Wyoming County Commissioners Association

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January 28, 2011

Robert V. Abbey, Director
Bureau of Land Management (BLM)
1849 C Street N.W. Room 5655
Washington, DC 20240

Re: Comments on Wild Lands Policy Manuals

Dear Director Abbey:

The Wyoming County Commissioners (hereinafter WCCA) submits the following comments on the draft Manuals that are said to implement the Wild Lands Policy. While the Bureau of Land Management (BLM) notice does not specifically invite public comment or prescribe a deadline, the WCCA believes that public comment is legally required. In addition, BLM is legally required to coordinate with the local governments in both the development and implementation. The WCCA hopes that instead of implementing the Secretarial Order and the Manuals, the BLM will proceed to honor its coordination mandate and withdraw both Manuals in order to reassess the Wild Lands Policy and the adverse impacts on rural communities throughout the West.

The WCCA is a nonprofit organization formed to strengthen the role and communicate the needs of county government. The WCCA members include county commissioners from all twenty three (23) counties in Wyoming. The use of public lands is an extremely important issue to Wyoming counties.

1. SUMMARY OF COMMENTS

- The Secretary lacks the legal authority to create Wild Lands, because Congress reserved the creation of wilderness to itself and the Wild Lands Policy contradicts the statutory mandates found in the Federal Land Policy and Management Act (FLPMA).

- The Wild Lands are the same as wilderness study areas (WSAs), only the name is changed. Any authority to create new WSAs expired October 21, 1993.

- The Wild Lands Policy contradicts the commitments made to the State of Utah, the U.S. Congress and the public by the Secretary to honor the Settlement Agreement that he made to Senator Bennett in his letter of May 20, 2009. (Answering Yes to the question from Senator Bennett "Do you agree that currently the Department has no authority to establish new WSAs (Post-603 WSAs) under any provision of law, such as the Wilderness Act of [sic] Section 202 of FLPMA?" The Secretary also stated BLM had no authority to impose nonimpairment management on non-WSA lands. The adoption of the Wild Lands Policy also makes a mockery of the Secretary's pledge to collaborate and cooperate on public land controversies with the Utah Governor and the Utah local governments in the summer of 2010.

- The Wild Lands Policy violates the Settlement Agreement between the State of Utah, School and Institutional Trust Lands Administration (SITLA) and the Utah Association of Counties (UAC) and the Department of the Interior signed in 2003. The repudiation occurred without the apparent approval of the Department of Justice and without the courtesy of notifying the State of Utah, other than a phone call a few minutes before a press conference.

- Even assuming that the Interior Secretary had the authority to adopt the Wild Lands Policy, BLM has failed to follow following rulemaking procedures that are mandated by FLPMA.

- The Wild Lands Policy will have significant environmental impacts, including increased risk of catastrophic wildfire, which will destroy wildlife habitat, increase soil erosion, increase noxious weed infestations and air pollution. BLM WSA policies also demonstrate that there will be the diminished ability to treat noxious weeds, gather wild horses, and to build range improvements to enhance vegetation and rangeland resources. Ironically, the Wild Lands Policy will deal the hardest blow to the 'fast track' clean energy projects that will suffer delays and additional costs due to the need for a wilderness inventory and evaluation, and assuming the affected area is deemed to have wilderness character, the additional measures to avoid impairment or the decision process to proceed regardless of the wilderness character finding.

2. NO DIFFERENCE BETWEEN WSAS AND WILD LANDS

Interior is calling the newly-inventoried lands "Lands with Wilderness Characteristics (LWCs)"" that will be managed as "Wild Lands." The only difference between WSAs or wilderness and Wild Lands is the name. Interior admits the lack of difference where the DOI Q&A published on December 23, 2010, referred to the Wild Lands Manuals as 'new wilderness guidance. ("Why is it necessary for the BLM to issue *new wilderness guidance*?")

Elsewhere BLM states that the Wild Lands Policy this does not create new WSAs. [Wild Lands Inventory and Planning Guidance Questions and Answers, p.2] Its own statements are contradicted by the Manuals, where BLM employs the same criteria as it used to identify WSAs in 1978. DM6300-1.13 ¶¶A. B. The Manuals also provide that BLM will manage the Wild Lands under the same legal criteria as it currently manages the WSAs. DM6300-1.13.B.(2); DM6300-2.06 ('The BLM shall protect LWCs when undertaking land use planning and when making project-level decisions by avoiding impairment of their wilderness characteristics"); *Id.* .22, .24. There is no substantive difference between Wild Lands and WSAs, except Interior's use of a different name.

3. WILD LANDS POLICY FAILS TO ADDRESS OR RESOLVE DIFFICULT LEGAL ISSUES THAT SUPPORT THE CONCLUSION THAT SECRETARIAL ORDER 3310 AND THE RESPECTIVE DRAFT MANUALS ARE WITHOUT LEGAL AUTHORITY

a. No Legal Authority to Implement Secretarial Order 3310

Only Section 603 of FLPMA authorizes BLM to manage lands so as to not impair their wilderness character and that nonimpairment standard was and is reserved for WSAs. *Tri-County Cattleman's Association Idaho Cattlemen's Association*, 60 IBLA 305, 314 (1981). There is no other statutory authority and FLPMA, elsewhere, states that all other public lands are to be managed so as to not unduly and unnecessarily degrade the resources. 43 U.S.C. §1732(b) [nondegradation standard].

Given the lack of authority, the Secretarial Order 3310 is a usurpation of authority that Congress expressly reserved to itself in FLPMA and in the 1964 Wilderness Act to designate wilderness. It also directly conflicts with the management standard for public lands established in FLPMA.

BLM proposes to adopt the Wild Lands Policy and implement it through two Manuals, based on its discretion in FLPMA. We assume that BLM is relying on its authority in Sections 202 and 302 of FLPMA. Those provisions do not support BLM's claimed authority to create new WSAs under the guise of Wild Lands or to manage them as if they were designated WSAs for nonimpairment of the wilderness character.

Section 202 of FLPMA provides for the development and revision of land use plans. 43 U.S.C. §1712. Land use planning must have coordination with state and local governments, public involvement, and be consistent with FLPMA. 43 U.S.C. §1712(a). The criteria for developing and revising land use plans, includes (1) using and observing the principles of multiple use and sustained yield set forth in FLPMA and other applicable laws, 43 U.S.C. §1712(c)(1); (2) interdisciplinary approach, §1712(c)(2); (3) priority to designate ACECs, §1712(c)(3), and (4) "to the extent consistent with the laws governing the administration of the public lands, coordinate the land use inventory, planning, and management activities of or for such lands with the land use planning and management programs of other Federal departments and agencies and

of the States and local governments within which the lands are located;"§1712(c)(9). FLPMA further states: "Land use plans of the Secretary under this section shall be consistent with State and local plans to the maximum extent he finds consistent with Federal law and the purposes of this Act." *Id.*

Unlike the definition of multiple use for National Forests, 16 U.S.C. §529, FLPMA does not include wilderness as one of the statutory multiple uses. 43 U.S.C. §1702©. Wilderness has its own definition, which is limited to Section 603. ("(I) The term 'wilderness' as used in section 1782 of this title shall have the same meaning as it does in section 1131© of Title 16." §1702(I). A word search of FLPMA shows that the term 'wilderness' is found only in the definition section, 43 U.S.C. §§1702(I) and the wilderness review provisions of Section 603, 43 U.S.C. §1782; 43 C.F.R. § 1601.0-5(I).

When BLM developed the rules governing land use plans, it originally defined a resource management plan as including "the initial determination of whether a wilderness study area shall be recommended to the President for recommendation to the Congress as suitable or unsuitable as an addition to the National Wilderness Preservation System." 43 Fed. Reg. 58764, 58768-69 (1978) *draft* 43 C.F.R. §1601.0-5(p)(2). The definition of a resource management plan was revised to delete reference to wilderness study area recommendations. 44 Fed. Reg. 46386 (1979). Thus, BLM has no regulations such as in the land use planning chapter authorizing establishment of wilderness type areas or authorizing nonimpairment management for such lands other than designated WSAs.

b. Conflicts with the Settlement Agreement between the Department of the Interior and the State of Utah, SITLA and UAC

In 2003, the United States and the State of Utah resolved litigation that was filed in 1996 to challenge the wilderness reinventory of certain public lands that were determined to lack wilderness character in BLM's initial wilderness evaluation and redetermination of WSAs between the years of 1980 and 1985. Throughout that litigation, BLM maintained that the 1996 Utah wilderness reinventory was limited to gathering data for only the State of Utah due to unusual controversy regarding the original wilderness inventory done in the 1980s. *State of Utah v. Babbitt*, 137 F. 3d 1193, 1199 (10th Cir. 1998). At that time and hence, BLM has admitted that the Utah wilderness inventory and study authority expired in October of 1993 with the final deadline to submit public land wilderness recommendations to the Congress. *State of Utah v. Babbitt*, 137 F. 3d at 1206 n.17 (referring to letter written by former Interior Secretary Babbitt ""I also agree with you that FLPMA's section 603 no longer provides authority to inventory BLM land in Utah for wilderness values.").

The litigation was resolved in 2003 with a Settlement Agreement that was based on facts developed in the case showing that BLM had managed the new inventory areas as if they were

WSAs, thereby harming the local economies and state revenues. The Settlement Agreement was challenged by the numerous environmental organizations and affirmed by the Utah District Court and the Tenth Circuit Court of Appeals. *State of Utah v. Norton*, no. 96-365B (D. Utah 2006), *aff'd* 535 F.3d 1184 (10th Cir. 2008).

The Utah Settlement Agreement provides that "Defendants [DOI] will not establish, manage or otherwise treat public lands, other than section 603 WSAs and Congressionally designated wilderness, as WSAs or as wilderness pursuant to the Section 202 process absent congressional authorization."" ¶5, *Utah v. Norton*, Settlement Agreement Sept. 2005. This provision was based on the plain language of both the Wilderness Act that only Congress can designate wilderness, 16 U.S.C. §1131©, and the provision providing for a 15-year wilderness study and nonimpairment management in FLPMA, 43 U.S.C. §1782.

c. Other Conflicts with *Utah v. Norton* Settlement Agreement

The first paragraph of the Settlement Agreement provides:

> 1. The authority of Defendants to conduct wilderness reviews, including the establishment of new WSAs, expired no later than October 21, 1993, with submission of the wilderness suitability recommendations to Congress pursuant to Section 603. ***As a result, Defendants are without authority to establish Post-603 WSAs,*** recognizing that nothing herein shall be construed to diminish the Secretary's authority under FLPMA to:
>
> a. manage a tract of land that has been dedicated to a specific use according to any other provision of law (Section 302(a)),
>
> b. utilize the criteria in Section 202© to develop and revise land use plans, including giving priority to the designation and protection of areas of critical environmental concern (Section 202(c)(3)), or
>
> c. take any action necessary, by regulation or otherwise, to prevent unnecessary or undue degradation of public lands (Section 302(b)).

Secretarial Order 3310 relies on FLPMA, while excluding Section 603, without identifying which section of FLPMA authorizes the creation of new wilderness areas under the new name of Wild Lands. But as noted above in the subparagraphs a through c, FLPMA does not in fact authorize Wild Lands. They are not ACECs and are not identified in accordance with the procedures and criteria for ACECs. 43 C.F.R. §1610.7-2.

The Wild Lands are to be managed to not impair wilderness characteristics, *e.g.* DM6300-1.13.B. (2); DM6300-2.06. All public lands that are not WSAs are to be managed to avoid unnecessary or undue degradation. 43 U.S.C. §1732(b). Finally, no other law authorizes the Secretary to create Wild Lands. Perhaps due to the lack of authority, Secretarial Order 3310 does not cite to a specific law.

Paragraph 2 of the Settlement Agreement also provides

> The 1999 Utah Wilderness Inventory shall not be used to create additional WSAs or manage public lands as if they are or may become WSAs, and the inventory information will be evaluated for its validity and utility at such time as changes are made to the appropriate land use plan.

The Wild Lands designation appears to apply to the Utah wilderness reinventory areas and any other area currently pending before Congress, because they are citizen proposed wilderness. DM6300-2.04.C. The Manuals do not address what BLM should do in Utah, where BLM analyzed all of the citizen proposed wilderness in a supplemental EIS.

Paragraph 5 of the Utah Settlement Agreement states that "Defendants will not establish, manage or otherwise treat public lands, other than Section 603 WSAs and Congressionally designated wilderness, as WSAs or as wilderness pursuant to the Section 202 process absent congressional authorization."

The Wild Lands Policy directly contradicts this provision. No law has authorized the Interior Secretary to treat public lands as WSAs [Wild Lands] or as wilderness, except for the WSAs established pursuant to the Section 603 wilderness review program or the areas designated by Congress. The Secretary, nevertheless, has taken it upon himself to do so.

In Paragraph 6 of the Utah Settlement Agreement, the Secretary agreed that "Defendants will refrain from applying the IMP, H-8550-1, to BLM lands other than the WSAs established during the Wilderness Review pursuant to §603." The Wild Lands Policy Manuals specifically apply nonimpairment management to the identified Wild Lands. DM 6300-2.24. There is no question these are 'lands other than the WSAs established during the Section 603 wilderness review.'

The Interior Secretary misrepresented his commitments to the law. Notably, when the current Deputy Secretary of the Interior testified before Congress on this issue (in order to be confirmed); he assured Congress that "BLM does not have authority to apply the non-impairment standard to non-WSAs." Less than two years later, the Interior Department has adopted a "Wild Lands" policy that mandates nonimpairment management for the new Wild Lands that are not WSAs. See draft H-6300-2.24. This policy has been adopted without any stated basis for the 180-degree change in the interpretation of the law regarding the authority of the agency.

d. Wild Lands Policy Making Wilderness Management a Priority Contradicts FLPMA

The Wild Lands Policy establishes a presumption in favor of wilderness or Wild Lands while excluding the statutory principal or major multiple uses established in FLPMA. 43 U.S.C. §§1702(l); 1712(e). This presumption in favor of wilderness management may only be overcome by a specific evidentiary demonstration that the proposed use should proceed despite impairment of alleged wilderness. H-6300-2.24. It also makes wilderness a priority for public land management, Sec. Order 3310, §1; H-6300-2.06, again contrary to FLPMA's direction dedicating the public lands to primary uses that do not include wilderness.

FLPMA does not authorize wilderness as a priority for public land management. In fact, FLPMA does not include wilderness in its definition of multiple use. 43 U.S.C. §1702©. FLPMA creates, however, priority multiple uses, for timber, domestic livestock grazing, mining and mineral development, outdoor recreation, fish and wildlife habitat, and rights-of-way. 43 U.S.C. §1702(l). Of these principal multiple uses, timber, post-1976 mining and mineral development, and rights-of-way are prohibited in WSAs. H-8550-1, Introduction. Fire suppression are limited due to likely impairment of wilderness character and policy favoring using fire for resource benefits. H-8550-1, ¶12 (emergency only). While the IMP permits snowmobiles and motorized vehicles on existing roads, BLM RMPs closed WSAs to motorized travel. *See e.g.* Kemmerer RMP 2-32; Rawlins RMP 2-32, 2-39. Other multiple uses are permitted only on a limited basis, i.e. grazing without increases in forage and without any new structures or range improvements. H-8550-1, ¶13 (permitting maintenance only of range improvements that existed as of October 21, 1976). The WSA management Manual also limited motorized outdoor recreation to a few specific exceptions, although it does allow bicycles, *Id.* ¶11. Thus, it is apparent that the Wild Lands Policy seeks to rewrite FLPMA without the benefit of any change in the law by Congress.

e. Contradictions with BLM Policy

The Wild Lands Policy requires that BLM implement "non-impairment" management for all public lands that BLM identifies as having wilderness character. H-6300-2.24. The nonimpairment standard by law applies only to congressionally designated Wilderness or WSAs, 43 U.S.C. §1782(a), H-8550 (1997). The extension of the nonimpairment management to other lands violates the FLPMA direction that all other lands be managed to avoid undue and unnecessary degradation or non-degradation standard. 43 U.S.C. §1732(b); 43 C.F.R. §3809.1(a).

BLM concluded, consistent with earlier decisions of the Interior Board of Land Appeals, that BLM does not have the authority to manage new lands based on the non-impairment standard. *See* Director's Instruction Memorandum No 2003-274 (September 2003), ("Following the expiration of the Section 603(a) process [in 1993], there is no general legal authority for the BLM to designate lands as WSAs for management pursuant to the non-impairment standard prescribed by Congress for Section 603 WSAs. FLPMA land use plans completed after April 14, 2003 will not designate any new WSAs, nor manage any additional lands under the Section 603 non-impairment standard." (emphasis and bracket added)). *See also Colorado Environmental Coalition*, 386 IBLA 386, 391-396 (2004); *Southern Utah Wilderness Alliance*, 166 IBLA 270, 290 (2005).

4. WILD LANDS POLICY UNNECESSARY EXCEPT TO LIMIT MULTIPLE USES AND HARM ECONOMIES OF WESTERN COMMUNITIES

FLPMA allows BLM to protect individual resources independent of the concept of wilderness. Wilderness is defined as:

> A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this chapter an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

16 U.S.C. §1131(a).

BLM has authority to protect public land resources for scenic quality, special recreation management, historical resources, ecological resources or special or unique wildlife habitat as ACECs. *See* H-1601, ¶5.f.3, p. 21 (2005). When BLM uses its authority to specifically protect certain scenic or historic resources, it achieves the specific protection without wilderness management under the nonimpairment standard. Scientific, ecological or historical resources are listed in only one category of the wilderness definition, 16 U.S.C. §1131(c)(4); 43 U.S.C. §1702(I). Elements 1 through 3 of the wilderness definition, 16 U.S.C. §1131(a) (1)-(3) are unique to the concept of wilderness. A wilderness area must be natural and without permanent structures, such as roads, transmission lines, or water reservoirs. It must feature outstanding recreation or solitude, and it must be greater than 5000 acres. Each of these elements must be met to fit the definition of wilderness.

As part of each land use plan, BLM assigns a visual resource management (VRM) class, based on the inventory and adjusted by the land use allocation. H-8410-1. BLM also designates areas for special management, H-1601-1, ¶5.f.3, p. 21, including wildlife habitat or recreation. BLM manages cultural resources pursuant to National Historic Preservation Act (NHPA), 16 U.S.C. §470, National Historic Trails Act, 16 U.S.C. §1241, and the Archaeological Resources Protection Act (ARPA), 16 U.S.C. §469, 470aa; H-8110-1, H-8130-1, H-8140-1.

For areas that are subject to irreparable harm and which have unique resource or process values, BLM can designate them as ACECs. 43 C.F.R. §1610.7-5. H-1601-1, I.A.3., V.B.5. ACECs undergo additional analysis to document their regional or national significance, the threats, and the proposed boundaries. There is also a separate 60-day comment period in the Federal Register. 43 C.F.R. §1610.7-5(b).

It is unclear what the Wild Lands Policy will add, except to remove more public land from the FLPMA's principal multiple uses, for rights-of-way and mining and mineral development, popular forms of outdoor recreation, such as snowmobiles and ATVs, and imposing additional restrictions on rangeland projects that are needed to meet rangeland health standards and to address sagebrush habitat. The Wild Lands Policy is less about protecting resources and more about stopping economic uses of the public lands.

5. AUTHORITY CITED IN SECRETARIAL ORDER 3310 DOES NOT AUTHORIZE THE SECRETARY TO EFFECT SIGNIFICANT CHANGES IN PUBLIC LAND MANAGEMENT WITHOUT RULEMAKING PROCEDURES

Secretarial Order 3310 is purportedly issued in accordance with the 'housekeeping' authority (5 U.S.C. §301), but that statute only authorizes the head of a department to issue 'regulations.' The term regulations refers to rules issued in accordance with the Administrative Procedure Act (APA), 5 U.S.C. §551, 553-556. Secretarial Order 3310, however, does not contain direction to issue regulations. Instead, it directs BLM to issue as go final two draft Manuals, which are merely internal guidance to BLM staff. *Arizona Silica Sand Co.*, 148 IBLA 236, 243 (1999) ("The provisions of the BLM Manual do not have the force and effect of law; nevertheless, as this Board has held on numerous occasions, they are binding on BLM."); *Howard B. Keck, Jr.*, 124 IBLA 44, 55 (1992). The Manuals implementing Secretarial Order 3310 are being adopted without compliance with rulemaking procedures, because there is no notice of public comment and no compliance with other procedures that govern APA rulemaking.

The Draft Manuals were not issued by way of a proper APA process, in violation of FLPMA, with proper notice and comment. 43 U.S.C. §1740, 1712(a). FLPMA provides that its provisions shall be implemented through rulemaking. 43 U.S.C. §1740 ("The Secretary, with respect to the public lands, shall promulgate rules and regulations to carry out the purposes of this Act and of other laws applicable to the public lands.").

The Order purports to implement the Secretary's authority under FLPMA, with the exception of Section 603, 43 U.S.C. §1782. It would appear that Secretarial Order 3310's reliance on Manuals is a deliberate effort to avoid complying with the law.

Rulemaking procedures would also require review by the Office of Management and Budget, review by the Small Business Administration to evaluate the impacts on small businesses and rural local governments, 5 U.S.C. §§601-611, compliance with the Paperwork Reduction Act, 44 U.S.C. §3501, as well as notice and public comment. 5 U.S.C. §552.

6. SIGNIFICANT IMPACTS ON THE HUMAN ENVIRONMENT IGNORED

Secretarial Order 3310 also significantly affects the human environment under the National Environmental Policy Act (NEPA), which requires that the Secretary prepare an environmental impact statement (EIS), including an analysis of the economic impacts of the action, before undertaking the action. 42 U.S.C. §4332(2) ©; 40 C.F.R. §1508.27; H-1790-1, ¶3.2.1.
The BLM draft Wild Lands Manuals provide that all public land projects must be delayed for an inventory and study of wilderness character on the affected public lands. H-6300-1. Thus,

current energy projects, including 'clean energy projects' must be halted or delayed until the inventory and study are completed. It is likely that transmission lines and wind turbines will impair wilderness character, thus conflicting with the Wild Lands Policy. If these projects are to go forward, BLM must decide to impair the alleged wilderness characteristics. H-6300-2, ¶.24. The additional time for a wilderness inventory and study with public comment will add years to the approval process for these supposedly 'fast track' projects. The clean energy industry is already suffering due to project delays, government delays in distribution of funds and loans, and reallocation of funds to other programs. [WSJ Dec. 22, 2010 editorial regarding need for additional tax incentives to maintain wind and solar energy industry which has lost jobs]. The Wild Lands Policy will add to delays and cost, thus making 'clean energy' even more expensive than it already is.

Clean energy projects will adversely affect the alleged wilderness characteristics. BLM must decide whether to deny the project, revise it to reduce the impacts, or to allow it even though it will impair wilderness character. Wind energy will require permanent installation of turbines and transmission lines, both of which are inconsistent with nonimpairment. Moreover, wind turbines kill birds and permanently alter the visual resources. This is equally true for solar projects that require permanent installations on large areas of land.

The additional transmission lines necessary for wind and solar energy are also permanent structures that change the views. They must be located outside of existing natural gas pipeline rights-of-way for safety reasons and thus require separate environmental review.

Requiring these projects to bury transmission lines across thousands of miles would also impair the economics of clean energy that currently relies on tax incentives and government funding.

The Order will have additional environmental impacts. Wild horse management would be restricted. H-8550-1, III.E (limiting gathers to fixed wing or helicopters). Fire management will also be impaired due to policies that restrict fire suppression in WSAs to emergencies and other policies that favor wildfire in wilderness. Post-burn areas typically are infested with noxious weeds. Sage brush habitat lost to wildfire could take more than 50 to 60 years to recover due to soils and arid climates typical of Wyoming public lands.

NEPA requires that BLM assess the environmental impacts as well as the impacts on the western communities.

7. CONCLUSION

The Wyoming County Commissioners Association members urge the Secretary and BLM to withdraw the misguided and unlawful order. It will have significant adverse environmental and economic impacts in the rural western states. The rush to implement the order regardless of the impacts is both misguided and poor public policy. The harm to western communities is out of proportion to any benefits.

Sincerely,

Joel Bousman

Joel Bousman
WCCA President, Commissioner
Sublette County, Wyoming

xc: Mr. Don Simpson, Director Wyoming Bureau of Land Management