BOARD OF COMMISSIONERS

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November 23, 2026

Lindsay Abercrombie-Johler
Natural Resource Specialist
Bureau of Land Management
Wyoming State Office
5353 Yellowstone Road
Cheyenne, WY 82009

Re: 2027 Second Quarter Competitive Oil and Gas Lease Sale – Request for Parcel Deferrals (DOI-BLM-WY-0000-2027-0002-EA)

Dear Ms. Abercrombie-Johler,

The Teton County Board of County Commissioners (Board) appreciates the opportunity to provide comments on the Bureau of Land Management's (BLM) proposed 2027 Second Quarter Competitive Oil and Gas Lease Sale. The Board respectfully requests that BLM defer all proposed lease parcels located wholly or partially within Teton County, Wyoming, and additional parcels overlapping high-use mule deer migration corridors and stopover habitats on the Bridger–Teton and Shoshone National Forests. These lands provide exceptional wildlife habitat, important migration connectivity, and highly valued public recreation opportunities. The Board believes these resources warrant protection from the potential impacts of new oil and gas development and associated road construction.

The Board specifically requests deferral of parcels WYP106838078 (638.32 acres), WYP106838080 (1,520 acres), and WYP106838067 (2,440 acres), which are located wholly or partially within Teton County. These parcels include lands administered by the Bridger–Teton and Shoshone National Forests. The Board further requests deferral of proposed parcels in the broader Dubois area that overlap high-use portions of the Upper Wind River Mule Deer Migration Corridor and associated stopover habitats, regardless of county boundaries. Wildlife migration does not follow jurisdictional boundaries, and effective conservation of these corridors requires coordination across the larger landscape.

Teton County has an established and formally adopted position opposing new oil and gas leasing and development on National Forest lands within the County. On November 13, 2018, the Board unanimously adopted Resolution No. 18-040, Resolution Proclaiming Conservation Principles for US Forest Service Lands in Teton County. The resolution recommends permanent withdrawal of National Forest lands within Teton County from new oil and gas leasing and hard-rock mining, prohibits new mineral extraction and development subject to specified exceptions, and recommends prohibiting new permanent and temporary roads except under limited circumstances. The resolution also recognizes the importance of maintaining wildlife habitat, ecosystem connectivity, recreational opportunities, and the ecological integrity of these public

lands for present and future generations.[1] The Board's request to defer the three Teton County parcels is consistent with this longstanding adopted position.

The lands proposed for leasing also provide substantial recreational and economic benefits to Teton County and the state of Wyoming. These areas of the Bridger-Teton and Shoshone National Forests offer nationally significant opportunities for hunting, fishing, hiking, horseback riding, snowmobiling, camping, wildlife viewing, and backcountry recreation. The scenic landscapes surrounding Togwotee Pass, the Upper Wind River Basin, and the Absaroka and Wind River ranges contribute to the region's identity and support local businesses, outfitters, guides, and tourism-related employment. The undeveloped character of these lands is fundamental to many of these activities. New roads, well pads, industrial traffic, noise, and associated infrastructure could diminish recreational experiences, fragment habitat, and alter the landscapes that residents and visitors value.

The proposed lease areas also intersect an important regional wildlife migration landscape. In September 2024, the Wyoming Game and Fish Commission formally identified the Upper Wind River Mule Deer Migration Corridor, recognizing the importance of maintaining migration pathways and connecting seasonal habitats across a portion of this lease area. Wyoming Game and Fish Department (WGFD) research using GPS data from 147 collared mule deer identified migration routes, high-use corridors, and important stopover habitats used by deer traveling between high-elevation summer ranges and lower-elevation winter ranges. Individual migrations extend as far as 90 miles.[2] The accompanying maps, provided by The Wilderness Society, illustrate the substantial overlap of proposed leases with this migration landscape, including concentrated high-use routes and stopover areas. Importantly, this migration failed to achieve full designation under the Wyoming Executive Order 2020-1, in part due to a lack of threats on the public land portions of the high-use areas, these proposed leases are challenging that as a false narrative.[3]

These high-use migration routes and stopovers deserve particular consideration because they represent places where migrating animals concentrate their movements or spend extended periods resting and foraging. Disturbance in these locations can affect migration functionality beyond the immediate footprint of development. Roads, traffic, drilling activity, and other infrastructure may displace animals, reduce access to important forage resources, and create cumulative barriers to movement. The Board requests that BLM consult closely with WGFD to evaluate impacts to mule deer, elk, and other wildlife, including the cumulative effects of potential development across multiple lease parcels. Given the existing recreational and wildlife values, the Board believes deferral is warranted in these important migration habitats.

The Board also requests that BLM and the Forest Service carefully evaluate the proposed parcels for consistency with applicable Forest Plan direction and existing oil and gas leasing restrictions. The 1990 Bridger–Teton National Forest Land and Resource Management Plan establishes

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[1] Teton County Board of County Commissioners, *Resolution No. 18-040, Resolution Proclaiming Conservation Principles for US Forest Service Lands in Teton County* (November 13, 2018), pp. 2–3 (attached).

[2] Wyoming Game and Fish Department, *Upper Wind River Mule Deer Migration Corridor*; see also *Migration Corridor Threat Evaluation* (June 26, 2024).

[3] Office of the Governor of Wyoming. (2026, June 26). *Executive Order 2020-1: Wyoming mule deer and antelope migration corridor protection* (Reissued). State of Wyoming. https://governor.wyo.gov/state-government/executive-orders [1]

resource management objectives and leasing stipulations intended to protect wildlife, recreation, water quality, and other environmental values.[4] Several management prescriptions, including Desired Future Conditions 2A, 3, and 4, generally require no-surface-occupancy stipulations for new oil and gas leases. Other management prescriptions contain specific grizzly bear protections and restrictions on access and development. The Forest's 1992 oil and gas leasing amendment further documents the application of mapped no-surface-occupancy restrictions, wildlife timing limitations, and road construction standards in site-specific leasing decisions. The Board requests that the Forest Service identify the applicable management prescriptions and lease stipulations for each proposed parcel and ensure that areas subject to no-surface-occupancy requirements are fully protected.

The Shoshone National Forest's 2015 Land Management Plan and previously adopted oil and gas leasing decisions also establish restrictions on leasing and surface development. The preliminary mapping attached indicates that portions of the proposed lease areas overlap lands identified as closed to oil and gas leasing on the Shoshone National Forest. The Board requests that BLM verify these boundaries and remove any acreage that is not available for leasing under existing management direction. The Board is also concerned about potential impacts to the Continental Divide National Scenic Trail, where new roads, industrial infrastructure, noise, and visual disturbances could diminish the primitive recreational experiences and scenic values for which the Trail was designated. The Shoshone National Forest's 2015 Land Management Plan establishes a corridor extending one-half mile on either side of the Trail and prohibits surface development under mineral leases within that corridor (MA3.6A-STAND-07). The Shoshone Forest Plan also recognizes restrictions on new leasing in inventoried roadless areas pending applicable leasing availability decisions and includes management standards protecting sensitive wildlife habitats and limiting new road construction.[5] These provisions should be reviewed before any proposed parcel is advanced for sale, rather than relying exclusively on future development permitting to resolve potential conflicts.

Grizzly bear conservation provides another important consideration. The 2006 Forest Plan Amendment for Grizzly Bear Habitat Conservation for the Greater Yellowstone Area National Forests amended management direction for both the Bridger–Teton and Shoshone National Forests. The amendment establishes standards for maintaining secure habitat and limiting changes in motorized access and developed sites within the Primary Conservation Area. The 2024 Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Ecosystem reinforces the importance of these protections and specifies that new leases and associated development must meet applicable secure habitat and developed-site standards.[6] The Shoshone National Forest Plan additionally prohibits surface development for oil and gas activities within the grizzly bear Primary Conservation Area. The Board requests that the agencies evaluate each applicable parcel for

[4] USDA Forest Service, *Bridger–Teton National Forest Land and Resource Management Plan and Final Environmental Impact Statement* (1990); *Forest Plan Amendment No. 1, Oil and Gas Leasing of Specific Lands, Management Area 49 – Willow Creek* (April 17, 1992).

[5] USDA Forest Service, *Shoshone National Forest Land Management Plan, 2015 Revision*, Minerals section, pp. 81–83; see also Management Area direction and Map H; and, Management Area 3.6A – Continental Divide National Scenic Trail.

[6] USDA Forest Service, *Forest Plan Amendment for Grizzly Bear Habitat Conservation for the Greater Yellowstone Area National Forests, Record of Decision* (April 2006), pp. A-2–A-4; Interagency Grizzly Bear Committee, *Conservation Strategy for the Grizzly Bear in the Greater Yellowstone Ecosystem* (2024), Chapter 3.

consistency with these requirements, including potential impacts from new roads, increased motorized access, and habitat fragmentation in occupied grizzly bear habitat.

The Board recognizes that issuance of an oil and gas lease does not itself authorize construction or drilling. Nevertheless, the leasing decision is an important opportunity to evaluate whether future development can be accommodated, while protecting the resources and management objectives established in the applicable Forest Plans. Under 36 C.F.R. § 228.103(e), the Forest Service must review proposed leasing of specific National Forest lands for consistency with applicable land management plans, adequacy of environmental analysis, and appropriate lease stipulations. Where significant new information requires additional analysis, or leasing would be inconsistent with the applicable Forest Plan, leasing consent must be withheld or withdrawn. The Board requests that BLM and the Forest Service incorporate the latest WGFD migration data, current grizzly bear habitat information, and applicable Forest Plan restrictions into this review before proceeding with the proposed lease sale.

In conclusion, the Board respectfully requests that BLM defer parcels WYP106838078, WYP106838080, and WYP106838067 in their entirety, along with additional parcels on the Bridger–Teton and Shoshone National Forests that overlap high-use mule deer migration corridors and important stopover habitats. We further request that BLM exclude lands closed to leasing under existing Forest Service direction, verify all applicable no-surface-occupancy and other protective stipulations, and coordinate with WGFD and the affected National Forests to evaluate cumulative impacts to wildlife migration and recreation. These requests reflect the County's longstanding conservation priorities and the importance of maintaining the ecological, recreational, and economic values of this exceptional landscape.

Thank you for considering the County's comments and for your continued coordination with local governments and wildlife management agencies. We appreciate the opportunity to participate in the review of these proposed lease parcels and request that BLM provide a response identifying how the County's concerns and recommended deferrals are addressed in subsequent lease sale decisions.

Sincerely,

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Mark Newcomb, Chair
Teton County Board of County Commissioners

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Attest: Maureen E. Murphy
Teton County Clerk

STATE OF WYOMING
County of Teton } ss.

I, Maureen Murphy, County Clerk and Ex-Officio Register of Deeds, within and for Teton County, in the state of Wyoming, do hereby certify that the above and foregoing is a full, true and complete copy of transcript of Resolution #18-040

being so full, true and complete, as the same now appears upon record. IN TESTIMONY WHEREOF, I haveunto set my hand and the official seal at Jackson, Wyoming, this 23rd day of December, 2025

County Clerk and Ex-Officio Register of Deeds

By Natalie K. Murphy
Deputy Clerk

County Clerk

STATE OF WYOMING
COUNTY
CLERK
TETON COUNTY

Resolution # 18-040

RESOLUTION PROCLAIMING CONSERVATION PRINCIPLES FOR US FOREST SERVICE LANDS IN TETON COUNTY

WHEREAS, Teton County's community vision is to preserve and protect the area's ecosystem in order to ensure a healthy environment, community, and economy for current and future generations;

WHEREAS, the Wyoming County Commissioners Association (WCCA) established the Wyoming Public Lands Initiative (WPLI) to develop a proposed management recommendation for the Wilderness Study Areas (WSAs) in Wyoming, and where possible, pursue other public land management issues and opportunities affecting Wyoming's landscape;

WHEREAS, the Teton County Board of Commissioners (Board) opted into the WPLI process in an effort to achieve formal proposals through a collaborative process that would form the basis for federal legislation to resolve the status of WSAs in whole or in part as Wilderness to be managed as per requirements of the 1964 Wilderness Act or in whole or in part released from WSA status to be managed via other methods available to the United States Forest Service (USFS), as well as to consider other areas of interest within the County for potential inclusion in its recommendation, including other land use designations, transfers, or other management actions not necessarily related to WSA designation or release;

WHEREAS, the Board abided by all WCCA guidelines as presented in the 2015 letter from the WCCA to all participating counties, including establishing a Teton County WPLI Committee (Committee) representing a broad cross-section of public lands stakeholders who drafted a charter, abided by the charter, met at monthly meetings open to the public, allowed public comment at all meetings, drafted publicly available minutes for all meetings, developed proposals and distributed proposals for public comment;

WHEREAS, the Committee's consideration of lands outside of WSAs was done in compliance with WCCA guideline II.i. and supported by extensive mapping work and careful descriptions of the landscapes under consideration;

WHEREAS, the Committee submitted three proposals at a regular meeting of the Board on August 20, 2018, public comment was taken and considered, and the Board remanded the Mountain Athletes Working Group (MAWG) Middle Ground Proposal back to the Committee to address concerns presented by dissenting members of the Committee with instructions to return a single proposal that achieved a 66% majority favorable vote;

WHEREAS, the Committee, by letter from WPLI Committee Co-chair Abigail Moore dated October 3, 2018, to the Board, submitted the new Combined Middle Ground Proposal dated September 17, 2018, with a 66% favorable vote and on October 9, 2018, further public comment was taken and considered at the regular Board meeting;

WHEREAS, the Board remanded that proposal and convened a special meeting on October 16th, 2018, at which Board voted not to advance the Combined Middle Ground Proposal and the Committee convened one final time, in the presence of the Board, and voted on the 10.16 Modified MAWG Proposal, which failed to obtain 66% majority support;

WHEREAS, as a result the Committee put forth no final specific recommendations on changes to the portions of the Palisades Wilderness Study Area (PWSA) and the Shoal Creek Wilderness Study Area (SCWSA) within Teton County;

WHEREAS, the Board stated that as a result, the Teton County WPLI process formally recognizes the continued status of the PWSA and the SCWSA within Teton County as WSAs per the 1984 Wyoming Wilderness Act;

WHEREAS, prior to remanding the Combined Middle Ground Proposal on October 9, 2018, the Board formally moved to recognize the common ground established in each of the Committee's three proposals presented on August 20, 2018, as it applied to all public lands [sic: understood to mean USFS lands] within Teton County;

WHEREAS, the specific motion is recorded in the minutes as follows: "A motion was made by Paul Vogelheim and seconded by Greg Epstein to recognize as a resolution or as part of our WPLI

recommendation, that all members of WPLI advisory committee unanimously agree that within the Teton County public lands, protection of wildlife is a priority and that there would be no new roads, no new timber harvest except where necessary to support healthy forest initiatives, no new mineral extraction excepting gravel, no oil and gas exploration or development.";

WHEREAS, further discussion clarified that representatives of summer motorized, winter motorized and heli-skiing only support timber and mineral withdrawal if the portions of the WSAs in Teton County were to be permanently released from consideration for Wilderness designation;

WHEREAS, importance of National Forest lands in Teton County to provide quality habitat for wildlife and fish sufficient to sustain ecosystem integrity and connectivity and to offer both motorized and non-motorized recreational access and experiences that allow people to connect with natural and cultural landscapes, improve mental and physical health, foster learning and personal growth, enhance bonds with family and friends, and support the local economy; and

WHEREAS, Teton County supports formal legislation as part of the WPLI legislative package, or independently of that package, to implement the following vision and ensure that USFS lands in Teton County be managed to achieve this vision:

- To conserve, protect, and enhance wildlife, watershed, and wildland resources and their associated ecological, scenic, recreational, cultural, educational, spiritual, and scientific values for the benefit of present and future generations.

NOW THEREFORE, having duly met at a regular meeting on November 13, 2018, and having fully considered the matter, it is hereby,

RESOLVED, that in order to achieve this vision the Board formally submits a recommendation for USFS lands in Teton County to permanently withdraw oil and gas leasing, hard rock mining, scheduled timber harvest and permanently protect inventoried roadless areas per the following language:

- Mineral withdrawal: All National Forest lands in Teton County will be withdrawn from mineral entry, with an exception for sand and gravel mining within one-quarter mile of existing roads. A mineral withdrawal includes prohibitions on new mining claims, oil and gas leasing and/or development, and mineral-related disposal of national forest lands. It does not affect valid existing rights.

- Commercial Timber Harvest: Commercial timber harvest will be prohibited on National Forest lands in Teton County. This prohibition does not apply to:

    - Fuel reduction activities, consisting of the cutting, sale or removal of generally small diameter trees within the wildland-urban interface where necessary to maintain or restore the characteristics of ecosystem composition and structure (such as to reduce the risk of uncharacteristic wildfire effects);
    - cutting, sale, or removal of timber that is incidental to the implementation of a management activity not otherwise prohibited, such as a wildlife habitat enhancement project;
    - cutting, sale, or removal of timber that is needed and appropriate for personal or administrative use; and
    - These limited exceptions mirror those found in the Roadless Area Conservation Rule (36 C.F.R. 294.13). The prohibition does not prohibit cutting fuel wood for personal use or Christmas tree cutting.

- New roads: The construction of permanent or temporary roads will be prohibited within National Forest lands in Teton County except where necessary to:

    - Protect the health and safety of individuals in cases of an imminent threat of flood, fire, or any other catastrophic event that, without intervention, would cause the loss of life or property;
    - conduct environmental cleanup required by the United States of America;

- allow for the exercise of reserved or outstanding rights provided for by a statute or treaty; and
- prevent irreparable resource damage by an existing road or rectify a hazardous road condition.
- These limited exceptions mirror those found in the Roadless Area Conservation Rule (36 C.F.R. 294.12) and Public Law 111-11, section 1204(f) (Mt. Hood, Oregon).

- Existing Wilderness Study Areas: Teton County does not support any legislation removing or weakening the management standards for the Palisades and Shoal Creek Wilderness Study Areas provided by the Wyoming Wilderness Act of 1984. The appropriate time to consider the future of these Wilderness Study Areas is during the Forest Plan Revision process, as directed by Section 301(a) of the Wyoming Wilderness Act.

- *Note: National forest lands within Teton County include the Teton County portions of the Bridger-Teton, Caribou-Targhee, and Shoshone National Forests.*

BE IT FURTHER RESOLVED, that in compliance with the WCCA Guideline instrument's paragraph II.i. requirement that each recommendation should be accompanied with sufficient rationale for the recommendation made, the Board provides a map outlining the respective areas of interest (map title: "TCBCC WPLI Resolution Map") as well as a descriptive instrument (instrument title: "USFS Teton Outstanding Areas – Teton County, Wyoming") that provides a rationale for the recommendation for each area; and

BE IT FURTHER RESOLVED, that the Board urges the WCCA, the Governor of Wyoming, Wyoming's U.S. Representative and U.S. Senators, and interested citizens supports the passage of legislation in the 115th United States Congress or a subsequent Congress that incorporates the provisions of this resolution.

PASSED, APPROVED, and ADOPTED by the Board of County Commissioners of Teton County, Wyoming, on this 13th day of November 2018.

BOARD OF COUNTY COMMISSIONERS
TETON COUNTY, WYOMING

Mark Newcomb, Chair

Natalia D. Macker, Vice Chair

Greg Epstein

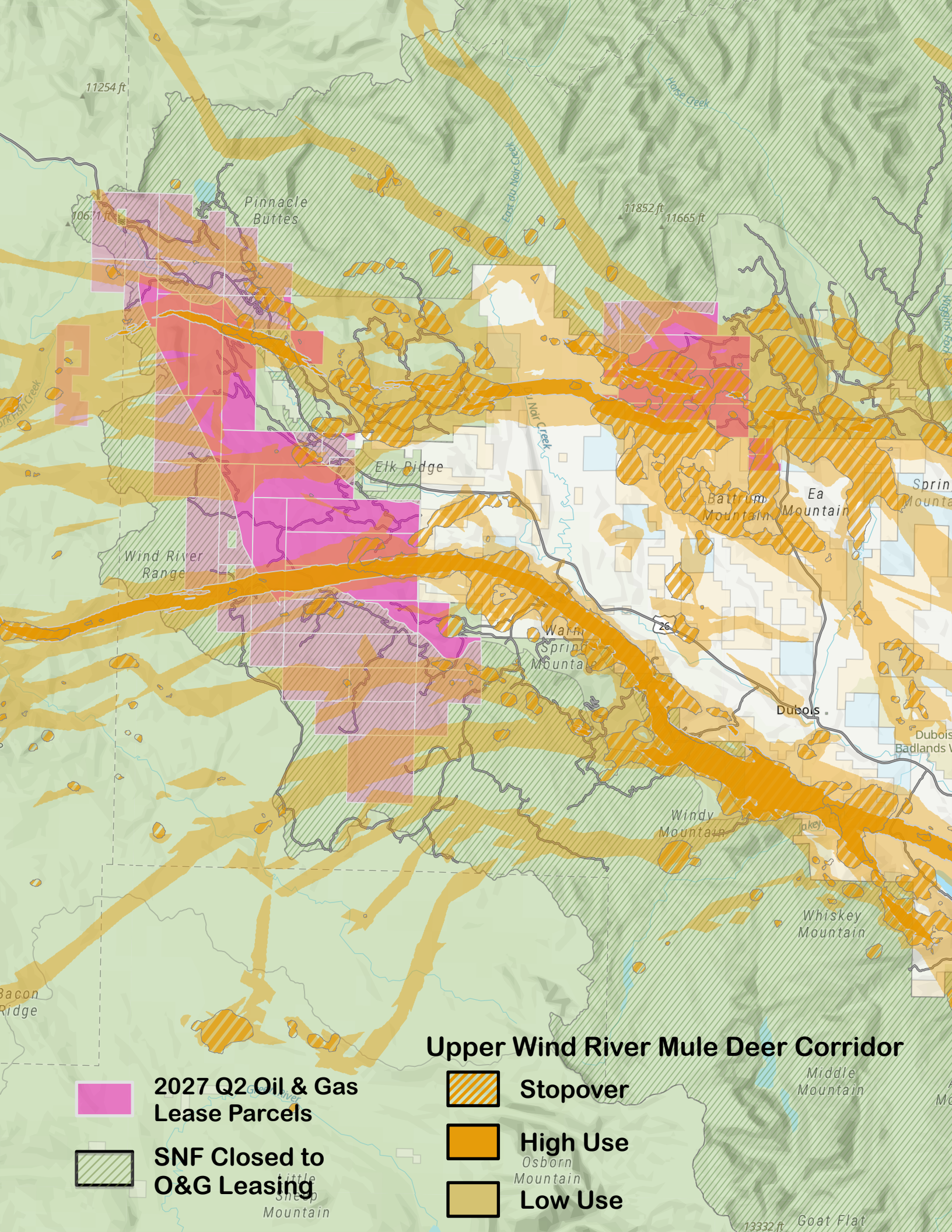
Smokey Rhea

Paul Vogelheim

ATTEST:

STATE OF WYOMING COUNTY CLERK TETON COUNTY

Sherry L. Daigle, County Clerk



Upper Wind River Mule Deer Corridor
2027 Q2 Oil & Gas Lease Parcels
SNF Closed to O&G Leasing
Stopover
High Use
Low Use
Pinnacle Buttes
Elk Ridge
Wind River Range
Battrum Mountain
Ea Mountain
Warm Springs Mountain
Dubois
Windy Mountain
Whiskey Mountain
Middle Mountain
Osborn Mountain
Little Sheep Mountain
Goat Flat
Bacon Ridge
East du Noir Creek
Horse Creek
11254 ft
11852 ft
11665 ft
13332 ft