



## WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699  
wgfd.wyo.gov

### GOVERNOR

Mark Gordon

### DIRECTOR

Brian R. Nesvik

### COMMISSIONERS

Richard Ladwig, President  
Mark Jolovich, Vice President  
Ashlee Lundvall  
Kenneth D. Roberts  
John Masterson  
Rusty Bell  
Ralph Brokaw

May 28, 2024

WER 15259.00

United States Department of Agriculture  
Forest Service  
Black Hills National Forest  
South Slope Winter Burning  
Crook County

Elizabeth Krueger  
Bearlodge Ranger District Resource Planner  
Forest Service  
P.O. Box 680  
Sundance, WY 82729  
Elizabeth.krueger@usda.gov

Dear Ms. Krueger,

The staff of the Wyoming Game and Fish Department (Department) has reviewed the proposed South Slope Winter Burning in Crook County. The Department is statutorily charged with managing and protecting all Wyoming wildlife (W.S. 23-1-103). Pursuant to our mission, we offer the following comments for your consideration.

The Forest Service is proposing to burn up to 8,382 acres in various locations in the Bearlodge Ranger District, Black Hills National Forest. The purpose of the project is to reduce accumulations of grass, brush, fallen trees, and other hazardous fuels to provide fire managers with areas in which to safely and effectively manage future wildland fires. Burning would occur in winter on south-facing slopes is expected to occur on an estimated 500 acres annually until the project is complete.

### **Terrestrial Recommendations:**

#### **Prescribed Burns**

The Department is generally supportive of using prescribed fire as a management tool. By setting back plant succession in a mosaic pattern and attempting to mimic natural fire cycles, even aged stands of shrubs are replaced by grasses, forbs, and young shrubs ensuring a diverse, healthy plant community. As south-facing slopes are at elevated risk for fire ignition and spread, winter burns in these areas will allow reduction of hazardous fuels while also reducing the risk of fire intensity. To further minimize impacts to terrestrial and aquatic habitat in the treatment area, we recommend

- Areas where the understory is dominated by cheatgrass, or other annual invasive grasses, should not be burned to avoid creating a monoculture.
- Burning decadent aspen stands to encourage sprouting and restore stand vigor.

### **Avoid Impacts to Wintering Big Game**

Areas of the project overlap with delineated crucial winter range for mule deer and white-tail deer. To minimize project impacts in big game crucial winter range, the Department recommends:

- Avoiding project activities located in big game crucial winter range from November 15 – April 30.
- If burning activity within big game winter range cannot be avoided, coordinate exemptions to big game crucial winter range timing stipulations with the Department's Habitat Protection Program at 307-777-4506 or [wgfd.hpp@wyo.gov](mailto:wgfd.hpp@wyo.gov).

### **Avoid Impacts to Nesting Raptors**

Some raptor species begin nesting very early in the season and nest failures may result from burning activities. If conditions allow the prescribed burning to overlap with raptors nesting early in the season, we recommend:

- Survey the area for raptor nest activity prior to the burn
- If nesting raptors are observed, consult with the U.S. Fish and Wildlife Service for species specific spatial buffers and timing recommendations.

### **Control Noxious Weeds and Other Invasive Plants**

Noxious weeds and invasive annual grasses can cause significant harm to the ecosystem. They establish and spread quickly, while significantly reducing the quality of wildlife habitat. The potential economic impacts are severe, and once established, eradication is difficult and costly. Prevention is the best way to keep Wyoming's wildlife habitats functioning. Proper precautions and post-treatment planning are essential to minimize the establishment and spread of noxious weeds and invasive plants after a prescribed fire treatment. The Department supports the development of a post-treatment noxious weed monitoring and control plan elements provided, including:

- Implement a post-treatment noxious weed monitoring and control plan for the project area.
- Post-treatment seeding within the same growing season using a native seed mix with proven capacity to compete with invasive plants.
- Preventing introduction by cleaning vehicles and equipment prior to reaching work sites to minimize the potential for transporting seeds.

### **Aquatic Recommendations:**

To minimize impacts to the aquatic resources, we recommend the most current information found in the [Wyoming Forestry Best Management Practices](#) and [Forestry BMPs](#), be utilized.

Elizabeth Krueger  
May 28, 2024  
Page 3 of 3 – WER 15259.00

Consultation with Paul Mavrakis, Sheridan Regional Fisheries Supervisor, at 307-675-5478 is encouraged if avoidance of specific aquatic issues is in question.

Thank you for the opportunity to comment. If you have any questions or concerns please contact Chris Henkel, Habitat Protection Biologist, at 307-777-2533.

Sincerely,

A handwritten signature in black ink, appearing to read 'Will Schultz', with a stylized, cursive script.

Will Schultz  
Habitat Protection Supervisor

WS/ch/kgb

cc: U.S. Fish and Wildlife Service  
Chris Wichmann, Wyoming Department of Agriculture