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From: Lander RMP
Subject: blm management plan comments&general suggestions, 2011.---rg---

From: rgwizzard@wyoming.com [<mailto:rgwizzard@wyoming.com>]
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To: BLM_WY_LRMP_WYMail
Subject: blm management plan comments&general suggestions, 2011.---rg---

BLM resource management plan comments & general suggestions, 2011

I would like to start by changing what is called a citizen proposed wilderness. BLM should rephrase that to "Environmentalist Proposed Wilderness" so there's no confusion about where it came from because local citizens do not propose wilderness because of the disadvantages of that classification. Wilderness type classifications are undesirable and unnecessary especially near communities. Land management permitting process is enough to protect the land. Here are a few examples.

The residents of Dubois experienced some of the disadvantages this summer from the forest fires that surrounded the town. Those fires destroyed a lot of resources and wildlife, a historical structure called Double Cabin and contaminated the air in town causing respiratory discomfort for a lot of residents. Wilderness type classifications are also an economic threat to communities. Wilderness type classification does not belong anywhere near towns or communities.

For example referencing map 12, the Dubois badlands including WSA area is too close to town for wilderness type classification and nothing there qualifies it for wilderness types of classification according to The Wyoming Wilderness Act of 1984 which points out the areas should be roadless and undeveloped for example. That area could qualify as a motor vehicle play area for example as explained on pg. 27 paragraph 2.4.15 vol.1. Also that area is undergoing a natural state of geological erosion which began about 50,000 years ago so no amount of human activity there is going to change that. As far as Whiskey Mountain that is also too close to town for wilderness type classification and doesn't really meet wilderness standards either. Red Creek area is not wilderness material either because of small size and is not roadless either. A simple road restriction would serve the purpose. Whiskey Mountain has multiple use potential so no need to destroy the whole area with a wilderness classification when seasonal road control would be more effective. Also the permit process controls most land use. This prettymuch eliminates the need to reclassify public land from general multiuse to anything else or use buffer zones around trails and such. Evidence shows that positive interaction between humans and wildlife is a good thing. The only exception is during hunting season when wildlife don't want to see human presence.

Keep in mind public lands are supposed to be open for public multi use. The general land users are not going to hurt anything. It is important that roads remain intact so the elderly and disabled can have the right to access the land too. Also roads should not be converted to - small ATV use only - on certain sections of road without an alternate route.

Wilderness type classifications can be a powerful weapon against man and nature when used in the wrong places for the wrong reasons. It seems like Wilderness study areas are being used to restrict areas that don't quite meet wilderness qualifications. The word protection needs to be understood. Restricting or stopping human presence does not necessarily mean the area is protected. In some instances the lack of human presence means the lack of protection.

There are other means of protection like declaring buffer zones around towns; a so many mile radius would be off limits to wilderness type classifications, etc. to protect the livelihood of the community. The only exceptions might be certain types of energy systems that are harmless to the environment.

Instead of putting buffer zones around entire trails like map 126 suggests which are already in managed areas and protected by the permit process use the buffer around the well or mine itself. Once an exact location for a well is determined that location can be examined to determine the size buffer needed so the well does not interfere with anything around it. This might be more efficient than trying to map out every nest, den, or mating site that's active and trying to buffer those as shown in maps 62 - 65. Wildlife has the ability to move where and when they want. When a well or mine is established it's not likely to move so its buffer won't either.

We are lucky to be in a state with this much resource potential. While other states are struggling economically Wyoming is still balancing its budget. We should protect our resource production so we can continue having the benefits that we have.

There's no need to manage or restrict over snow travel because this is pretty much a leave no trace form of transportation and does not harm the environment. Referencing maps 114-116.

In 2006-09 I explored sections of the continental divide for the placement of the Continental Divide Trail, 20 miles of it out of approx. 50mi. was established. This trail is expected to include all types of diversities. Several hundred miles of this trail is allowed for industrialized or modern occurrences. The National Historic Trails section across the basin area could remain multiuse without affecting the integrity of the trail. The benefits would be multipurpose access including emergencies or land restoration projects. Volume 1 3.7.1.

I have extensive knowledge and experience at building and locating trails if anyone needs help at this.

Vol.3 Appendix J.- standards for healthy rangelands, guidelines for grazing. Also 1.4. vol. 1. Having the knowledge of the natural land and growing up farming & ranching I was able to collect information on livestock grazing in certain locations. My research was limited to elevations close to and above 9000ft. along the continental divide which is where most water sources occur. Above 10,000 are critical water sources depending on location and should be off limits to livestock by fencing off the source area appropriately and piping water down to the grazing area where necessary. I found that most livestock grazing should not occur in the high country because the topsoil is too thin to sustain a herd of cattle and the ground in general can be too weak for this kind of impact causing destruction of the ground leading to erosion problems. More importantly unprotected water sources were destroyed and contaminated. In the Sweetwater Needles area I witnessed a new spring turned into a cesspool from a herd of cattle trampling in it. Water sources need to be off limits or excluded from livestock by fencing off those areas where cattle graze. A lot of my research has been in the 3 waters mtn. area. I've been studying glacial runoff and high mtn. springs of pure quality water. In high elevations the wildlife and vegetation need clean water and it needs to stay clean as far down as possible so other wildlife can benefit also. I learned that water normally starts out from glacial runoff or a high mtn. spring for example with unique properties. As the water makes its way down, long exposure to sunlight can change this in a natural way. Livestock can change these properties instantly making it very acidic and high in bacteria. Also livestock in the high country are not welcome much by wildlife living there, another part of human presence activities maybe. Livestock tend to eat what little food supply there is for wildlife. More research and data can be made available.

Vol.1.3.3 fire & fuels management, vol.3. appendix O. land management agencies want everyone to think large scale fires are a useful tool for managing the forest and rangeland. Many of us feel opposed to this. A tool is thought of as some implement used under someone's full control to do work. A large forest fire is under no one's control, therefore fire becomes a weapon of mass destruction. Fire does not discriminate it destroys everything in its path regardless of how it got started. We know that fire changes the biochemistry of the land, for example allowing seeds to grow that normally would not or plants to appear that normally would not, like the knapweed having a high resistance to heat can appear before any native plant that was there.

The best and right way to manage the forest is the old tried and true way with woodsmen using forestry tools and equipment. That way nothing gets destroyed especially wildlife, and a healthy forest

remains. And human's can interact with nature the way we were meant to. Motorized use is very important to the health of the forest.

Vol. 2. 4.11 & 4.12 mention minerals being extracted without replenishment in a timely manner. Instead of thinking of it as an irreversible and irretrievable loss of a mineral, think of it as a beneficial use of that mineral. I think the minerals are for our use in a reasonable manner. Whether or not it should be replaced right away might depend on what the mineral is and why it's there in the first place. It might not need to be replaced or even be a concern.

Vol.1. 3.4.1. and vol. 2 4.11, biological resources. I think trees or vegetation should be left mostly to manage themselves, let nature do its thing. Land management agencies are probably not as qualified as Mother Nature is. For example if juniper or conifer move into a new area, might be to balance the ground minerals or chemistry. Like conifers dominating aspens for example might have something to do with the water table declining if aspens need more water than evergreens. The whole treeline has declined because the whole underground water table has declined. Aspens usually indicate where water sources are. That might be why high elevation aspens are diminishing.

3.4.10 vol. 1 mentions wild horses. They should not be killed, as they were here first and killing animals is inhumane.

As it is not possible to comment on the entire management plan I covered as much as possible. If BLM wants more info on anything feel free to contact me.

Sincerely, Rich Gerow

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