

Washakie County, Wyoming

Natural Resource Management Plan

Preliminary Draft

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the Washakie County Board of County Commissioners

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Contents

Preface	TOC-3
Introduction	1
Purpose and Intent of this Plan.....	1
Legal Framework.....	2
Organization.....	4
Chapter 1: Custom and Culture	6
Chapter 2: Land Use	8
Land Use.....	8
Land Access.....	8
Wilderness and Other Special Land Use Designations.....	9
Fire Management.....	13
Forest Management.....	14
Chapter 3: Geology, Mining and Air	16
Mining	16
Energy Resources	16
Mining and Mineral Resources	17
Air Quality	17
Soils	18
Chapter 4: Water Resources	19
Irrigation and Related Infrastructure	19
Dams and Reservoirs.....	19
Water Rights.....	19
Water Quality.....	20
Flood Plains	21
Rivers and Streams.....	21
Wetlands.....	21
Riparian Areas	21
Wild and Scenic Rivers	21
Chapter 5: Wildlife and Fisheries	22
Fisheries	22
Threatened, Endangered, and Sensitive Species	22
Wildlife	24
Predator Control	25
Wild Horses and Burros	25
Invasive Species.....	26
Chapter 6: Economics & Society	27
Recreation and Tourism.....	27
Law Enforcement	27
Cultural, Historical, Geological, and Paleontological Resources.....	28
Economic Considerations.....	29
Chapter 7: Agriculture	30
Livestock and Grazing	30
Noxious Weeds and Invasive Species	31

References Cited**32**
List of Appendices**33**
 Appendix I 33
 Appendix II 33
 Appendix III 33

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Preface

This current draft document is a component of the overall completion of a Washakie County Natural Resource Management Plan. The existing Washakie County Comprehensive Plan (2010) consists of seven chapters that describes a variety of aspects of the county as a whole, including discussion on the impacts and influences of public land:

- Chapter 1: Introduction
- Chapter 2: History
- Chapter 3: Public Land
- Chapter 4: Countywide Policies by Area of Concern
- Chapter 5: Countywide Policies by Industry
- Chapter 6: County Policies Regarding Urban Centers
- Chapter 7: Next Step

This Comprehensive Plan was reviewed to determine what resources were considered in this initial planning effort and how this revision should occur: a standalone natural resource document or a revision of a chapter within the existing document. A template for the statewide planning effort from the Wyoming County Commissioner's Association (WCCA) was provided for consistency between counties, but is not restricting on the overall creation or development of the plan. After review of the Washakie County Comprehensive Plan, we suggest that Chapter 3: Public Land be amended to include discussion on the listed resources within the plan, resources outlined in the template if relevant to the county, and resources identified by the Commission or the public. In addition, we recommend that custom and culture, specifically as it relates resources, values, and economics, be discussed within this revised Chapter 3.

In this Draft Washakie County Natural Resource Management Plan, *red italicized language* denotes our recommendations or suggestions to consider within the plan. Additionally, language throughout this draft plan has been taken directly from the Washakie County Comprehensive Plan (WCCP) and from the Washakie County Conservation District Natural Resource Land Use Plan (WCCD LUP). *Purple text* denotes language taken from the WCCP. *Orange text* denotes language taken from the WCCD LUP. These existing policy statements represent a starting point for this updated Natural Resource Management Plan but should not be considered necessary components of this plan. Resource Management Objectives and Priorities will likely be edited to reflect Washakie County's current values and goals. Please note that empty Resource Assessment or Resource Management Objective sections simply indicate that these statements are not included in either of the existing Washakie County plans.

Introduction

The WCCA template Introduction was supplemented to expand upon existing themes and ideas.

A Natural Resource Management Plan (NRMP), a form of land use planning (LUP), is a document that serves as the basis for communicating and coordinating with the federal government and its agencies on land and natural resource management issues on public lands that influence the local area and economy. Understanding that rural counties can be strongly impacted by federal land management decisions on public lands located within, or adjacent to, the county, local governments can ensure that local policies and concerns are meaningfully considered by federal agencies through formally adopting a NRMP.

While local governments do not have jurisdiction over the federal government or federal lands, various federal and state statutes dictate the requirements and parameters for how federal agencies engage with local entities during decision-making processes. This can include local governments serving as a “Cooperating Agency” during project planning as an Interdisciplinary (ID) Team member or providing local expertise and information for areas of statutory responsibility. Additionally, both the National Environmental Policy Act (NEPA) and the Federal Land Policy and Management Act (FLPMA) require a federal “consistency review” of the planning effort or project with the local policies, plans, or laws adopted by the local government (Budd-Falen Law Office 2018).

Counties are particularly well-suited to understand the impacts that federal land management decisions may have on the local economy, custom, and culture. Under Wyoming Statute § 18-5-208(a), a county is “deemed to have special expertise on all subject matters for which it has statutory responsibility, including but not limited to, all subject matters directly or indirectly related to the health, safety, welfare, custom, culture and socio-economic viability of a county.”

Purpose and Intent of this Plan

We recommend the Commission stating the intent of this document and goals for how this document should be used.

The purpose of this plan is to establish the custom and culture of the local area, identify resources or land uses that economically or culturally impact the stability and character of the county, and recognize the importance of local involvement in federal decision making.

In adopting this NRMP, the Board of County Commissioners intends to:

- Maintain or expand upon the culture, customs, heritage, and economic diversity of resource-based industries within the local economy, while balancing the integrity of local natural resources, wildlife, and environmental quality;
- Promote the understanding of the history, dynamics, and benefits from uses of public lands within the county from activities such as agriculture, recreation, and other multiple-uses;
- Recognize and protect privacy rights and interests in federal and state land resources including, but not limited to, rights-of-way, grazing permits, water rights, special use permits, leases, contracts, and recreation permits and licenses;

- Minimize conflicts between land uses; and
- Promote a robust, diverse and stable local economy.

The Board of County Commissioners also acknowledges that comprehensive and responsible management of local natural resources requires equal effort and participation of all parties involved, including local, state and federal. In order to encourage this relationship, the Board will:

- Inform the federal agencies of the date, time, and location of their regularly scheduled meetings with an open invitation that federal agency personnel should attend such meetings if there are issues to discuss. Meetings will be scheduled on a biannual basis.
- Transmit a copy of this plan to the state, regional, and local federal agency offices doing business within the county for their consideration as part of any consistency review that is required pursuant to federal statute.
- Contact the Bureau of Land Management (BLM) and the U.S. Forest Service (USFS) offices to determine a protocol for informal communication that should occur so that each is apprised of issues and concerns as early as possible.
- Review NEPA documents to determine if they will request “cooperating agency status” and will consider entering into Memorandums of Understanding (MOU) or Memorandums of Agreement (MOA) as appropriate. The District and the County reserve the right to negotiate an MOU or MOA on a case-by-case basis, although an MOU or MOA is not appropriate nor necessary in all cases.

Legal Framework

We recommend separating the “Legal Framework” and “Purpose” sections, as shown here. This makes the explanation of statutory requirements easy to find and separates them from the purpose described above.

Federal statutes provide opportunities for counties to share their own special expertise with federal agencies during decision-making processes in order to protect the local custom and culture, tax base, and private property. NRMPs establish the current economic and cultural conditions and the desired future conditions of an area, and illustrate how those conditions are linked with activities that occur on adjoining public lands. Specifically, federal laws require federal agencies, including the BLM and USFS, to consider state and local land use plans and to explain deviations from these plans in decision documents per the following statutes:

The National Environmental Policy Act (NEPA)

NEPA and its implementing regulations under the Council of Environmental Quality (CEQ) require all federal agencies to address inconsistencies between a proposed action and State and local plans, and address the extent to which the agency would harmonize its proposed action with the local law or plan (40 C.F.R. § 1506.2). Consistency review and cooperating agency status are each provisions that allow local voice within federal planning:

In order to participate in the federal agency’s consistency review process, an adopted local plan is required. Provided that the local government submits the local plan to the agency in the course of

writing an Environmental Impact Statement (EIS) or Environmental Assessment (EA), the federal agency is required to

discuss any inconsistency of a proposed action with any approved State or local plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the [environmental impact] statement should describe the extent to which the [federal] agency would reconcile its proposed action with the [local government] plan or law (40 C.F.R. §§ 1506.2, 1506.2(d)).

Local governments can also participate in the NEPA process as a “cooperating agency”, which is defined as: “any Federal agency other than a lead agency which has jurisdiction by law or special expertise with respect to any environmental impact involved in a proposal (or a reasonable alternative) for legislation or other major Federal action significantly affecting the quality of the human environment.” (40 C.F.R. § 1508.5). As a cooperating agency, the local government would be involved in the federal process at its inception and participate in the NEPA process, such as scoping and drafting portions of the NEPA document (40 C.F.R. § 1501.6(b)).

CEQ regulations (40 C.F.R. § 1501.6(b)(3)) also permit a cooperating agency to “assume on request of the lead agency responsibility for developing information and preparing environmental analyses including portions of the environmental impact statement concerning which the cooperating agency has special expertise.”

In short, federal agencies are required to cooperate with State and local agencies to reduce duplication between NEPA and comparable local requirements (40 C.F.R. § 1506.2(b)). By adopting a local NRMP, a county (1) ensures that local policies are considered during a federal agency’s consistency review process, and (2) demonstrates the special expertise required for participation in the NEPA process as a cooperating agency (if desired by the county).

The Federal Land Policy Management Act (FLPMA)

FLPMA, BLM’s guiding statute, requires BLM to coordinate their land use plans with local and state government land use plans, providing that BLM’s plans “shall be consistent with State and local plans to the maximum extent [the Agency] finds consistent with Federal law and the purposes of this Act.” (43 U.S.C. § 1712(c)(9)).

Specifically, FLPMA requires that the BLM:

- Stays apprised of local land use plans;
- Assures that consideration is given to those local land use plans that are germane in the development of land use plans for public lands;
- Assists in resolving, to the extent practical, inconsistencies between Federal and local land use plans;
- Provides for meaningful public involvement of local government officials in the development of land use programs, land use regulations, and land use decisions for public lands, including early public notice of proposed decisions which may have a significant impact on non-Federal lands. (43 U.S.C. § 1712(c)(9)).

BLM has also adopted *A Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners* (2012) that guides the BLM through the legal, regulatory, and planning roles when involved in a cooperating agency relationship.

The National Forest Management Act (NFMA)

NFMA requires the USFS to coordinate National Forest land and resource plans with “the land and resource management planning processes of State and local governments and other Federal agencies[.]” (16 U.S.C. § 1604(a)). While the USFS is not required to comply with State and local plans, a final decision document must contain results of a review of local plans, including consideration of objectives, the compatibility and interrelated impacts of USFS plans and local government policies, opportunities to contribute to common objectives, and ways to reduce conflicts between a Forest Service plan and local policies (36 C.F.R. § 219.4(b)(2)).

While the objectives and priorities of the county may not be consistent with existing management plans or practices of the federal or State of Wyoming government, this plan is consistent with federal and State law.

Organization

This plan considers the current conditions of federal resources, county objectives for each resource, and how the county would like to see those objectives achieved. For each federal resource in the county, this plan addresses the following:

- **Resource Assessment:** This assessment includes background and detailed information on the resource, including qualitative as well as quantitative information. The assessment includes an evaluation of the importance of the resource to the county, location, quality and size, as well as a map of the resource, where appropriate. The Resource Assessment relies on the best data available at the time of publication, though new data collection or research is not required. The Resource Assessment addresses the question, “What is the state of the resource now?”
- **Resource Management Objectives:** Resource Management Objectives describe general goals in the form of broad policy statements regarding the use, development, and protection for each resource. Where applicable, objectives should be stated in measurable terms and include tangible metrics for which resource objectives can be met. This may include quantifiable goals and timelines, where applicable and feasible. Resource Management Objectives address the question, “What does the county want for and from this resource?”
- **Priorities:** This sections describes specific priorities on how to achieve the county’s Resource Management Objective for each resource. Priorities tier to Resource Management Objectives for each resource and address the question, “How would the county like to see its objectives achieved?”

Public Process

We recommend a description of the public process that occurred during the creation of this plan including data gathering, public engagement, document preparation, reviews of drafts, and final adoption by the Board of County Commissioners. The Governor’s criteria recommends that public engagement occur at a minimum in the initial, draft, and final plan development stages. Final plans should include a description of the core substantive issues identified by way of public comments and how, if at all, these issues were addressed in the final plan.

Consistent with Wyo. Stat. § 9-4-218(a)(viii)(D), the county developed this plan in public meetings in accordance with Wyo. Stat §§ 16-4-401 through 16-4-408, allowing for participation and contribution from the public.

This plan is based on criteria developed by the Office of the Governor of the State of Wyoming in consultation with the counties, consistent with Wyo. Stat. § 9-4-218(a)(viii)(B).

Credible Data

We recommend adding this section to the Organization, describing how data was evaluated for this plan and goals for guiding planning decisions.

There are many factors that make a data source credible, but the underlying basis is an assurance that the source is unbiased and supported by evidence. The Information Quality Act (Pub. Law. 106-554, § 515) directed the Office of Management and Budget to require federal agencies to issue formal information quality guidelines that would ensure the quality, objectivity, utility, and integrity of information disseminated by Federal agencies. To satisfy these standards (67 Fed. Reg. 8452, Feb. 22, 2002), the BLM and USFS have each adopted information quality guidelines. The Board of County Commissioners has used credible data in the creation of this plan by the utilization of federal, state, and local publically available data sources, as well as data that meets, at a minimum, the Information Quality Act guidelines. Conversely, the Board expects that all federal agencies will also follow, as required, their respective information quality guidelines to “ensure and maximize the quality, utility, objectivity and integrity of the information that they disseminate [...]” (67 Fed. Reg. 8452, Feb. 22, 2002). To take into account the best available unbiased science in planning efforts, the Board recommends that federal planning efforts:

- Describe how high-quality data (data which is evaluated by rigorous scientific methodology and principles) was considered, appropriately interpreted, and applied in the planning process within the context of the issued being considered;
- Evaluate and disclose substantial uncertainties in that science; and
- Evaluate and disclose substantial risks associated with plan components based on that science.

Updating the Plan

To the extent county resources allow, this plan will be updated

As new information is acquired or resource conditions change/every 10 to 15 years/some other schedule.

Chapter 1: Custom and Culture

We suggest discussing the county's local customs, local culture, and the components necessary for the county's economic stability. This discussion would outline:

- *Major economic uses on federal and state lands that impact the county*
- *Intrinsic uses on federal and state lands that enhance local values*
- *Historic uses of federal and state land that influence economic factors and values*
- *Historic uses of federal and state land that influence the values and customs of surrounding communities*
- *County stability as it has been influenced by major uses throughout the county*

The language below was taken from existing plans (either the Washakie County Comprehensive Plan (WCCP) or the Washakie County Conservation District Natural Resource Land Use Plan (WCCD LUP)). For this Custom and Culture section, we recommend incorporating these ideas into a fluid discussion that accomplishes the items listed above.

Washakie County Comprehensive Plan

Washakie County will support traditional land uses as a means to maintain continuity in the local economy, and assure the sustainability of existing agricultural, recreational, and industrial interests. By supporting traditional multiple uses, the County intends local custom and culture will be maintained and given continuity thereby mitigating potential negative social impacts on the community in the process.

Washakie County will oppose material changes in land uses, which hamper or otherwise negatively impact traditional land uses. The County intends to avoid undue social distress, dislocation, and hardship brought on the community by such changes.

Washakie County will endeavor to forge cooperative agreements and maintain existing cooperative agreements with various agencies, bureaus, and administrations to assure the greatest possible communication and exchange between and among stakeholders to public land. Washakie County intends that cooperative agreements will be relied on and acted on regularly with consistency.

Washakie County will enforce mandates on State and federal authorities to consider the social, cultural, and economic needs of the local human environment in any regulatory action impacting local custom and culture. The County will insist regulatory action cite the impacts to the local economy, local custom and culture, the human environment and provide how such action is consistent with new, revised or supplements to the County's land use plans.

Washington County Conservation District LUP

Culture is defined as the customary beliefs, social forms and material traits of a group; an integrated pattern of human behavior passed to succeeding generations (Webster's New Collegiate Dictionary, 227, 1975). Custom is a usage or practice of the people, which by long and unvarying habit, has become compulsory and has acquired the force of law with respect to the place or subject-matter to which it relates (Bouvier's Law Dictionary, 417, 1st ed. 1867).

Open spaces are a defining quality of Wyoming and WCCD. A 2004 poll conducted by the University of Wyoming reports that the preservation of farms and ranches, the western lifestyle, and protecting private property rights are of particular importance to Wyoming residents (Boelter and Mays, 2004). A

more recent polling identified the loss of family farms and ranches as the issue of greatest concern to Wyoming residents (Reedman and Korfanta, 2014). Seventy-nine percent of the respondents in that poll described themselves as “personally benefitting from the presence of ranches and farms in Wyoming.”

Due to the nature of WCCD’s landscapes and ecology, agriculture goes hand in hand with maintaining the custom and culture of open space and its attendant values. Agriculture as practiced in harmony with WCCD’s ecology, provides a basis for community while maintaining those values.

Agriculture production accounts for almost 90% of the private land in Washakie County (Suitewater 2016). Because agriculture is the dominant private land use in the county, the future of open spaces in WCCD will depend to a large extent on what happens to agriculture. A number of factors may adversely affect the retention of agricultural land in Wyoming including the continued uncertainty about livestock grazing on federal lands (Taylor, et al. 2003).

There has been recent interest in assigning monetary value to open space ecosystem services. It is recognized that open landscapes provide “natural goods and services” such as water filtration and wildlife habitat, along with livestock grazing and agriculture goods (Taylor, et al. 2011). A recent study estimates the value of natural goods and services at \$22 per acre for native rangelands, \$66 per acre for pasture and hay lands, and \$55 per acre for cultivated cropland. These adjusted 2016 values are in addition to the actual market value of the land; jobs and income generated from the use of these lands. Using these values and 2012 Census of Agriculture data for private lands, natural goods and services provide an \$8,840,986 value to WCCD residents.

Due to the historic and ecological nature of land use across public and privately owned land and the inherent impact on the custom, culture, and economic welfare on the residents of WCCD, we expect (1) to engage with the federal government, such as BLM and Forest Service through coordination, and (2) to be given early notification of any opportunities for cooperating agency status by all federal agencies as part of the NEPA process regarding any land use management policy or proposed projects.

Chapter 2: Land Use

Land Use

Resource Assessment

The WCCP and WCCD LUP each include a breakdown of county ownership, by acres and percentage. For the Resource Assessment, we recommend that this ownership data be verified and included in a table and map. In addition, we recommend that acres (including overlapping acres) of each land use (i.e. livestock grazing, harvesting of forest products, oil and gas, recreation, etc.) be represented in a table and map.

Resource Management Objectives

Washakie County Comprehensive Plan

- Washakie County will support traditional land uses as a means to maintain continuity in the local economy, and assure the sustainability of existing agricultural, recreational, and industrial interests. By supporting traditional multiple uses, the County intends local custom and culture will be maintained and given continuity thereby mitigating potential negative social impacts on the community in the process.
- Washakie County will oppose material changes in land uses, which hamper or otherwise negatively impact traditional land uses. The County intends to avoid undue social distress, dislocation, and hardship brought on the community by such changes.
- Washakie County opposes management initiatives, which restrict or limit existing and potential uses. The County will inform public land managers of any negative impacts on the livelihoods and/or quality of life of Washakie County residents.
- Washakie County will utilize cooperative agreements, NEPA, the Wyoming Wilderness Act, broad-based legal precedent for appropriate, and timely notice of anticipated changes in land use management of public land so it can provide essential information and assert the maximum amount of influence on land use management decisions negatively impacting multiple use issues.

Washakie County Conservation District LUP

- WCCD has long supported multiple use, not only for federally managed lands, but also for State lands. Sustaining multiple uses includes preservation of historic and traditional economic uses on federally and State managed lands within and affecting WCCD.

Priorities

Washakie County Comprehensive Plan

1. To maintain the economy and tax base of the area, and to maintain the public/private balance of ownership whenever it becomes necessary to withdraw private land for State or federal use, those agencies will return land of equal value to private ownership. Access rights-of-way shall be exempt.

Land Access

Resource Assessment

Land Access is discussed in Chapter 3 of the WCCP, however no baseline data is presented. We recommend collecting baseline data for miles of Revised Statute (RS) 2477 roads, private roads, National

Forest System (NFS) roads, and BLM system roads and showing them on a map, as they relate to public land access.

Resource Management Objectives

Washakie County Comprehensive Plan

- Washakie County supports retention of existing access to public land, and will oppose management initiatives, which restrict or limit access or might impact the livelihoods and/or quality of life of Washakie County residents.

Washakie County Conservation District LUP

- WCCD supports the historic right to travel over federal and state lands.
- WCCD supports access to and across public lands, as critical to the use, management, and development of those lands and adjoining state and private lands.
- WCCD supports access to all water related facilities such as dams, reservoirs, delivery systems, monitoring facilities, livestock water and handling facilities, etc., for maintenance purposes.

Priorities

Washakie County Comprehensive Plan

1. Washakie County relies on its cooperative agreements, RS 2477, the Wyoming Wilderness Act, NEPA and broad-based legal precedent, which all assure continued access of public land, and place the burden on State and federal officials to show why access must be curtailed.
2. Washakie County expects and relies on State and federal agencies to provide appropriate and timely notice of anticipated changes to access or management of public land that impacts access to make an informed decision of any proposed change. Washakie County intends to assert such influence allowed by law to maximize access to public land.
3. Washakie County asserts State and federal officials need to respect access to public land as contributing to the sustainability of local custom and culture. Toward this end, the County supports efforts to identify and perfect stock trails, roads, and rights-of-way protected by law, education of public land users regarding access issues, and promotion of more efficient and effective regulatory schemes that allow continued access through repairs and other actions assuring such access.

Washakie County Conservation District LUP

1. WCCD opposes closure, withdrawal, or abandonment of roads, trails, rights-of-way, easements or other traditional access for the transportation of people, products, recreation, energy or livestock, without full public disclosure and analysis.

Wilderness and Other Special Land Use Designations

Resource Assessment

Special Land Designations are discussed in Chapter 3 of the WCCP and in the WCCD LUP (p. 39), however no baseline data is present. We recommend that the updated NRMP present baseline data (if available) for all special designations including: Wilderness, Wilderness Study Areas (WSAs), Special Recreation Management Areas (SRMAs), Areas of Critical Environmental Concern (ACECs), and any other special designations for all ownership.

In addition, this Wilderness and Other Special Land Use Designations section includes language taken

from Washakie County's recommendations made to the Wyoming Public Lands Initiative (WPLI) regarding three Wilderness Study Areas within the county: Bobcat Draw Badlands WSA, Honeycombs WSA, and Cedar Mountain WSA. The WPLI is a county-led process that aims to develop a federal law governing the designation and management of Wyoming's WSAs. In this section, black text denotes Washakie County's recommendations concerning management of these three WSAs. Recommendations were made in August 1st of 2018.

Resource Management Objectives

Washakie County Conservation District LUP

- WCCD supports special land use designations only when they are consistent with surrounding conservation management; do not preclude future conservation options for rangeland resources, soil conservation, and conservation, development and utilization of water resources; and contribute to sound policy of multiple use, economic viability and community stability.
- WCCD supports not allowing federal agencies to engage in endless and repetitive wilderness review or studies that expand lands managed as wilderness or as *de facto* wilderness while reducing the land base available for multiple use.
- WCCD opposes any impairment or diminution by any wilderness or other special use designations to those interests associated with ditches, reservoirs, water conveyance facilities, and easements, or rights-of-way.

Wyoming Public Lands Initiative Recommendations: Bobcat Draw Badlands WSA

- The Washakie County WPLI Committee has chosen to recommend approximately 5,000 acres of the most significant wilderness characteristics and visual resources in Bobcat Draw as the Bobcat Wilderness.
- The balance of the Bobcat Draw will be released to the regular BLM Resource Management Plan process and available for fluid mineral leasing with No Surface Occupancy (NSO) stipulations on the entire remaining area.
- Within Bobcat Wilderness and in addition to the scenic value, the lack of motorized recreation and surface-disturbing activities is what sets these areas apart, providing the public a place to go to experience naturalness and solitude. Many recreational activities can be pursued in the Bobcat Wilderness, including but not limited to:
 - Backcountry hunting
 - Hiking and backpacking
 - Horseback riding
 - Photography and sightseeing
 - Study of natural features (geology, wildlife, native flora, night sky)
- Within Bobcat Wilderness, hunting and wildlife viewing would continue in accordance with the Wilderness Act. Improvements such as development of water resources will be allowed in the non-wilderness area.

Wyoming Public Lands Initiative Recommendations: Honeycombs WSA

- The Washakie County WPLI Committee has identified approximately 10,000 acres to be referred to as Honeycombs within the boundary of the Honeycombs WSA.
- The management of Honeycombs shall consider the highly erodible soils and preserve the scenic rock formations when making management decisions on a case by case basis.

- The balance of Honeycombs WSA will be soft-released to the regular BLM Resource Management Plan process.
- The Honeycombs shall be managed for the following purposes:
 - Protection of unique scenic geologic formations and erodible soils;
 - Non-motorized recreation and hunting, including mountain biking;
 - Opportunities for the public to experience naturalness and solitude;
 - Protection of existing grazing permits and range improvements under existing laws.

Wyoming Public Lands Initiative Recommendations: Cedar Mountain WSA

- The Washakie County WPLI Committee recommends that the Cedar Mountain WSA be released from wilderness area consideration and would, be designated a Special Management Area (SMA); a designation that defines an area of concern to an agency (BLM) and directs them how to manage it. Designation is subject to valid existing rights and only affects federally managed land; no effect on private land within or adjacent to the area.
- Management purposes of the Cedar Mountain Special Management Area are to maintain the area's recreational, scenic, cultural, ecological, wildlife and livestock production values. Management consistent with purposes and only uses consistent with the purposes are permitted.

Priorities

Washakie County Comprehensive Plan

1. Washakie County opposes attempts to bypass the processes for creating wilderness areas by using "roadless areas" as a category for land management in and of themselves. Instead, the County supports the intent of the Wyoming Wilderness Act, which discourages efforts to promote additional roadless areas, and wilderness-like areas.
2. Washakie County opposes continuing to treat "wilderness study areas" as wilderness for extended lengths of time – more than a decade has passed since these areas were selected for study, and there seems no end in sight for a determination on the issue. Instead, the County supports the intent of the Wyoming Wilderness Act, which discourages efforts to promote additional wilderness areas, and wilderness-like areas in any form.
3. The County encourages the BLM to publish the findings and conclusions of its study of the three (3) areas selected for possible designation as wilderness, prior to finalizing its revisions for its management plan. In this way, the BLM will be able to adopt an appropriate management plan for these areas rather than waiting another fifteen (15) years to do so.

Washakie County Conservation District LUP

1. WCCD supports the release of wilderness study areas that were not recommended for wilderness from non-impairment management, and supports an end to the informal *de facto* wilderness management of other "study areas".
2. WCCD opposes proposed special designations until it is determined and substantiated by verifiable scientific data that; a need exists for the designation, protections cannot be provided by other methods, and the area in question is truly unique when compared to other area lands.

Wyoming Public Lands Initiative Recommendations: Bobcat Draw Badlands WSA

1. Within Bobcat Wilderness, recreation will be limited to non-motorized non-mechanized travel in accordance with the Wilderness Act.

2. Outside of the portion of Bobcat Draw designated as Wilderness, mechanized and motorized travel would be allowed but restricted to existing roads and trails. These routes would be designated in a travel management plan that the BLM would be required to develop for the Area. This travel management plan would include a narrative depicting how travel regulations would be enforced.
3. The Area will remain in Visual Resource Management (VRM) Class I within Bobcat Wilderness and with the balance of the Bobcat Draw to be released designated as VRM Class II.
4. Bobcat Wilderness would be withdrawn from mineral entry, oil and gas leasing, and disposal and energy development subject to existing rights.
5. The area released to the RMP process, except that portion east of the Wildlife Habitat Management Area (WHMA) would have the following stipulations:
 - Valid existing mining/energy/disposal rights would be honored.
 - All solid, locatable, and saleable minerals would be withdrawn from leasing.
 - Fluid minerals would be available for leasing with a NSO stipulation.
6. Within Bobcat Wilderness, livestock grazing and associated management would continue in accordance with the Wilderness Act.
7. In the non-wilderness area outside of Bobcat Wilderness, livestock grazing shall occur on the rangeland and be managed in accordance with The Federal Land Policy and Management Act of 1976, Rangeland Improvement Act of 1978, Taylor Grazing Act of 1934, and Multiple Use Sustained Yield Act of 1960.
8. Livestock grazing and associated management, including fence maintenance would continue and motorized access for water development and maintenance including reservoirs, guzzlers and potential water pipelines are allowed.
9. Roads necessary for livestock production would continue to be used and maintained.

Wyoming Public Lands Initiative Recommendations: Honeycombs WSA

1. ICE (Internal Combustion Engine) motorized travel shall be prohibited.
2. Mechanized travel shall be allowed, subject to a travel management plan that the BLM would be required to develop for the Area.
3. Teepee Pole road shall be reestablished for non-motorized travel.
4. Other improvements to non-motorized recreation opportunities subject to normal agency review processes.
5. Valid existing mining/energy/disposal rights will be honored.
6. All solid, locatable, and saleable minerals will be withdrawn from leasing.
7. Fluid minerals will be available for leasing with a NSO stipulation.
8. Livestock grazing shall occur on the rangeland within the boundary of the entire Honeycombs. Grazing shall be managed in accordance with The Federal Land Policy and Management Act of 1976, Rangeland Improvement Act of 1978, Taylor Grazing Act of 1934 and Multiple Use Sustained Yield Act of 1960.
9. Livestock grazing and associated management, including fence maintenance, shall continue and motorized access for water development and maintenance including reservoirs, guzzlers, and potential water pipelines are allowed.
10. Roads necessary for agricultural practices shall continue to be used and maintained.
11. Area Outside of Honeycombs shall be soft-released to the RMP with this direction:
 - Motorized and mechanized travel will be allowed and managed under the current RMP.

- Other improvements to non-motorized recreation opportunities subject to normal agency review processes.
- The area will be available for mineral entry and disposal, oil and gas leasing, and energy development per the RMP.
- Livestock grazing shall occur on the rangeland within the boundary of the entire Honeycombs. Grazing shall be managed in accordance with The Federal Land Policy and Management Act of 1976, Rangeland Improvement Act of 1978, Taylor Grazing Act of 1934 and Multiple Use Sustained Yield Act of 1960.
- Livestock grazing and associated management, including fence maintenance, shall continue and motorized access for water development and maintenance including reservoirs, guzzlers, and potential water pipelines are allowed.
- Existing roads necessary for agricultural practices shall continue to be used and maintained.

Wyoming Public Lands Initiative Recommendations: Cedar Mountain WSA

1. Mechanized and motorized recreation would be allowed but restricted to existing roads and trails where these uses were permitted as of date of enactment. Routes would be designated in a travel management plan that the BLM would be required to develop for the Area. This travel management plan would include narrative depicting how travel regulations would be enforced.
2. Due to the arid nature of the area, highly erodible soils and steep topography, construction of additional roads or trails for recreational purposes would not be allowed.
3. Horse and foot travel would continue as allowed previous to enactment.
4. Valid existing mining/energy/disposal rights would be honored.
5. All solid, locatable, and saleable minerals would be withdrawn from leasing.
6. Fluid minerals would be available for leasing with a NSO stipulation within the Cedar Mountain Special Management Area.
7. Livestock grazing is not a discretionary use and shall occur on rangeland within the SMA consistent with the purposes of the area and be managed in accordance with The Taylor Grazing Act 1934, The Federal Land Policy and Management Act of 1976, Rangeland Improvement Act of 1978 and Multiple Use Sustained Yield Act.
8. Livestock management practices, including fence maintenance would continue and motorized access for water development and maintenance including reservoirs, guzzlers and potential water pipelines are allowable where necessary to meet the purposes of the area.
9. Roads necessary for agricultural practices would continue to be used and maintained.
10. Noxious weed control as well as fire control would be allowed as would vegetation management if consistent with the Area's purposes and existing law.
11. Hunting and wildlife viewing would continue. Habitat improvements such as development of water resources, elimination of woven wire fences and conversion of existing fences to wildlife friendly fences would be allowed consistent with the purposes of the area.
12. The BLM, with public involvement including Wyoming State Parks and Historic Sites and Trails, would be required to conduct a study evaluating potential areas for development of mountain bike and ORV activities in (but not limited to) Hot Springs County.

Fire Management

Resource Assessment

The WCCP and WCCD LUP briefly mention fire management policies but do not provide baseline data. We recommend that a narrative of fire history and management be presented in this section with yearly data within a 10-year timeframe including date, size, and intensity of wildland and prescribed fires (subject to data availability). We suggest analysis of the data based on changes or trends within the county comparative of the state.

Resource Management Objectives

Washakie County Conservation District LUP

- WCCD supports the use of fire, such as in prescribed burns, thinning, or as vegetative treatments, and salvage logging in burned forest areas.
- WCCD recognizes the benefits of wildfire in certain habitats.
- WCCD supports aggressively suppressing and preventing wildfires when private property structures are threatened.

Priorities

Washakie County Comprehensive Plan

1. The County will seek to encourage State and federal agencies to use prescribed burns as a primary means of weed and pest control. The County will become actively involved in planning for prescribed burns to mitigate potential wildfire threats.
2. The County will seek to work with federal, State and local agencies to educate the public on the value burning plays a part in agriculture operations. The County will work with agricultural interests to develop best practices concepts and applications for burning fields, ditches and canal facilities.

Washakie County Conservation District LUP

1. WCCD encourages development of policies for grazing rest prescriptions related to either wildfires or prescribed burns on a site-specific basis taking into account the needs of the vegetation and flexibility to meet the needs of the rancher.
2. WCCD encourages the development of vegetation treatments and use of livestock grazing to keep fuel loads within appropriate limits.

Forest Management

Resource Assessment

The WCCP and WCCD LUP briefly mention forest management policies but do not provide baseline data. We recommend a discussion in this section relating to the importance of forests and forest management in the county, including active management (see mention of discussed items below). In addition, we recommend the following baseline data be collected and presented: amount of timber harvested in the last 10 years, fire activity including prescribed fire (or reference Fire Management section), primary wildlife habitats within the forest, and current and/or modeled disease within the geographic limits.

Active forest management was discussed during the kick-off call. In addition to the baseline data outlined above, we recommend including a short discussion describing what active forest management is and why it is important.

Resource Management Objectives

Washakie County Comprehensive Plan

- Washakie County supports efforts to thin poorly managed forests and to remove dead and infested trees to mitigate wildfires.

Washakie County Conservation District LUP

- WCCD encourages proper rangeland, forest, and woodland management to ensure healthy and vibrant watersheds for current and future generations and to sustain the stability of ranching and agriculture.
- WCCD supports maintenance and restoration of watershed health by demonstrating active rangeland, forest, and woodland management.
- WCCD supports local, regional, state and federal partnerships in the manufacture and use of forest and forest by-products, including innovative ways to harvest timber.

Priorities

Washakie County Comprehensive Plan

1. Washakie County is particularly concerned about management practices of wildlife within view corridors of existing scenic byways on public land. Trees in Ten Sleep Canyon are being devastated by disease and pestilence, thus creating excessive risk of fire, reduced habitat, the potential for excessive erosion, and the ultimate loss of aesthetic values that contribute to its “scenic” integrity. Washakie County calls on public land managers to take drastic action to stop tree losses and/or for drastic action to replace plant wildlife along these scenic view corridors.

DRAFT

Chapter 3: Geology, Mining and Air

Mining

We recommend that this be merged with Mineral resources.

Energy Resources

Resource Assessment

The WCCP and WCCD LUP explain the importance of oil and gas operations to the local economy and custom and culture. In addition to a brief explanation of the importance of energy resources to the area and federal actions that could impact operations, we recommend that baseline data presented in this section include the following items: miles of pipeline, locations/age of current infrastructure, and current or proposed energy production numbers (i.e. barrels of oil and cubic feet of gas).

The data suggested above includes the following items that were discussed during the kickoff call:

- 1. Oil and gas development and any action that may impact the socioeconomics from that resource such as ROWs, reclamation, etc.*
- 2. Cooperator for the CO2 pipeline coming into the Basin for enhancing the older oil and gas fields.*

Resource Management Objectives

Washakie County Conservation District LUP

- WCCD supports minerals and oil and gas production and will provide information and education on the importance of natural resource conservation. The minerals and oil and gas industry is a significant part of the custom and culture of the district, and it provides economic opportunity to Washakie County.
- WCCD supports the continued development and extraction of minerals, and oil and gas within federal and state jurisdiction in keeping with the local and regional custom and culture, in order to maintain the economic stability of Washakie County.
- Encourages mineral, and oil and gas production to be conducted in an environmentally responsible manner and to ensure industries continuance is compatible with the principles of multiple use on public lands.

Priorities

Washakie County Comprehensive Plan

- 1. The County acknowledges coal seams underlying the County at-depth are not presently economical for development, but future exploitation has implications the County needs to address. It is good public policy to assure negative impacts associated with CBM production in other parts of the State do not occur here; that agricultural interests in the surface are appropriately protected; and that responsible mineral interests will be able to proceed without undue interference or delay.*
- 2. Washakie County asserts local, State, and federal land use and management plans are incomplete and materially deficient unless such plans contain a thorough discussion and evaluation of coal bed methane development, and the implications such development has on surface land uses.*
- 3. Washakie County will endeavor to incorporate provisions in its land use regulations directed at*

development of coalbed methane (“CBM”).

Mining and Mineral Resources

Resource Assessment

The WCCP briefly describes mineral extraction trends in Chapter 5. We recommend that bentonite, sulphur, gravel, and other mineral extraction numbers/locations be presented in this section.

Resource Management Objectives

Washakie County Comprehensive Plan

- Washakie County supports continued mineral exploration on public land in an environmentally responsible manner.

Priorities

Washakie County Comprehensive Plan

1. Washakie County strongly urges mineral interests reach written agreements with surface owners before entering upon the land. The County believes mineral and surface owners both have rights and responsibilities, one to the other, and only through mutual cooperation can each optimize their returns on investment.
2. Washakie County asserts it is the responsibility of the mineral owner, especially State and federal officials, to evaluate opportunities for commercial use and mitigate adverse impacts on surface uses. Cooperation and good planning will help sustain the County’s agriculture heritage for future generations.
3. Mineral extraction operations will conform to the best practicable management practices concerning water quality and shall be expected to conform to the Big Horn Basin Water Quality (208) Plan.
4. The County will adopt clear and objective standards for the development of mining operations. These standards will be applied to all mining operations, except where supplanted by other clear and objective standards.

Air Quality

Resource Assessment

While no baseline data is provided, the WCCP (Chapter 5) outlines several sources that contribute to air quality impacts within the county (i.e. oil and gas facilities, feedlots, and other farm operations). We recommend that baseline data be collected and presented including: a map of monitoring stations, any and all available data for criteria air pollutants (CAPs), description of pollution-contributing sources, data on source contributions, and State and Federal standards compared with Washakie County CAPs emissions.

Resource Management Objectives

Washakie County Comprehensive Plan

- As water, air, and soil are essential elements of the economy and environment, all new development proposals or changes in land use shall limit erosion and maintain, or make better, this area’s high-quality air and water.

Priorities

Washakie County Comprehensive Plan

1. Protection of existing air quality will be a major consideration in the review of plans for new industrial, commercial, and large-scale residential projects. New uses or changes in existing land uses, which would tend to cause a significant deterioration of existing air quality shall be discouraged. Existing activities shall be encouraged to improve management and practices in support of higher air quality standards.
2. The County will seek to work with federal, State and local agencies to educate the public on the value burning plays a part in agriculture operations. The County will work with agricultural interests to develop best practices concepts and applications for burning fields, ditches and canal facilities.
3. The County will seek to encourage State and federal agencies to use prescribed burns as a primary means of weed and pest control. The County will become actively involved in planning for prescribed burns to mitigate potential wildfire threats.

Washakie County Conservation District LUP

1. WCCD requires that air quality baselines for the area must be established.
2. WCCD requires all air quality studies undertaken by or on behalf of a public land management agency by the Wyoming DEQ-Air Quality Division to be coordinated with WCCD.
3. WCCD supports an air quality monitoring plan, as it is critical to the health and well-being of our residents.

Soils

Resource Assessment

The WCCD LUP (p. 15) briefly characterizes soil types within the county. Because soil data is incredibly variable and vast, we recommend that this section describe the importance of soil health (agriculture, wildlife, water and air quality, etc.) and then tier to the NRCS Web Soil Survey, Washakie County Conservation District Soil Survey, or other comprehensive data sources for available data.

Resource Management Objectives

Washakie County Comprehensive Plan

- Community perceptions and the physical capabilities of the land (such as geography, geology, soil conditions, and drainage patterns) rather than population projections will guide primary land use planning.

Priorities

Chapter 4: Water Resources

Irrigation and Related Infrastructure

Resource Assessment

We recommend a discussion on why and how irrigation is used, the county's primary water sources, including Boysen Reservoir (which is not located within Washakie County), and what related infrastructure means. We recommend that baseline data be collected and presented including: acres of irrigated cropland, well locations on public land, well production, and pipeline/canal locations.

Resource Management Objectives

Washakie County Comprehensive Plan

- Washakie County supports continued exploration for water sources and aquifers on public land in an environmentally responsible manner.

Washakie County Conservation District LUP

- WCCD recognizes the importance of irrigation systems that make up a critical part of the water cycle within WCCD and supports the implementation of irrigation BMPs.

Priorities

Washakie County Comprehensive Plan

1. Washakie County will continue to support and advocate for augmentation of water storage facilities on public land. Local agricultural interests rely on the strict compliance with State water law and water storage agreements, which give priority to agriculture in delivery and use of water.

Washakie County Conservation District LUP

1. WCCD supports water development projects that increase water quantities for beneficial use within the district, while considering the traditional custom, culture, ecology, and economy of the area.

Dams and Reservoirs

Resource Assessment

We recommend that data be presented showing number of dams, number and acres of reservoirs, and the dams/reservoirs' respective watersheds. We recommend that a map accompany this data.

Resource Management Objectives

Washakie County Conservation District LUP

- WCCD supports agency actions that analyze impacts on facilities such as dams, reservoirs, delivery systems, monitoring facilities, etc., located on, or downstream from, land covered by any water related proposal.

Priorities

Water Rights

Resource Assessment

We recommend discussing the uses and importance of water rights. Instead of displaying this data in

tables or maps, this Resource Assessment will reference the Wyoming State Engineer's Office for specific water right information.

Resource Management Objectives

Washakie County Conservation District LUP

- WCCD supports the development, adoption, implementation of water storage, and water distribution that benefits individual, irrigators, irrigation and canal companies, industrial users, aquatic recreation users, municipalities, public land managers, and private landowners.
- WCCD works with local, state and federal government to encourage and support state control of water rights and to maintain opportunities for future water right allocations.

Priorities

Washakie County Conservation District LUP

1. WCCD opposes any federal governmental control over individual water rights within the boundaries of the district and within the boundaries of the State of Wyoming.
2. WCCD supports Wyoming's beneficial uses of water as defined under administrative policy of the State Engineer's Office.
3. WCCD recognizes and will protect the existence of all legal canals, laterals, or ditch rights-of-way.
4. WCCD requires that historic and customary beneficial uses take precedence over any and all in-stream flow use designations established under current Wyoming State Law.

Water Quality

Resource Assessment

We recommend that water quality baseline conditions be displayed (in tabular form) and discussed. These conditions will be based on the most recent TMDL and 303(d)/305(b) information. In addition, a map depicting groundwater and surface water locations and their quality and/or impairment ratings is recommended. As discussed during the kickoff call, sediment issues from surrounding badlands will be included in this resource assessment.

Resource Management Objectives

Washakie County Comprehensive Plan

- In its role as an example, the County will seek appropriate state and federal agency action, which encourages ground and surface water quality, to prevent or mitigate potential harm to the health and safety of County residents.
- As water, air, and soil are essential elements of the economy and environment, all new development proposals or changes in land use shall limit erosion and maintain, or make better, this area's high-quality air and water.

Priorities

Washakie County Comprehensive Plan

1. In its role as an example, the County will participate in the planning of programs to identify, monitor, and abate all non-point source pollution-generating activities on lands and waters.
2. The County will vigorously oppose proposals or efforts to modify the watersheds, natural vegetation, or prevailing climate patterns, as a means of transferring and increasing water

supplies at the expense of County residents, wildlife, vegetation, and quality of life.

Washakie County Conservation District LUP

1. WCCD recognizes that many of our perennial, intermittent and ephemeral streams exist within a natural framework of highly erosive soils and strive to define the water cycle to include the natural background's effect on water quality in our jurisdiction.
2. WCCD recognizes only credible scientific data in regards to water quality, which examines the biological, chemical, and physical attributes of a watershed within the context of related historical records. WCCD will collect water quality data as determined by priorities and programs.
3. WCCD will strive to increase the efficient use of water and maintain and improve the quality and quantity of waters within WCCD, through education, technical assistance, and Best Management Practices (BMPs).
4. WCCD will help alleviate and manage soil erosion, improve energy flow, improve the water and nutrient cycle within WCCD by providing education to the public on the benefits of trees.
5. Promotes BMPs that reduce non-point source pollution and promote water conservation.

Flood Plains

Resource Assessment

Flood plains are mentioned briefly in Chapter 4 of the WCCP but may not warrant their inclusion as major resource areas. They are not sections found in the WCCP or WCCD LUP, nor brought up during the kick-off call.

Rivers and Streams

Resource Assessment

Rivers and streams (i.e. the general characteristics of local drainages) are explained briefly in the WCCD LUP (p. 13) but may not warrant their inclusion as major resource areas, as other water-related sections cover this information.

Wetlands

Resource Assessment

These are covered briefly in other resource sections and it may not warrant their inclusion as major resource areas. They were not sections found in the WCCP or WCCD LUP, nor brought up during the kick-off call.

Riparian Areas

Resource Assessment

These are covered briefly in other resource sections and it may not warrant their inclusion as major resource areas. They were not sections found in the WCCP or WCCD LUP, nor brought up during the kick-off call.

Wild and Scenic Rivers

There are no Wild and Scenic Rivers within Washakie County, so their inclusion as a major resource area is not warranted.

Chapter 5: Wildlife and Fisheries

Fisheries

Resource Assessment

While no baseline data is present, the WCCP and WCCD LUP each emphasize the importance of county fisheries to local tourism and recreation. Based upon the existence of the Ten Sleep Fish Hatchery, fisheries within the county, and the importance of fishing along with hunting within the county, we recommend baseline data be collected that presents fishery resources and special designations. Fishing access sites can also be presented. We suggest fisheries special designations along with fishing access be presented spatially, and all other information be presented in tabular form. This section would be referenced by discussion in Chapter 6 in regards to the socioeconomics of fisheries.

Resource Management Objectives

Washakie County Comprehensive Plan

- Supplying adequate stream flows to maintain and sustain these fisheries is important to the tourism industry and local recreationists alike.

Priorities

Threatened, Endangered, and Sensitive Species

Resource Assessment

We recommend that baseline data be collected showing Threatened or Endangered species and habitat present in Washakie County. Instead of listing animal species that fall under other federal or state designations, this resource assessment should explain federal and state government considerations behind these designations and direct the reader to current listings. Other Special Status Designations may include: BLM and Forest Service Sensitive Species, Species of Concern, Species of Greatest Conservation Need, Management Indicator Species, Migratory Birds, Bald and Golden Eagles, and raptors. In addition, this resource assessment should reference applicable management guideline documents in lieu of or that preclude federal protection.

Resource Management Objectives

Washakie County Conservation District LUP

- WCCD participates as a cooperating agency in all decisions and proposed actions which affect WCCD regarding threatened or endangered species.

Priorities

Washakie County Conservation District LUP

1. WCCD will be involved in the review of federal actions regarding ESA listings, delisting, and management plans.
2. WCCD supports the use of credible data or information BLM and USFS can use on which to base a decision that a species should be designated a “species of concern” or “sensitive” beyond criteria provided in their respective handbooks.
3. WCCD opposes the management of non-ESA listed species (e.g., species of concern, species of special concern, or any other non-ESA designation) as though they are listed and protected by the rules of the Endangered Species Act.

4. WCCD opposes the listing and supports the delisting of any species with insufficient, unsupported, or questionable data not meeting the minimum criteria for its listing or protection level.
5. WCCD supports management plans not created for single species and are consistent with multiple use mandates.
6. WCCD supports creating a unified (cross-agency (i.e. BLM and Forest Service)) definition for “species of concern”.
7. WCCD supports the development of local solutions to keep a species from being listed as a sensitive species/species of concern.
8. WCCD supports the development of management activities on federal lands as part of the local solutions to keep a species from being listed as a sensitive species/species of concern.
9. WCCD supports control of predators, zoonotic, and vector borne diseases that negatively impact sensitive species/species of concern.
10. WCCD cooperates and/or coordinates with federal rulemaking, including any NEPA analysis related to the designation of critical habitat and development of recovery plans.
11. WCCD recognizes threatened and endangered species that are listed based on clear, convincing, peer reviewed, scientific data. There is an additional financial burden imposed on private landowners by the listing of threatened or endangered species because of laws and regulations.
12. WCCD requires the full analysis of the economic impacts on all proposed critical habitat designations or species management plans.
13. WCCD supports cooperation between private landowners and federal agencies to reduce the risk of listing under the Endangered Species Act.
14. WCCD opposes the introduction or reintroduction of listed species into WCCD, unless WCCD deems no harm will come to its constituents, or WCCD consents to terms and conditions or standard operating criteria that avoid disrupting current land uses.
15. WCCD supports the development of recovery plans within 18 months of a species listing that include clear objectives to reach for delisting to occur; for species already listed, supports the development of a recovery plan within 18 months of the adoption of this Plan.
16. WCCD requires the petition of the immediate delisting of a species when population or recovery plan objectives have been met.
17. WCCD supports the development of local solutions to keep a species from being listed under the Endangered Species Act.
18. WCCD supports the development of management activities on federal lands as part of the local solutions to keep a species from being listed under the Endangered Species Act.
19. WCCD requires the avoidance of single-species management in all planning efforts and requires multiple uses of lands and resources as required by federal law.
20. WCCD requires the data used in any listing decision meeting the minimum criteria defined in (Bureau of Land Management 2006) Data Administration and Management and FS Handbooks FSH 1909.12 (United States Forest Service 2013) Supporting Land Management Planning.
21. WCCD supports involvement of WCCD in discussions and decisions regarding any proposed introduction of experimental populations.
22. WCCD opposes management actions increasing the population of any listed species in WCCD without an approved recovery plan. Without a recovery plan, management cannot focus on increasing the species population or habitat, and cannot move closer to a potential delisting.

23. WCCD supports returning to existing approved management documents(s) when litigation is pursued (e.g., revert to the State or local plan rather than the BLM/USFS Sage-grouse Land Use Plan Amendment).
24. WCCD requires the continued use of existing valid permits and lease rights on lands with listed species wherever possible.
25. WCCD requires copies of legal descriptions showing the exact boundaries of all designated critical habitat to WCCD for distribution to impacted private land owners.
26. WCCD opposes the designation of potential habitat as critical habitat unless quantifiable data showing when and how features necessary for species recovery will be achieved on the property.
27. WCCD requires completion of exclusion analysis regarding critical habitat designations for all lands within WCCD.

Wildlife

Resource Assessment

To keep this discussion streamlined, we recommend that data presented in this section relates only to big game species. Background data should include acres of habitat and acres of crucial winter habitat. We recommend this data be presented in tabular and spatial form.

Resource Management Objectives

Washakie County Comprehensive Plan

- Washakie County supports integrated long-term wildlife management. The County believes any planning process needs to account for both consumptive and non-consumptive management strategies and tactics addressed in an environmentally responsible manner from the perspective of impacts on the human environment.

Washakie County Conservation District LUP

- WCCD is committed to proper habitat management by incorporating science, in the planning, programs, and projects.
- WCCD works with government agencies, local cooperators, and other interested parties in the management, maintenance and improvement of habitat, emphasizing voluntary and incentive-based programs.

Priorities

Washakie County Comprehensive Plan

1. The State of Wyoming has made the Department of Game and Fish responsible for management of wildlife. This responsibility entails protection of the public and their property from damage by wildlife. If and when such damage does occur, the County fully expects victims to be compensated in full for their losses as expeditiously as possible.

Washakie County Conservation District LUP

1. WCCD encourages the use of tools such as grazing, plantings, water development, fire, chemical application, and other best management practices for habitat management.
2. WCCD supports wildlife management objectives and numbers based on what the range conditions and habitat can support. Wildlife habitats should be managed for sustainable wildlife populations that take into account obligations for livestock grazing and competing resource

management objectives.

3. WCCD supports reasonable and science-based protection and restoration of critical winter range habitat, while respecting private property and considering the economic effects.
4. WCCD supports game herd population objectives and management decisions that will benefit the wildlife resource, while taking into consideration competition between wildlife species and domestic livestock.

Predator Control

Resource Assessment

The WCCP and WCCD LUP each emphasize the importance of predator control efforts. We recommend listing State-defined predators (i.e. coyote, jackrabbit, porcupine, raccoon, red fox, skunk, stray domestic cat, gray wolf) and their effects on Washakie County resources. In addition, we recommend discussing the intricacies and recent history of the gray wolf.

Resource Management Objectives

Washakie County Conservation District LUP

- WCCD encourages the control of predatory animals to reduce property damage, to protect wildlife and the local economy and tax base, including the viability of the agriculture community.
- WCCD supports predator control efforts as a way to protect private property, human health, and achieve state directed wildlife population goals. Predators can have a negative impact on livestock and wildlife causing an economic loss.

Priorities

Washakie County Comprehensive Plan

1. Washakie County supports pro-active efforts to reduce and control predator populations; and more especially, prevent the spread of predator species such as grizzly bears and wolves from migrating or re-locating to grazing allotments. Washakie County expects predator control strategies to balance with the best science available, economics and the pragmatic logistics of the livestock industry.

Wild Horses and Burros

Resource Assessment

As there are no herd management areas (HMAs) in Washakie County, we recommend stating as such and keeping this section concise and short. Please note that the absence of HMAs will be confirmed.

Resource Management Objectives

Washakie County Conservation District LUP

- WCCD supports wild horse management for viable healthy herds that will not adversely impact the rangeland resource, wildlife habitat or wildlife, soil resources or other approved multiple uses.

Priorities

Washakie County Conservation District LUP

1. WCCD opposes the introduction or reintroduction of wild horses or burros or estray livestock on public lands within WCCD.

2. WCCD supports herd management plans that include provisions for periodic gathers of all horses in the herd management area to limit populations to planned levels, remove trespass horses, and test for equine diseases as prescribed by the Wyoming state veterinarian and prevent habitat degradation.
3. WCCD works to ensure that forage adjustments to livestock grazing also make proportionate adjustments for wild horses, when wild horses are a causal factor in the area not meeting the Wyoming Healthy Rangeland Standards.
4. Encourages wild horse management tools that will permit long-term, cost-effective solutions, but recommends use of short-term remedies to ensure that the wild horses are not left on the public or private lands.

Invasive Species

Resource Assessment

We recommend that this section be removed from Chapter 5 and addressed (combined) in Noxious Weeds in Chapter 7.

Resource Management Objectives

Washakie County Conservation District LUP

- Supports cooperative effort with State, federal and private land managers to enhance cooperative weed management efforts countywide, coordinated with, and primarily managed by the Washakie County Weed and Pest Control District.
- Supports and strongly encourages the control of noxious weeds, invasive species, and pests by owners, managers, and users of all private, state and federal lands including easements, right-of-way, and municipalities.

Priorities

Chapter 6: Economics & Society

Recreation and Tourism

Resource Assessment

The WCCP and WCCD LUP each discuss recreation and tourism opportunities, their importance to the county, and associated challenges. This section should include relevant data from IMPLAN/REMI and the Wyoming Economic Analysis as it relates to recreation and tourism.

Resource Management Objectives

Washakie County Comprehensive Plan

- Washakie County supports recreation and tourism opportunities carried out in an environmentally responsible manner consistent with sustaining local businesses that rely on tourism and recreation.

Washakie County Conservation District LUP

- WCCD encourages recreational activities that provide opportunities for economic development and maintains the custom and culture of Washakie County, while ensuring conservation of the rangeland, water, and soil resources.
- WCCD recognizes that recreation is multiple use of state and federal lands and WCCD supports the historical access on these lands.
- WCCD promotes the value of natural resources through education of multiple use ethics (sharing of the land) and good stewardship by recreational users.

Priorities

Washakie County Comprehensive Plan

1. Washakie County will strive for additional federal designation(s) of scenic byways, will promote cooperative agreements with other communities to develop heritage and cultural corridors, and will take appropriate action in support of efforts to create facilities to bolster scenic highway access in and through the County.
2. Washakie County deems it incumbent upon State and federal offices and agencies to provide sufficient sanitary facilities on major highway corridors, at recreation areas, historic sites, and other attractions throughout the County.
3. Washakie County asserts State and federal land use and management plans are incomplete and materially deficient unless there is a thorough discussion and evaluation of the need for public sanitary facilities. Each plan needs to incorporate standards and objectives, which sustain and support local recreation and tourism economic interests.
4. The County will coordinate with municipal, State and federal officials to encourage recreational opportunities.

Law Enforcement

Resource Assessment

We recommend keeping this section streamlined and presenting the following baseline data: current positions, roles and responsibilities, and jurisdictions throughout the county.

Resource Management Objectives

Washakie County Comprehensive Plan

- Washakie County supports cooperation between and among County, State and federal authorities for uninterrupted communications, expedited emergency response, and unimpeded law enforcement protection.
- Washakie County will endeavor to adhere to its rights and responsibilities for each cooperative agreement, and will insist on the adherence by other parties. In the event the County is unable to carry out its obligations, it will take immediate action to assure the public health; safety and general welfare are not compromised.

Priorities

Cultural, Historical, Geological, and Paleontological Resources

Resource Assessment

The WCCD LUP lists many historical sites and area attractions (p. 21) that should be included in this section. For this resource assessment, we recommend that locations and descriptions of designated public cultural and archeological sites be presented spatially.

Resource Management Objectives

Washakie County Comprehensive Plan

- Washakie County will support development of public education and stewardship programs which increase awareness about cultural, paleontological, and archeological resources (“Cultural Resources”), enhance responsible visitation, appreciation of history and meaning of various sites, and heighten protection strategies carried out within the context of multiple use.
- Washakie County will commit to cooperative agency status in federal agency actions affecting historic buildings and culturally significant sites.

Priorities

Washakie County Comprehensive Plan

1. It is the County’s intent to be recognized as a consulting party under Section 106 of the National Historic Preservation Act (as amended). Washakie County has a Historic Preservation Commission, and maintains the status of a certified local government (“CLG”) as evidence of its intent to be a consulting party.
2. Washakie County will cooperate with State and federal authorities in identifying significant Cultural Resources in the County, make such sites known, and evaluate the significance of proposed land use actions and their impact on Cultural Resources. It is the County’s intent to evaluate the economic and cultural impacts associated with Cultural Resource identification and protection, and weigh one against the other in a cost/benefit context based on the County’s unique custom and culture.
3. Washakie County supports visitation opportunities to local Cultural Resources, and site protection of those Cultural Resources. Washakie County relies on State and federal agencies for the fiscal costs and expertise necessary to carry out this policy.
4. The County will support the inventory of historic and cultural sites and buildings within the County. There is no prior inventory of historical and archeological resources so a thorough inventory is essential if the County is to achieve its goal of preserving the County’s historical and archeological heritage. Through a cooperative effort between public and private interests a

methodical effort will be made to identify and develop innovative and wide ranging incentives to support a variety of historic preservation activities.

5. The County will assist in the search for funding to review and update the existing inventory of eligible historic and cultural sites, buildings, communities, land, archeology, landscapes, and historic transportation corridors within the County. Preservation and adaptive re-use of historic buildings will be given due consideration in the planning process, and methods to preserve these historic and cultural resources will be investigated.
6. The County will encourage local historic preservation interest groups to assist property owners and communities in understanding the benefits of, and preparing nominations for, the National Register of Historic Places listing. Yearly goals for nominations will be established.
7. The County will make owners of historic properties aware of grant and loan programs for restoring historic buildings and provide information on the proper maintenance and repair of historic buildings. In addition, the County will continue to promote the compatible adaptive reuse of significant historic structures through the use of flexible regulations.
8. The County will set the example for preservation of historic and cultural structures and sites through designation, maintenance, and compatible use of County-owned sites and areas.
9. Projects and publications, which link cultural heritage and tourism, have the potential to become important components in the County's tourism program. The County will actively participate in regional tourism efforts that link and promote Washakie County's unique attractions and activities. This participation will encourage efforts that will attract new and repeat visitors to this community's lodging, retail and restaurant facilities.

Economic Considerations

Resource Assessment

This section should include relevant data from IMPLAN/REMI through the Wyoming Economic Analysis Division. Data can be gathered from both the Wyoming Regional Economic Analysis Project and Federal Reserve Economic Data (FRED) both found on the Wyoming Economic Analysis Division website. In addition, Washakie County Commissioners can also request specific reports from the University of Wyoming and to the Wyoming Economic Analysis Division via the Wyoming County Commissioner's Association. We recommend a summary here, but the complete information contained with the Appendices.

Resource Management Objectives

Washakie County Conservation District LUP

- WCCD supports stakeholders in the pursuit of utilizing agriculture by-products. This will help provide economic stability and efficiency in agriculture practices.
- WCCD discourages any action that results in a net loss of irrigated lands which produce food and fiber and affects the economic return of those lands within the district.

Priorities

Chapter 7: Agriculture

Livestock and Grazing

Resource Assessment

Appendix B of the WCCD LUP contains a variety of agriculture acreage estimates. We recommend that, in addition to updating relevant data from the WCCD LUP, federal and state allotments be presented on a map, and county-wide AUMs be presented in a table. If information is present, showing changes in those AUMs over a period of time could be beneficial for capturing past use. Grazing is a topic that was brought up during the kickoff call.

Resource Management Objectives

Washakie County Conservation District LUP

- WCCD will promote Best Management Practices (BMP) for the improvement and continued use of all rangelands and irrigated cropland to sustain agriculture productivity.

Priorities

Washakie County Comprehensive Plan

1. Washakie County endorses fencing strategies, especially strategies implemented by the Wyoming Department of Transportation (WyDOT) which enhance the ability of permittees and other agricultural interests to keep their operations financially viable, and reduce or otherwise mitigate risks to the health, safety and general welfare of the public.

Washakie County Conservation District LUP

1. WCCD supports stakeholders in the pursuit of utilizing agriculture by-products. This will help provide economic stability and efficiency in agriculture practices.
2. WCCD assists and promotes local stakeholders' continued use of best management practices for erosion control and vegetation management on rangeland and irrigated cropland. WCCD supports livestock grazing as a tool for the sound management of private, state and federal lands.
3. WCCD works to increase productivity of land to increase and/or maintain Active Preference Animal Unit Months (AUMs) to maximum sustainable levels on rangeland in WCCD. WCCD will not support any action that causes the net loss of Animal Unit Months (AUMs) for livestock on any allotment, permit, or lease on lands owned or managed by the State of Wyoming or the United States Government, which is not based on sound science.
4. WCCD discourages any action that results in a net loss of irrigated lands which produce food and fiber and affects the economic return of those lands within the district.
5. WCCD discourages any action that results in a net loss of open space which is beneficial to wildlife, and vital to maintaining the viewshed and water quality.
6. WCCD supports the development and use of new technologies in range and irrigation management practices.
7. WCCD maintains partnerships with local, state and federal agencies to provide technical assistance and/or funding to local residents.
8. WCCD supports the development and use of new technologies in land use management that are alternatives to permanent reductions in stocking rates.

Noxious Weeds and Invasive Species

Resource Assessment

We recommend that this section include the county and State noxious weed and pest list and any available associated data (priority status if any, infestation estimates, year designated, management tools etc.). We recommend that Invasive Species in Chapter 5 be addressed (combined) here in Chapter 7. The discussion will include the following items that were discussed during the kickoff call:

- 1. Noxious weeds and the tools to fight noxious weeds*
- 2. Invasive species (medusa head, cheatgrass, western spruce budworm) growth and impacts such as fire, management implications, budgets, etc.*

Resource Management Objectives

Washakie County Comprehensive Plan

- Washakie County supports integrated long-term plant management and weed control tactics programs for responsible wildlife habitat preservation, development, and management through the Washakie County Weed and Pest Control District.
- Washakie County will support cooperative efforts with State, federal and private land managers to enhance cooperative weed management efforts countywide coordinated with and primarily managed by the Washakie County Weed and Pest Control District.

Priorities

Washakie County Comprehensive Plan

1. Washakie County relies on Washakie County Weed and Pest Control District to make use of cooperative agreements, NEPA, the Wyoming Wilderness Act and broad-based legal precedent to assure recognition of local conditions and circumstances in the decision-making process, and to keep the County and the public informed of those efforts.

References Cited

BLM. 2012. *A Desk Guide to Cooperating Agency Relationships and Coordination with Intergovernmental Partners*.

Budd-Falen Law Office. 2018. *Local Government Participation in Federal Agency Decision Making*.

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List of Appendices

Appendix I

We recommend including IMPLAN/REMI socioeconomic data here.

Appendix II

We recommend listing additional supporting information/resources here.

Appendix III

We recommend summarizing public comments/input here.

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