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Comments for the Bureau of Land Management on the Lander Resource Management Plan Revision

Topics of Interest

- *Visual Resources* (Table 2.25 [p. 124], Chapter 3.5.3 [pp. 402ff], Chapter 4.5.3 [pp. 949ff])
- *Recreation* (Table 2.31 [p. 144], Chapter 3.6.6 [pp. 436ff], Chapter 4.6.6 [pp. 1019ff])
- *Wilderness Study Areas* (Table 2.33 [p. 169], Chapter 3.7.2 [pp. 457ff], Chapter 4.7.2 [pp. 1054])

Comment #1: Alternative D prescribes, "Surface-disturbing activities within VRM Class III and IV not within view of Congressionally Designated Trails will be evaluated on the VRM Class designation at the site of the surface disturbance" (Bureau of Land Management - Lander Field Office, Wyoming 2011, p. 125). While, at first glance, it seems logical that surface disturbing activities should be evaluated on the VRM Class designation at their site, Alternative D goes on to state, "Surface-disturbing activities out of scale with the surrounding landscape *within view of Congressionally Designated Trails* will be evaluated based on VRM Class II standards" (*Ibid.*, emphasis added). This concession recognizes that the preservation of visual resources in at least some scenic areas requires the restriction of certain *offsite* surface-disturbing activities, where such activities are viewable from said scenic areas *and degrade the quality of the landscape* for users of the protected visual resources. Considering the relative scarcity and value—both locally and nationally—of many visual resources in the Lander Field Office Planning Areas that are not Congressionally Designated Trails, I strongly recommend the use of Alternative B, not Alternative D, which "prohibit[s] surface-disturbing and disruptive activities that create a moderate to strong contrast with the existing visual environment that can be observed from areas managed as VRM Class I and Class II, such as wind development" (*Ibid.*).

Comment #2: As noted by the Wyoming Outdoor Council,

The recreation resource on public lands is becoming increasingly valuable: more people want to recreate on a finite amount of public land. Recreationists desire solitude, clean air, clean water, vast undeveloped landscapes, and a place to witness healthy natural systems thriving with native plants and wildlife. The RMP should accommodate those desires... Increasing recreation pressure dictates the need to include more lands within ROS [Recreation Opportunity Spectrum] classes that protect the land's undeveloped, wild character, i.e. primitive and semi-primitive non-motorized recreation classes (Blair and Pendery 2007, p. 32).

The personal and economic value of the Lander Field Office Planning Area's recreational resources cannot be overstated. As stated in another WOC document,

Some BLM lands in the Lander area (especially Johnny Behind the Rocks and the Bus) share some of the characteristics that make Moab [Utah] such a popular destination, and it is possible with proper management and vision, that these lands could become a regional destination for mountain bikers.

If so, recreation in the Lander area will continue to support a diversity of new businesses and attract younger residents to Fremont County (Maxon 2010, p. 9 [emphasis added]).

Maxon goes on to enumerate areas of critical recreation concern thusly:

[R]ecreation areas of [...] particular importance both locally and nationally [...] include the Granite Mountains, Green Mountain, Beaver Creek Ski [A]rea, Sweetwater Canyon, Johnny Behind the Rocks, the Bus, Baldwin Creek, Red Canyon, as well as Beaver Rim and the upper Sweetwater watershed... Certainly as the human population in Fremont County increases, these areas will become even more important, not only as places for local residents to recreate, but also for local business[es] like NOLS, sporting goods retailers, and other businesses who will benefit from tourism inputs as well as local spending (Ibid.).

It is imperative that BLM protects the recreational character of these resources to the fullest possible extent. Therefore, it is my recommendation that the RMP implement *Alternative B, not Alternative D*, to "Manage the following areas as individual ERMAs [...]: Agate Flats..., Beaver Creek Nordic Ski Area..., Castle Gardens..., Copper Mountain..., Dubois Badlands..., Coalmine Draw..., Green Mountain..., Lander Slope/Red Canyon..., Muskrat Basin..., Whiskey Mountain/East Fork..." (Bureau of Land Management - Lander Field Office, Wyoming 2011, p. 148).

Comment #3:

Concerning the Sweetwater Canyon WSA, Alternative D states, "If grazing permits in Sweetwater Canyon are voluntarily relinquished the BLM will close the area to livestock grazing" (Bureau of Land Management - Lander Field Office, Wyoming 2011, p. 152). This is unacceptable. As stated by the Wyoming Outdoor Council, "[T]he wilderness qualities of these areas [Wilderness Study Areas, including Sweetwater Canyon] should be protected to the maximum extent possible even if they are not eligible for wilderness designation" (Blair and Pendery 2007, p. 27). As requested elsewhere, "All lands within WSAs, proposed wilderness, and ACECs should be managed as ROS class primitive" (*Ibid.*, p. 32), in view of the scarcity and value—to current and future generations—of wildlands. As urged in Alternative B, I recommend that "The fenced area of the Sweetwater Canyon SRMA [be] closed to livestock grazing *in order to enhance [its] recreation, watershed, and wilderness values*" (Bureau of Land Management - Lander Field Office, Wyoming 2011, p. 152).

Works Cited

Blair, Andy, and Bruce Pendery. "Re: Scoping Comments for the Lander Field Office RMP." April 16, 2007.

Bureau of Land Management - Lander Field Office, Wyoming. "DRAFT Resource Management Plan and Environmental Impact Statement for the Lander Field Office Planning Area, Volume 1." U.S. Department of the Interior - Bureau of Land Management, 2011.

Maxon, Nathan. "Re: Supplemental Comments for the Lander Field Office RMP." April 26, 2010.