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BOARD OF COMMISSIONERS

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October 1, 2019

Mr. Chris French
Objection Reviewing Officer
United States Forest Service
UNITED STATES DEPARTMENT OF AGRICULTURE
1400 Independence Ave., SW,
EMC-PEEARS, Mailstop 1104
Washington, DC 20250
<https://cara.ecosystem-management.org/Public/CommentInput?project=52904>

RE: Objection regarding the Greater Sage-grouse Draft Record of Decision and Land Management Plan Amendment for National Forest Service Land in Wyoming – Request to Participate as an Interested Person

Dear Mr. French:

On behalf of the Campbell County Board of Commissioners located in Gillette, Wyoming, I am writing to request the opportunity to participate in meetings related to objections to the United States Forest Service's (the "Service") Greater Sage-grouse Draft Record of Decision (DROD) and Final Environmental Impact Statement (FEIS) for the Land Management Plan Amendments (LMPA) regarding National Forest System Lands in Wyoming (the "Draft ROD"). Campbell County has been actively engaged in the Service's Sage-grouse plan amendment process as a cooperating agency, and we do not object to the Draft ROD as proposed but wish to remain involved to support the proposed action, understand objections and to stay apprised of potential changes to the decision.

As per the Service's September 2019 Sage-grouse Bulletin #13, any cooperating agency that participated in the National Environmental Policy Act ("NEPA") process for the Draft ROD has "automatic standing as Interested Persons, but they must contact the Forest Service to request the status." Based on this guidance and through this correspondence, the Campbell County Board of Commissioners is formally requesting interested person status in all meetings addressing objections to the Draft ROD.

However, the Service indicates in the Draft ROD itself that interested persons "must have previously submitted substantive formal comments related to the objection issues," are required to "identify the specific issues they have interest in discussing" in their request and "will be able to participate in discussions related to issues on the agenda that they have listed." It is unclear whether these requirements and limitations apply to cooperating agencies, or if cooperating agencies are entitled to attend all meetings and discuss all issues regardless of previous comments or topics listed.

In the event the Service is adopting policy language in the Draft ROD, Campbell County indicates here that it has submitted substantive formal comments, which are attached to this letter, and requests the opportunity to participate in discussions on the following issues:

- a. Alignment with the State of Wyoming Sage-grouse Core Area Protection Executive Order;
- b. The elimination of sagebrush focal areas in lieu of the State of Wyoming's Core Area Protection Strategy;
- c. The adjustment of habitat management area maps to be consistent with Wyoming's current core area maps;
- d. Mitigation requirements, including the removal of the "net conservation gain" requirement;
- e. The use of compensatory mitigation and consistency with the Wyoming Revised Greater Sage-grouse Compensatory Mitigation Framework;
- f. Impacts to energy development including winter concentration areas, connectivity areas and noise restrictions;
- g. Desired conditions related to seasonal habitat;
- h. Grazing guidelines;
- i. Recognition and protection of private property rights including split estate situations;
- j. Adaptive management;
- k. Invasive plants and species; and
- l. The Draft ROD's use of plan components and optional plan content.

While Campbell County supports the Draft ROD as proposed and the efforts the Service has made to better align with the agency's Greater Sage-grouse Land Use Management Plans and the State of Wyoming's Sage-grouse Core Area Protection Executive Order, we reserve the right to participate in subsequent litigation as plaintiff if the Service alters its proposed decision in a way objectionable to Campbell County, or as intervenor supporting the Service's final decision.

We appreciate the opportunity to participate in the process, and we look forward to continuing to work with the Service, other cooperating agencies and objectors to reach a Final ROD. Should you have questions or require additional information, do not hesitate to contact Ms. Carol Seeger in our office at 307-682-7283 (CJS06@ccgov.net) or our natural resource policy advisor Dru Bower at 307-388-2709 (dru@wyoming.com).

Sincerely,



Rusty R. Bell
Chairman

CC: The Honorable Governor Mark Gordon
United States Senator Mike Enzi
United States Senator John Barrasso
United States Congresswoman Liz Cheney
Jerimiah Rieman – Wyoming County Commissioner Association

Attachment



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Robert P. Palmer, Commissioners
Administrative Director

BOARD OF COMMISSIONERS

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G. Matthew Avery
Micky Shober
Del Shelstad

January 3, 2019

Mr. John Shivik
Forest Service Intermountain Region
UNITED STATES DEPARTMENT OF AGRICULTURE
Federal Building
324 25th Street
Ogden, Utah 84401
Email: comments-intermtn-regional-office@fs.fed.us

RE: Notice of Availability of the Draft Greater Sage-grouse Proposed Land Management Plan Amendments (LMPA) and Draft Environmental Impact Statement (DEIS) for the Intermountain and Rocky Mountain Region (Volume 83, Page 50331-50332, Document Number 2018-21619, dated October 5, 2018)

Dear Mr. Shivik:

On behalf of the Campbell County Board of Commissioners, I want to thank you and the United States Department of Agriculture for allowing us the opportunity to submit comments regarding the above-referenced document. These issues are of great importance to us and working with agencies to pursue Sage-grouse conservation is critical to the long-term health of our County and the State of Wyoming.

Sage-grouse is a significant issue in Campbell County as federal lands are comprised of approximately 12% federal surface and an estimated 83% federal minerals. Sage-grouse habitat and core areas are encompassed within the county boundary. Balancing surface disturbing activity, conserving Sage-grouse habitat, protecting private property rights and promoting continued energy development is essential to our livelihood.

Campbell County has been actively engaged in Sage-grouse management discussions through participation in the following efforts: Thunder Basin National Grasslands (TBNG) Land and Resource Management Plan (LRMP) Revisions, Buffalo Field Office Resource Management Plan revision as a cooperating agency, the Wyoming Executive Order 2015-4, Greater Sage-grouse Core Area Protection (EO), along with the construct of Wyoming County Commissioner Association positions. We also developed and adopted the Campbell County Amended Natural Resource Land Use Plan, which addresses Sage-grouse and Sage-grouse habitat management. The County has demonstrated through numerous efforts that we have a vested interest in proactive management of Sage-grouse to prevent a threatened or endangered listing under the Endangered Species Act.

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Mr. Shivik, Campbell County provides the following comments for consideration by the Forest Service (FS):

General

- State of Wyoming Comments – Campbell County worked closely with the State of Wyoming and the Wyoming Department of Agriculture (WDA) throughout the DEIS public comment period process to address issues of concern with the Forest Service, many of which were captured through the comments submitted by the State of Wyoming. Therefore, to reduce redundancy, Campbell County endorses and incorporates by reference, comments submitted by Wyoming Governor Matt Mead, with specific attention toward Chapter 2, Table 2-9 – Wyoming – Comparison of Alternatives.
- Wyoming County Commissioners Association (WCCA) -- Campbell County endorses, and incorporates by reference, comments submitted by WCCA.
- Support Wyoming EO – Campbell County strongly supports the Wyoming Executive Order 2015-4 (EO) "Greater Sage-Grouse Core Area Protection" and the FS effort to align their LMPs to be consistent with the EO to the greatest extent possible. Through the Sage-grouse Implementation Team (SGIT), the EO was developed by a cross-section of stakeholders representing a multi-jurisdictional, cross-governmental and citizen-inclusive collaborative working group, of which Campbell County members participated. The framework that was established as a result of this effort was supported by the Fish and Wildlife Service as a regulatory mechanism that would, in fact, protect the long-term viability of Sage-grouse habitat and therefore, Sage-grouse populations. Campbell County generally supports the proposed action with additional modifications that are addressed in our comments below.
- Private Property Rights – Campbell County remains concerned that the consequences of federal stipulations, mitigation and policy directives continue to impact private property rights.

In the Wyoming EO on page 4, item 4, it outlines that "... activities on private lands are not subject to state or federal agency review or approval. Only those activities which state agencies are required by state or federal law to review or approve are subject to review for consistency... The additional habitat included within the Core Population Area boundaries is adequate to accommodate continuation of existing land uses and landowner activities. Existing land uses and landowner activities deemed to have negligible or no impacts to Greater Sage-grouse are exempt from review for consistency under this Executive Order..."

The FS needs to include similar language that they will respect and support the protection of private property rights to the maximum extent allowed by law, regulations, policies, etc.

- Pre-2008 Permitted Activities – Campbell County is concerned that the proposed action does not include a provision regarding pre-2008 permitting activities. The FS must add language consistent with the State EO that places importance on respecting valid existing rights and specifically exempts pre-2008 permitted activities from having to comply with PHMA stipulations. Campbell County recommends that the FS include the language in the LMPs specifying that pre-2008 permitted activities, such as oil and gas units and drilling and spacing units, are not subject to

GRSG stipulations and that activities permitted outside of PHMA areas that are now included in PHMA areas are not subject to PHMA area stipulations.

- 1.4 Proposed Action, page 1-4 & 1-5 – Campbell County supports the FS proposed action items 1-11 listed under 1.4 along with the following comments:

1. Sagebrush Focal Areas (SFA) – Campbell County supports the FS decision to eliminate SFAs from the LMPs as that is consistent with the Department of the Interior’s decision to cancel the proposed withdrawal on October 11, 2017.
5. Habitat Management Areas (HMA) – Campbell County supports the FS decision to align its HMAs with the State of Wyoming EO with the most current and up to date core area maps. Furthermore, Campbell County supports this action being considered as a Management Approach (GRSG-GEN-MA-012) as this promotes a more flexible management method to provide consistency of GRSG habitat protection state wide as boundaries are modified to reflect changing conditions.
6. Livestock Management Guidelines or Table 2 – Campbell County supports the FS decision to remove Table 2 in the Greater Sage-grouse (GRSG) LMP amendment. Campbell County supports additional recommendations provided by the State of Wyoming in their specific comments. Habitat Framework Assessments, rangeland monitoring information, site capability, and Ecological Site Descriptions should all be used when determining habitat and desired conditions.

In addition, we continue to support the utilization of the State of Wyoming’s livestock grazing management guidelines and regulations to determine appropriate desired conditions at sites capable of producing GRSG habitat. The FS must work with state agencies, local governments and grazing permittees during the process when determining specific grazing guidelines.

7. Invasive Plant Species – Campbell County supports the addition of this language to broaden the context of Early Detection and Rapid Response strategies for invasive species management and prioritize treatments. Furthermore, the FS should coordinate treatment and implementation strategies with the effected counties, conservation districts and weed and pest districts prior to application on-the-ground.
8. Adaptive Management -- With regard to adaptive management, Campbell County supports revisions to the LMPs to be consistent with the EO. Additionally, Campbell County supports the FS proposal to amend GRSG-GRSGH-ST-005 Standard and to create GRSG-GEN-MA-006 Management Approach, providing that the Adaptive Management Working Group will establish a process to reverse management actions once the factor identified as causing the negative impact on the Sage-grouse is resolved.
10. Compensatory Mitigation -- With regard to compensatory mitigation requirements, Campbell County supports the Wyoming EO wherein compensatory mitigation is only required in core areas (identified by FS as Priority Habitat Management Areas (PHMAs))

and only if specific core area (PHMA) thresholds are exceeded. We further support the idea of consistent application of compensatory mitigation ratios as outlined in the EO's Compensatory Mitigation Framework. In order for the LMPs to be consistent with the EO in these areas, the LMPs need to be changed to eliminate all compensatory mitigation requirements outside of core areas (identified by FS as General Habitat Management Areas (GHMAs)) and to only require compensatory mitigation in core areas (PHMAs) when specific thresholds are exceeded. We also support the FS proposal to adjust and clarify GRSG-TDDD-MA-024 as a Management Approach as this is the appropriate method for managing situations where compensatory mitigation may be necessary.

Campbell County also supports the removal of the net conservation gain standard from all management actions across all LMPs and the FSs intent to follow the Wyoming EO regarding the Revised Greater Sage-grouse Compensatory Mitigation Framework. It is recommended that the FS include a process by which they will consult with the State of Wyoming regarding the need to apply compensatory mitigation.

Finally, Campbell County encourages the FS to revise language in Table 2-9, Appendix F and Appendix G to clarify that they will rely on, not simply consider, the Wyoming Compensatory Mitigation Framework when determining the nature of required mitigation and will consult with the State of Wyoming.

- 1.7, page 1-11, Relationship to Other Policies, Plans, and Programs – The FS recognizes the "...importance of local plans...the FS will 'coordinate land management planning with the equivalent and related planning efforts of... State and local governments.'"

While the FS did a more than adequate job in meeting with cooperating agencies to consider alignment with the Wyoming State EO, there is no table or information provided in the DEIS that demonstrates in detail where or how the FS conducted that consistency review with local government land use plans or how those plans may be affected by proposed management actions. Campbell County is requesting that any information pertaining to this review be made available to interested parties.

- 2.3.2 Alternative 2 – Proposed Action, page 2-21, paragraphs 6 – The FS notes that "To be consistent with the planning rule, those plan components of the 2015 Greater Sage-Grouse Plan Amendments that do not meet the definitions for plan components in 36 CFR 219.7(e)(1) were changed to management approaches."

While Campbell County generally supports the FS management provision of allowing for management approaches as provided under the 2012 Planning Rule, we would caution the FS that sufficient rationale must be provided as to why any Standard or Guideline was changed to reflect a Management Approach in the planning process. Management Approaches do provide for a level of flexibility that is beneficial when managing changing conditions on the landscape and this method will assist the FS in aligning with the state EO in a timely manner.

- 4.3 Analytical Assumptions, page 4-202, bullet point one – The FS states that "...Budgets are expected to remain flat or decrease in the future...To analyze effects without consideration of expected budgets would be a misrepresentation of expected outcomes."

Campbell County remains concerned with the structure of the FS budgeting process. The FS openly admits that with budgets remaining flat or decreasing in the future, there is little faith that the agency will be able to comply with management provisions in their plans. Even if the agency were appropriating a sufficient level of funds to manage their operational programs, "fire borrowing" is most likely to occur every Fiscal Year, leaving the agency with virtually no funding and unable to meet its objectives in the FS plans.

Congress and Department of Agriculture must take the lead in revisiting how their budgeting process is working and develop a system that provides for a more stable funding mechanism to implement and comply with management objectives and program obligations. Without that consistent stream of funding, the agency will continue to struggle in implementing their duties and complying with laws, rules, regulations, and policies.

In conclusion, Campbell County believes the steps taken by the FS to align with the Wyoming Executive Order is critical to successful species and habitat management. Coordinating and combining resources between the state, local governments and federal agencies ensure the success of long-term approaches that benefit all parties affected by the Greater Sage-grouse and conservation management.

Mr. Shivik, thank you again for the opportunity to provide comments on this critical land management issue. A tremendous amount of time and effort has been expended both in the development of the Wyoming EO as well as the implementation of the on-the-ground conservation efforts in Wyoming, which demonstrates our state's commitment to the conservation of the Sage-grouse and its habitat.

Sincerely,



Mark A. Christensen
Chairman

xc: The Honorable Matt Mead, Governor of Wyoming
The Honorable Liz Cheney, United States Representative
The Honorable John Barrasso, United States Senator
The Honorable Mike Enzi, United States Senator
Pete Obermueller – Wyoming County Commissioners Association



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31 July 2018

Mr. John Shivik
Forest Service Intermountain Region
UNITED STATES DEPARTMENT OF AGRICULTURE
Federal Building
324 25th Street
Ogden, Utah 84401
Email: comments-intermtn-regional-office@fs.fed.us

RE: Supplemental Notice of Intent to Prepare an Environmental Impact Statement (EIS) and Amend Land Use Plan's (LUP) regarding Greater Sage-Grouse (GRSG) Conservation (Federal Register Volume 83, Number 119, Page 28608, dated June 20, 2018)

Dear Mr. Shivik:

On behalf of the Campbell County Wyoming Board of Commissioners, I want to thank you and the Department of Agriculture for allowing us the opportunity to submit comments regarding the above-referenced topic. These issues are of great importance to us and working with agencies to pursue Sage-Grouse conservation is critical to the long-term health of our county and the State of Wyoming.

Sage-Grouse is a significant issue in Campbell County as our federal lands are comprised of approximately 12% federal surface and an estimated 83% federal minerals. Sage-Grouse habitat and core areas are encompassed within the county boundary. Balancing surface disturbing activity, conserving Sage-Grouse habitat, protecting private property rights and promoting continued energy development is essential to our livelihoods.

Campbell County has been actively engaged in Sage-Grouse management discussions through participation in the following efforts: Thunder Basin National Grasslands (TBNG) Land Use Plans (UMP) Revisions, Buffalo Resource Management Plan revision as a cooperating agency, the Wyoming Executive Order 2015-4, Greater Sage-Grouse Core Area Protection (EO), along with the construct of Wyoming County Commission Association positions. We also developed and adopted the Campbell County Amended Natural Resource Land Use Plan, which addresses Sage-Grouse and Sage-Grouse

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habitat management. The County has demonstrated through numerous efforts that we have a vested interest in the proactive management of Sage-Grouse to prevent a threatened or endangered listing under the Endangered Species Act.

Campbell County provides the following comments for consideration by the Forest Service (FS):

General

- State of Wyoming Comments – Campbell County endorses and incorporates by reference, comments submitted by Governor Matt Mead and the State of Wyoming.
- Wyoming County Commissioner Association (WCCA) -- Campbell County endorses, and incorporates by reference, comments submitted by the WCCA.
- Support for Wyoming EO – Campbell County strongly supports the Wyoming Executive Order 2015-4 and the FS effort to align their Land Use Plan's (LUPs) to be consistent with the EO to the greatest extent possible. Through the Sage-Grouse Implementation Team (SGIT), the EO was developed by a cross-section of stakeholders representing a multi-jurisdictional, cross-governmental and citizen-inclusive collaborative working group. The framework that was established as a result of this effort was supported by the Fish and Wildlife Service as a regulatory mechanism that would, in fact, protect the long-term viability of Sage-Grouse habitat and therefore, Sage-Grouse populations. Campbell County generally supports the proposed action with additional modifications that are addressed in our comments below.
- Adaptive Management -- With regard to adaptive management, Campbell County recommends that the LUPs be revised to be consistent with the EO. The EO incorporates an approach that considers current conditions, impacts, restoration, monitoring and trends. Overlapping adaptive management processes only leads to confusion and inefficient implementation. This process must be streamlined between the federal agencies and policies should defer to states to the greatest extent possible.

In addition, the FS should add language to be more consistent with the BLM Greater Sage-Grouse Conservation DEIS Management Alignment Alternative that says "The Adaptive Management Working Group would define a process to review and reverse adaptive management actions once the identified causal factor is resolved (e.g. returning to previous management once objectives of interim management strategy have been met.) Adding language that is consistent with the State EO and between federal agencies will assist in minimizing confusion.

- Appendixes – Campbell County is significantly concerned that no mention is made with regard to revising appendixes to the current LUPs with the exception of Appendix B and XX. If changes made to the main body of the LUPs are not made to corresponding appendixes, inconsistencies will exist which will not only cause confusion but will also leave the FS legally vulnerable. At the

very least, the FS should add a sentence to the LUP amendments stating that “in the case of inconsistency between text in the LUP amendment and the original LUP appendices, the LUP amendment text shall take precedence.” However, the best course of action is to ensure that changes made to the main body of the Wyoming Sage-Grouse LUPs are also applied to the corresponding appendices.

In addition, Campbell County supports the FS decision to change the identification of Table 1 to Appendix XX as it provides the agency with additional flexibility to administer changes, in a timely manner, to remain consistent with the Wyoming EO.

- Boundary Consistencies -- The PHMA boundary map being utilized by the FS is inconsistent with the Wyoming Core Area Map. Through the land use planning process, the FS added new areas to PHMA within the State of Wyoming that is neither consistent with the Wyoming Core Area Map nor supported by valid science. In order to alleviate confusion and to provide the best science-based protection for GRSG, Campbell County recommends the FS revise its PHMA boundaries to be consistent with those in the Version 4 Wyoming Core Area Map. We further recommend this be done through a maintenance action or similar FS regulatory mechanism, much the same as was recently completed by the Bureau of Land Management (BLM) to adopt Version 4 of the Wyoming Core Area Map into its Wyoming GRSG plan amendments.
- Grazing and Table 2 – Campbell County supports the FS decision to remove Table 2 in the Greater Sage-Grouse (GRSG) LUP amendment. Simply put, Table 2 was not included in the 2015 WY LUP Draft Environmental Impact Statement and the public did not receive adequate notice and opportunity to comment on or participate in the GRSG LUP Amendment/Revision process that culminated in the 2015 WY USFS Record of Decision for the LUP Amendment; therefore, eliminating Table 2 was the appropriate course of action by the FS.
- Pre-2008 Permitted Activities – Campbell County is concerned that the proposed action does not include a provision regarding pre-2008 permitting activities. The FS must add language consistent with the State EO that places importance on respecting valid existing rights and specifically exempts pre-2008 permitted activities from having to comply with PHMA stipulations. Campbell County recommends that the FS include the language in the LUPs specifying that pre-2008 permitted activities, such as oil and gas units and drilling and spacing units, are not subject to GRSG stipulations and that activities permitted outside of PHMA areas that are now included in PHMA areas are not subject to PHMA area stipulations.
- Private Property Rights -- Campbell County remains concerned that the consequences of federal stipulations, mitigation and policy directives continue to impact private property rights specifically where split estate lands exist.

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In the Wyoming EO on page 4, item 4, it outlines that "...activities on private lands are not subject to state or federal agency review or approval. Only those activities which state agencies are required by state or federal law to review or approve are subject to review for consistency... The additional habitat included within the Core Population Area boundaries is adequate to accommodate continuation of existing land uses and landowner activities. Existing land uses and landowner activities deemed to have negligible or no impacts to Greater Sage-grouse are exempt from review for consistency under this Executive Order..."

Wyoming FS needs to include similar language that they will respect and support the protection of private property rights to the maximum extent allowed by law, regulations, policies, etc.

- Sagebrush Focal Areas – Campbell County supports the Department of Agriculture and Department of the Interior’s decision to eliminate sagebrush focal areas (SFA) from the LUPs as these areas were proposed for mineral withdrawal under the 2015 GRS G LUPs. The move to eliminate SFAs is consistent with the Department of the Interior’s decision to cancel the proposed withdrawal on October 11, 2017.
- Winter Concentration Areas and Connectivity Areas – Campbell County supports, and incorporates by reference, language submitted by the Petroleum Association of Wyoming (PAW) regarding Winter Concentration Areas (WCA) and connectivity areas. Specifically, all designated WCAs and connectivity areas must be consistent with the State EO.

GRSG-GRSGH-DC-002-Desired Condition, page 2, Proposed Action

Campbell County supports language submitted by the State of Wyoming and incorporates by reference.

GRSG-GRSGH-DC-002-Desired Condition, page 2, Proposed Action (footnote), page 2

Campbell County supports language submitted by the State of Wyoming and incorporates by reference.

GRSG-GRSGH-ST-005-Standard, page 3, Proposed Action – Hard Triggers

Campbell County supports language submitted by the State of Wyoming and incorporates by reference.

GRSG—TDDD-ST-014-Standard, page 6, Proposed Action -- Noise

Campbell County supports the noise provisions included in the proposed action alternative specifying that noise stipulations will only apply in PHMA. The proposed changes will make the noise requirements consistent with those contained in the EO.

GRSG—TDDD-ST-015-Standard, page 6, Proposed Action – Compensatory Mitigation

With regard to compensatory mitigation requirements, Campbell County supports the Wyoming EO wherein compensatory mitigation is only required in core areas (identified by FS as Priority Habitat Management Areas (PHMAs)) and only if specific core area (PHMA) thresholds are exceeded. We further support the idea of consistent application of compensatory mitigation ratios as outlined in the EO's Compensatory Mitigation Framework. In order for the LUPs to be consistent with the EO in these areas, the LUPs need to be changed to eliminate all compensatory mitigation requirements outside of core areas (identified by FS as General Habitat Management Areas (GHMAs)) and to only require compensatory mitigation in core areas (PHMAs) when specific thresholds are exceeded.

In addition, Campbell County supports the removal of the net conservation gain standard from all management actions across all LUPs and supports the FS intent to follow the Wyoming EO regarding the Revised Greater Sage-Grouse Compensatory Mitigation Framework.

Regarding the use of compensatory mitigation to receive timing stipulation relief for mineral development, the exception criteria in the LUPs need to be revised in order for FS to be able to systematically grant such relief as allowed by the Wyoming Compensatory Mitigation Framework. In addition, if compensatory mitigation is warranted and implemented by the operator, additional NEPA should not be required in order to grant timing stipulation exceptions.

GRSG-TDDD-ST-XX-Standard, page 6, Proposed Action – Compensatory Mitigation

Campbell County supports the added language under this standard.

GRSG-TDDD-GL-XX-Guideline, page 6, Proposed Action – Designated Corridors and Rights-of-Way

Campbell County supports the added language under this guideline.

GRSG-LG-GL-031- Guideline, page 11, Proposed Action – Designated corridors and rights-of-way.

Campbell County supports the deletion of this guideline in the proposed action.

GRSG-GRSGH-GL-XX-Guideline, page 11, Proposed Action – Early Detection and Rapid Response

Campbell County supports the addition of this language to broaden the context of Early Detection and Rapid Response strategies for invasive species management and prioritize treatments. Furthermore, the FS should coordinate treatment and implementation strategies

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with the affected counties, conservation districts and weed and pest districts prior to implementing these treatments.

GRSG-LG-GL-037- Guideline, page 13, Proposed Action – Habitat Assessment Framework

Campbell County supports language submitted by the State of Wyoming and incorporates by reference. We encourage the FS to utilize the State of Wyoming's livestock grazing management guidelines and regulations to determine appropriate desired conditions at sites capable of producing GRSG habitat. Furthermore, the FS should work with state agencies, local governments and grazing permittees during the process when determining specific grazing guidelines.

GRSG-LG-GL-038-Guideline, page 13, Proposed Action – Thunder Basin National Grassland Allotments

Campbell County supports deletion of this guideline in the proposed action.

GRSG-LG-GL-039-Guideline, page 13, Proposed Action – Grazing Permits Waived Without Preference

Campbell County supports deletion of this guideline in the proposed action.

GRSG-FM-GL-053-061-Guidelines; GRSG-RT-ST-073-074-075-077-Standards and GRSG-M-FML-ST-084 Standard, Current 2015 LRMP Directive Alternative – Sagebrush Focal Area Language

To be consistent, Campbell County recommends that the FS delete sagebrush focal areas language from the Current 2015 LRMP Direction Alternative.

GRSG-R-GL-067-Guideline, page 20, Proposed Action – Recreational Facilities

Campbell County supports language that is consistent with the State EO.

GRSG-M-FML-GL-087-Guideline, page 24, Proposed Action – Required Design Features

It appears the Required Design Feature (RDF) language was taken directly from the 2015 BLM Greater Sage-Grouse RMP amendments. Campbell County recommends that the FS either adopts the BLM RDF language in its entirety, including the clarification language provided on page ES-4 of the 2018 Wyoming Greater Sage-Grouse Draft Environmental Impact Statement, or the FS must delete this reference from the proposed action and replace it with utilization of Best Management Practices to be consistent with the terminology in their LUPs.

GRSG-M-FMO-GL-092-Guideline, page 25, Proposed Action – Phased Development Approach

Campbell County supports a phased development approach for fluid minerals, wherever possible and consistent with the rights granted under the lease for PHMA designated areas only. This

same recommendation should not be applied to GHMA designated areas as the same values should not be applied to both PHMA and GHMA areas. The FS should recognize that PHMA habitats have a higher value than GHMA so as not to defeat the purpose of providing incentives to develop outside of PHMA.

GRSG-M-CM-GL-094-Standard, page 26, Proposed Action – Suitability Criteria

Campbell County supports the deletion of this standard in its entirety as the regulations cited go far beyond the scope of this effort and are inconsistent with the Wyoming EO.

GRSG-M-CM-GL-095-Guideline, page 26, Proposed Action – Coal Leases

Campbell County supports the deletion of this guideline under the proposed action.

In conclusion, Campbell County believes the steps taken by the FS to align with the Wyoming Executive Order is critical to successful species and habitat management. Coordinating and combining resources between the state, local governments and federal agencies ensure the success of long-term approaches that benefit all parties affected by the Greater Sage-Grouse and conservation management.

Thank you again for the opportunity to provide comments on this critical land management issue. A tremendous amount of time and effort has been expended both in the development of Wyoming EO as well as implementation of the on-the-ground conservation efforts in Wyoming, which demonstrates our state's commitment to the conservation of the Sage-Grouse and its habitat.

Sincerely,



Mark A. Christensen
Chairman

xc: The Honorable Matthew H. Mead, Governor of Wyoming
United States Senator Mike Enzi
United States Senator John Barrasso
United States Congressman Liz Cheney
Pete Obermueller – Wyoming County Commissioners Association

The mission of Campbell County is to provide quality, efficient, and cost-effective services for all Campbell County residents through sound decision making and fiscal responsibility.