

SUBLETTE COUNTY COMMISSIONERS



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January 6, 2025

U.S. Forest Service
Kate Olsen, Pinedale District Ranger
29 East Fremont Lake Rd, PO Box 220
Pinedale, WY 82941

Dear District Ranger Olsen,

Subject: Sublette County, Wyoming Comments and Letter of Support for the East Rim WUI Vegetation Management Project #67357

We are writing to provide Sublette County's formal comments and express our support for the proposed East Rim Wildland Urban Interface (WUI) Vegetation Management Project #67357, as outlined in the December 18, 2024 Scoping Notice.

Sublette County supports the United States Forest Service (USFS) proposal to implement various vegetation management techniques, including mechanical harvest, hand thinning, pre-commercial and commercial thinning, aspen enhancement, and whitebark pine release/radial thinning to effectively remove live, dead, and diseased trees within the 3,000-acre project area, thereby reducing hazardous fuel loads, improving forest health, and reducing wildfire risks in the region.

We find that the stated purpose and need for this project are valuable. The East Rim project area is characterized by mixed conifer forests with high incidence of disease and pest outbreaks, substantial tree mortality, and significant accumulation of hazardous fuels. The presence of adjacent Wildland Urban Interface (WUI) subdivisions and developments in the area exacerbates the risk and potential impacts from wildfires. The proposed project will address the hazardous fuel accumulation on a landscape level, reducing wildfire risks for the surrounding communities. Furthermore, this project will enhance firefighter response, safety, and operational effectiveness during wildfire events and will improve overall public safety in the area. The proposed vegetation changes may improve wildlife habitat. By validating the project's purpose and need, we aim to ensure that efforts are focused on implementing effective strategies that will yield tangible benefits for both the environment and the communities at the wildland urban interface.

Having considered the purpose and need, we turn our attention to the proposed project's alignment with the policies established in Sublette County's documents. The proposed project aligns perfectly with the recommendations outlined in the Sublette County Community Wildfire

Protection Plan (CWPP)¹, adopted in October 2022. Specifically, the CWPP recommends that the USFS implement WUI hazardous fuel treatments for the East Rim area, with specific document language as follows:

“The Rim to the Upper Green Valley (East Rim). This project would be led by the USFS and funded by federal fuels program resources. The communities at risk served are Rim Ranches, Packer Creek Ranch, Flying A Ranch, Kendall Valley Lodge, and the Upper Green communities. The vegetation management treatments proposed would focus on reducing hazardous fuels and potential fire intensity in the project area. Private landowners can seek grant assistance through WSFD to match work proposed on adjacent federal lands.²

This project will directly address the priority high hazard/high risk communities identified in the CWPP, including:

- Flying A Ranch & Surrounding Area (CWPP Page 69)
- Packer/Miner Subdivision (CWPP Page 69)
- Rim Ranches/Summit Road (CWPP Page 69)
- Sargent Subdivision (CWPP Page 69)

This proposed project is also consistent with the Sublette County Forest Collaborative,³ recommendation which aims to achieve fuels mitigation and improve forest health. The Forests Collaborative’s final report reads, in part:

East Rim

2a. We recommend the appropriate parties collaborate to conduct a fuels reduction treatment on the East Rim from the Rim Station to Kendall Valley to achieve fuels mitigation and forest health in identified WUI areas.⁴

¹ [2022-Sublette-County-Community-Wildfire-Protection-Plan](https://www.sublettecountywy.gov/DocumentCenter/View/1108/2022-Sublette-County-Community-Wildfire-Protection-Plan?bidId=)
<https://www.sublettecountywy.gov/DocumentCenter/View/1108/2022-Sublette-County-Community-Wildfire-Protection-Plan?bidId=>

² CWPP 6.2.4 Recommendations to Foster and Maintain Resilient Landscapes to Reduce Community Risk – Recommendation #20, page 97

³ [Final-Sublette-Collaborative-2021-Report](https://www.sublettecountywy.gov/DocumentCenter/View/3677/Final-Sublette-Collaborative-2021-Report)
<https://www.sublettecountywy.gov/DocumentCenter/View/3677/Final-Sublette-Collaborative-2021-Report>

⁴ Sublette County Forest Collaborative Final Report: East Rim Recommendation #2A, page 10

The proposal in the Scoping Notice also aligns with the Sublette County Federal and State Land Use Policy (SCFSLUP)⁵ on Fire Management, which includes the following Resource Management Objectives⁶:

1. Sublette County supports active management of excessive fuel loads and vegetation and the utilization of tools and treatments that prevent and/or minimize the negative effects of wildfire.
2. Sublette County supports fire management strategies that consider firefighter and public safety and protect human life, property, and communities.
3. Sublette County requests a high level of cooperation between agencies and firefighter organizations in the County.

The SCFSLUP includes the following project-aligned Fire Management “Priorities”⁷:

1. ...Sublette County encourages the expedited approval of vegetation management treatments where objectives to reduce wildfire risk or to slow wildfire spread have been identified.
2. Encourage state and federal agencies to use prescribed burns as a vegetation management tool, especially in areas where access or roads are limited.
3. Encourage the use of all available efforts and tools to manage excessive fuel loads to mitigate wildfire.
4. Support aggressive suppression and prevention of wildfires where private property structures or historic values are threatened.
5. Support active rehabilitation (seeding, grazing treatments, chemical treatments, salvage-logging operations, or other forms of treatments that have been shown to be beneficial to post-fire rehabilitation) of forests and rangeland damaged by wildfires, where applicable, in order to protect habitat values and wildlife, and to reduce the potential for erosion and the introduction or spread of invasive annual grasses or noxious weeds. Consider seeding where the risk of site stabilization outweighs the concern of potential invasive weed introduction.
6. Work with federal, state, and local agencies to educate the public on the value of prescribed burning in agriculture operations and wildfire risk reduction, while also

⁵ [Federal & State Land Use Policy](https://www.sublettecountywy.gov/DocumentCenter/View/437/LandUsePolicy?bidId=)

<https://www.sublettecountywy.gov/DocumentCenter/View/437/LandUsePolicy?bidId=>

⁶ Sublette County Federal & State Land Use Policy, Page 24

⁷ Sublette County Federal & State Land Use Policy, Page 24 & 25

providing education on the best practices, concepts and applications for reducing agricultural and prescribed burning emissions.

7. Request that federal and state agencies work with local fire departments to make water sources available, as needed, for firefighting purposes.

8. Request that federal and state agencies incorporate local fire department plans and policies into fire suppression and control plans.

9. Request state and federal firefighting local response activities to be coordinated with Sublette County Unified Fire.

10. Request state and federal firefighting agencies maximize the use of cooperative firefighting agreements (Interagency Cooperative Fire Management and Stafford Act Response Agreement - Wyoming, Great Plains Interstate Fire Compact - state agencies only).

In addition to these identified Fire Management objectives and priorities, the SCFSLUP also aligns with this proposed project in other resource categories such as:

Forest, Rangeland & Vegetation Management

Objectives: 1. Sublette County encourages active forest and rangeland management to ensure healthy and vibrant watersheds and wildlife habitat for current and future generations. 2. Sublette County supports the private use of timber products from federal and state lands in the County for fuel, posts and poles, Christmas trees, etc. 3. Sublette County recognizes that a sustainable wood products industry on federal and state lands in the County is an important aspect of its economic diversity. 4. Sublette County encourages timber harvesting and treatment programs that promote forest health, reduce disease and insect infestation, and prevent waste of forest products while providing opportunities for local businesses and small businesses.⁸

Priority: 3. Support and encourage a business-friendly biomass removal program with the goal of attracting long-term contracts to clean up our unhealthy forests and restore healthy ecological function. Such a program would involve the prompt removal of renewable biomass from federal and state lands in Sublette County. Renewable biomass is defined to include materials, pre-commercial thinnings, or removed exotic species (such as trees, wood, brush, thinnings, chips, and slash) that are removed during forest management treatments for any of the following reasons: a. To reduce hazardous fuels b. To reduce, prevent, or contain disease or insect infestation c. To restore ecosystem health d. To complete forest management activities e. To create and retain American jobs and business f. To reduce and engage in active management of invasive species 4. Encourage that forestry conservation efforts are consistent with the following practices: a. Avoid

⁸ Sublette County Federal and State Land Use Policy, page 26 & 27.

management scenarios that result in a static forest condition b. Avoid restricting management actions to a particular size or age of wood material c. Concentrate activities on current condition as compared to desired condition d. Follow an aggressive timetable for management implementation e. Use a systemic, diagnostic approach to anticipate forest health problem f. Work with and not against nature g. Accurately account for forest health costs using a long-term risk analysis

Air Quality & Climate Change

Priority 18 Federal agencies should consider land management practices that restore through active management, high carbon-value ecosystems, such as forests and grasslands, and reduced wildfire frequency and intensity.⁹

We believe this project is crucial for reducing wildfire risks, improving forest health, and ensuring the safety of our communities. Nevertheless, as representatives of our constituents, we request that you develop public education opportunities to facilitate community engagement and support. These educational efforts should comprehensively address potential project impacts and considerations, including topics such as anticipated noise levels, dust generation, environmental disturbances, whitebark pine preservation strategies, wildlife migration route protections, strategies to maintain the categorical exclusion acreage limitations, and the project's potential multi-year duration.

In addition, we request that the interests of grazing permittees be considered and addressed. Ranchers depend on their Forest Service allotments to keep their operations viable. Please work with the permittees, prior to any implementation, to ensure that their concerns are heard and addressed. Some things that need to be reconciled are permittee access during the project, potential impacts on the availability and quality of forage for their livestock, and any potential change in regulatory requirements. Ranchers may also request to be heard on other issues not noted here. Fundamentally, we don't want to lose sight of the fact that grazing practices can also be used as a fuel management tool. We ask that you balance the needs of grazing permittees with the imperative of protecting communities.

In conclusion, after reviewing the Scoping Notice, we have determined that the East Rim WUI Vegetation Management Project #67357 is in alignment with Sublette County's key policy documents and strategic objectives. The project's goals and proposed methods directly address the priorities outlined in our Community Wildfire Protection Plan (October 2022) and the recommendations put forth by the Sublette County Forest Collaborative (April 2021). Specifically, the project targets high-risk areas identified in our CWPP and employs vegetation management techniques that are consistent with our established forest health and wildfire mitigation strategies. The proposed actions, including mechanical harvest, thinning, and aspen enhancement, align with our policy directives for reducing hazardous fuel loads and improving forest resilience in Wildland Urban Interface areas. Furthermore, the project's focus on landscape-level treatment and its potential to enhance firefighter safety and operational effectiveness are consistent with our county's broader public safety and emergency management policies. This alignment between the

⁹ Sublette County Federal and State Land Use Policy, page 31.

proposed project and our established policies underscores our strong support for its implementation.

Thank you for considering our comments and support.

Respectfully,

A handwritten signature in blue ink, appearing to read "Sam White", with a stylized flourish at the end.

Sam White,

Chairman, Sublette County Commission