



The Nature Conservancy in Wyoming
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January 19, 2012

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



RE: Lander Field Office Draft RMP and Draft EIS

Dear RMP Project Manager:

The Nature Conservancy (TNC) is an international conservation organization working to protect ecologically important lands and waters for nature and people. In 1993, The Conservancy's Wyoming Chapter purchased approximately 5,000 deeded acres in Red Canyon (Red Canyon Ranch) to protect the area from the threat of fragmentation. The Ranch is a mixture of land ownership, including 5,000 acres of deeded land, 12,000 acres of Bureau of Land Management permits, 3,000 acres of State of Wyoming lease, and 15,000 acres of U.S. Forest Service permits. The Ranch is managed under the Coordinated Resource Management approach, enabling landscape-scale management of habitats. TNC is committed to protection of Red Canyon and its habitats while integrating ranching and conservation.

Red Canyon Ranch encompasses a large cross section of the Wind River Mountain habitats representing a diversity of elevations, ranging from 5,500 to 7,800 feet; geological formations including sandstone, limestone and dolomite, cottonwood and other deciduous plant communities including sagebrush, bitterbrush, chokecherry and serviceberry communities, aspen, lodgepole pine, Douglas fir and high elevation wetlands. The property also contains five globally rare plants. The property is critical winter range for all native ungulate species in the state and contains over twenty-five miles of important riparian habitat including the Little Popo Agie River, Cherry Creek, Deep Creek, Barrett Creek and Red Canyon Creek.

The draft RMP proposes in alternatives A, B and D that 15,109 acres of the Red Canyon area (including portions of Red Canyon Ranch) retain the Area of Critical Environmental Concern (ACEC) designation. The Conservancy supports that continued ACEC designation because it will help ensure the conservation of Red Canyon's significant natural communities.

The Nature Conservancy is also committed to the protection of the Lander Front. The Lander Front provides crucial winter and yearlong habitat for deer, elk, and moose, summer range for pronghorn, and an important migration corridor between winter and summer ranges. The Front also lies within the Greater South Pass/Lander greater sage grouse core area providing nesting, brood rearing, and winter habitat for these birds. Since 2000, Lander has experienced residential development, which places pressure on wildlife habitat and big-game migration routes. The Nature Conservancy is working with willing landowners to prevent fragmentation of the Lander Front and maintain the integrity of this landscape.

Again, the draft RMP proposes in alternatives A, B and D that the 25,065-acre Lander Front ACEC retain its designation. The Conservancy supports that continued ACEC designation because it will help ensure the conservation of the Lander Front's significant natural communities.

As noted in the draft plan, recreation activities contribute to the local economies within the planning area, specifically Lander. NOLS, the Wilderness Medicine Institute and the Wyoming Catholic College depend upon the continued management of the BLM and USFS managed lands in a manner that is conducive to wilderness activities. Hunting and fishing, also noted economic drivers, need that same level of resource protection.

Surface disturbance from mineral development within the Lander Front/Red Canyon area would harm not only the wildlife habitat but also the viewshed, recreational activities, and agricultural operations. TNC supports alternative D's proposed closure of phosphate leasing in the Lander Front/Red Canyon area because of the importance of this area to wildlife habitat and to the community for protection of the visual resource. On pg. 466 the plan states, "Red Canyon has the highest visual sensitivity of any landscape in the planning area." For that reason, along with the NNL designation, the ACEC designation, and the crucial winter ranges, TNC supports the closure of the Lander Front/Red Canyon area from any phosphate leasing.

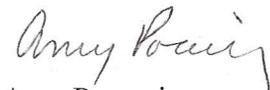
Finally, we have been working closely with the NRCS Sage-Grouse Initiative (SGI) on a scientific study investigating the benefits of conservation actions on sage-grouse populations, including the Wyoming Core Area Strategy. We understand that the Lander Field Office is operating under the BLM Sage Grouse IM and the State of Wyoming Executive Order to protect sage-grouse populations. Through our research we have closely examined the 5% disturbance cap requirement and how it is calculated. After careful review of these calculations, we suggest that the BLM consider a new approach tied to absolute calculations, rather than the relative approach currently used. This new approach could use core areas, groups of townships, or some other appropriate geographic unit. The important feature of this new approach is that the percent area disturbed **does not change** based on the project area. We believe that such an approach will prevent abuse of the system, as well as allow scientists to monitor the overall long-term percent disturbance in the core areas, and would be more defensible in the long run. We would be more than willing to review or consult on development of this new methodology.

Thank you very much for the opportunity to comment on this important public document.

Sincerely,



Paula Hunker
Associate State Director



Amy Pocewicz
Landscape Ecologist



Holly Copeland
Spatial Ecologist

