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**RE: Access Fund Scoping Comments to WY BLM Q1 2022 Oil and Gas Lease Sale  
(DOI-BLM-WY-0000-2021-0003-EA)**

Access Fund and American Whitewater welcome this opportunity to provide scoping comments on the Bureau of Land Management (BLM) proposed oil and gas lease sale, NEPA Number: DOI-BLM-WY-0000-2021-0003-EA. The Access Fund opposes the leasing of parcel number WY-202X-XX-7182 because of potential impacts to rock climbing, other recreational activities, and the local county park.

**Access Fund**

The Access Fund is the national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501(c)(3) non-profit and accredited land trust supporting and representing over 7 million climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is the largest US climbing advocacy organization with over 20,000 members and 130 affiliates. Many of Access Fund's members live and recreate in Wyoming.

**American Whitewater**

American Whitewater is a national non-profit 501(c)(3) river conservation organization founded in 1954 with over 6,200 members and 100 local-based affiliate clubs, representing over 60,000 whitewater enthusiasts across the nation. American Whitewater's mission is to protect and restore America's whitewater rivers and to enhance opportunities to enjoy them safely. The organization is the primary advocate for the preservation and protection of whitewater rivers throughout the United States and connects the interests of human-powered recreational river users with ecological and science-based data to achieve the goals within its mission.

**Leasing Proposal is Controversial and Threatens Important Recreation Areas**

Despite the Biden administration's stated commitment to reviewing our country's broken oil and gas leasing system, the BLM is now poised to offer over half a million acres for oil and gas leasing in Wyoming alone.<sup>1</sup> These proposals include sensitive parcels with documented conflicts related to outdoor recreation, wildlife, proposed wilderness, and Special Management Areas including locations designated by the BLM as Areas of Critical Environmental Concern. In particular, the lease proposal for parcel # WY-202X-XX-7182, provides no protective stipulations to preserve the significant recreation and natural values of this landscape. This 1,392-acre

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<sup>1</sup> <https://eplanning.blm.gov/eplanning-ui/project/2015621/510>

parcel contains Converse County Park,<sup>2</sup> rock climbing, hiking, paddling, and fishing<sup>3</sup>, and should be protected for these exceptional recreation values. In addition, the BLM has assessed this area as holding very low/negligible potential for oil and gas development,<sup>4</sup> further underscoring the point that it is inappropriate to lease this parcel. In other words, the cost of harming valuable recreation resources is high and the probability of successfully exploiting oil and gas resources is relatively low.

Access Fund and American Whitewater are concerned that the BLM will not adequately consider potential impacts from this proposed lease sale to rock climbing, paddling and the other recreation assets and other important values noted herein. Because the direct, indirect, and cumulative effects that would result from implementation of this lease sale could be detrimental to recreation opportunities, we urge the BLM to fully evaluate the cumulative impacts of this proposed lease sale, including how these sales would impact the recreation experience as well as regional socioeconomics. The local economy depends on recreation and tourism. We urge the BLM to cancel this sale or at least defer this lease until it conducts a comprehensive environmental analysis and proposes leasing stipulations—such as no surface occupancy—or other measures to minimize/mitigate oil and gas development impacts on recreation assets and associated socioeconomics.

### **Recreation in Box Elder Canyon**

Box Elder Canyon has climbing resources<sup>5</sup> in at least three locations: 1) the limestone area near the west rim of the canyon, 2) the granite area at the bottom of the canyon including the Promontory Ridge near the “Big Falls”—offering two distinct three-pitch climbs—and 3) another area of quartzite rock atop the granite layer that affords climbing opportunities. There are hiking trails located throughout this parcel, including fishing access trails in the canyon and surrounding the state-owned Duncan Ranch Trailhead west of the canyon, also used by mountain bikers.<sup>6</sup> Finally, this lease proposal also overlays the unique whitewater recreation<sup>7</sup> found in Box Elder Creek as well as Converse County Park.<sup>8</sup> The paddling opportunities in Box Elder canyon are of very high quality and rare in the region. The stunning scenery and high challenge draw experienced paddlers from a wide surrounding area.

In addition to removing this valuable recreation property for this proposed lease sale, we urge the BLM to conduct a meaningful environmental analysis (EA) for the balance of the half-million acres proposed statewide for this lease. This environmental review is especially needed given the many conflicts with wildlife, proposed wilderness, Special Management Areas, Areas of Critical Environmental Concern, and other parcels with outdoor recreation activities such as fishing and hunting.

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<sup>2</sup> See <https://mapcarta.com/23989264>, [https://trib.com/news/state-and-regional/open-access-to-park-former-duncan-ranch-owner-urges/article\\_e1c1d79a-769c-5e5e-aa38-d547d7d83d0e.html](https://trib.com/news/state-and-regional/open-access-to-park-former-duncan-ranch-owner-urges/article_e1c1d79a-769c-5e5e-aa38-d547d7d83d0e.html)

<sup>3</sup> <https://www.hookandbullet.com/fishing-box-elder-creek-glenrock-wy/>

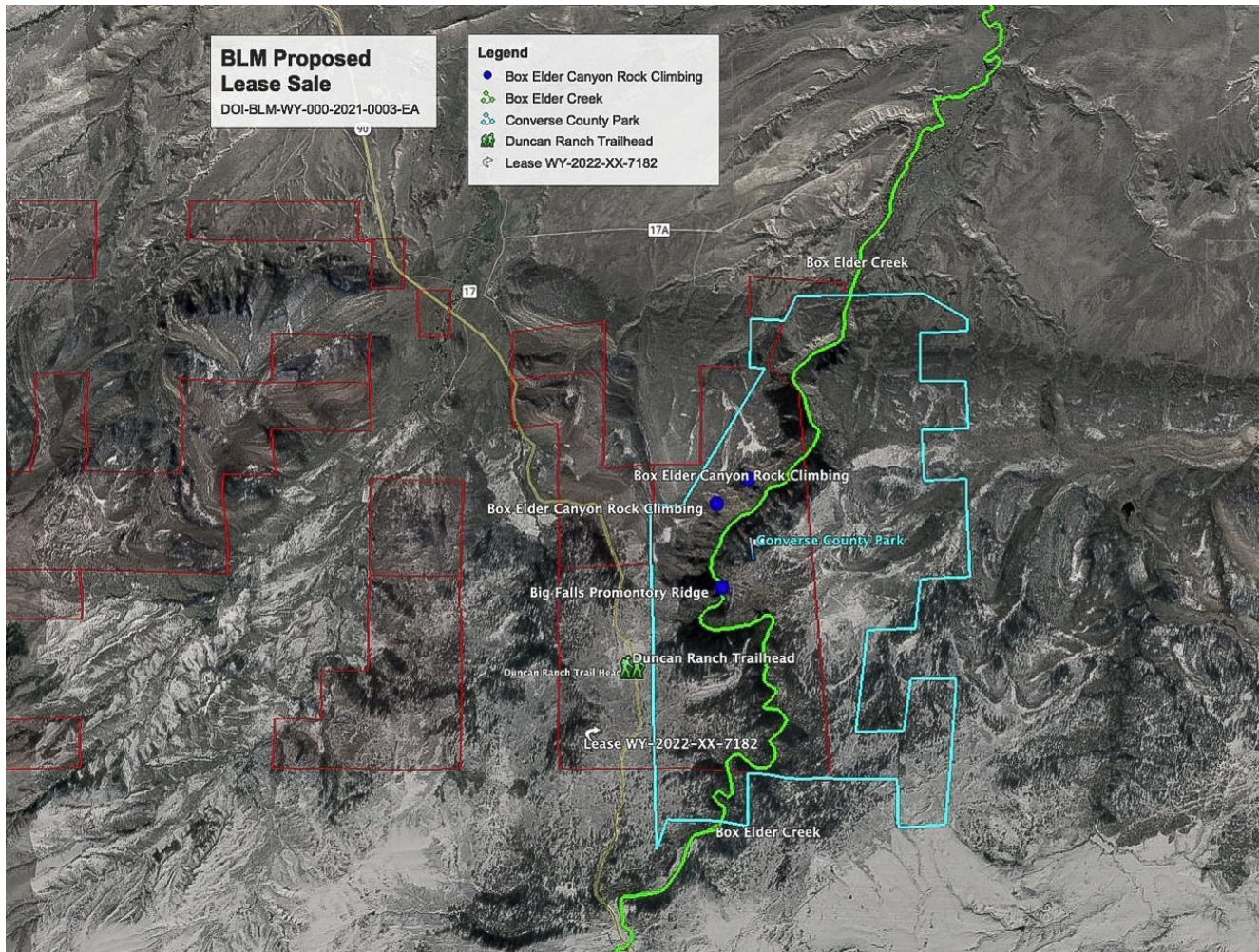
<sup>4</sup> Data provided by BLM and updated on a regular basis. See <https://rmwild.maps.arcgis.com/apps/webappviewer/index.html?id=ec5a650d19b4432fb7199d5c94ec6c3d>

<sup>5</sup> <https://www.mountainproject.com/area/108670680/converse-county-park-box-elder-cyn>

<sup>6</sup> <https://www.facebook.com/OEOCC/posts/299220338770053/>

<sup>7</sup> <https://www.americanwhitewater.org/content/River/view/river-detail/5258/main>

<sup>8</sup> <https://wyoming.hometownlocator.com/maps/feature-map.ftc.2.fid.1586941.n.converse%20county%20park.cfm>



*Recreation in Box Elder Canyon, Wyoming*

### **BLM Must Take a Hard Look at Impacts to Recreation**

In order to take the “hard look” required by NEPA, BLM is required to consider the incremental impact of these lease sales “when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.” 40 C.F.R. § 1508.7. The BLM here must conduct an EA to consider how these lease sales cumulatively impact recreation assets and related socioeconomics, and accordingly propose any mitigating measures to address such negative impacts.

The BLM’s multiple-use mandate prohibits the management of public lands primarily for energy development or in a manner that unduly or unnecessarily degrades other “co-equal” uses such as “outdoor recreation, fish and wildlife, grazing, and rights-of-way must receive the same consideration as energy development.” 43 U.S.C. § 1732(a), 43 U.S.C. § 1702(l). Once leased, these parcels can be held even without production—for decades, preventing management practices focused on other valuable uses such as outdoor recreation or conservation.

Therefore, we urge the BLM to develop a considerate set of EAs for this statewide lease sale that either defers these leases or implements the following standards for protecting recreation assets and other important values:

- NSO stipulation for a 1-mile radius from developed recreation site boundaries.
- NSO stipulation within 0.5 miles of the centerline of high use routes (motorized) and trails (non-motorized).
- NSO stipulation for a 0.5-mile radius around high use recreation areas.
- NSO stipulation to all VRM Class II areas in Special Recreation Management Areas and a Baseline CSU stipulation throughout the remainder of SRMAs.
- Apply an NSO stipulation to Recreation Focus Areas

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The BLM should cancel this proposed lease sale to prevent damage to these high quality and regionally significant outdoor recreation experiences. Cancelling this sale would help fulfill Present Biden's commitment to reconsider harmful leasing practices and provide more access to outdoor recreation.<sup>9</sup> We urge you to remove parcel WY-202X-XX-7182 from this lease sale and conduct a meaningful environmental analysis for the rest of the proposed leases in this statewide sale.

Sincerely,



Erik Murdock, PhD  
Vice President of Policy & Government  
Affairs  
Access Fund



Hattie Johnson, PLA  
Director, Southern Rockies Stewardship  
Program  
American Whitewater

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<sup>9</sup> <https://www.doi.gov/pressreleases/president-bidens-budget-invests-28-billion-support-economies-outdoor-recreation-and>