

## CONSULTATION AND COORDINATION

During the preparation of this feasibility study, the National Park Service reviewed the project scope and identified public agencies, organizations, and individuals with interests in the project. Meetings with these public agencies and organizations were used to further refine issues that the study should address, exchange information about related projects and programs, review historical research and alternatives, seek information on sites and routes, and inform agencies of the status and scope of the study. National Park Service and non-National Park Service historians, archeologists, trail researchers, and local informants in the various states were consulted regarding potential resources, and background and significance of the trail. Archeological site records were researched in all six states. Historians reviewed the preliminary draft to ensure accuracy and fairness in discussion of the historical events and places.

At the time of project initiation, letters were sent to American Indian tribes along the route and those with historic ties to lands crossed by the trail requesting their comments. Later in the project, phone calls were made to tribal headquarters to update tribal representatives about project status.

A scoping newsletter was prepared and distributed in February 1998. The newsletter, which included a summary of the purpose and scope of this study and the process used in its preparation, contained a response form to facilitate input and comment. The National Park Service distributed about 500 newsletters, and 318 responses were received.

Almost all of the responses were supportive of the designation of the Old Spanish Trail as a National Historic Trail, the protection of resources, and programs to help communities better appreciate their heritage. Typical comments centered upon the need to preserve the trail as a link to our Nation's history, create new recreational opportunities, involve volunteers, enhance academic and educational interest, and help ailing local economies by increasing tourism. Many commentators felt that the trail designation was crucial to acknowledge the diverse character of our national heritage—including Indians, Spaniards, and Mexicans—a part of history that had been previously neglected. Two commentators felt that the trail was only of regional, not national, significance, and thus should not be designated.

Newsletters and other trail-related information, both hard copy and electronic versions also were sent to all the national parks along the route, and to applicable National Park Service regional office personnel and long-distance trail office staff.

The National Park Service completed and released for public review the first draft of the Old Spanish Trail National Historic Trail Feasibility Study in early Spring 2000. In the ensuing months the National Park Service received 196 responses and review comments. The overwhelming majority of respondents supported designation of the Old Spanish Trail as a National Historic Trail. Ten respondents suggested the Old Spanish Trail lacked sufficient documentation or failed to meet the criteria for national significance, and favored commemoration of the trail through local or state efforts.

As part of the review and consultation process, the National Park Service contacted all affected states' historic preservation officers and tribal entities, either by letter or phone. In many cases, contacts were followed by additional phone calls or letters. Only a handful of contacted offices replied, and their responses were compiled and accounted for along with those of the general public.

Most of the respondents voiced general, unqualified support for designation of the Old Spanish Trail as a National Historic Trail, without reference to the feasibility study or its findings. In some instances, respondents revealed an unclear understanding of the implications of National Historic Trail designation. In these cases, respondents enthusiastically supported designation as a means of putting the Old Spanish Trail on a federal registry of historic places or historic trails. Some saw it as a means of putting the trail on a federal inventory of historic trails, while others saw the goal as nominating the trail as a national historic landmark. There was also a tendency among some respondents to weigh the benefits of multi-state vs. federal administration of a National Historic Trail. As identified in the feasibility study, National Historic Trail designation is not merely an honorific title. Designation creates a federal program that involves staffing, program management, statutory compliance, and federal expenditure of funds.

A number of responses provided substantive comment, debate, and appraisal on the significance and feasibility of the Old Spanish Trail, and the practice of applying National Trail System and National Historic Landmark criteria to potential National Historic Trails. There were examples of respondents supportive of National Historic Trail designation that made broad claims for significance or pointed to historical activities that occurred on the trail, but failed to provide examples or historical documentation. In almost all cases these assertions were investigated, but unsubstantiated claims were not incorporated into the final study. The substantive comments focused on several critical subjects.

One issue was the application of the National Park Service's Revised Thematic Framework. Many respondents felt that by relying first on its 1987 thematic framework, and then on its 1996-Revised Thematic Framework, the National Park Service was enforcing a rigid, exclusionary, and restrictive application of the criteria for national significance of the trail. Moreover, several respondents felt that the National Park Service's used only one theme to determine national significance. Respondents raised questions about whether the National Park Service, by relying on only one theme to identify national significance, ignored its own recommendations found in its Revised Thematic Framework to use multiple themes as a way of exploring the complexities of historic events. The methodology used by the National Park Service, however, was based on the analysis of each theme based on the historic activities that occurred on the trail. Each activity was assessed for its national significance and its relationship to the historic themes. And, while there is no magic, pre-ordained yardstick to measure national significance, the feasibility study team relied on a broadly subjective interpretation of the criteria found in the National Trail System Act which requires that an event must have had "far reaching effect on broad patterns of American culture." In consultation with specialists from the National Historic Landmark program, the feasibility study team disagrees with the concept that an accumulation of different activities that represented different themes that individually may have state or local significance together amounted to national significance. After a careful assessment of all the historic activities on the trail and their impacts on the historic evolution of the American, Mexican, and Indian peoples, the feasibility study team found national significance within Theme VII, The Changing Role of the U.S. in the World Community, the topic of commerce, and the National Trail System Act facet of trade and commerce.

Some respondents insisted that the expedition led by John Fremont in 1843-1844 that touched on several portions of the western half of the Old Spanish Trail made the trail nationally significant within the topic of exploration. Nonetheless, the National Park Service maintains that while Fremont's expedition may have been significant, it is the entirety of his expedition, which included significant explorations outside the affected area of the Old Spanish Trail, that must be analyzed comparatively against Fremont's and others' explorations in the western United States. This is a task outside the scope of the feasibility study.

Other respondents disagreed with the National Park Service's determination that migration patterns along the Old Spanish Trail that led to the settlement of New Mexicans and Anglo-Americans in California was not nationally significant within the topic of immigration or the theme of Peopling Places. Respondents also maintained that when, in 1847, Kit Carson carried the first overland dispatches from California to Washington using, in part, the Old Spanish Trail, that activity made the trail nationally significant. The National Park Service stands by its analysis that identifies these activities as having local or state, but not national, significance. It also reasons that a complete analysis of Carson's lifetime achievements is required before the trail could be deemed nationally significant because of its association to this undeniably significant personality.

Respondents also raised questions on the period of significance the National Park Service identified for the trail. Some respondents called for extending the period of significance back in time to recognize the trail's Spanish and Indian antecedents. Others called for including in the period of significance activities that occurred after 1848, such as Mormon activities on the western half of the trail, or military exploration activities on the North Branch. Only those activities that made the trail nationally significant are used to define a period of significance, as explained in the study's Statement of Significance.

Many respondents agreed with the National Park Service's recommendation that additional research needs to be completed for the trail. In fact, several respondents were unsatisfied with the depth of research conducted by the National Park Service. Some respondents recommended additional sources, and some of these sources were included in the final study. A few respondents called for more research to identify additional routes, particularly along the North Branch. The National Park Service recognizes the need for additional research. This study is not an exhaustive analysis of all routes and activities on the trail. Rather, it is designed to determine the trail's feasibility as a National Historic Trail. If designation occurs, then further research may identify additional routes and activities. In this same vein of the need for additional research, a few respondents were unsatisfied with the breadth of the study's assessment of the natural resources that could be impacted by trail designation. The environmental assessment completed for a trail feasibility study is appropriate for this level of planning. If the Old Spanish Trail becomes a national historical trail, then a more comprehensive Environmental Impact Statement will be completed to accompany the Comprehensive Management and Use Plan.

The most important need for additional research is in the topic of the trail's impact on the affected Indian cultures. The National Park Service concurs that the activities that impacted the Indian tribes along and about the trail were nationally significant. However it also acknowledges several respondents' claims that additional consultation and extensive research would help expand the understanding of just how profound and widespread these impacts were. The feasibility study recommends that this line of investigation should be at the forefront of any research plan for the National Historic Trail.

Other comments pointed to the need to recognize the trail for its intrinsic cultural value because it acted as an avenue of acculturation and opened California to the Mexican and American populations to the east. While California's culture and economy were already well known to many due to extensive contact through maritime channels, additional cultural mixing resulted from the completion of the trade connection between New Mexico and California. This is a subtheme that can be integrated into later national historic trail interpretive programs.

Those respondents who disputed national significance based their claims on several issues. An important consideration some respondents raised was that there was simply insufficient evidence to make a determination of national significance, and several doubted whether the accumulation of data

would ever warrant a claim of national significance. A small group of respondents compared trade on the Old Spanish Trail to that of other Mexico/U.S. commercial trails, such as the Santa Fe Trail and the Camino Real de Tierra Adentro (both National Historic Trails). These respondents found the amount of trade on the Old Spanish Trail to be insignificant in comparison. This was perhaps the most important issue the National Park Service had to address in its analysis of the Old Spanish Trail. There is no benchmark for when a minimum amount of trade becomes nationally significant. Without data to track the amount of trade on the Old Spanish Trail, it was nearly impossible to determine how it affected the frontier provinces in terms of price and profit levels. Nonetheless, the National Park Service ultimately determined that the trade on the Old Spanish Trail was nationally significant and determined that the data available suggested that in some years the horse and mule trade was considerable. More important, the study found that the trade was significant within the context of the evolution of the northern Mexican frontier and the Indian cultures, and the expansion of the U.S. These were unquantifiable impacts that reached the plateau of national significance in trade and commerce.

Finally, a handful of respondents adamantly claimed that the terminology, the "Old Spanish" Trail, is a misnomer, and perpetuates stereotypes about the region and its people. Clearly, the trail was neither old nor Spanish when it was in use. It was completed in 1829, and named the Old Spanish Trail in 1845 by Fremont, when in fact it was at its height of use. During its entire period of significance it was within the Mexican nation. Anglo-Americans popularized the term Old Spanish Trail after 1848. The name has come into common use and is now considered the appropriate name for the trail.