

November 30, 2017

Erica Husse
BLM Wyoming State Office
5353 Yellowstone Road
Cheyenne, WY 82009

SENT VIA EMAIL TO: ehusse@blm.gov

RE: Amendments to Wyoming Land Use Plans regarding Greater Sage-Grouse Conservation

Dear Ms. Husse:

The Petroleum Association of Wyoming (PAW), Wyoming Mining Association (WMA), Wyoming Stock Growers Association (WSGA), Wyoming Farm Bureau Federation, Wyoming Business Alliance, Campbell County Board of Commissioners, Wyoming Outdoor Council, The Nature Conservancy, and the National Audubon Society (collectively the Organizations) thank you for the opportunity to provide comments on amendments to Wyoming land use plans regarding Greater sage-grouse conservation.

PAW is Wyoming's largest and oldest oil and gas organization dedicated to the betterment of the state's oil and gas industry and public welfare; WMA is a statewide trade organization that represents and advocates for Wyoming's mining industry; WSGA is Wyoming's oldest trade association, serving the livestock industry since 1872; Wyoming Farm Bureau Federation is the largest general agriculture organization in the state, representing over 2,700 regular member families; Wyoming Business Alliance has served as Wyoming's premier trade organization representing and advocating for business for over 36 years; Campbell County, Wyoming has an estimated 12% federal land surface, and the Board of Commissioners has Cooperating Agency status with corresponding federal agencies; The Nature Conservancy is one of our nation's leading science-based conservation organizations with chapters in every state; the Wyoming Outdoor Council is the state's oldest independent conservation organization dedicated to protecting Wyoming's environment and quality of life for future generations since 1967; and the National Audubon Society is one of the oldest and most respected conservation organizations in the United States and is dedicated to the conservation of birds and their habitats.

The Organizations support Wyoming's Greater sage-grouse Conservation Strategy as outlined in Executive Order 2015-4 Greater Sage-Grouse Core Area Protection (EO) and believe it is the most appropriate plan for Wyoming as it provides protection for Greater sage-grouse (GRSG) and core habitat while allowing for economic development across the State. It is imperative that any changes made to elements of the federal land use and resource management plans regarding sage-grouse conservation, including the United States Forest Service Sage-Grouse Record of Decision, (collectively RMPs)¹

¹ Casper, Kemmerer, Newcastle, Pinedale, Rawlins, and Rock Springs Field Offices Approved Resource Management Plan Amendment for Greater Sage-Grouse, September 2015.
Worland Field Office Approved Resource Management Plan, September 2015 (as maintained January 2016).
Cody Field Office Approved Management Plan, September 2015.
Buffalo Field Office Approved Management Plan, September 2015.

complement the provisions contained in the EO in order to provide for consistent and effective management of GRSG and core habitat throughout the State of Wyoming.

Wyoming has long been a national leader in conservation of GRSG and has taken unprecedented steps to ensure the conservation of the species. In 2008, Governor Dave Freudenthal signed Executive Order 2008-2 to implement the recommendations developed by the Governor's Sage Grouse Implementation Team (SGIT), a 30-member team composed of federal, state and local government agencies, various industry and conservation stakeholders and private land interests. Governor Freudenthal renewed the State's commitment to the Wyoming Plan in 2010, and Governor Matthew Mead updated the policy in 2011 and 2015.

The EO is a living document that can be adjusted, through due deliberation and process, to incorporate scientific findings as necessary. We recommend that BLM establish a process that assures the same level of adaptability as changes to the EO are made. The need for this is exemplified by BLM's recent adoption of Version 4 of Wyoming's Core Area Map through a maintenance action.

The U.S. Fish and Wildlife Service specifically endorsed the Core Area Strategy as stated in a letter to Wyoming Governor Matt Mead (June 24, 2011), that "[i]f fully implemented, we believe the EO can provide the conservation program necessary to achieve your goal of precluding listing of the Sage-grouse in Wyoming." Moreover, the Service also noted that the Executive Order "is a sound policy framework by which to conserve Greater sage grouse in Wyoming."

Through Wyoming's determined effort and development of an effective Core Area Strategy, the State has successfully conserved GRSG and core habitat while allowing for mineral development to take place, which is vital to our State's economy. In addition, the EO has recognized that some practices, such as proper livestock grazing, are de minimus activities. Not only can these activities be classified as de minimus, many can contribute to enhanced habitat and rangeland conditions.

The EO is the result of an unprecedented collaborative process among Wyoming stakeholders, in which diverse interests were represented. Through this collaborative process, strongholds were identified where GRSG are present and provisions for management of those areas were provided through the establishment of core population areas (also known as Priority Habitat Management Areas (PHMAs)). An indispensable premise of the EO is to reduce potential disturbances to GRSG by limiting development inside core, while incentivizing development outside of core. This is done by placing more restrictions on development inside core, while applying fewer restrictions on development in habitat areas outside of core.

Wyoming's Core Area Strategy classifies 23% of Wyoming as priority habitat, which supports 80+% of all GRSG in the State. As such, we recommend that all management and mitigation proposals currently

under consideration provide for consistent management throughout the State. We further recommend that BLM look for opportunities to make any revisions deemed necessary through means other than the full RMP amendment process, wherever possible, including through Instructional Memoranda or policy clarification.

Again, the Organizations believe that in order to provide for the effective protection and management of GRSG throughout the state of Wyoming, it is necessary that any changes made to the RMPs complement Wyoming's Greater Sage-Grouse Core Area Protection as outlined in the EO.

We are grateful for your thoughtful consideration of our comments and your stewardship of our nation's public lands and natural resources.

The Organizations:

Paul Ulrich, Chairman
Petroleum Association of Wyoming

Travis Deti, Executive Director
Wyoming Mining Association

Jim Magagna, Executive Vice President
Wyoming Stock Growers Association

Holly Kennedy, Field Services & Federal Lands Associate
Wyoming Farm Bureau Federation

Cindy DeLancey, President
Wyoming Business Alliance

Rusty Bell, Chairman
Campbell County Board of Commissioners

Dan Heilig, Senior Conservation Advocate
Wyoming Outdoor Council

Milward Simpson, State Director
The Nature Conservancy, Wyoming

Brian A. Rutledge, VP National Audubon
Director Sagebrush Ecosystem Initiative
National Audubon Society

cc: U.S. Senator Mike Enzi
U.S. Senator John Barrasso
U.S. Representative Liz Cheney
Mike McGrady, Policy Advisor, Governor Matt Mead's Office
Bob Budd, Chairman, Sage-Grouse Implementation Team
Mary Jo Rugwell, BLM Wyoming State Director
Larry Claypool, BLM Wyoming Association State Director