

18 January 2012

To: BLM
Attn: Lander Management Plan
Lander Field Office
1335 Main Street
Lander, WY 82520

Subject: Comments Draft Lander Resource Management Plan & EIS

I have reviewed the draft plan and overall support preferred Alternative D. The increased conservation measures are an improvement over the status quo and necessary to improve resource conditions on BLM lands. I am encouraged that the preferred alternative incorporates as much as possible the principle that federal lands should be managed in the national interest for all citizens.

I believe it is prudent to err on the side of conservation rather than development, when the potential harm or impacts of a human activity are unknown.. Too often, activities have been permitted that have caused significant resource damage. Once harm to a resource is done, it is difficult and costly, if not impossible, to make it right. Activities, once established, can be more difficult to limit or eliminate.

The following are recommendations to expand conservation measures and/or acreage to specific resource alternatives in Alternative D.

Chapter 2.4.9. Livestock Grazing.

Page 23. According to the draft, the BLM evaluates range conditions only when considering renewals for grazing permits. "The BLM workload does not allow BLM to gather data except in association with permit renewal analyses." I understand staff and funding constraints, but this is also an agency prioritization issue and appears to be a fragmented approach to managing an important and extensive resource use. It seems to me that allocating funding for a broader evaluation of 300 + allotments is warranted and consistent with ecosystem management and BLM policies and mandates. I am not opposed to grazing nor am I in favor of blanket grazing closures, but believe the BLM should have a more broad baseline of range and riparian conditions. That is good science.

Chapter 2.7. Detailed Description of Alternatives by Resource

Page 72. #1048. Lands w/ Wilderness Characteristics. The preferred alternative includes about 500 acres less than Alt. B; Glacier Trail appears to be eliminated from Alt D. If this area possesses wilderness characteristics, it should be added to the preferred alternative, increasing the acreage to 5,490 acres. After all, this is only .0002% of the Lander District surface acreage.

Page 74 #2007. Locatable Minerals. I believe that more acreage should be pursued for withdrawal, consistent with Alternative B, which recommends 1.6 million acres. My primary concern is that current mining law allows for the patenting of mining claims or conversion of public land to private property. While I understand that there is a moratorium on granting patents in place at this time, a moratorium can be lifted. It would be a travesty to lose public lands at places like Green Mountain and Johnny Behind the Rocks. Adding 1.6 million acres for withdrawal may be too ambitious, there are areas that merit protection from mineral development and possible privatization.

Pages 74-75. #2009-2013. Locatable Minerals - Oil and Gas. I support the management constraint acreages under Alternative D, believing they will provide adequate conservation measures for natural resources. The Lander Slope and South Pass areas should be closed or protected by NSO constraints to protect viewsheds and cultural resources. The major constraint designation to oil and gas exploration may not be enough to protect viewsheds in these areas.

Pages 78-82. #2022-2034. MLP - Beaver Rim. I support the measures in Alternative D for this area. They are balanced and promote the conservation of this important area.

Pages 83-84. Fire management. Actions Common to all alternatives. Minimum Impact Suppression Tactics (MIST) should be employed in sensitive areas such as WSAs or non-WSAs with wilderness characteristics. I suggest adding a positive statement to this effect somewhere in this section. Use of MIST, where appropriate, will reduce fire suppression impacts and, as a result, can reduce the cost of rehabilitation associated with wildland fire suppression.

Page 127. #6009. BLM Mineral Withdrawals. See comments for #2007.

Page 159. #7003. Outdoor Recreation.

The recommended 1/4 mile corridor in Alt. D to protect the CDNST is inadequate to protect scenic values. The five mile recommendation in Alt. B seems more prudent to me and should be reconsidered in the final plan. The heritage tourism and recreation corridor to protect the NHTs is critical to protecting a national treasure, and one of the most important outcomes of this plan.

Pages 175-176. #7040 ACECs. I support the recommendations in Alt D, especially the expansion of the South Pass Historic Landscape and the designation of Government Draw/Upper Sweetwater Sage Grouse Reference and Education Area as ACECs.

/S/
John Daugherty
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