



File Code: 1950/2600

Date: Monday, May 24, 2021

Dear Interested Party,

The Pinedale Ranger District of the Bridger-Teton National Forest is conducting an environmental analysis on the effects associated with changes in livestock management on the Elk Ridge Complex. The analysis is to be documented in an environmental assessment (EA) titled Elk Ridge Complex Rangeland Supplementation Project. The EA will be used to determine if significant effects would occur from the proposed action and if additional analysis is needed. If significant effects are not found, the Responsible Official will decide whether livestock grazing will be authorized within the project area, and if so, under what conditions.

This letter describes the proposed action and provides information on how to submit your comments, concerns, recommendations, and any new pertinent information regarding management of the Elk Ridge Complex.

Background of the Elk Ridge Complex Rangeland Supplementation Project

The Elk Ridge Complex is comprised of four allotments: Lime Creek, Rock Creek, Tosi Creek and Elk Ridge. Located approximately 32 miles northwest of Pinedale, these allotments encompass 30,577 acres of National Forest System lands in Pinedale Ranger District of the Bridger-Teton National Forest. The Elk Ridge Complex is bordered on two sides by allotments that were analyzed in the Upper Green River Area Rangeland Analysis. The Elk Ridge Complex is situated within the Green River Basin between the Gros Ventre Range and the Wind River Range. See [Attachment A](#) to view the Vicinity and Allotment Maps.

In 1978, the Forest Supervisor issued a decision implementing an allotment management plan for the Elk Ridge Complex that provided grazing for 3,631 sheep or 725 cow/calf pairs on the allotments. At that time, livestock operators chose to utilize the allotments for sheep grazing. In 2016, the permittee chose to vacate the allotments as a result of a buyout negotiated between the permittee and conservation groups. Subsequently, the associated term grazing permits were returned to the USFS as waived without preference. These allotments have remained vacant ever since. Baseline vegetation inventories were conducted in 2019 and 2020 by the USFS and Sublette County Conservation District to determine current conditions for an EA.

Purpose and Need for Action

The purpose of the proposal is to manage livestock grazing in a manner that allows the health of the land to be sustained and to meet the goals and objectives of the 1990 Bridger-Teton Land and Resource Management Plan with Amendments (Bridger-Teton Forest Plan). Analysis would determine in what capacity cattle grazing on the Elk Ridge Complex could occur to enhance management flexibility in the Upper Green River Complex when drought, fire, predator conflicts and other management challenges arise.



This purpose and need are supported by the following:

- Where consistent with other multiple use goals and objectives, there is Congressional intent to allow grazing on suitable lands (Multiple Use-Sustained Yield Act of 1960, Forest and Rangeland Renewable Resource Planning Act of 1974, Federal Land Policy and Management Act of 1976, National Forest Management Act of 1976).
- The Elk Ridge Complex lies within the Management Area 72 on the Bridger-Teton National Forest. Desired Future Conditions describe the land management direction intended to accomplish goals and objectives.
 - Approximately fifty-six percent of the Elk Ridge Complex is within the DFC 10 (Simultaneous Development of Resources, Opportunities for Human Experiences and Support for Big-game and a Wide Variety of Wildlife Species).
 - Approximately forty-four percent of the Elk Ridge Complex is located within the Gros Ventre Wilderness designated by the Bridger-Teton Forest Plan as having a DFC of 6B (Wilderness).
 - Less than one percent of the Elk Ridge Complex is within the DFC 12 (Backcountry Big-game Hunting, Dispersed Recreation, and Wildlife Security Areas).
- Federal regulation (36 CFR 222.2(c)) states that “[f]orage producing National Forest System lands will be managed for livestock grazing and the allotment management plans will be prepared consistent with [forest] plans.”

Proposed Action

The Pinedale Ranger District proposes to authorize cattle grazing on the Elk Ridge Complex such that these allotments would be utilized within the rotational grazing system of the adjacent allotments, analyzed in the Upper Green River Area Rangeland Project (Upper Green Area). This would provide operators with greater management flexibility by allowing currently permitted cattle within the Upper Green Area additional acreage to better address seasonality fluctuations, weather conditions, predators, and impacts from wildfire. The season of use for the Elk Ridge Complex would be July 1st to October 15th. Allowable use would be determined based on the rangeland suitability analysis and historic stocking rates. Frequency of use and maintenance of rangeland improvements would be determined in the allotment management plans. The proposed action includes design criteria sufficient for achieving and maintaining compliance with the Bridger-Teton Forest Plan direction, Forest Service grazing management policies, and other applicable laws and regulations such as the Rescission Act of 1995. No new range improvements are proposed, and the boundaries of the allotment remain unchanged as shown in Allotment Map under [Attachment A](#).

Allowable-Use Standards

Project-specific allowable-use standards would be implemented and include more stringent forage utilization standards than outlined in the Forest Plan and a streambank alteration standard consistent with the Forest Plan. For all allowable-use standards listed below, the actual use would be measured prior to livestock on-date and soon after they have been removed from the pasture. The following allowable-use standards are incorporated into the draft Allotment Management Plan as part of the Proposed Action.

Two riparian allowable-use standards would be implemented along the greenline and other parts of the moist zone of riparian areas and wetlands:

- **Streambank Alteration Standard:** No more than 20% of the total streambank length, within any given stream reach, would be allowed to show streambank alteration as defined by Burton, Cowley, and Smith (2008) and Simon (2008) caused by the hoof action of large herbivores during the current livestock grazing season.
- **Forage Utilization Standard (riparian):** Vegetation utilization limits are set at a maximum of 50% utilization for all riparian communities and retain a 4 to 6-inch stubble height minimum along the greenline of streams.

The intended purposes of riparian allowable-use standards are to (1) allow the health and functionality of riparian areas to be restored and sustained by restoring/sustaining native streambank vegetation on streambanks, sustaining healthy roots of these plants, limiting trampling effects, and fostering the catchment of sediments; and (2) ensure that an adequate amount of suitable herbaceous wildlife cover is retained in a majority of riparian zones and wetlands.

One allowable use standard would be established for all other vegetation types.

- **Forage Utilization Standard (upland):** Vegetation utilization limits are set at a maximum of 50% utilization for all upland communities.

The intended purposes of the allowable-use standard for all other vegetation types would be to (1) allow plant health and rangeland functionality to be restored and sustained, including litter buildup and increased organic content in soils; (2) allow an adequate amount of suitable wildlife forage to be retained.

Grizzly Bear Conservation Measures

To help prevent conflicts with grizzly bears in the Elk Ridge Complex, the Forest will require implementation of the grizzly bear conservation measures found in [Attachment B](#). These conservation measures are similar to the ones implemented in the Upper Green River Area Rangeland Project allotments in order to provide consistent management strategies across the two complexes. These management strategies help decrease livestock-grizzly bear conflicts by reducing the availability of anthropogenic food, decreasing the number of sick, injured, isolated livestock in the allotments, and by removing livestock carcasses.

Opportunity to Participate

The scoping comment period provides those interested in or affected by this proposed project an opportunity to comment on the purpose and need for the project, the proposed action, and scope of the analysis, as well as identify any issues, concerns, and recommendations. While comments will be accepted at any time during the planning process, to establish standing for eligibility to object, substantive comments must be received during a designated opportunity to comment and must meet the information requirements of 36 CFR 218 Subparts A and B.

This 30-day public scoping comment period provides the only designated opportunity to comment and to establish standing for eligibility to object. Timely and substantive comments must be received during this designated opportunity and must meet the information requirements of 36 CFR 218 Subparts A and B. The public scoping comment period is initiated with the publication of this legal notice in the Casper Star-Tribune (36 CFR 218). Comments concerning this proposal must be postmarked or received within 30 calendar days after publication of the legal notice. If the time period expires on a Saturday, Sunday, or a Federal holiday, the time is extended to the end of the next Federal workday. It is the responsibility of all individuals and organizations to ensure that their comments are received in a timely manner.

Electronic comments should be submitted online on the BTNF webpage at: <https://www.fs.usda.gov/project/?project=60020>. Click on the “Comment/Object on Project” link located in the right column. Written comments may also be submitted to: **Robert Hoelscher, District Ranger; Pinedale Ranger District, Bridger-Teton National Forest; PO Box 220, Pinedale, WY 82941**. The Bridger-Teton NF is not accepting hand-delivered comments currently due to limited office functions as part of precautions in response to the coronavirus. Those who respond to this request for comments will remain on the mailing list for this planning effort.

Comments received in response to this solicitation, including names of those who comment, will be part of the public record and available for public inspection. Comments submitted anonymously will be accepted and considered; however, anonymous comments will not allow the respondent to have standing in subsequent administrative or judicial reviews.

An objection period, if required, will follow regulations found in 36 CFR 218.7. For objection eligibility (36 CFR 218.5), only those who have submitted timely, specific written comments during a designated opportunity for public comment may file an objection. Issues raised in future objections must be based on previously submitted specific written comments regarding the proposed project and attributed to the objector, unless the issue is based on new information that arose after a designated opportunity to comment (36 CFR 218.8(c)).



Information on this project is available on the webpage at:

<https://www.fs.usda.gov/project/?project=60020>. For additional information, please contact Chad Hayward (chad.hayward@usda.gov).

By mail: Robert Hoelscher
Pinedale Ranger District
Bridger-Teton National Forest
PO Box 220
Pinedale, WY 82941

Thank you for taking the time to assist us in managing our National Forest lands.

Sincerely,

Robert Hoelscher
District Ranger

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Pinedale Ranger District

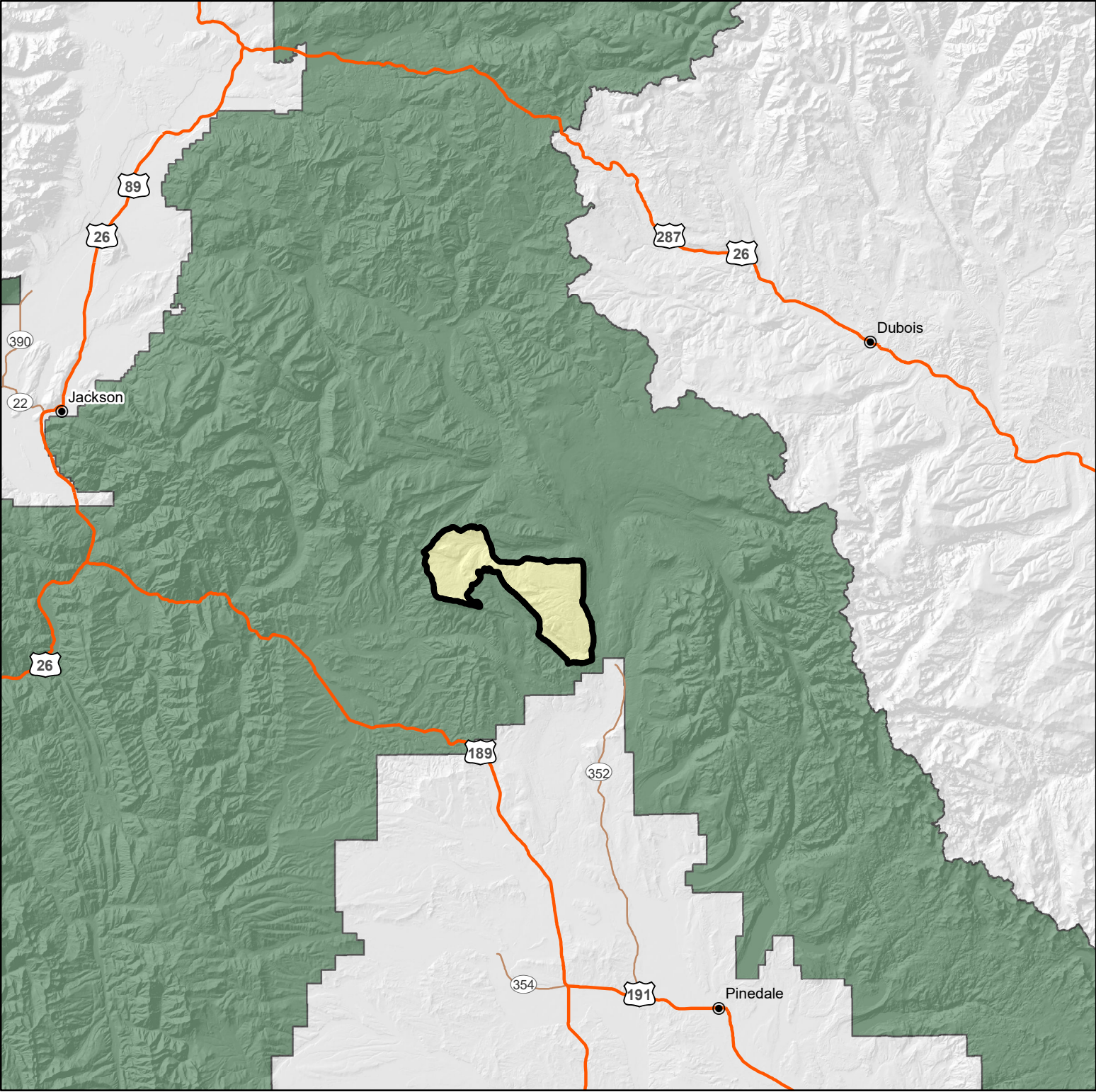
29 E. Fremont Lake Road
Pinedale, WY 82941

Attachment A: Maps





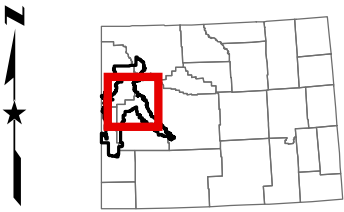
Project Vicinity
Bridger-Teton National Forest - Pinedale Ranger District



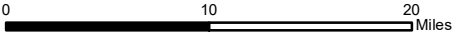
Legend

- Project Area
- Elk Ridge Complex
- Bridger-Teton National Forest

WYOMING
Bridger-Teton National Forest



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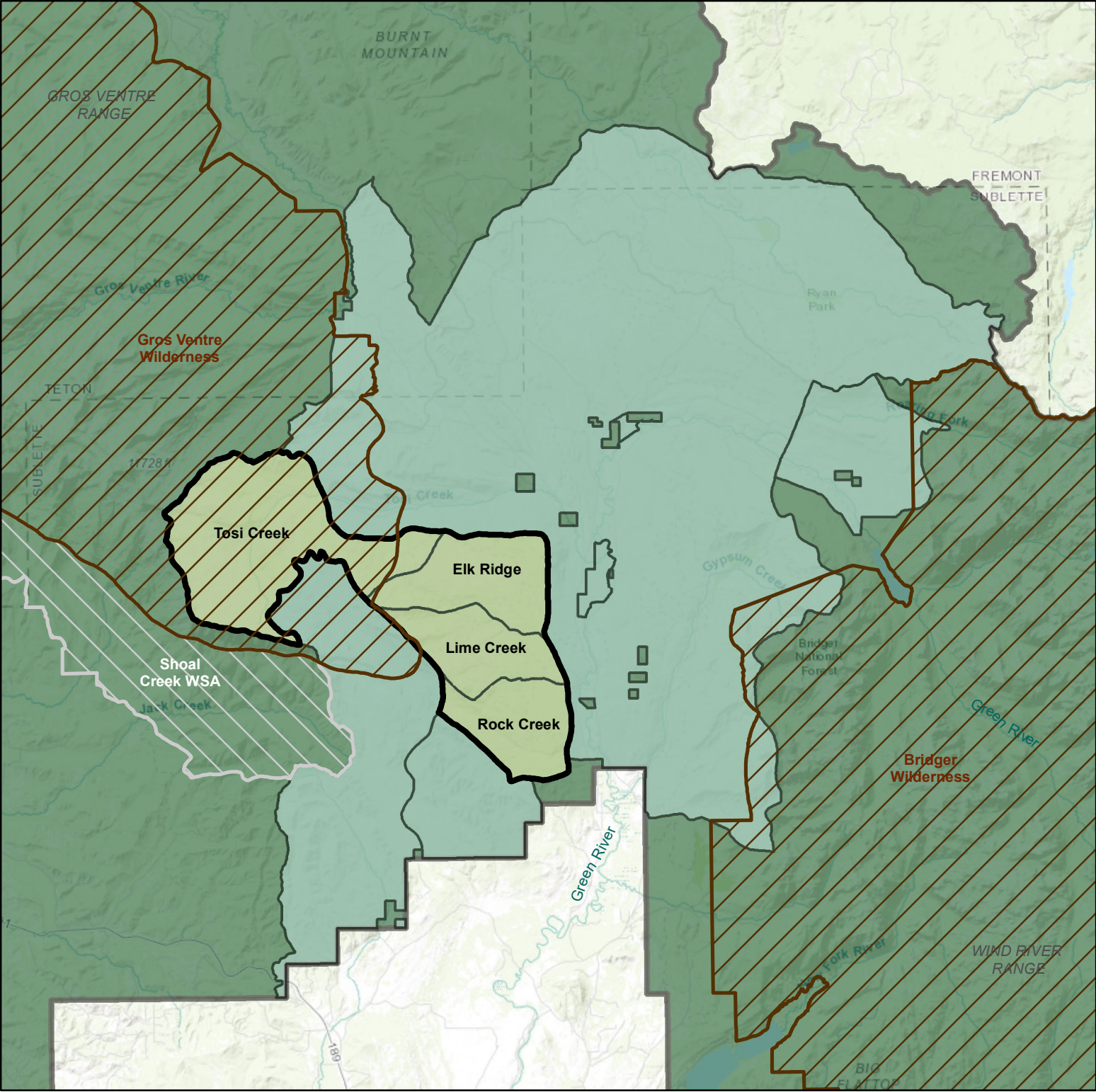


Map Author: cmiller; Map Creation Date: 5/10/2021
Data Sources: U.S. Forest Service, U.S. Geological Survey, ESRI
Coordinate System: NAD_1983_UTM_Zone_12N



Elk Ridge Complex Allotments

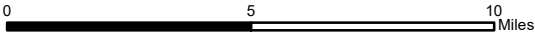
Bridger-Teton National Forest - Pinedale Ranger District



Legend

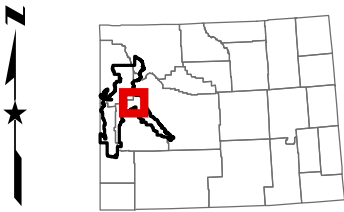
- | | | | |
|--|-----------------------|--|-------------------------------|
| | Project Area | | Elk Ridge Complex Allotments |
| | Wilderness Area | | Upper Green River Allotments |
| | Wilderness Study Area | | Bridger-Teton National Forest |

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WYOMING

Bridger-Teton National Forest



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Data Sources: U.S. Forest Service, ESRI
Coordinate System: NAD_1983_UTM_Zone_12N

Attachment B: Grizzly Bear Conservation Measures

Conservation measures are consistent with the standards, guidelines, management emphasis for the desired future conditions identified in the Forest Plan and, therefore, are part of the proposed action. The commitments made by the action agency are to contribute to the recovery of the grizzly bear. The grizzly bear management objective is to minimize the livestock related grizzly bear mortalities. The conservation measures and commitment to grizzly bear recovery will provide for a balance between livestock grazing management and minimizing grizzly bear conflicts with livestock, in addition, minimizing grizzly bear/human safety concerns.

1. Bear Sanitation Guidelines will be followed for all camps associated with livestock operations as described and defined in Food Storage Order 04-03-330. Where outdoor toilets are available in Range Camps, keep doors closed and make toilets as “bear proof” as possible.
2. Riders are required to watch all livestock closely for sick, injured, or stray animals.
3. Forest Service employees designated by the Pinedale District Ranger will monitor allotments on a regular basis.
4. On Cattle Allotments: a) all carcasses located within 0.5 mile of system roads, developed campgrounds, private cabins, guard stations, permitted cow camps, permitted outfitter camps, and trailheads will be removed if possible or moved so that the carcass is at least 0.5 miles away from the facilities, trailheads or roads; b) all carcasses in locations not described above that pose a health or safety hazard to the public or to the environment will be removed if possible or moved so that the carcass is at least 0.25 mile from live streams, springs, lakes, riparian areas, system roads and trails, developed recreation areas, dispersed camping sites, and picnic sites; and c) all sick or injured animals will be removed or treated. If compliance with this measure is not physically possible, an exception may be granted per the discretion of the Pinedale District Ranger and/or his designated representative. If rider safety is deemed an issue, an exception may be allowed as described in CM #5 below.
5. Exceptions to requirements for removing or moving carcasses described in CM #4 may be granted by the Pinedale District Ranger and/or his/her designated representative if human rider or herder safety is of concern. Rider or herder safety concerns include the possible presence of a grizzly bear in the immediate vicinity of carcasses, and carcasses being located in hazardous terrain such that attempting to move or remove may not be possible or unsafe. In such cases, a USFS employee or the WGFD bear specialist will be notified immediately of the hazard location and need for exception.
6. The Forest will recommend that all permittees and their representatives (herders, riders, or other employees) carry bear spray while working within allotments. Additional recommendations are that spray canisters be holstered or otherwise carried so that they are available for use in the event of encounters with bears; storing spray canisters in back packs, saddle bags, and vehicles are acceptable methods of storage during non-working time periods. Only brands of Bear Spray certified by the Interagency Grizzly Bear Committee are recommended.

7. Continue to identify and implement opportunities that reduce the potential for grizzly bear conflicts. The Forest has investigated and explored additional means of reducing grizzly bear-livestock conflicts, which included assessments of: a) cattle herding; and b) where appropriate, and when permittees are willing participants, study sites may be developed within allotments to "test" new management actions.
8. Through the permitting process and at annual meetings, the USFS will make grazing permittees aware of their responsibilities under the Endangered Species Act (ESA) in regard to laws and regulations concerning the taking of grizzly bears (Interagency Grizzly Bear Guidelines).
9. Continue to work in cooperation with the Service, the Wyoming Game and Fish Department, and the Interagency Grizzly Bear Study Team to identify and collect information related to the habitat use, survival, reproduction, and depredation tendencies of grizzly bears inhabiting Livestock Grazing Allotments on Northern Portions of the Pinedale Ranger District.