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June 21, 2021

Director Brian Nesvik
Wyoming Game and Fish Department
5400 Bishop Blvd.
Cheyenne, WY 82006

Dear Director ~~Nesvik~~ ^{Brian},

Pathfinder Ranches, LLC (Pathfinder) would like to address the Wyoming Game and Fish Commission (Commission) at its July 2021 meeting. Pathfinder wishes to formally request that the Commission direct the Wyoming Game and Fish Department (Department) to begin the habitat and other reviews necessary to support the expedient reintroduction of bighorn sheep (*Ovis canadensis*) into the Sweetwater Rocks in central Wyoming.

For decades, conversations surrounding the reintroduction of bighorn sheep into the Sweetwater Rocks have punctuated our public discourse regarding those areas remaining in Wyoming that are amenable to restoration of bighorn sheep populations. The last resident herds of bighorn sheep disappeared from the Sweetwater Rocks in the late 1800s and early 1900s. Despite efforts in the 1940s to reintroduce the species, by 1980, the last vestiges of a bighorn sheep populations tied to those efforts were gone. On at least three separate occasions (1987, 1999 and 2013), the Commission and Department engaged public processes like the one Pathfinder is requesting through this correspondence. None succeeded. Today seems like a perfectly timed moment to finally get the job done.

As Senator John Barrasso introduces legislation to move the Sweetwater Rocks from a Wilderness Study Area to one formally designated by Congress as a Wilderness Area – following a public process that involved myriad stakeholders – it seems wholly appropriate that the Commission and Department make the companion move of helping transition the Sweetwater

Rocks to a more protected status with a fully intact and functioning bighorn sheep herd.

Why? Certainly, bighorn sheep might bring visitors to Independence Rock, Casper and the surrounding area. Those visitors might spend money, which churns in our local economies. The Department may sell ram and ewe hunting licenses one day, which would add to your agency's bottom line and likely that of an outfitter. But to us, the answer is much simpler: Bighorn sheep belong in the Sweetwater Rocks. But for the hand of man – they would be there today. Ours is the unique and amazing opportunity to bring them back.

Pathfinder's support for the reintroduction of bighorn sheep into the Sweetwater Rocks assumes that (1) the Commission and Department processes are and remain open and public; and (2) bighorn sheep will not be or become a talisman for those groups wishing to disrupt, reduce, hamper, slow or otherwise negatively impact livestock grazing on federal, state and private lands within and appurtenant to the Sweetwater Rocks complex. Because the Commission and Department are among the most accomplished agencies in conducting public and open processes, we have little concern about the first prerequisite. Unfortunately, the same level of optimism does not attend the second listed assumption.

Those that wish to end or disrupt public land livestock grazing are willing to leverage anything at their disposal to hamstring those of us that rely on federal grazing permits for our operations. Without need to recount all the reasons that the previous three reintroduction efforts failed, chief among them was fear that certain anti-grazing, radical non-governmental organizations (NGO) would weaponize reintroduced bighorn sheep to displace cattle and domestic sheep from the federal estate.

A separate concern that attended previous efforts was the fear that federal land managers would use bighorn sheep habitat and forage needs to cover for failed federal feral horse policy. The not-so-remote suspicion is that bighorn sheep could be used as a stalking horse where NGOs and federal land managers demand that cattle and domestic sheep be kicked off the range while the reduction in cattle and domestic sheep numbers are truly

only a means to avoid federal feral horse management and support exploding horse numbers that devastate federal, state and private lands in Wyoming.


Consequently, Pathfinder requests that, prior to any final decision on reintroduction, the Commission and Department commence discussions with the Bureau of Land Management (BLM), Pathfinder National Wildlife Refuge, Bureau of Reclamation and other relevant agencies to frame thoughtful and lasting assurances that bighorn sheep will never serve as a conduit to achieve the disagreeable ends of some in the radical NGO fringe. More specifically, the Department and the listed federal agencies should agree in advance of any reintroduction that any management decision that pits bighorn sheep against domestic livestock be resolved in favor of the domestic grazing interest. Perhaps a Resource Management Plan amendment would be the best tool to assure such an outcome, but we will leave it to the Department and federal agencies to provide the requisite assurances to those whose livelihoods depend on federal grazing authorizations.¹ If an amendment cannot be adopted quickly, the Department and Commission should take the aggressive position that reintroduced bighorn sheep will be removed from the Sweetwater Rocks in the event they are used as a pawn to achieve misplaced and untoward objectives.

Pathfinder is committed to facilitating a public dialogue and helping with the necessary work of making the Sweetwater Rocks a ready home for bighorn sheep, including water development, fence conversion, weed control and other forage enhancements. Further, we will commit to the sportsmen and women whose license fee dollars would help fund the Sweetwater Rocks bighorn sheep herd reintroduction to provide access to those that are fortunate enough to eventually hunt within our landownership within the Sweetwater Rocks. In the past five years we have welcomed and hosted bighorn sheep hunters in Area 17 to hunt free-of-charge on Pathfinder Ranches' deeded property.

¹ Normally the Wyoming State-wide Bighorn/Domestic Sheep Interaction Working Group Final Report and Recommendations would guide federal and state decision-making in this space. However, that Report only extends to the interface between bighorn and domestic sheep and does not include managing through issues that arise between cattle and bighorn sheep.

Thank you for your time and attention to this important endeavor. We look forward to participating in the Commission's July hearing and to an expedited but thorough process that ultimately leads to bighorn sheep being reintroduced into the Sweetwater Rocks complex. In the meantime, if you have questions, please contact us.

Grateful regards,

A handwritten signature in blue ink, appearing to read "Ryan M. Lance". The signature is fluid and cursive, with the first name "Ryan" being the most prominent part.

Ryan M. Lance
President

A handwritten signature in blue ink, appearing to read "Matt Hoobler". The signature is cursive and somewhat stylized, with the first name "Matt" being the most prominent part.

Matt Hoobler
Director of Operations