



National Outdoor Leadership School

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The Leader In Wilderness Education

January 20, 2012

BLM Lander Field Office
Attn: RMP Project Manager
1335 Main St.
Lander, WY 82520

Dear Ms. Yannone:

On behalf of the National Outdoor Leadership School (NOLS), please accept the following comments on the draft land use plan revision being pursued by the Bureau of Land Management (BLM) Lander Field Office.

Introduction

NOLS is a non-profit organization that teaches outdoor skills, leadership and environmental ethics to more than 10,000 students each year. Founded in 1965 and headquartered here in Lander, Wyoming, NOLS employs more than 800 instructors and staff at ten locations and two professional institutes worldwide. NOLS' mission is to be the leading source and teacher of wilderness skills and leadership that serve people and the environment. The core of our education programs includes extended backcountry expeditions in remote environments of 28 to 93 days in length. For this reason, the Wind River Mountains and the surrounding areas provide us with a quintessential classroom. Very few places in the lower 48 states can support a seamless expedition of this length while offering students (and other visitors) a true wilderness experience. Key to this wilderness experience are clean air, expansive views, and backcountry access.

NOLS has a long history with the Lander Field Office in particular. When NOLS was founded in 1965, students began hiking into the Wind River Range via Sinks Canyon, and climbing courses have spent time scaling the sandstone, limestone, and granite walls season after season since that time. In 1973 we began teaching climbing courses at Split Rock. In 1989, NOLS began to teach climbing and leadership courses at Lankin Dome. Over the decades, the Sweetwater Rocks have become a critical area to us. The presence of diverse wildlife and the Sweetwater River create a rich backdrop for our courses. Split Rock and Lankin Dome are ideal backcountry classrooms because they offer relatively easy access while simultaneously offering a remote feel. With 1,500 user days each year in the Sweetwater Rocks Wilderness Study Areas, NOLS has an important stake in their future management. Though our horsepacking courses are mainly centered in and around the Red Desert, we occasionally bring courses through the South Pass region. This typically happens during years when high snow levels in the Red Desert cause our courses to seek out drier areas, like the region just South of Sweetwater Canyon.

Finally, we recently acquired a parcel of land in Red Canyon and are in the process of constructing a state-of-the-art campus to house our Wilderness Medicine Institute Emergency Medical Technician (EMT) courses. Red Canyon is an ideal place for this campus due to its proximity to town and

backcountry feel. An EMT course lasts 30 days, and indoor classroom space must dovetail with access to remote-feeling outdoor space in order to create educationally effective scenarios.

In general, NOLS is satisfied with the on-the-ground conditions of the land under the jurisdiction of the Lander BLM office, and we feel that the preferred alternative goes to considerable lengths to preserve these conditions. The previous plan left iconic landscapes vulnerable to degradation from energy development, and from motorized recreation. Mineral development hasn't marred the natural qualities of the landscape, and broad, relatively wide-open vistas still reward the student or climber who perches atop McIntosh Peak. Sinks Canyon remains a convenient place to access excellent climbing without needing to compete with motorized use. Students attending courses at our Red Canyon campus, once completed, will enjoy watching migrating elk and other megafauna, as well as accessing the clean, clear Popo Agie River outside their classroom.

The Lander Field Office manages an extensive array of recreation opportunities important to the community. Green Mountain, the Sweetwater Rocks, Sweetwater Canyon, Alkali Basin, the National Historic Trails Auto Tour Route Recreation Management Zone, Baldwin Creek Canyon, Johnny Behind the Rocks, and the Bus at Baldwin Creek, to name a few, are all popular recreation destinations for the local population. All of them warrant careful management. NOLS appreciates the BLM taking these areas into consideration in its evaluation of Special Recreation Management Areas. Management direction in the preferred alternative should meet the local population's needs.

These lands and their designation as largely non-motorized are important assets to our community and contribute a great deal to Lander's appeal as a place to live and for NOLS to house its International Headquarters. Many who live in this community, including those with ties to NOLS, take full advantage of the recreational opportunities available on nearby BLM land. This includes hunting, fishing, and horseback riding, as well as climbing, trail running, mountain biking and hiking. These opportunities have given Lander the reputation of a town where backcountry access is abundant and an active lifestyle is achievable. We appreciate the Lander BLM's intentional management of these places in a manner commensurate with these priorities.

Air Quality

It will be important to establish baseline air quality data prior to embarking on major oil and gas development projects, and to place monitoring stations not only near the project area but also near popular recreation destinations. Additionally, companies working on development projects should be required to adhere to Best Management Practices regarding air quality. It would be helpful to see ozone data broken out on its own due to its health implications and negative effects on the human respiratory system. We would like to pay particular attention to the phenomenon of winter ozone events as experienced in the Pinedale Field Office to find out if those are also experienced in the Lander Field Office.

Locatable Minerals

Of chief concern to NOLS is the prospect of non-energy minerals development, such as granite. A granite quarry in the Sweetwater Rocks area could have a significant impact on climbing opportunities there. Previous extraction activity at the Moonstone has demonstrated this potential. Directives indicate "The BLM should identify the following consistent with the goals and objectives for exploration, development, and disposal of non-energy leaseables in concert with the protection of natural resources within the planning area... Any area wide terms, conditions, or other special considerations needed to

protect other resource values while exploring or developing minerals under the non-energy leasable regulations.” (BLM Handbook H-1601-1, Appendix C, II.K. p. 26) The primitive recreation resource values in the Sweetwater Rock area are not consistent with the development of non-energy minerals.

Phosphate mining, with its significant environmental impacts, is another concern for the school, especially given the aforementioned purchase of property for our new Wilderness Medicine Institute campus in Red Canyon. We are grateful that the BLM lands in Red Canyon are currently closed to phosphate mining and hope that these management prescriptions in the preferred alternative persist into the final plan.

Visual Resources and the Historic Trails Corridor

We are pleased overall with the increased designations of Class II and Class III and existing Class I designations within the Preferred Alternative of the plan. The designations associated with the Historic Trails corridor encompass not only the Sweetwater Rocks WSA Complex, but also the Sweetwater Canyon WSA and Red Canyon. Of particular interest to us are No Surface Occupancy and Controlled Surface Use designations within the trail corridor. By limiting visual interruptions to the landscape, this area will continue to be enjoyed much as the first settlers in the area experienced it.

Socioeconomic Impact of Recreation

We do not feel that the socioeconomic impacts of recreation are adequately addressed in this plan. Specifically, the IMPLAN system does not accurately capture the economic impact of NOLS, one of the largest outfitters in the United States.

In Fremont County in 2010, NOLS paid \$7,200,000 in annual payroll for 125 full time and 50 seasonal staff, and 300 seasonal field instructors. The school spent \$350,000 on food in the state of Wyoming 2010, 53,000 on fuel for vehicles in Wyoming and 50,000 on vehicle maintenance. Further, NOLS paid \$110,000 to Wyoming outfitters in 2010, spreading the economic benefits provided by the school to the extended community.

One way that IMPLAN tracks economic impact is through counting hotel stays. However, the 1,200 students (and, thus, at least 2,400 hotel stays) that come through Lander annually on NOLS courses are not accounted for in this data because they stay in the Noble Hotel, the NOLS dormitory. We recommend that qualifiers be included in the final plan that clarify what economic activity is not captured by IMPLAN. Though our use of public lands in the Lander Field Office is only a small percentage of our land use through our Rocky Mountain location, we would like to see the economic sector of outdoor education and recreation more fully recognized.

Conclusion

Thank you very much for the opportunity to comment on this plan. We consider ourselves fortunate to have access to such amazing areas and we look forward to being an active participant in the agency's plan to manage them.

Best Regards,

Andy Blair
Assistant Director, NOLS Rocky Mountain
National Outdoor Leadership School (NOLS)