



Carbon County Resource Council

PO Box 1887, Red Lodge, MT 59068

Carbon County Planning Board
17 West 11th St.
Red Lodge, MT 59068

Dear Carbon County Planning Board,

Thank you for all your work to revise and update the Carbon County Growth Policy. Carbon County Resource Council greatly appreciates the opportunity to comment on the draft County Growth Policy, as additional opportunities for public input in the planning process have not been as robust as in years past.

The County Growth Policy states very clear plans for land use in regard to subdivision development. These measures are very sensible and protect neighbors from potential negative effects resulting from subdivision growth. Carbon County Resource Council believes the same measures should be taken for other types of development in the county, as standard and fair protocol.

What follows are our proposed edits, underlined. We believe that language should be added to ensure that protections are in place for water quality, soil and air quality, as well as wild-life where appropriate. Additionally, we believe that reference should be added to tourism- a huge economic driver in Carbon County.

Once again, we appreciate the opportunity to comment on the 2020 Carbon County Growth Plan and appreciate your continued efforts on the growth policy.

Sincerely,

A handwritten signature in cursive script that reads "Susan Beug". The signature is written in black ink and is positioned above the typed name of the signatory.

Susan Beug, Chairperson- Carbon County Resource Council



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Section 2, Existing Conditions

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The Montana Sage Grouse habitat Conservation Program, Montana Sage Grouse Habitat Conservation Map identifies central Carbon County as core and general habitat for greater sage grouse. The Montana Sage Grouse Habitat Conservation Program and Strategy is a collaborative effort by a diverse group of stakeholders to sustain viable sage grouse populations and conserve habitat. The Program implements Montana's Executive Order 12-2015 and the Greater Sage Grouse Stewardship Act as part of a wider collaborative effort involving Montana and 10 other western states developing conservation strategies to conserve greater sage grouse populations and habitat across its range. These state collaborative commitments involving landowners, state and federal agencies, and other private stakeholders resulted in the U.S. Fish and Wildlife Service to decide listing under the Endangered Species Act was currently not warranted. Implementing Montana's Conservation Strategy and achieving the goal to conserve greater sage grouse and key sagebrush habitats will ensure that listing under the federal Endangered Species Act will not be warranted so that Montana will maintain authority to manage its own lands, wildlife, and economy.

Section 4, Key Issues

Natural Resources and Environment

8. Protection of key wildlife habitat particularly associated with greater sage grouse (see Montana Sage Grouse habitat Conservation Program, Montana Sage Grouse Habitat Conservation Map), Migratory Bird Treaty Act, and Bald and Golden Eagle Protection Act.

Land Use and Agriculture

Keeping lands in agricultural production maintains open space and conserves wildlife habitat. Suburban and exurban development fragments habitat and removes productive lands from agricultural use.

7. Fragmentation and loss of wildlife habitat from suburban and exurban development.



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Section 5, Vision

- Land use change and development occurs in such a way so as not to jeopardize water quality or availability, or adversely impact key wildlife habitat.

Section 6, Goals and Objectives

- 1.2.B** Track the number of acres of agricultural land converted to residential or natural resource developments in the county. Report this number to the citizens of the county annually.
- 1.2 C** Track the reported effects on agricultural lands, tourism, and wildlife associated with new residential and natural resource development including, infrastructure, property value, water, air, and soil impacts.
- 1.5 A** Request information and briefings, hold public hearings, and actively respond...
- 1.6B** When revising the subdivision and development regulations, incorporate a request that developers coordinate with local Fish, Wildlife and Parks, Bureau of Land Management, and Forest Service agencies early in the development process about design and mitigation of...
- 1.6C** Encourage developers to mitigate impacts to wildlife, recreation areas, and agriculture such as by closing water storage tanks and pits, cleaning spills, and keeping major migration corridors as open as possible.
- 1.6D** When considering changes in land use particularly energy development, consult with and follow recommendations for conservation of greater sage grouse and other wildlife species as outlined in Montana Sage Grouse habitat Conservation Program, Montana Sage Grouse Habitat Conservation Map), Migratory Bird Treaty Act, and Bald and Golden Eagle Protection Act.
- 1.7 B** Discourage urban growth within the wildland- urban interface.
- 3.2B** Update the county Emergency Operations Plan to include continued training, necessary disclosure, and liability measures for the changing needs of the county as they come.



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- Objective 3.4** Participate in economic development activities which benefit county residents and businesses and that do not compromise current county economic development drivers, including agriculture, tourism, and outdoor recreation.
- 3.6B** Support countywide usage of existing recycling infrastructure in Carbon County including Red Lodge Recycling.
- Goal 5.** Develop the county's natural resources balancing economic development with environmental responsibility while preserving the existing agriculture, tourism, and outdoor recreation economies.
- 5.2 C** Request developers seek baseline data on air, water, soil quality, and wildlife habitat in areas of development to ensure environmental quality is maintained.
- 5.2D** Maintain access to public lands, unobstructed scenic views, and the right to a clean and healthful environment in Carbon County.
- 5.2E** Proposed development, particularly energy development, or changes in lands use will consider impacts to greater sage grouse populations and habitat and follow guidelines and recommendations contained in the Montana Greater Sage Grouse Conservation Program, Executive Order 12-2015, and the Greater Sage Grouse Stewardship Act.