitor center altogether from the cultural landscape is obviated by the determination of no significant impact of the enlarged structure on the cultural landscape. Investment in such an undertaking, of course, is likely to postpone the realization of the GMP for the indefinite future.

We are attaching the analysis, in case you have not seen it.

Director Bomar, we strongly urge you to suspend construction pending your analysis of the FONSI by a cultural resource specialist on your own staff, who can provide you with an assessment of its adequacy to justify the project. While we understand your continuing desire to “back your superintendents,” to do so in this instance is not only inconsistent with policy and previous decisions, but prolongs the existence of an inappropriate facility that ultimately must be relocated.

Sincerely,

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