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First name: Mark

Last name: Hinschberger

Organization:

Title:

Comments: Nothing in Forest Planning regulations state that you can have only one standard for a wildlife species. I suggest that the forest add the proposed standard for bighorn sheep and retain the already existing one for the Darby Bighorn Sheep Herd.

Since bighorn sheep are considered a Regional Forester's Sensitive Species and a potential Species of Conservation Concern, you cannot "walk away" from the Darby Herd, especially if you are concerned about landscape scale protections for bighorn sheep. Nothing requires the Bridger-Teton National Forest to adhere to State law that differentiates between core-native area herds and non-emphasis area herds.

I realize that this environmental assessment to amend the forest plan makes no decisions regarding stocking or management of individual livestock allotments; those such decisions would be subject to separate environmental analysis. However, replacing the Reintroduction Areas of Bighorn Sheep Range Standard will certainly open the door to future restocking of domestic sheep in formerly closed allotments that were vacated, retired and bought out in good faith.

Two of those allotments were vacated, retired, and bought out for very good reasons, often to protect important wildlife habitats and populations, but more importantly to re-establish bighorn sheep. In the early 80's, Dave Lockman, (a former Wyoming Game and Fish Biologist and, check your records, a liaison with the Bridger-Teton during its forest planning effort), Bruce Johnson (also a Wyoming Game and Fish biologist stationed in Big Piney), and I (former District Wildlife Biologist on the Big Piney Ranger District) brought bighorns back to the Mt Darby and Fish Creek Mountain in the two allotments that were rename to Bighorn Sheep Allotments for that purpose.

It maybe that these two allotments were not big enough to hold the expansion of this population, which started to grow from 1981 and 1987 transplants of nearly 70 bighorns from Whiskey Mountain. They may have ventured into other areas, south and north along the Wyoming Range where domestics were. But in the mid-90's several instances of domestic sheep and Jim Magagna's herder caught grazing in these allotments closed to domestic sheep were reported to the District. In one instance the herder was told that domestic sheep were not allowed in the drainage due to the presence of bighorns. The herder said his boss had told him to go there. These domestic sheep were owned by Jim Magagna as he held the allotment adjacent to these bighorn sheep allotments. It is likely nothing was ever done about this. It wasn't long after this that bighorns began dying. Lessons learned: the area for bighorns was likely not big enough (not enough separation from domestic sheep); we shouldn't have believed that the livestock industry, particularly the individuals now after these allotments to be returned to domestic sheep grazing would hold up their side of the agreement; and maybe we shouldn't have wasted our time on that effort, especially in light of Wyoming's position now that this is a "non-emphasis area" for bighorns. That lack of emphasis has allowed the livestock industry to pounce and apparently the Forest Service to fold. Both of which are wrong! Just because the State of Wyoming's position is non-emphasis for bighorns in this area is no reason to go back on the agreements that were made - there are still bighorns there. For the following reasons I oppose this proposed action if it leads to restocking domestic sheep on formerly closed allotments in any areas of the Forest:

- 1) Restocking these allotments with domestic livestock would revive the very problems that were reasons for vacating, retiring and buying out the allotments in the first place.

- 2) The proposed action is an extraordinary slap in the face to those of us who put in so many diligent hours and many thousands of conservation dollars to enact. (Who will refund those dollars spent? The Forest? The

livestock industry?)

3) This proposal could likely put an end to all conservation buyouts throughout the entire country (how likely will organizations be inclined to pursue conservation buyouts and spend funds to purchase these when federal agencies turn around 45 years later and go back on agreements).

4) If this proposal is adopted it would also set the precedent for opening up retired, vacant, and bought out grazing allotments in all National Forests across the entire country.

5) The proposed action would likely cause the extinction of the Darby Mountain Bighorn Sheep Herd.

6) The proposed action, if adopted and applied to other National Forests, will most certainly result in the decline or extinction of many bighorn sheep populations all across the Western US. It will also have negative repercussions on a myriad of other important wildlife species and habitats.

I therefore recommend that the Forest revise their amendment to the Forest Plan to add the propose standard to the Forest Plan for core-native bighorn sheep herds and retain the current standard to protect the Darby Bighorn Sheep Herd. I also urge the Bridger-Teton National Forest to take a firm stand against other such assaults on the public's wildlife and wildlife habitats rather than cave in to the interests of groups who desire to utilize public lands for their own personal gain with considerable consequences to public resources.

Sincerely,

Mark Hinschberger