



May 19, 2021

Joseph Flower
USFS Washakie Ranger District
333 East Main Street
Lander, WY 82520

Dear Joe:

On behalf of the Wild Sheep Foundation (WSF), the Wyoming Wild Sheep Foundation (WY-WSF), and the National Bighorn Sheep Center (NBSC), please accept these scoping comments on the proposed Torrey Rim Prescribed Burn, adjacent to the Whiskey Basin Wildlife Habitat Management Area (WHMA), near Dubois, WY.

This proposed prescribed burn is identified as a priority habitat management activity for the Whiskey Mountain herd in the “2019 Whiskey Mountain Bighorn Sheep Plan”. This “2019 Plan” resulted from four public collaborative meetings involving, but not limited to, the Shoshone NF, BLM, WGFD, UW, NBSC, 8 “expert” wild sheep managers/researchers from across the West, and approximately 110 Dubois community individuals. WY-WSF, WSF and NBSC financed and facilitated this collaborative process. We sincerely thank the Shoshone NF for being an integral and critical component of this planning process, and, following up with this important proposed habitat enhancement project.

This prescribed burn project is widely supported and sorely needed, given the recent demographic performance and impaired status of the Whiskey Basin bighorn sheep herd. Especially given the intentional inclusion of language in the 1984 Wyoming Wilderness Act that authorized motorized and mechanized activity for the express purpose of enhancing bighorn sheep habitat in the Glacier Addition to the Fitzpatrick Wilderness, this proposed action is built upon a solid legal, policy, and resource management foundation. Fire suppression in the area has led to increased levels of conifer encroachment which has reduced bighorn sheep habitat quality. Reduction of canopy cover and enhancement of horizontal visibility will aid in detection of predators by bighorn sheep that rely on visual cues in their environment.

In addition to the benefits to bighorn sheep habitat, implementing a carefully planned and managed prescribed fire may reduce the potential for catastrophic wildfire in the future. Prescribed fire will enhance bighorn sheep habitat, create a fuel break, and diversify the forest community providing for greater forest health and resiliency.

WSF, WY-WSF, and NBSC strongly support the proposed pre-burn tree felling using chainsaw crews on the 181-acre sub-unit, to facilitate later prescribed burning. We also fully understand the need for dropped trees to “cure” prior to ignition, and we concur with the reduced stump-height resulting from chainsaw vs. cross-cut saw work. WSF, WY-WSF, and NBSC also recommend pre- and post-burn treatment of any invasive weeds.

The Dubois community and the NBSC are very interested in the implementation and results (e.g., change in vegetative quantity/quality, species composition, photo retakes, etc.) of this proposed treatment, designed to enhance bighorn sheep habitat quantity/quality. Therefore, we suggest the Shoshone NF consider developing a “public-friendly” before-and-after monitoring program, facilitating public engagement.

Timing of this work is important, so WSF, WY-WSF, and NBSC recommend the Shoshone NF pursue a Categorical Exclusion under NEPA, to expedite this project, especially felling live/dead trees during summer 2021. WSF, WY-WSF, and NBSC support and request an expedited review of the Minimum Requirements Decision Guide (MRDG) rationale submitted by the Shoshone NF to the USFS Region 2 HQ in Colorado.

Thank you for taking this important step toward enhancing bighorn sheep habitat on/near the Whiskey Basin WHMA. We look forward to staying apprised of progress on this proposed prescribed burn project.

Sincerely,



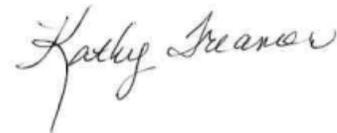
Gray N. Thornton
President & CEO



Kevin Hurley
VP for Conservation



Zach McDermott
WY-WSF President



Kathy Treanor
NBSC President

cc: Wyoming WSF Board of Directors
National Bighorn Sheep Center Board of Directors
Sara Bridge, Executive Director, NBSC
Wyoming Game and Fish Department, Lander
Bureau of Land Management, Lander