

January 19, 2012

Bureau of Land Management

Lander Field Office

Electronic mail: BLM_WY_LRMP_WYMail@blm.gov

RE: Lander Field Office RMP/EIS

To Whom It May Concern:

The undersigned (Ronald D. Hansen and Jeffrey A. Hansen) are partners in North Fork Land & Cattle, LLLP ("NFLC"). Another partner of NFLC, Carol A. Hansen, is the designated allotment holder on grazing allotments # 02237 (North Fork, 480 acres) and # 02220 (Red Butte, 40 acres). These grazing allotments have been held by NFLC affiliates for over twenty-five years.

The private property of NFLC encompasses approximately 2,135 acres bordering or surrounding the 520 acres of BLM property noted above. Also, NFLC holds the leases on Wyoming State trust lands totaling approximately 673 acres (lease # 3-8553, 313 acres and lease # 3-8609, 360 acres). Of the private property of NFLC, all but 160 acres are under permanent conservation easements with the Wyoming Game & Fish Commission (1,453 acres) or The Nature Conservancy, Wyoming Chapter (522 acres).

The total surface acreage of private and public lands under the ownership or grazing rights of NFLC is approximately 3,328 acres, and includes surface acreage partially or fully designated as follows:

- Governor's Greater Sage-Grouse Core Area
- 6/10-mile Greater Sage-Grouse Lek Buffer
- Big Game Crucial Winter Range
- Big Game Migration Route
- Lander Slope Area of Critical Environmental Concern
- Visual Resource Inventory Class II (Red Butte)

Overall, NFLC supports the recommendations of the draft Resource Management Plan ("RMP") Alternative D, or the Preferred Alternative. Specific recommendations within this overall statement of support are as follows:

1. The Bus @ Baldwin Creek Recreation Management Zone (RMZ)

BLM acreage of approximately 1,160 acres comprising this RMZ could be better utilized for purposes of recreational opportunities if BLM could complete a land exchange with Wyoming State Lands on adjacent (west) State Lands parcels totaling 800 acres, specifically lease

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3-7393 (640 acres) and lease # 3-8558 (160 acres). As you know, State Lands manages most of its land inventory for purposes of maximizing revenues for the Wyoming public school system, with a much lesser focus on enhancing recreational opportunities (admittedly, others may dispute this statement). While a laudable goal, our opinion is that State Lands lacks the management focus and financial resources to fully develop a management plan for Wyoming public lands that maximizes revenues to the Wyoming public school system **and** most fully enhances recreational opportunities for Wyoming's citizens and visitors.

We also believe that the Fremont County tourism economy is not fully developed to its potential, and expanding the footprint of The Bus @ Baldwin Creek RMZ can better help elements of the local tourism economy such as lodging, restaurants, outdoor equipment retailers and vendors, etc.

A number of BLM's "disposal parcels" identified in the RMP (Appendix S) are adjacent to or are in close proximity to existing State Lands parcels, so consolidating such parcels with the end goal of a RMZ of approximately 1,960 acres (current BLM of 1,160 acres and current State Lands of 800 acres) would provide the expanded footprint to more fully develop recreational opportunities for this RMZ.

2. Mineral Development

We support the draft RMP Alternative D proposal of limiting most of the mineral development in the planning area to the northeastern portion, primarily the Moneta / Lysite area for natural gas development. While the Sweetwater River corridor may contain other mineral resources, our opinion is that many of these resources will be uneconomic to extract in likely economic scenarios of a global economy. Additionally, mineral development in the Sweetwater River corridor would likely conflict with the cultural resources of the area (Oregon Trail, etc.), which in turn helps the tourism economy in the planning area.

3. Trails and Travel Management

We support the draft RMP Alternative D proposal of limiting motorized travel to seasonal periods that lessen the potential conflicts with wildlife, particularly in the winter and early spring months (Map 112). Hiking, fishing, hunting and photography enthusiasts are major contributors to the local tourism economy, and seasonal closures to motorized travel is a great way to help protect a sustainable resource.

We also support the seasonal closures to all human presence in certain critical environmental areas (Map 113) for reasons similar to above.

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A more sensitive and perhaps controversial recommendation would be for BLM to cooperate with local, state and other federal agencies in completing a comprehensive Fremont County (and also Carbon, Natrona and Sweetwater counties, if applicable) road inventory as per the guidance of Wyoming Statutes 24-3-201 through 24-3-206. A November 2010 Wyoming Supreme Court opinion (case number S-09-0227 and S-09-0228) in our opinion **greatly increases** the likelihood of future controversial road access disputes such as “Bunker Road” that impacts BLM allotment # 02237 near Lander. Map 81 of the draft RMP (“Roads in the Planning Area”) lists identifiable roads on the Lander Field Office area, regardless of the status of those roads (public or private). Our opinion is that without a comprehensive road inventory in Fremont County, the physical roads as identified in Map 81 along with the November 2010 Wyoming Supreme Court decision almost guarantees future controversial road access disputes involving Fremont County, state of Wyoming, BLM or other federal agencies.

4. Land Tenure Adjustments

NFLC has previously submitted its request to have BLM allotment # 02237 (480 acres) considered for a land tenure adjustment, as described in Appendix R, as follows:

“The lands located in T. 33 and 34 N., R. 100 W. are located west of Lander, Wyoming with Red Butte to the south and the North Fork Road to the north. These lands have been identified for the purpose of protecting wildlife and open space resources of the adjoining private property owner.”

NFLC respectfully requests BLM to amend the last sentence of this paragraph to read as follows:

“These lands have been identified for the purpose of protecting wildlife and open space resources of the adjoining private property owner and the holders of conservation easements on this private property, which are legal property rights in the state of Wyoming.”

Also, NFLC would like to submit BLM allotment # 02224 (Natural Lake, 240 acres) for inclusion as a land tenure adjustment with the following description:

“These lands have been identified for the purpose of protecting wildlife and open space resources of the adjoining private property owners.”

If the current or future allotment holder didn’t support the designation, (for an exchange meeting certain criteria) NFLC would withdraw its recommendation for a land tenure adjustment on allotment # 02224. Allotment # 02224 is directly east of allotment # 02237. The legal description is T. 34 N., R. 100 W., Section 32, SENW, NESW, S2NE, N2SE.

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Finally, NFLC respectfully requests that up to 80 acres of the land tenure adjustment requested for allotment # 02237 be considered for a disposal as soon as possible. The legal description would be T. 34 N., R. 100 W., Section 32, SWNW, NWSW. As a condition of the disposal, NFLC would agree to this parcel being put under a permanent conservation easement.

5. Private / public lands conflicts

It is our opinion that public land boundaries (including State Lands as well as other federal agencies such as U.S. Forest Service) have evolved much more slowly than the demographic constituencies these public lands were originally intended to serve. These diverging “directions of change”, if you will, have inevitably led to conflicts between private landowners and those people desiring to access public lands when access to public land is most convenient by way of private property, regardless of legal access. This is a problem that won’t be solved any time soon, but it would be helpful for public land managers such as BLM to work with private landowners to initiate land exchanges that results in (a) more contiguous public land holdings with an increased geographic footprint, and (b) allowing private landowners to purchase isolated or smaller public land parcels that lack legal access.

In this regard, the reauthorization of the Federal Land Transaction Facilitation Act (“FLTFA”) may be one way to help accomplish this objective. For those BLM parcels to be sold in sensitive environmental areas (ACECs, etc.), requiring the buyers to place these parcels under permanent conservation easements (as a condition of the sale by BLM) can accomplish the dual objectives of protecting sensitive areas and consolidating public land ownership for net public gain.

Sincerely,

/s/ Ronald D. Hansen, partner

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