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**Pro hac vice applications pending*

Attorneys for Plaintiff Western Watersheds Project

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

WESTERN WATERSHEDS PROJECT,

Plaintiff,

v.

UNITED STATES FOREST SERVICE;
TOM SCHULTZ, in his official capacity as
Chief of the United States Forest Service;
and CHAD HUDSON, in his official
capacity as Forest Supervisor of the Bridger-
Teton National Forest,

Defendants.

Case No.

**VERIFIED COMPLAINT FOR JUDICIAL
REVIEW OF FINAL AGENCY ACTION
AND FOR INJUNCTIVE AND
DECLARATORY RELIEF**

INTRODUCTION

1. Situated near the Upper Green River in Western Wyoming, the Elk Ridge Complex of Grazing Allotments includes 30,500 acres of wildlands of the Green River Valley within the Bridger-Teton National Forest. Ten years ago, conservation groups bought out the holders of grazing licenses for the Tosi Creek, Elk Ridge, Lime Creek, and Rock Creek Allotments within the Complex. Conservationists funded the buyouts to prevent the spread of disease from domesticated sheep to native big-horn sheep in the Bridger-Teton National Forest, Grand Teton National Park, and nearby Gros Ventre Wilderness Area, and to prevent the predictable and increasingly recurring conflicts between domesticated sheep and endangered Gray Wolf and Grizzly Bear populations, which typically have resulted in wolf and grizzly bear killings by agencies or grazing permittees.

2. Defendant United States Forest Service, under pressure from cattlemen to stock the allotments with cattle, failed to formally retire the Elk Ridge Complex Allotments. But the Forest Service never completed its plan to convert the allotments for cattle grazing, either. As such, the allotments remained inactive for the next ten years, allowing the rich ecosystem of the mountains to begin its natural restoration.

3. Then, on June 8, 2026, without notice to the public or opportunity to be heard, the Pinedale Ranger District Office of the U.S. Forest Service quietly authorized the use of the Elk Ridge Complex for cattle grazing from August 15 to October 15, 2026, to “assist with livestock distribution and burned area restoration.” Relying on a “thorough [National Environmental Policy Act] sufficiency review” based on a 1978 Environmental Assessment, the Forest Service contradicted earlier findings to declare that the stocking of the forest with non-native, invasive cattle would be environmentally neutral. This reliance ignores that much has changed in the ecosystem since 1978, including the reintroduction of Gray Wolves (1995) as well as the expansion of federally listed Grizzly Bear (1970), Canada Lynx (2000), and Wolverine (2023) populations in the allotments.

4. Plaintiff Western Watersheds Project initiates this lawsuit to request judicial

review of the U.S. Forest Service and Forest Supervisor Chad Hudson’s decision to stock the Elk Ridge Complex of Grazing Allotments with cattle, because Federal Defendants failed to comply with the National Environmental Policy Act (NEPA), the National Forest Management Act (NFMA), the Federal Land Policy and Management Act (FLPMA), and the Administrative Procedure Act (APA) prior to adopting the Upper Green River Annual Operating Instructions (2026 AOI), which authorized multiple cattle companies to graze up to 1,300 cattle in the Elk Ridge Complex this year.

JURISDICTION AND VENUE

5. This Court has jurisdiction over this action under 28 U.S.C. § 1331, because this action arises under the laws of the United States, including NEPA, 42 U.S.C. §§ 4321 *et seq.*; NFMA, 16 U.S.C. §§ 1600 *et seq.*; FLPMA, 43 U.S.C. §§ 1701-1787; the APA, 5 U.S.C. §§ 701 *et seq.*; the Declaratory Judgment Act, 28 U.S.C. §§ 2201 *et seq.*; and the Equal Access to Justice Act, 28 U.S.C. §§ 2212, 2214.

6. This Court has the authority to review the Forest Service’s actions or inactions complained of herein and grant the relief requested under 5 U.S.C. § 706. The relief sought is authorized by 28 U.S.C. §§ 2201, 2202, and 5 U.S.C. §§ 701-706.

7. Venue is proper in this Court under 28 U.S.C. § 1391(e). Violations of the federal laws alleged herein have occurred and continue to occur in this District, a substantial part of events or omissions giving rise to the claim have occurred in this District, and Plaintiff has members in this District.

PARTIES

8. Plaintiff WESTERN WATERSHEDS PROJECT (WWP) is a nonprofit environmental conservation group that works to improve public lands management throughout the western United States. WWP’s principal place of business is at 219 S. River Street, Hailey, Idaho 83333. Federal Defendants’ decisions at issue herein will affect the substantial recreational, aesthetic, and conservation interests of WWP’s staff, members, and supporters who

care about the proper management of watersheds and wildlife on public lands. WWP, its staff, volunteers, members, and supporters are deeply concerned that Federal Defendants routinely and systematically overlook the detrimental effects of private livestock grazing, and in the case of the 2026 Annual Operating Instructions temporary grazing allotments from August 15, 2026, until October 15, 2026, on the Elk Ridge Complex, and have skirted NEPA review and federal law entirely. WWP's interests in this decision include the proper and unbiased administration of public lands and full and fair environmental analysis of landscape health and impacts to native wildlife.

9. WWP is also dedicated to ensuring the long-term survival and recovery of Bighorn sheep, Grey Wolf, Grizzly Bear, and countless other threatened and endangered species native to the American West Bear to their former range throughout the contiguous United States, including the Northern Rocky Mountain Region which includes Wyoming, and to ensuring that the Forest Service complies with all applicable federal laws related to the survival and health of these endangered species. In furtherance of these interests, Plaintiff's members, supporters, and staff have worked, and continue to work, to conserve the native Western species throughout the American West.

10. The interests of Plaintiff and its members, supporters, and staff have been, and will continue to be, injured by the Forest Service's approval of the 2026 AOIs and stocking plan complained of herein that threaten the preservation of healthy rivers and intact ecosystems, native wildlife and wildlife habitat, and the recovery of threatened and endangered native species.

11. Moreover, the Forest Service's violations of law injure WWP and its board, staff, members, and supporters by denying them the ability to adequately participate in the public review processes for the grazing allotment plan in the Elk Ridge Complex by denying them information concerning potential environmental impacts and other issues that NEPA requires agencies to disclose, analyze, and seek public review of prior to authorizing the 2026 AOIs and stocking plan.

12. WWP member Chuck Neal is an individual resident of Wyoming. Mr. Neal is an ecologist, conservationist, activist, author, and grizzly bear aficionado. Mr. Neal has dedicated his life to the recovery of the subpopulation of grizzly bears in the Greater Yellowstone Ecosystem. Mr. Neal is injured by the Forest Service's decision to allow cattle within the Greater Yellowstone Ecosystem and Elk Ridge Complex, which causes human-cattle-bear conflict.

13. WWP member Meredith Taylor is an individual resident of Wyoming. Ms. Taylor is a retired scientist and outfitter, conservationist, activist, author, and educator. Ms. Taylor has dedicated her life to the conservation of the Greater Yellowstone Ecosystem, including the Elk Ridge Area. Ms. Taylor is injured by the Federal Defendants' lack of accountability and adherence to law in issuing the 2026 AOIs without proper analysis.

14. WWP member and Wyoming/Northern Utah Direction Dagny Signorelli uses and enjoys the lands and natural resources in the Bridger-Teton National Forest for health, recreational, aesthetic, and other purposes. Ms. Signorelli takes great pleasure in living, working, and recreating in this region. She is injured by the Forest Service's decision to allow cattle grazing on the Elk Ridge Complex without adherence to NEPA and federal law, which will cause deleterious effects of livestock grazing including fecal deposits, trampling, utilization of vegetation that would otherwise grow taller and more robust. Her interests in a healthy and more aesthetically pleasing region due to native species, healthier soils, hydrology, and native wildlife are impacted and threatened by Federal Defendants' actions described herein.

15. Defendant UNITED STATES FOREST SERVICE is an agency of the United States within the Department of Agriculture and is charged with managing the public lands and wildlife of the Bridger-Teton National Forest, in accordance and compliance with NEPA, NFMA, the APA, and their implementing regulations.

16. Defendant TOM SCHULTZ is the Chief of the U.S. Forest Service, who along with other individual defendants, is sued solely in his official capacity.

17. Defendant CHAD HUDSON is the Forest Supervisor for the Bridger-Teton National Forest, responsible for the management of the Bridger-Teton National Forest and its

compliance with NEPA, FLPMA, and NFMA requirements.

STATUTORY AND REGULATORY BACKGROUND

National Forest Management Act

18. NFMA is the primary statute governing the administration of national forests. 16 U.S.C. §§ 1600-1614. NFMA and its implementing regulations provide for forest planning and management by the Forest Service on both the forest level and the individual project level.

19. At the forest level, NFMA requires the Forest Service to develop, maintain, and revise a Land and Resource Management Plan, or “Forest Plan,” for each national forest. 16 U.S.C. § 1604(a). Forest Plans consist “of broad, long-term plans and objectives for the entire forest,” *All. for the Wild Rockies v. U.S. Forest Serv.*, 907 F.3d 1105, 1109 (9th Cir. 2018), and are “designed to manage forest resources by balancing the consideration of environmental and economic factors,” *Native Ecosystems Council v. Weldon*, 697 F.3d 1043, 1056 (9th Cir. 2012).

20. A Forest Plan must establish natural resource management practices forest-wide, setting standards, management goals and objectives, desired conditions, and monitoring and evaluation requirements. Forest Plans must also provide for sustained yields and multiple uses, including the coordination of outdoor recreation, livestock grazing, timber harvest, soil conservation, watershed conservation and restoration, riparian conservation, wilderness protection, and conservation and protection of fish and wildlife species habitat and diversity. 16 U.S.C. § 1604(e), (g). The Forest Service must provide for and foster public participation in the development, review, and revision of Forest Plans. *Id.* § 1604(d).

21. The Forest Service adopted forest planning regulations in 1982. 47 Fed. Reg. 43,037-43,052 (Sept. 30, 1982) (1982 Rules).¹

¹ The Forest Service revised the regulations in 2012, but with transitional provisions allowing the Forest Service to elect to apply portions of the 1982 Rules to the development or revision of Forest Plans initiated prior to 2012. 36 C.F.R. § 219.17(b)(3). The Forest Service largely elected to apply the 1982 Rules to the development of the Forest Plan.

22. The 1982 Rules require that the Forest Service determine the capability of national forest lands of sustaining domestic livestock grazing, and their suitability for that purpose, and to determine the condition and trend of the lands used for grazing. 1982 Rules § 219.20.

23. Capability refers to the potential of an area of land to produce particular resources, such as forage to support the needs of both native wildlife and domestic livestock, which in turn depends on the physical components of the area such as climate, slope, landform, soils, and geology, as well as the application of management practices. *Id.* § 219.3. Suitability, on the other hand, is the appropriateness of applying certain management practices to a particular portion of the forest, “as determined by an analysis of the economic and environmental consequences and the alternative uses forgone.” *Id.*

Federal Land Policy and Management Act

24. The Federal Land Policy and Management Act, 43 U.S.C. §§ 1701-1787, governs the management of federal public lands generally, and includes specific provisions regarding the management of federally permitted domestic livestock grazing on these public lands, *id.* §§ 1751-1753. The implementing regulations regarding range management are at 36 C.F.R. Part 222.

25. The Forest Service allows livestock grazing on specified “allotments” within national forests. 43 U.S.C. § 1752; 36 C.F.R. § 222.1(b). The Forest Service manages livestock grazing on an allotment through an Allotment Management Plan (AMP), grazing permits issued in accordance with the AMP, and annual operating instructions that guide grazing on a year-to-year basis. Each of these is a site-specific action which must be consistent with the Forest Plan. *Buckingham v. Sec’y of U.S. Dep’t of Agric.*, 603 F.3d 1073, 1077 (9th Cir. 2010).

26. The Forest Service prepares an AMP for each allotment, which must specify a “program of action” to meet the “multiple-use, sustained yield, economic, and other needs and objectives as determined for the lands involved.” 36 C.F.R. §§ 222.1(b)(2), 222.2(b); 43 U.S.C.

§ 1702(k)(1). In contrast to a Forest Plan, which is an “overarching land management directive for an entire forest-wide unit,” an AMP is a “land management directive for a specific allotment within a national forest that the Forest Service has designated for livestock grazing.” *See Or. Nat. Desert Ass’n v. U.S. Forest Serv.*, 465 F.3d 977, 980 (9th Cir. 2006). Each AMP must be consistent with the applicable Forest Plan, and when a plan is revised, “shall be revised as soon as practicable to be made consistent with such plans.” *Id.*; 16 U.S.C. § 1604(i); 36 C.F.R. § 222.2(c).

27. A permit grants a specific license to graze on an allotment, and establishes: (1) the number, (2) kind, (3) and class of livestock, (4) the allotment to be grazed, and (5) the period of use. *Or. Nat. Desert Ass’n*, 465 F.3d at 980; 36 C.F.R. §§ 222.1, 222.3; 43 U.S.C. § 1752. The Forest Service generally issues grazing permits for ten-year periods. 36 C.F.R. § 222.3(c)(1). The terms and conditions of a grazing permit must be consistent with the AMP; they may be canceled if the land under permit is to be devoted to another public purpose; and they may be modified to comply with the provisions of an AMP or other management needs, including resource protection measures. 36 C.F.R. § 222.4(a).

28. The Forest Service also issues yearly instructions to holders of national forest grazing permits through annual operating instructions (AOIs). FSH § 94.3. AOIs are used to respond to conditions that the Forest Service could not or may not have anticipated and planned for in the AMP or grazing permit. *Or. Nat. Desert Ass’n*, 465 F.3d at 980–81.

29. AOIs are final agency action for the purpose of judicial review under the Administrative Procedure Act. *Id.*

National Environmental Policy Act

30. The centerpiece of environmental regulation in the United States, NEPA requires federal agencies to pause before committing resources to a project to consider the likely environmental impacts of the preferred course of action as well as reasonable alternatives. *See* 42 U.S.C. § 4331(b).

31. As a threshold matter, NEPA requires agencies to consider whether a proposed action might conflict with the requirements or purpose of another statute. *See* 40 C.F.R. § 1501.1(a) (2024) (rescinded).²

32. In assessing the appropriate level of NEPA review, agencies must determine whether to rely upon an Environmental Assessment (EA) or prepare an Environmental Impact Statement (EIS). An EA is appropriate where there is not likely to be a significant effect or the significance of the effects is unknown. 42 U.S.C. § 4332(C); 40 C.F.R. § 1501.3(a). An EIS is appropriate for major actions that are likely to significantly affect the quality of the human environment. *Id.*

33. The U.S. Department of Agriculture’s implementing NEPA regulations require that the Forest Service to reevaluate the sufficiency of an existing EA to support continuing agency action if, “there are new circumstances or information with relevance to the proposal and these have bearing on the major Federal action, such that there is potential to alter the disclosure of adverse effects.” 7 C.F.R. § 1b.9(r).

34. If the Forest Service determines after its reevaluation that it is “not necessary to correct, revise, or supplement, and environmental document,” implementation of the “major Federal action may continue.” *Id.* at (1). The Forest Service “may” document its reevaluation determination . . . in a format deemed sufficient by the responsible official.” *Id.*

35. The Forest Service uses the NEPA process for the development of Forest Plans, as well as for the development of most site-specific plans, including grazing permits and Annual Operating Instructions to grazing permittees.

Administrative Procedure Act

36. Agency actions taken pursuant to NMFA, FLPMA, and NEPA are reviewable by this Court under the APA, 5 U.S.C. §§ 702, 704, 706. The APA provides that “[t]he Court shall

² These NEPA regulations have been rescinded, but they remain persuasive authority and may guide the court in interpreting the statute’s purpose and meaning.

... hold unlawful and set aside agency action . . . found to be . . . arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2). In making this determination, the Court must rule de novo all questions of law and statutory interpretation. *See Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 412-13 (2024) (courts “may not” defer to agencies on questions of law or statutory authority).

FACTUAL BACKGROUND

The Elk Ridge Complex

37. The Elk Ridge Complex is comprised of four livestock grazing allotments: Elk Ridge, Lime Creek, Rock Creek, and Tosi Creek. Located approximately 32 miles northwest of Pinedale, these allotments encompass 30,500 acres of National Forest System lands in the Pinedale-Ranger District of the Bridger-Teton National Forest. The Elk Ridge Complex is situated within the Green River Basin between the Gros Venture Range and the Wind River Range. A true and correct copy of the Forest Service’s allotment map is attached as **Exhibit A** to this Complaint.

38. The U.S. Fish and Wildlife Service listed Grizzly Bears as threatened species in 1975, when the population dropped below 700. Three years later, in 1978, the Forest Supervisor issued its Record of Decision and Environmental Assessment implementing an Allotment Management Plan for the Elk Ridge Complex that would allow the grazing of sheep, goats, or cattle with significant constraints. At that time, livestock operators chose to utilize the allotments for sheep grazing. A true and correct copy of the 1978 EA is attached hereto as **Exhibit B**.

39. In 1990, the Forest Service adopted the Bridger-Teton National Forest Plan, which called for the primary management of the Forest for wilderness, wildlife, and human experience in solitude. This Complaint will refer to the plan as the “1990 Forest Plan,” which is available at <https://www.fs.usda.gov/sites/nfs/files/legacy-media/bridger-teton/Forest%20Plan%20ReaderFriendly2.pdf>. The Forest Service amended the 1990 Forest Plan throughout the years, but the 1990 plan goals and objectives remain in effect.

40. The 1990 Forest Plan identified and described “Desired Future Conditions,” or

“DFCs,” which the Forest Service intended to reach to accomplish the Plan’s Goals and Objectives. 1990 Forest Plan at 199.

41. The 1990 Forest Plan set the following DFCs for the Bridger-Teton National Forest, which includes the Elk Ridge Complex: 56% as DFC 10 (Simultaneous Development of Resources, Opportunities for Human Experiences, and Support for Big Game and a Wide Variety of Wildlife Species) and 44% as DFC 6B (Wilderness, Wilderness Study Areas, and Wild Rivers), with less than 1% DFC 12 (Backcountry Big-Game Hunting).

42. DFC 10 requires that an area be managed to allow for some resource development and roads while having no adverse and some beneficial effects on wildlife. 1990 Forest Plan at 317. “Management emphasis is to provide long-term and short-term habitat to meet the needs of wildlife managed in balance with timber harvest, grazing, and minerals development.” *Id.* at 319. For fisheries and wildlife, “Groups of species are emphasized, such as early- or late-succession-dependent species, to increase species richness or diversity. Habitat is managed to achieve the game and fish populations, harvest levels, success, and recreation-day objectives identified by the Wyoming Game and Fish Department and agreed to by the Forest Service.” *Id.* at 318. For range, “Range is managed to maintain and enhance range and watershed condition while providing forage for livestock and wildlife.” *Id.*

43. DFC 6B requires that, “Management emphasis is to provide for the protection and perpetuation of natural biophysical conditions and a high degree of solitude for visitors but with some perceptible evidence of past human use” in and around Wilderness Areas, Wilderness Study Areas, and Wild Rivers. 199 Forest Plan at 263. For fisheries and wildlife, “Animal populations and distribution are affected by natural processes.” *Id.* at 273. And for range, “Range is managed to maintain and enhance range and watershed condition while providing forage for livestock and wildlife.” *Id.*

44. The 1990 Forest Plan specifically addresses vacant allotments with its “Vacant Allotment Guideline,” which provides: “Vacant allotments will be stocked only to meet resource-management needs.” *Id.*

45. The Forest Service has relied on the vacancy status of the Elk Ridge Complex to meet its Forest Plan goal for the last ten-years.

46. The 1990 Forest Plan considers Western (Boreal) Toad and Boreal Chorus Frog as “Management Indicator Species,” requiring close monitoring and management response if populations decline.

47. The Forest Service has amended the 1990 Forest Plan once to include plans to better achieve original objectives and goals, including by setting a goal to establish a large mammal migration corridor for Pronghorns and other ungulates who require annual migrations uninterrupted by human improvements to survive the ecosystem’s harsh winters.

48. In addition to the adoption of the 1990 Forest Plan and subsequent amendments, since the Forest Service adopted the 1978 EA, among other significant environmental and ecosystem changes,

- a. Congress designated the adjacent Gros Ventre Wilderness Area in 1984 as part of the Wyoming Wilderness Act, covering more than 285,000 acres of the Bridger-Teton National Forest.
- b. The U.S. Fish & Wildlife Service reintroduced threatened Gray Wolves to the Greater Yellowstone Ecosystem in 1995, which includes the Grand Teton National Park and Bridger-Teton National Forest.
- c. The U.S. Fish & Wildlife Service listed Canada Lynx as threatened in 2000.
- d. The U.S. Fish & Wildlife Services listed Wolverines as threatened in 2023.

49. Moreover, ten years ago, conservation groups, including the Sagebrush Habitat Conservation Fund (a 509(a) supporting organization of WWP), purchased the grazing rights to each allotment within the Elk Ridge Complex to protect the Whiskey Mountain, Jackson North, and Jackson South Bighorn Sheep Herds from a “high risk” of disease transmission from domesticated sheep authorized to graze in the allotments. According to the U.S. Forest Service’s Pinedale-Ranger District Office, these Bighorn Sheep herds are considered core native herds under the Wyoming Bighorn Sheep/Domestic Sheep Interaction Working Group – Final Report

and Recommendations (also referred to as the “Wyoming Plan”). *See* June 21, 2016, letter from Pinedale Ranger District to Mary Thoman.

50. In addition to the important goal of protecting core herds of Bighorn Sheep from disease transmission, the Forest Service acknowledged that permitted domestic sheep operations on the Elk Ridge Complex had sustained “significant predation by Grizzly Bears and Wolves over the past decades” and that recurrent predator-related scattering events continued despite substantial conflict-reduction efforts. *Id.* Accordingly, the Forest Service indicated it would not stock the Elk Ridge Complex with sheep or goats following the buyout.

51. In the same letter, the Forest Service advised grazing permittees it *may* consider issuing grazing permits for cattle in the Elk Ridge Complex, but the agency explicitly stated: “Since the potential effects of cattle grazing in the Elk Ridge Complex have not recently been considered under any NEPA analysis, such an analysis would be necessary prior to any authorization of term permitted cattle grazing on these allotments.” *Id.*

52. The Forest Service identified potential conflicts with threatened and endangered large carnivores, lack of livestock-management infrastructure, the proximity of designated Wilderness Areas, wildlife migration corridors, Forest Plan requirements, and other resource issues that would be addressed in a future NEPA review. It stated that the allotments would be held vacant pending a final suitability determination and that, if any allotment were determined suitable for cattle grazing, NEPA analysis would follow.³

³ The Forest Service completed an Environmental Impact Statement in 2017 for the Upper Green River Area Rangeland Project, which did not include any of the allotments within the Elk Ridge Complex. However, the Upper Green River Area is adjacent to the Elk Ridge Complex. Relevantly, in 2023, the U.S. Court of Appeals for the Tenth Circuit held the 2019 Record of Decision for the Upper Green River Area Rangeland Project unlawful, because the biological opinion relied upon failed to fully consider the impact of lethal bear removals to resolve bear-livestock conflicts on the population of breeding females in the area and the Forest Service further failed to ensure compliance with Forest Plan components to protect migratory birds. *W. Watersheds Project v. Haaland*, 69 F.4th 689 (10th Cir. 2023).

53. The allotments have been vacant since June 2016.

Attempts at NEPA Compliance

54. In keeping with its previous position that the agency must comply with NEPA before permitting cattle grazing in the Elk Ridge Complex, in 2021, the Forest Service released a Draft Environmental Assessment for the Elk Ridge Complex Rangeland Supplementation Project to evaluate the environmental impacts of cattle grazing in the ten-years-vacant allotments. The Draft EA analyzed whether cattle grazing should be authorized within the Complex and under what conditions.

55. As of the filing of this Complaint, the Forest Service appears to have abandoned the 2021 Draft EA.

Final Agency Action

56. In June 2026, the Forest Service quietly distributed AOIs for the upcoming fiscal year to grazing permittees in the Upper Green River Area Rangeland. The 2026 AOIs provide that, “if necessary,” cattle may graze the Elk Ridge Complex from August 15 through October 15, 2026, to assist with “livestock distribution and restoration of areas burned by the Dollar Lake Fire.” A true and correct copy of the 2026 AOI authorizing cattle grazing in the Elk Ridge Complex is attached as **Exhibit C** to this Complaint.

57. The AOIs assert that the Forest Service undertook a “thorough NEPA sufficiency review” after consultation with the U.S. Fish and Wildlife Service.

58. Plaintiff WWP did not learn of the 2026 AOIs’ authorization of grazing in the Elk Ridge Complex until July, as the Forest Service provided no public notice, opportunity for comment, contemporaneous disclosure of the decision, NEPA sufficiency review, U.S. Fish and Wildlife Service consultation, or supporting documentation before authorizing grazing in the Elk Ridge Complex. A true and correct copy of the Forest Service’s “NEPA sufficiency review” is attached hereto as **Exhibit D**.

FIRST CLAIM FOR RELIEF
Procedural Violation of NEPA and APA,
Failure to Prepare an Environmental Assessment

59. Plaintiff realleges and incorporates each of the preceding paragraphs as if fully set forth herein.

60. This claim alleges that Federal Defendants violated NEPA, 42 U.S.C. §§ 4321 et seq., by authorizing the 2026 AOIs without preparing an Environmental Assessment (EA) to evaluate the significant environmental impacts that result from nearly 50 years of new information, special species statuses, wilderness area designations, and scientific advancements in wildlife management since the Forest Service adopted the 1978 EA.

61. To comply with NEPA, an agency may prepare an EA to determine whether the environmental impact of a proposed action is significant enough to warrant preparation of an EIS, but an agency must prepare an EIS if the proposed project will “significantly affect” the environment. 42 U.S.C. § 4332(2)(C).

62. The U.S. Department of Agriculture’s implementing NEPA regulations require that the Forest Service reevaluate the sufficiency of an existing EA or EIS to support continuing or renewed agency action if, “there are new circumstances or information with relevance to the proposal and these have bearing on the major Federal action, such that there is potential to alter the disclosure of adverse effects.” 7 C.F.R. § 1b.9(r).

63. If the Forest Service determines after reevaluation that it is “not necessary to correct, revise, or supplement, and environmental document,” implementation of the “major Federal action may continue.” *Id.* at § 1b.9(r)(1).

64. The Forest Service elected to reevaluate the 2026 AOIs as a continuing implementation of the 1978 EA, pursuant to 7 C.F.R. § 1b.9(r), even though significant changes to the ecosystem and environment have occurred over the last 50 years, including but not limited to:

- a. Congress designated the adjacent Gros Ventre Wilderness Area in 1984 as part of the Wyoming Wilderness Act, covering more than 285,000 acres of the

Bridger-Teton National Forest.

- b. The Bridger-Teton National Forest adopted a Forest Plan in 1990, which has since been amended, to establish a large mammal migration corridor for Pronghorns.
- c. The U.S. Fish and Wildlife Service reintroduced threatened Gray Wolves to the Greater Yellowstone Ecosystem in 1995, which includes the Grand Teton National Park and Bridger-Teton National Forest.
- d. The U.S. Fish and Wildlife Service listed Canada Lynx as threatened in 2000.
- e. Permittees voluntarily retired their grazing permits for the Elk Ridge Complex in 2016, allowing the Complex's ecosystem to recover and thrive over the last decade.
- f. The U.S. Fish and Wildlife Services listed Wolverines as threatened in 2023.

65. In prior public statements, the Forest Service has admitted that NEPA review is necessary to analyze environmental impacts to the Elk Ridge Complex from cattle grazing, and at least one federal court has stricken a federal agency decision authorizing grazing in the Bridger-Teton National Forest for failure to consider adverse impacts to Grizzly Bears due to bear-livestock conflicts. *W. Watersheds Project v. Haaland*, 69 F.4th 689 (10th Cir. 2023).

66. Indeed, the 1978 EA does not mention, let alone analyze, the environmental impacts of livestock grazing on multiple species of concern in the Elk Ridge Complex, including not only endangered carnivores, but also Western (Boreal) Toad, Columbian Spotted Frog, Boreal Chorus Frog, and Colorado River Cutthroat Trout. The Western (Boreal) Toad and Boreal Chorus Frog are Management Indicator Species under the 1990 Bridger-Teton Forest Plan. While the 1978 EA briefly mentioned recovering Grizzly Bear populations, it does not analyze these impacts, and any analysis would be outdated given the current listing status of the Grizzly Bear.

67. The 2026 AOIs are final agency action for the purpose of judicial review under the APA, 5 U.S.C. §§ 702, 704, 706. *See Or. Nat. Desert Ass'n*, 465 F.3d at 980–81.

68. Plaintiff, having no opportunity to review or provide public comment on Federal Defendants’ “NEPA sufficiency” review of the 2026 AOIs, has exhausted its available administrative remedies and has no other remedy.

69. The Forest Service acted arbitrarily and capriciously, abused its discretion, and acted contrary to the law when it determined that it was not necessary to correct, revise, or supplement the 1978 EA based on significant new information, in violation of NEPA and § 706 of the APA.

70. The APA gives this Court authority to “hold unlawful and set aside agency action . . . found to be . . . arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2).

SECOND CLAIM FOR RELIEF

Substantive Violations of NEPA and APA Inadequate analysis; failure to take “hard look”

71. Plaintiff realleges and incorporates each of the preceding paragraphs as if fully set forth herein.

72. This claim alleges that Federal Defendants’ approval of the 2026 AOIs without undertaking a new NEPA review violated NEPA, 42 U.S.C. §§ 4321 *et seq.*, because Federal Defendants failed to take a “hard look” at the 2026 AOIs’ potential impacts, as required by NEPA. Plaintiff brings this claim pursuant to the judicial review provisions of the APA, 5 U.S.C. § 706.

73. NEPA “requires that federal agencies perform an environmental analysis before taking any ‘major Federal actions significantly affecting the quality of the human environment.’” *Ctr. for Biological Diversity v. Salazar*, 706 F.3d 1085, 1094 (9th Cir. 2013) (quoting 42 U.S.C. § 4332(2)(C)). This requires agencies to take a “hard look” at the environmental effects of their planned actions. *Marsh v. Or. Nat. Res. Council*, 490 U.S. 360, 374 (1989).

74. NEPA’s “hard look” review requires that “every significant aspect” of the environmental effects of a proposed major federal action be made available to inform agency

decisionmakers and the public so that both may “play a role in both the decision-making process and the implementation of” the action. *See Balt. Gas & Elec. Co. v. Nat. Res. Def. Council, Inc.*, 462 U.S. 87, 97 (1983); *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349 (1989).

75. Such review requires consideration of direct, indirect, cumulative, and ecological impacts associated with a proposed action. *See* 40 C.F.R. § 1508.1(g); *Neighbors of Cuddy Mountain v. U.S. Forest Service*, 137 F.3d 1372, 1379 (9th Cir. 1998); *Sierra Club v. U.S. Army Corps of Engineers*, 645 F.3d 978, 991 (8th Cir. 2011).

76. NEPA review does not allow an agency to break down an action into small component parts to avoid a significance determination. *See Kern v. U.S. Bureau of Land Mgmt.*, 284 F.3d 1062, 1075 (9th Cir. 2002).

77. NEPA also requires that an agency’s reliance on data not be stale. *See N. Plains Res. Council, Inc. v. Surface Transp. Bd.*, 668 F.3d 1067, 1086 (9th Cir. 2011); *Lands Council v. Forester of Region One of the U.S. Forest Serv.*, 395 F.3d 1019, 1030-31 (9th Cir. 2004).

78. Rather than comply with NEPA’s requirement that the Forest Service conduct an EA to determine whether the 2026 AOIs will have a significant effect on the environment, the Forest Service elected to proceed with a sufficiency evaluation of the 1978 EA for the Bridger-Teton National Forest Allotment Management Plan, pursuant to 7 C.F.R. § 1b.9(r).

79. The Forest Service’s sufficiency evaluation of the 1978 EA violates NEPA’s “hard look” requirement in the following ways:

- a. First, the project baseline information in the 1978 EA does not accurately reflect the baseline information today, as the Elk Ridge Complex has been vacant for ten years. The vegetation within the Complex has recovered substantially following decades of heavy livestock grazing. Elk, mule deer, and other native herbivores are likely using the area differently due to the decade-long absence of livestock, and their populations will likely have expanded in response to decreased competition from livestock. Due to

departure from a fundamentally different baseline, the environmental impacts of renewed livestock grazing on the previously ungrazed habitat of the Elk Ridge Complex will be different from the impacts analyzed in the 1978 EA, which analyzed alternatives departing from a baseline of currently-grazed conditions.

- b. The Elk Ridge Complex is located within the Greater Yellowstone Ecosystem, which has seen significant gains in Gray Wolf and Grizzly Bear population recoveries, since implementation of Endangered Species Act protections. In fact, according to the Forest Service in 2016, “potential conflicts with large carnivores as well as a lack of infrastructure for cattle management” indicate that cattle grazing in this current ecosystem differs from grazing conditions analyzed in 1978. In addition, according to the Forest Service in 2016, the 1990 Forest Plan’s direction for wilderness, wildlife migration corridors, and other resources “must be addressed in the development of feasible grazing strategies.” No such analysis was conducted prior to the proposed grazing use authorized by the 2026 AOIs.
- c. The renewal of six adjacent grazing allotments (Badger Creek, Beaver-Twin Creeks, Noble Pastures, Roaring Fork, Wagon Creek, and Upper Green River) under the Upper Green River Area Rangeland Project (UGRA) was conducted under a full-scale EIS, completed in 2019. Neither the EIS nor the specialist reports considered site-specific impacts of any environmental impact on the lands and wildlife of the Elk Ridge Complex. However, the Forest Service conducted an independent Sensitive Amphibians Report and Migratory Birds Report as part of internal agency analysis of alternatives for the UGRA Project. Effects to rare and imperiled species, including Grizzly Bears, Canada Lynx, Wolverines, and Colorado River Cutthroat Trout, were found to be significant impacts to the human environment. For Grizzly Bears, the

Biological Assessment concluded the grazing allotment renewal would be “likely to adversely affect” the species. The same imperiled species are found on the Elk Ridge Complex, but no assessment has been conducted.

- d. In the UGRA EIS, the Forest Service concluded that cattle impacts to riparian and aquatic conditions were significant, as this area (as well as the Elk Ridge Complex) is habitat for the Boreal Toad, Columbia Spotted Frog, Boreal Chorus Frog, and other riparian and aquatic species. According to the UGRA Record of Decision (ROD), “Livestock tend to congregate in riparian areas, and without appropriate management can exceed forage allocation amounts, damage stream banks, and accelerate erosion.” UGRA ROD at 27. The UGRA EIS did not encompass any of the Elk Ridge Complex and therefore did not provide NEPA analysis examining site-specific impacts of renewed livestock grazing that likely rise to the level of significance, requiring an EIS. The Forest Service’s previous finding that the environmental impacts of livestock grazing are significant such that an EIS was required to authorize grazing in the adjacent UGRA indicates the Forest Service must complete an EIS for the Elk Ridge Complex.
- e. The Elk Ridge Complex adjoins six other allotments where Grizzly Bears are routinely killed due to livestock-bear conflict, and these killings adversely affect the Grizzly population. Introduction of cattle into vacant allotments where human and livestock presence has been minimal for a decade will likely initiate additional bear-cattle and wolf-cattle conflicts, and the resulting lethal removals will have cumulative impacts on both species’ populations, impacts which have never been analyzed.
- f. The critically important Pronghorn migration corridor passes just to the east of the Elk Ridge Complex, and the increase of livestock activity in the Complex could result in shifts of predator habitat use in ways that have direct or

cumulative effects on migrating Pronghorn, but which have not been considered, analyzed, or disclosed in the Forest Service’s sufficiency review.

- g. The Forest Service should have considered a range of reasonable alternatives, including permanent closure of the Elk Ridge Complex. In failing to initiate a NEPA process prior to approving AOIs authorizing the stocking of the Elk Ridge Complex, Federal Defendants considered no alternatives to the action ultimately approved.

80. The Forest Service’s sufficiency evaluation failed to take a “hard look” at the significant changes to the regulatory landscape and ecosystem that have occurred within the Bridger-Teton National Forest, since the Forest Service issued the 1978 EA.

81. The Forest Service’s decision to adopt the 2026 AOIs based on the environmental analysis contained in the 1978 EA despite the intervening changes to the regulatory landscape and ecosystem was plainly arbitrary and capricious under § 706 of the APA.

82. The Forest Service abused its discretion under § 706 of the APA by relying on the 1978 EA to adopt the 2026 AOIs, which will significantly alter the ecosystem, in violation of NMFA, the 1990 Forest Plan, and FLPMA.

83. The Forest Service’s decision to adopt the 2026 AOIs using the reevaluation process contained in 7 C.F.R. § 1b.9(r) violated NEPA’s statutory public disclosure requirements and was therefore contrary to law under § 706 of the APA.

84. The APA gives this Court authority to “hold unlawful and set aside agency action . . . found to be . . . arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2).

THIRD CLAIM FOR RELIEF
Violations of NFMA, FLPMA, APA
Failure to Comply with the Forest Plan

85. Plaintiff realleges and incorporates each of the preceding paragraphs as if fully set forth herein.

86. Under NFMA, project-level decisions must be consistent with direction in the Forest Plan. Under the 1990 Forest Plan, the Elk Ridge Complex is designated to be managed as approximately 56% as DFC 10 (Simultaneous Development of Resources) and 44% as DFC 6B (Wilderness), with less than 1% DFC 12 (Backcountry Big-game Hunting).

87. The 1990 Forest Plan identified and described “Desired Future Conditions,” or “DFCs,” which the Forest Service intended to reach to accomplish the Plan’s Goals and Objectives. 1990 Forest Plan at 199.

88. Federal Defendants violated 1990 Forest Plan DFC 10 and 6B when they adopted the 2026 AOIs without considering the effects of cattle grazing on plan goals.

89. Federal Defendants violated the 1990 Forest Plan’s Vacant Allotment Guidelines by stocking the Elk Ridge Complex with cattle before evaluating resource-management needs, including the needs of threatened and endangered species, native ungulates, and the recovering ecosystem of the Green River Basin.

90. Because the Forest Service elected to rely on the 1978 EA, the Forest Service failed to evaluate site-specific impacts to the Elk Ridge Complex under DFC 10 or 6B.

91. The Forest Service, moreover, failed to analyze whether the 2026 AOIs comply with the Forest Plan, which was adopted 12 years after the 1978 EA was released.

92. The Forest Service acted arbitrarily and capriciously, abused its discretion, and acted contrary to the law under § 706 of the APA when it adopted the 2026 AOIs without analyzing whether it complied with the NMFA and the 1990 Forest Plan.

93. The APA gives this Court authority to “hold unlawful and set aside agency action . . . found to be . . . arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2).

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully request that this Court:

- A. Issue an order and injunction compelling Federal Defendants to cease implementation of the 2026 AOIs provision authorizing cattle grazing in the Elk Ridge Complex of Grazing Allotments scheduled to begin on **August 15, 2026**, until Federal Defendants have complied with NEPA, FLPMA, and NFMA;
- B. Vacate and set aside the provision of the 2026 AOIs authorizing cattle grazing in the Elk Ridge Complex of Grazing Allotments;
- C. Issue a declaratory judgment pursuant to 28 U.S.C. §§ 2201–2202 declaring that Federal Defendants violated the procedural requirements of NEPA, NMFA, and the FLPMA when they relied on the sufficiency of the 1978 EA to adopt the 2026 AOIs provision authorizing cattle grazing in the Elk Ridge Complex of Grazing Allotments;
- D. Grant such additional and further relief to which Plaintiff may be entitled or as the Court may deem necessary, just or proper;
- E. Award Plaintiff attorney fees and costs pursuant to 28 U.S.C. § 2412.

DATED: August 10th, 2026,

/s/ John Persell
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** Pro hac vice applications pending
Attorneys for W. Watersheds Project*

VERIFICATION

I, Erik Molvar, am the Executive Director of the Western Watersheds Project. I have read the foregoing VERIFIED COMPLAINT FOR JUDICIAL REVIEW OF FINAL AGENCY ACTION AND FOR INJUNCTIVE AND DECLARATORY RELIEF and know its contents. The facts alleged in the above Complaint are within my own knowledge and I know these facts to be true, except as to matters alleged therein on information and belief.

I declare under penalty of perjury that the above is true and correct and that this declaration is executed on August 10, 2026, at Jacksonville, Oregon.

/s/ Erik Molvar

Erik Molvar

Executive Director, Western Watersheds Project

Exhibit A

Exhibit B

ALLOTMENT MANAGEMENT PLAN
AND ENVIRONMENTAL ANALYSIS REPORT
FOR THE ELK RIDGE GRAZING RESOURCE AREA

(Lime Creek S&G, Rock Creek S&G, Elk Ridge S&G, Tosi

Pinedale Ranger District, Bridger-Teton National Forest,

PINEDALE R.D.
BRIDGER-TETON N.F.

MAR 29 1978

Route to:	Act.	Int.
Ranger		8-4
Recreation Planner		
Range Conservationist	✓	NY
Timber		
Creek S&G)		
Engineering		
Range Conservationist		
Region Four		
Clerk/Typist		

Prepared by *David A. Small* 11/10/77
Range Conservationist Date

Recommended for
Approval by *Del S. Co* 11/11/77
District Forest Ranger Date

Recommended for
Approval by *Harold L. Edwards* 2/14/78
Forest Range Staff Date

Recommended for
Approval by *Hayes* 3/3/78
Forest Resource Coordinator Date

Recommended for
Approval by *James J. Connor* 3/3/78
Forest Planner Date

Report Approved by *Reid Buckner* 7-7-78
Forest Supervisor Date

Report Reviewed by *Paul Schwalbe* 3/23/78
Permittee Date

REPORT APPROVED, SUBJECT TO CHANGES DISCUSSED
IN 1950(2210) MEMORANDUM OF 3/6/78
(Designation) (Date)



Panorama of Tosi Basin from Tepee Creek Ridge. View looking southward. The Sawtooth Range is in the left background, Tosi Peak center background, and the Gros Ventre Wilderness study area is in the right background.

This area which lies in the western portion of the Elk Ridge Resource Area stands out because of its native wildlife populations and wilderness characteristics.

Elk Ridge Grazing Resource Area

Environmental Analysis Report

Pinedale Ranger District, Bridger-Teton National Forest, Region Four

The proposed activity is not considered to be a major Federal action significantly affecting the quality of the human environment (requiring an environmental statement pursuant to section 102(2)(C) of the National Environmental Policy Act of 1969 (PL-91-190)) or to be highly controversial. Those actions that could adversely affect the quality of the physical and biological components in the allotment area will be sufficiently minimized to prevent long-term environmental impacts. Overall social and economic effects of the proposal are considered to be beneficial. Consultation with others on the proposals did not reveal significant adverse reaction. These determinations are based upon evaluations made in the attached Environmental Analysis Report.

Forest Supervisor

ALLOTMENT MANAGEMENT PLAN OUTLINE

- I. Strategy and Objectives
 - A. Strategy
 - B. Resource Objectives

- II. Action Section
 - A. Number and Season of Use
 - B. Selected Management System
 - C. Range Improvement and Development

- III. Evaluation Section
 - A. Allotment Inspections
 - B. Evaluation
 - C. Permanent Forage Production and Trend Studies

Reference Section

ENVIRONMENTAL ANALYSIS REPORT OUTLINE

- I. Evaluation of Inventory Information
 - A. Introduction
 - B. History of Range Use
 - C. Present Range Use
 - D. Current Condition of Ecological Components
 - 1. Range
 - a. Tosi Basin Area
 - b. Klondike-Lime Creeks Area
 - c. Whiskey-Eagle Creeks and Lower Rock Creek Area
 - 2. Wildlife
 - 3. Recreation
 - 4. Timber
 - E. Special Problems
 - F. Estimated Grazing Capacity
 - G. Range Management and Other Objectives
- II. Range Management Alternatives
 - A. Range Improvements
 - B. Evaluation of Kind of Livestock (sheep or cattle) and Grazing Management Systems
- III. Analysis of Alternatives
- IV. Environmental Impacts of Selected Alternatives
 - A. FRES Management Strategy A
 - B. FRES Management Strategy B
 - C. FRES Management Strategy C
 - D. FRES Management Strategy D

() V. Summary of Probable Adverse Effects Which Cannot Be Avoided

VI. Relationship Between Local Short-Term Uses of Man's Environment
and Maintenance of Long-Term Productivity

VII. Irreversible and Irretrievable Commitment of Resources

VIII. Management Requirements and Constraints

IX. Consultation With Others

Map Packet

Forest-Range Environmental Study (FRES) Range Management Strategies

STRATEGY A

Environmental Management Without Livestock

Livestock are excluded by fencing, riding, public education, and by incentive payments. The environment is protected from natural or other disasters such as wildfires or pest epidemics. Resource damage is corrected to maintain a stewardship base.

STRATEGY B

Environmental Management With Livestock

Livestock use is within the apparent present capacity of the range environment with no attempt to achieve livestock distribution. Investments for range management are applied only to the extent required to maintain the environment at a stewardship level in the presence of grazing. Investments for implementation may be very low for some resource classes. Resource damage resulting from past use is charged to benefiting or stewardship functions. Livestock are constrained in some manner to their assigned allotment but there are no interior unit fences for management purposes. This management strategy provides for salting but no man-made water developments. The only fencing would be exterior boundary fence. This strategy is characterized by season-long grazing.

STRATEGY C

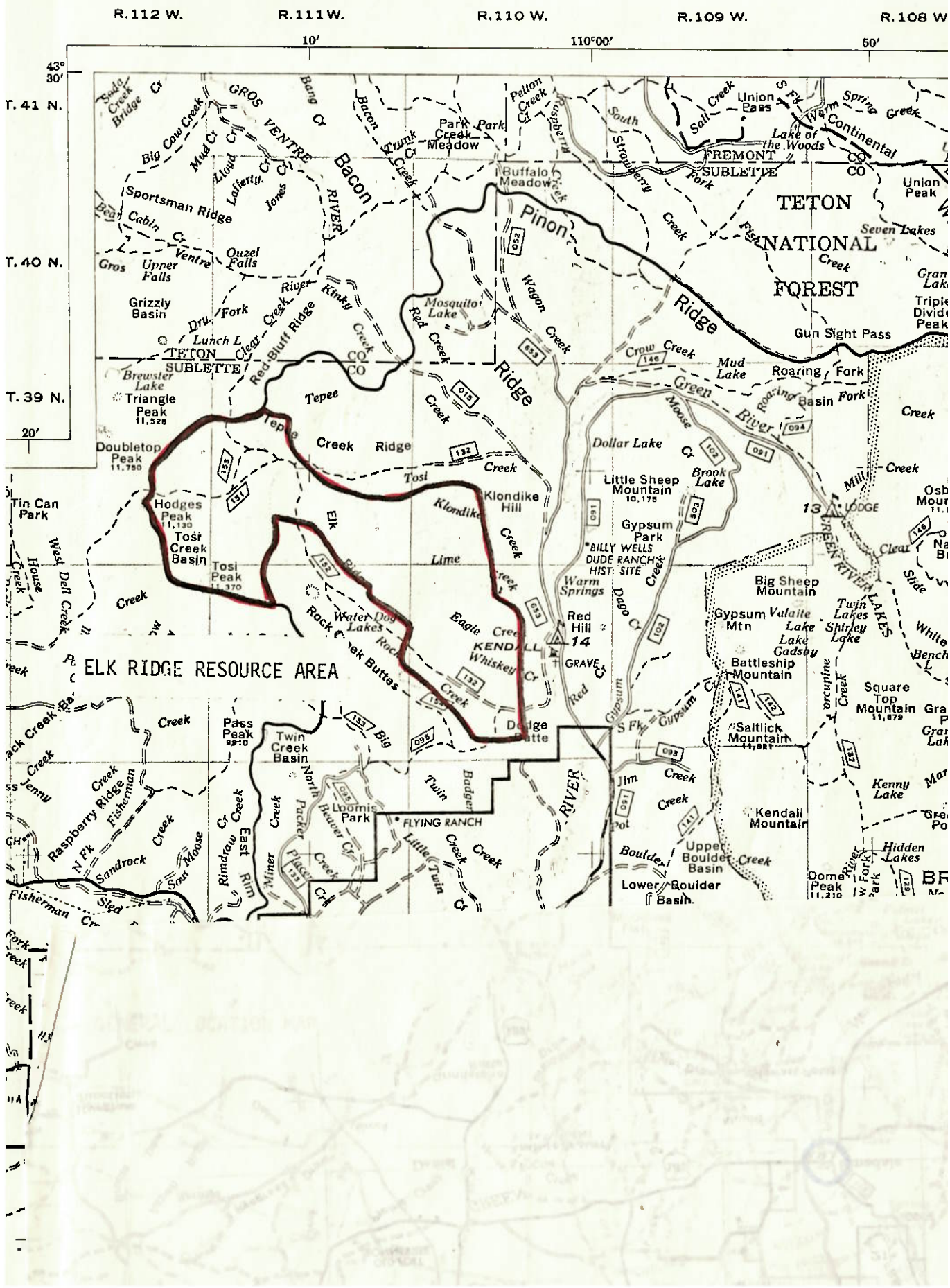
Extensive Management of Environment and Livestock

Management systems and techniques, including fencing and water developments, are applied as needed to obtain relatively uniform livestock distribution and plant use and to maintain plant vigor. Full utilization of the AUMs and no attempt will be made to maximize livestock forage production by cultural practices such as seeding. The native forage is used in a uniform fashion. This strategy may include sagebrush spraying or burning only if it is done for distribution and not for forage production.

STRATEGY D

Intensive Management of Environment and Livestock

All available technology for range and livestock management is considered. Management seeks to optimize livestock forage production consistent with constraints of maintaining the environment and providing for multiple use. Existing native vegetation may be replaced by better forage species. Sites may be modified extensively to provide better growing conditions. Structures may be installed to accommodate complex livestock management systems and practices. Advanced livestock practices are commonplace. Spraying, burning, seeding or other cultural practices may be done to increase forage production.



ALLOTMENT MANAGEMENT PLAN - SHEEP CLASS

I. Strategy and Objectives

- A. Strategy - These allotments will be managed under the strategy of Extensive Management of Environment and Livestock. This is Strategy C of the Forest Range Environmental Study. This strategy will prevail during completion of the South Gros Ventre Land Management Plan and any future designation of the Gros Ventre Wilderness Study Area. Under this system the allotments will be grazed under a rest-rotation grazing system to obtain relatively uniform livestock distribution and plant use, and maintain plant vigor. ~~the~~ stock water can be developed. No attempts will be made to maximize livestock forage production by vegetative type conversion through either spraying or burning.

The above management strategy was developed through the environmental analysis report and planning process.

B. Resource Objectives

1. Initiate a rest-rotation grazing system which will meet the physiological requirements of the desirable forage species.
2. Determine the carrying capacity of the allotment at the end of a five-year grazing period, 1982.
3. Maintain the vegetative and soil condition on all suitable range.
4. Consider all wildlife species in planning activities and efforts to assure minimal impact or provide mitigating measures to maintain wildlife habitat and populations on the allotments.
5. Evaluate the suitability of continuing livestock grazing in Tosi Basin in relationship to watershed and soil protection, wilderness values, and recreation use.
6. Protect elk calving areas from disturbance during the period from May 15 to June 30. This directs that activities such as road and fence construction which would increase vehicle and public use would be restricted. Other activities such as prescribed burning or spraying are permitted with mitigating measures. Current existing activities such as livestock grazing would continue unrestricted.
7. Maintain or increase forage production to support at least 10,299 sheep months of livestock use.
8. Avoid livestock damage to streambanks along Rock Creek.
9. Do not add to the trailing impacts along the Green River Road and stock driveway.

Allotment Management Plan - Sheep

10. Keep livestock losses from poisonous plants and wild animals within tolerable limits to the extent it is cost effective to accomplish and compatible with other resource values.
11. Protect wilderness values in Tosi Basin and the Elk Ridge resource area pending completion of the South Gros Ventre Land Management Plan.
12. Avoid concentrating livestock use around water and salting areas. Livestock will be moved away from these areas to feed. Open herd drifting or moving will be used to and from these areas.

Potential Objectives (pending completion of South Gros Ventre Land Management Plan and designation of the area for multiple use management).

1. Increase available stock water on allotment.
2. Reduce sagebrush densities in lower Lime Creek, Klondike Creek and Whiskey Creek drainages by herbicide spraying or prescribed burning.
3. Prevent livestock damage to conifer regeneration in timber harvest areas.
4. Coordinate water developments for use by both livestock and wildlife.
5. Promptly stabilize the soil on all the disturbed development areas.

C. Resource Problems

1. Lack of stock water - the area lacks perennial water with most streams, ponds and seeps drying up by late summer.
2. Gopher activity in Tosi Basin - Gopher activity is causing moderate to severe soil disturbance on some sites. However, no attempts will be made at this time to control infestation because of the area's possible inclusion for wilderness study.
3. Numerous gullies and bare streambanks in Tosi Basin and Rock Creek.
4. Big Horn Sheep winter range in Tosi Basin.
5. Unstable soils and erosion potential at the head of tributaries of Lime Creek. Vegetation is very thin in these areas and is influenced by snowbanks on the north slopes of Elk Ridge.

Allotment Management Plan - Sheep

6. Predatory Animals - Due to the fact that the area has not been grazed for several years, predator populations are assumed to be high.
7. Pending Land Management and decisions on the area. These decisions in particular are limiting range improvement construction such as stock water development. Upon completion of these studies, re-evaluation will be made.

II. Action Section

A. Sheep Grazing

1. Number of livestock and season of use.

Herd #1 (Tosi Basin)	1150 ¹	sheep-season 7/10 - 9/30	2683	Sheep Months
Herd #2	1300 1239	sheep-season 7/10 - 9/30	3510	Sheep Months
Herd #3	1300 1239	sheep-season 7/10 - 9/30	3510	Sheep Months
Total	3628		9703	

820 AUM's

926 AUM's

2. Selected Management System - The four allotments will be managed together under a rest-rotation grazing system. Each year three of the four allotments will be grazed and one will receive complete rest. Sheep access to the allotment will not be allowed on the Green River Stock Driveway. Sheep will either be (1) trucked to and from the allotment--temporary yearly loading corrals would have to be constructed; or (2) sheep trailed to and from the allotment along the west side of the Green River across private land.

Rest-Rotation System for Sheep Grazing

Year	Tosi Creek	Lime Creek	Elk Ridge	Rock Creek
977 & 1981	Rest	Graze (Herd #1)	Graze (Herd #3)	Graze (Herd #2)
978 & 1982	Graze (Herd #1)	Rest	Graze (Herd #3)	Graze (Herd #2)
979 & 1983	Graze (Herd #1)	Graze (Herd #3)	Rest	Graze (Herd #2)
980 & 1984	Graze (Herd #1)	Graze (Herd #2)	Graze (Herd #3)	Rest

81 85
82 86
83 87
84 88
85 89
86 90
87 91
88 92
89 93
90 94
91 95
92 96

Within the rest-rotation system, individual allotments will be grazed under simple deferred systems. These deferred areas will be outlined in the annual operating plan and will remain flexible so as to allow deferred use for seed production on previous heavily used area or areas in unsatisfactory range condition, or general allotment areas in need of seedling reproduction to maintain range production.

On the year Tosi Basin is rested, a temporary permit could be issued to cover the additional sheep months if it appears justified.

3 bands 1200 each

Allotment Management Plan - Sheep

B. Range Improvement and Development

1. Existing Improvements (refer to reference section)

<u>Improvement Name</u>	<u>Size</u>	<u>Location</u>	<u>Year Const.</u>	<u>Condition</u>
Green River Boundary Fence	7.0 mi.	S27,34 T39N R110W, S3,10 15,22,27,T38N R110W	1960	Poor - Abandoned -
Water Development		NW $\frac{1}{4}$, S8,T38N R110W	1933	Abandoned
Klondike-Lime-Eagle Cr. Spray Project	2110 a.	see reference section	1959	Good

2. Proposed Improvements

No construction of range improvements will be allowed pending completion of the South Gros Ventre Land Management Plan to maintain the roadless states of the area.

If this area or any part is not selected for Wilderness Study as a result of the South Gros Ventre Land Management Plan, the following options available for range improvement practices in that part or parts not selected for further wilderness study. (see map packet)

a. Stock Water

- (1) Pipeline from head of Lime Creek down the ridge between Lime and Klondike Creeks.
- (2) Pipeline from head of Lime Creek to fill natural ponds.
- (3) Potential for numerous runoff stock ponds over entire area.

B. Range Revegetation

Several areas in the lower Lime Creek, Klondike and Whiskey Creek drainages have potentials to increase livestock forage production by range revegetation treatments of herbicide spraying or prescribed burning. Specific boundaries will be established after Forest Interdisciplinary Team review and Stage II soil surveys.

C. Special provisions and Requirements

1. The permittee will provide sufficient riders or herders to achieve proper distribution and management of sheep on the allotment.
2. Sheep will not be bedded consecutively in the same area; nor will they be bedded within 300 yards of any running stream, spring, lake, or road.
3. Sheep will not be shaded or salted on or near water or roads.
4. Sheep will be open herded, and dogs will be used to a minimum to prevent heavy trampling and overgrazing. A once-over system of grazing will be followed. Bunching or pushing of sheep should be avoided.
5. All animal control (predators) permitted on these allotments will be performed in accordance with the Animal Damage Control Plan for the Pinedale Ranger District.
6. Sheep will not be grazed, bedded, salted, or trailed on steep hillsides and/or unsuitable range.
7. Sheep will not be salted in wet meadows or areas susceptible to heavy trampling. Salt areas should be sparse and have little feed, preferably rock salting locations should be moved from year to year.

D. Correlation with other Resources

1. Bighorn Sheep winter range in Tosi Basin will be protected. This area exits on the ridge leading from Hodges Peak to Tosi Creek. To insure there is no competition, domestic sheep will be kept lower and off this area.
2. Revegetation treatments will be scheduled to coincide where possible with rotation schedule rest treatments to limit non use taken.
3. Although no positive data exist, the threatened grizzly bear and endangered wolf may periodically inhabit the area encompassed by the allotments on a Transient Basis. No action carried out under this plan or in conjunction with sheep grazing operations may jeopardize either species existence or destroy or modify their habitat.

Allotment Management Plan - Sheep

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III. Evaluation Section

A. Allotment Inspections

The allotment will be inspected annually during the grazing season by the district ranger or his staff. On each of the inspections the following will be checked.

1. Annually check for compliance with the annual plan of use.
2. Annually check for any competition between big game and livestock.
3. Annually record data and take notes on the effectiveness of of the management system.
4. Use intensity map the entire allotment during the initial five-year period to determine livestock distribution and utilization patterns.
5. Annually check for trespass in Tosi Creek and Tosi Basin both from cattle on the Upper Green River Allotment and Beaver-Twin Allotment.
6. Annually check for livestock damage to stream banks along Rock Creek.
7. By 1984 evaluate any changes in range condition in the Rock Creek bottom, and at the head of Lime Creek.
8. Annually check for livestock losses from predatory animals and poisonous plants.
9. Annually check for excessive livestock concentrations around water and salting areas.
10. Map potential stock water development areas as they are found.
11. Annually check range improvement maintenance by the permittee.
12. Annually check herder or rider camps for compliance with rules and regulations.
13. In 1985 check on extend[†] or condition of gopher infestations in Tosi Basin.

Allotment Management Plan - Sheep

14. In 1985 check on condition and stabilization of old gullies in Tosi Basin and the head of Rock Creek. Evaluate if grazing should continue in Tosi Basin or if portions of the area as a whole should be closed to grazing.

B. Evaluation

Grazing capacity will be determined by comparison of actual use, proper use, and range trends and production.

A firmed up grazing capacity will be arrived at five years after the implementation of the rest-rotation grazing system. Further increases in capacity may be available after completion of preliminary structural range improvements. Additional capacity increases from revegetation projects will be determined after an appropriate time following the completion of the proposal.

C. Permanent Trend Studies

Vertical photographs will be used to monitor range production and trend. They will include data on plant species composition and ground cover.

These studies will be re-read at least every four to five years. See reference section for location map and Pinedale Ranger District files for a description and data summary of each study plot.

<u>Study No.</u>	<u>Location</u>	<u>Year Installed</u>	<u>Next Reading</u>
C-1	Sec. 32, T39N, R110W	1977	1983
C-2	Sec. 12, T38N, R111W	1977	1983
C-3	Sec. 35, T39N, R111W	1977	1983
C-4	Sec. 8, T38N, R110W	1977	1983
C-5	Sec. 28, T38N, R110W	1977	1983
C-6	Sec. 16, T38N, R110W	1977	1983
C-7	Tosi Basin	to be installed 1978 <i>Done</i>	1984

ALLOTMENT MANAGEMENT PLAN

CATTLE GRAZING

ELK RIDGE RESOURCE AREA

Pinedale Ranger District, Bridger-Teton National Forest, Region Four

ALLOTMENT MANAGEMENT PLAN - CATTLE CLASS

I. Strategy and Objectives

- A. Strategy - The Elk Ridge portion of this allotment will be managed under the strategy of extensive (FRES Strategy C) management of the environment and livestock during completion of the South Gros Ventre Land Management Plan and designation of the Gros Ventre Wilderness Study boundary. Under this system the allotment would be grazed under a rest-rotation grazing system to obtain relatively uniform livestock distribution and plant use, and maintain plant vigor. No stock water could be developed. No attempts would be made to maximize livestock forage production by vegetative type conversion through either spraying or burning.

The remaining Tosi Basin portion of the allotment will be managed under FRES Strategy A - Environmental Management Without Livestock. The area will be closed to livestock grazing.

The above management strategies were developed through the environmental analysis report and planning process.

B. Resource Objectives

1. Initiate a rest-rotation grazing system which will meet the physiological requirements of the desirable forage species.
2. Monitor the five-year trial period for (1) the conversion of sheep permits to cattle preference and (2) determine the carrying capacity of the allotment at the end of the trial period.
3. Maintain the vegetative and soil condition on all suitable range.
4. Maintain wildlife habitat and populations on the allotment at current levels.
5. Protect elk calving areas from disturbance during the period from May 15 to June 15.
6. Maintain or increase forage production to support at least 1900 average cow months of livestock use.
7. Avoid livestock damage to stream banks along Rock Creek.
8. Do not add to the trailing impacts along the Green River road and stock driveway.
9. Keep livestock losses from poisonous plants and predatory animals to a minimum.

Allotment Management Plan - Cattle

-2-

10. Protect wilderness values in Tosi Basin and the Elk Ridge Resource area pending completion of the South Gros Ventre Land Management Plan.
11. Avoid concentrating livestock use around water and salting areas.
12. Protect bighorn sheep winter range in Tosi Basin.

Potential Objectives (pending completion of South Gros Ventre Land Management Plan and designation of the area for multiple use management).

1. Increase available stock water on allotment.
2. Reduce sagebrush densities in Lower Lime Creek, Klondike Creek and Whiskey Creek drainages by herbicide spraying or prescribed burning.
3. Prevent livestock damage to conifer revegetation in timber harvest areas.
4. Coordinate water developments for use by both livestock and wildlife.
5. Promptly stabilize the soil on all disturbed areas.

Allotment Management Plan - Cattle

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II. Action Section

A. Cattle Grazing

1. Number of livestock and season of use.
725 cows w/calves - season 7/1 - 10/15
or
964 yearlings - season 7/1 - 10/15
2. Selected Management System - The allotment will be run on a rest-rotation grazing system with variable yearly stocking. Livestock will enter National Forest by (1) being trucked onto or adjacent to the allotment and trailed off the forest by fording the Green River at the forest boundary. No trailing will be allowed across the Kendall Bridge and down to the forest boundary; or (2) all livestock trailed to and from the allotment up the west side of the Green River from private land.

Planned Rest-Rotation System for Cattle Grazing

Elk Ridge Area
(Tosi Basin closed to cattle grazing)

<u>Year</u>	<u># cattle w/calves</u>		
1979	725	Graze entire area	Klondike Creek to Lime Creek deferred by riding until approx. Sept. 5
1980	725	Graze entire area	Lime Cr. to Eagle Cr. deferred by riding until approximately Sept. 5
1981	725	Graze entire area	Eagle Cr. to Rock Cr. deferred by riding until approximately Sept. 5
1982	0	Rest entire area	No cattle permitted on area for entire year
1983	725	Start rotation over	

B. Range Improvement and Development

1. Existing Improvements (refer to reference section)

<u>Improvement Name</u>	<u>Size</u>	<u>Location</u>	<u>Year Const.</u>	<u>Condition</u>
Green River Boundary Fence	7.0 mi.	S27, 34, T39N, R110W. S3, 10, 15, 22, 27, T38N, R110W	1960	Poor

Allotment Management Plan - Cattle

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<u>Improvement Name</u>	<u>Size</u>	<u>Location</u>	<u>Year Const.</u>	<u>Condition</u>
Water Development		NW $\frac{1}{4}$, S8, T38N R110W	1933	Abandoned in 1933
Klondike-Lime-Eagle Creek Spray Project	2110 a.	See reference section	1959	Good

2. Proposed Improvements

No construction of range improvements will be allowed pending completion of the South Gros Ventre Land Management Plan. Reconstruction of existing facilities will be allowed.

Prior to any conversion from sheep to cattle, seven miles of fence will be reconstructed by the permittee along the common boundary with the Upper Green River C&H Allotment. The estimated cost is \$35,000. Target date: 1978.

When and if the area is cleared from inventoried roadless status by the land management plan, several options are available for range improvement. Some of the options include: (see map packet)

a. Stock Water

- (1) Pipeline from head of Lime Creek down the ridge between Lime and Klondike Creeks.
- (2) Pipeline from head of Lime Creek to fill natural ponds and/or potholes between Lime and Eagle Creeks.
- (3) Potential for numerous runoff stock ponds over entire area.

b. Range Fence

One-half mile of fence near Well's Peak Pass to prevent cattle trespass into Tosi Basin. This fence, to be constructed by the permittee, should be strong buck-pole type design to withstand the heavy snow loads of the area. Maintenance will be the responsibility of the permittee.

c. Range Revegetation

Several areas in the lower Lime Creek, Klondike and Whiskey Creek drainages have potentials to increase livestock forage production by range revegetation treatments of herbicide spraying or prescribed burning. Specific boundaries will be established after I.D. Team review and Stage II soil surveys.

Allotment Management Plan - Cattle

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III. Evaluation Section

A. Allotment Inspections

The allotment will be inspected annually during the grazing season by the district ranger or his staff. On each of the inspections the following will be checked.

1. Annually check for compliance with the annual plan of use.
2. Annually check for any competition between big game and livestock.
3. Annually record data and take notes on the effectiveness of the management system.
4. Use intensity map the entire allotment during the initial five-year period to determine livestock distribution and utilization patterns.
5. Annually check for trespass in Tosi Creek and Tosi Basin both from cattle on the Upper Green River Allotment and the Beaver-Twin Allotment.
6. Annually check for livestock damage to stream banks along Rock Creek.
7. By 1984 evaluate any changes in range condition in the Rock Creek bottom and at the head of Lime Creek.
8. Annually check for livestock losses from predatory animals and poisonous plants.
9. Annually check for excessive livestock concentrations around water and salting areas.
10. Map potential stock water development areas as they are found.
11. Annually check range improvement maintenance by the permittee.
12. Annually check herder or rider camps for compliance with rules and regulations.
13. In 1985 check on extent or condition of gopher infestations in Tosi Basin.
14. In 1985 check on condition and stabilization of old gullies in Tosi Basin and the head of Rock Creek.

Allotment Management Plan - Cattle

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B. Evaluation

Grazing capacity will be determined by comparison of actual use, proper use, and range trends and production.

A firmed up grazing capacity will be arrived at five years after the implementation of the rest-rotation grazing system. Further increases in capacity may be available after completion of preliminary structural range improvements. Additional capacity increases from revegetation projects will be determined after an appropriate time following the completion of the proposal.

C. Permanent Trend Studies

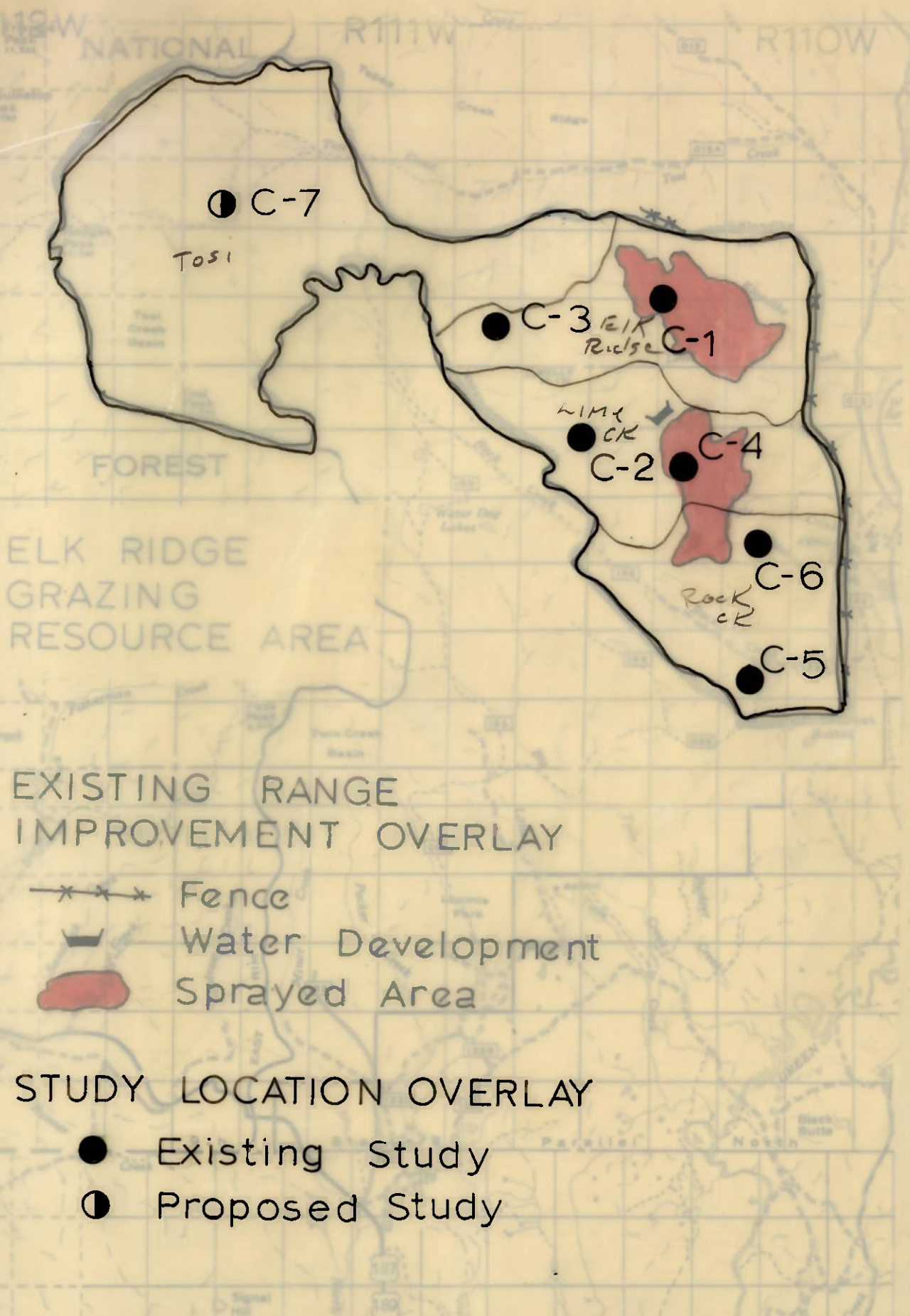
Vertical photographs will be used to monitor range production and trend. They will include data on plant species composition and ground cover.

These studies will be re-read at least every four to five years. See reference section for location map and Pinedale Ranger District files for a description and data summary of each study plot.

<u>Study No.</u>	<u>Location</u>	<u>Year Installed</u>	<u>Next Reading</u>
C-1	Sec. 32, T39N, R110W	1977	1983
C-2	Sec. 12, T38N, R111W	1977	1983
C-3	Sec. 35, T39N, R111W	1977	1983
C-4	Sec. 8, T38N, R110W	1977	1983
C-5	Sec. 28, T38N, R110W	1977	1983
C-6	Sec. 16, T38N, R110W	1977	1983
C-7	Tosi Basin	to be installed 1978	

REFERENCE SECTION

Existing Range Improvements and Study Location Overlays



ENVIRONMENTAL ANALYSIS REPORT

ELK RIDGE RESOURCE AREA

ie Creek S&G, Rock Creek S&G, Elk Ridge S&G, Tosi Creek S&G)

: Ranger District, Bridger-Teton National Forest, Region Four

ENVIRONMENTAL ANALYSIS

I. Evaluation of Inventory Information

Summary

This Environmental Analysis Report was prepared to document the planning process for the future management and development of the Elk Ridge Resource Area. This report and subsequent allotment management plans provide for grazing the area with either sheep or cattle. Management systems and strategies for these classes of livestock are currently limited by Roadless Area Review Evaluation (RARE II) and wilderness area study in land management plans. Final direction for the overall management of this area is projected to be 5 to 10 years in the future.

The determination as to which class of livestock to graze rests with the permittee. Certain requirements must be met under either livestock class. Proposed management systems and strategies are as follows:

Cattle

The Elk Ridge portion of the area would be managed under FRES Management Strategy C (Extensive Management). This would instate a single unit and rest-rotation system with the area being grazed three consecutive years and rested the fourth. Seven miles of boundary fence would have to be rebuilt to facilitate this proposal. Tosi Basin would be managed under FRES Strategy A (Environmental Management Without Livestock). This area would be closed to livestock grazing.

Sheep

The entire resource area would be managed under FRES Management Strategy C (Extensive Management). Grazing would be under a rest-rotation management system with three sheep bands concurrently grazing four individual allotments.

Upon completion of and release from roadless area evaluation and wilderness area study, provision is made in this report to change to FRES Management Strategy D (Intensive Management of Environment and Livestock). Under this strategy, optimum livestock forage production and utilization could be obtained through the construction of numerous stock water ponds, water distribution pipelines, and vegetative type conversion through prescribed burning or herbicide spraying.

Since the specific effects of individual projects cannot be determined until boundaries are established on the ground after review by the Forest Interdisciplinary Team and Stage II soil survey as the final steps of the planning process, this EAR may have to be supplemented by project work plans or addendums with information on specific effects. However, sufficient information concerning the proposals has been assembled to adequately evaluate management alternatives and feasibility.

Environmental Analysis Report

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A. Introduction

The Elk Ridge Grazing Resource Area is located in Townships 38 and 39 North, Ranges 110, 111, 112 West, Sixth Principal Meridian on the west boundary of the Pinedale Ranger District. About 25 miles north and west of Cora, Wyoming, this area is in the Green River drainage of the Colorado River system.

The area encompasses the boundaries of four sheep allotments - Rock Creek S&G, Lime Creek S&G, Elk Ridge S&G and Tosi Creek S&G. None of these allotments were grazed between 1970 and 1976.

Consisting of 31,170 acres, the resource area is within the Union Pass Land Management Plan of the Bridger-Teton National Forest. However, the entire allotment area is currently in inventoried roadless area status and borders the proposed Gros Ventre Wilderness Study Area. In order to insure consideration of the entire contiguous roadless area as a whole for possible wilderness study, allocations and decisions for these lands within the Union Pass Land Management Plan are being deferred at this time. The determination of what portion of the roadless area are suitable for wilderness study will be made in the South Gros Ventre Plan. In addition, management direction for any portions found not suitable for wilderness study will also be made in that plan.

Elevations vary from 11,380 feet on Tosi Peak to 7,800 feet in Lower Rock Creek. Vegetative types on the area are 26% grass-meadow-forb, 22% sagebrush, 2% willow bottom, 14% timber (white-bark pine, alpine fir, lodgepole pine) and 36% waste or barren rock.

Soils on the area are derived from cretaceous sediments of the Wasatch geologic formation. These are limestones and red clays. Soils originating from limestone parent materials are generally deep, well developed and very rocky. Soils from red clay formations are deep, poorly developed and generally unstable.

Geology is a series of uplifts and sloping monoclines towards the Green River. The area has been heavily glaciated, particularly in Tosi Basin. Glaciers in this area have only melted in recent history leaving broad areas of little soil development, scant vegetation and rock-covered moraines. Topographically, the resource area is divided northwest to southeast by Elk Ridge.

Climate is marked by short pleasant summers and long severe winters. Climatological data taken at Kendall Guard Station (8,200 feet elevation) on the east boundary of the area average 33°F. Extremes of temperature during 21 years of record have been between -51°F. and 90°F. with a consecutive frost-free period averaging about 21 days.

Environmental Analysis Report

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Average precipitation for the same 21-year period is 17.9 inches. Snow falls from September to June with an average annual accumulation of 133 inches, most of which falls in January, February and March. Water abounds on the areas during early summer, but becomes noticeably lacking by late summer, particularly on limestone associated geology on the Lime Creek and Klondike Creek drainages. There are many glacial-formed ponds in Tosi Basin.

The area holds much aesthetic significance. From atop Elk Ridge one can view the Upper Green River valley and Bridger Wilderness to the east. To the west is the proposed Gros Ventre Wilderness area. The panorama of this area with the Gros Ventre Range as background is extremely spectacular. The entire resource area is undeveloped with only a few existing four-wheel drive roads.



View of Tosi Basin looking southwest from Elk Ridge near head of Rock Creek. This area is under consideration for inclusion in the Gros Ventre Wilderness study area. Notice the red gullies on the side slopes that are still in existence even though this area has not been grazed by livestock for several years.

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B. History of Range Use

Prior to the establishment of the Forest Reserves, the resource area was used by cattle from Dubois, Wyoming. Shortly thereafter the area became part of the Upper Green River C&H Allotment.

In 1930, the present sheep allotments originated by an exchange from a cattle grazing preference to a sheep grazing preference at the request of permittee K.J. Luman. Prior to the exchange to sheep, the higher range within the area had not been utilized by cattle. Lower areas had generally been fully used and some areas over-utilized which may have contributed in part to the losses resulting from larkspur poisoning during several consecutive seasons prior to the exchange to sheep (Reference Figure #1)

The four sheep allotments had band sizes of approximately 1000 head each. A portion of Klondike Hill remained in the cattle allotment with between 250-600 head of cattle grazing the area. There was much reported drift onto the adjacent sheep allotments.

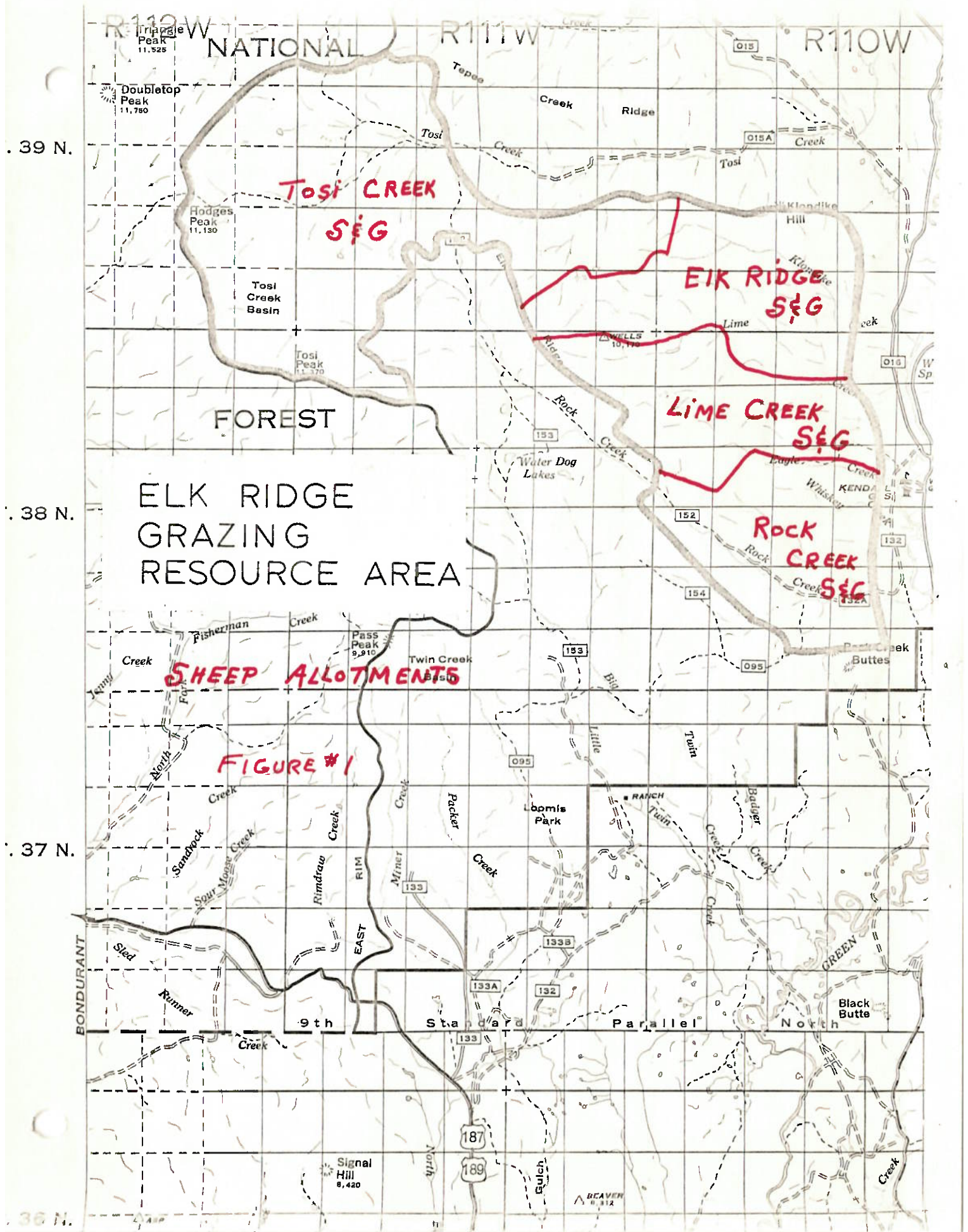
Several minor boundary changes were made in the following years to eliminate this cattle drift. In 1948 the Klondike Hill portion of the cattle allotment was exchanged for sheep range in Teepee Creek.

During the mid 1950s the four sheep allotment permits were acquired by the Schwabacher family partnership. Two-thousand, one hundred acres of sagebrush were sprayed in 1959 on three of the four allotments.

Seven miles of fence was constructed in 1960 along the east common boundary with the Upper Green River Allotment to protect the spray areas. This fence is currently in poor condition because of heavy snow loads and lack of maintenance.

In 1968 the permits were transferred to Dom Echeverria under a long-term stock purchase agreement. Mr. Echeverria was killed in an automobile accident in 1970 at which time the permit reverted back to the Schwabacher family by foreclosure of the escrow contract against the Echeverria estate.

However, during the time Mr. Echeverria held the permits, the Schwabacher family had liquidated their sheep ranch operations and switched entirely to cattle. Upon reacquiring the permits, the Schwabacher family requested that the class of livestock be changed to cattle.



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Region 4 policy is that all range improvements needed because of a change in kind of livestock will be financed and constructed by the permittee when such changes are made at the request of and mainly for the convenience of the permittee. Several miles of fence were proposed for this conversion. However, in 1972, the majority of the four sheep allotments fell within inventoried undeveloped areas which were under a national moratorium by court order. This moratorium prevented development of any form until land management planning was completed and an environmental statement prepared and approved. Because of this complication, the conversion of sheep to cattle could not be accomplished. The only way the allotments could be grazed during this interim was by sheep, which the Schwabacher family was not set up to run.

Actual Use Data:

Tosi Basin S&G	1954	1087 sheep	2609 SM
	1956	1087 sheep	2539 SM
	1961	1087 sheep	2536 SM
	1970	1087 sheep	2536 SM
	1971 to 1976		Non-use
	1977	Restored as part of 4-allotment rest-rotation	
Rock Creek S&G	1954	995 sheep	2388 AUM
	1956	995 sheep	2322 AUM
	1960-61	909 sheep	2121 AUM (non-use 86 sheep 201 AUM)
	1962-70	995 sheep	2322 AUM
	1971 to 1976		Non-use
	1977	1387 sheep	3005 AUM (Temporary permit)
Lime Creek S&G	1954	994 sheep	2386 AUM
	1957	994 sheep	2319 AUM
	1960-61	850 sheep	1883 AUM (non-use 144 sheep 336 AUM)
	1962-70	994 sheep	2319 AUM
	1970 to 1976		Non-use
	1977	1387 sheep	3005 AUM (Temporary permit)
Elk Ridge S&G	1954	1086 sheep	2606 AUM
	1956	1086 sheep	2536 AUM
	1960-61	775 sheep	1762 AUM (non-use 331 sheep 772 AUM)
	1962-70	1086 sheep	2534 AUM
	1971 to 1976		Non-use
	1977	1387 sheep	3005 AUM (Temporary permit)

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C. Present Range Use and Condition

During the period 1971 through 1974 the allotments were under non-use for personal convenience. In 1971 the non-use was charged against the Echeverria permit. From 1975 to the present time the non-use has been authorized because of restrictions on development imposed as a result of the roadless area decision. In 1977 a temporary permit was issued to William Thoman to graze 3 of the 4 allotments.

Range conditions on the resource area as a whole is in very good shape, partly because of the non-use during the last six years.

Herbicide spraying of big sagebrush in 1959 also did much to increase and improve forage on the area. In accordance with the Endangered Species Act of 1973 (PL 93205) the list of sensitive plants found on or near the National Forest in the Intermountain Region has been checked. No sensitive plants are known to occur on the Bridger-Teton National Forest. The following charts illustrate current range suitability and condition by livestock class.

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Sheep SuitabilityRange Condition in Acres - Elk Ridge Resource Area & Tosi Basin

<u>Type</u>	<u>Excellent</u>	<u>Good</u>	<u>Fair</u>	<u>Poor</u>	<u>Total</u>	<u>%</u>
S1 Grassland	449	125			574	3.3
S2 Meadow	2772	3467			6239	36.3
S3 Forb	188	481			669	3.9
S4 Sagebrush		2519	3454	705	6678	38.9
S5 Willow	309	119	48		476	2.8
S6 Grazeable Timber	415	1689	147		2251	13.1
S10 Aspen		146	147		293	1.7
TOTAL	4133	8546	3796	705	17,180	100.0
%	24.0	49.8	22.1	4.1		100.0

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Total Suitable	17,180	55.1%
Unsuitable	1,325	4.3%
Heavy Timber	1,821	5.9%
Waste	4,981	15.9%
Rock	<u>5,863</u>	<u>18.8%</u>
Total Acres	31,170	100.0%

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Environmental Analysis ReportCattle SuitabilityRange Condition in Acres - Elk Ridge Resource Area & Tosi Basin

<u>Type</u>	<u>Excellent</u>	<u>Good</u>	<u>Fair</u>	<u>Poor</u>	<u>Total</u>	<u>%</u>
S1 Grassland		125			125	0.9
S2 Meadow	2565	3034			5599	40.8
S3 Forb	188	436			624	4.5
S4 Sagebrush		3519	2777	50	5346	38.9
S5 Willow	309	119	48		476	3.5
S6 Grazeable Timber	113	1034	126		1273	9.3
S10 Aspen		148	147		295	2.1
TOTAL	3175	7415	3098	50	13,738	100.0
%	23.1	53.9	22.6	0.4		100.0

Ⓢ1	449				449	16.5
Ⓢ2	201	434			635	23.4
Ⓢ4		279	398	655	1332	49.0
Ⓢ6	302				302	11.1
TOTAL	952	713	398	655	2718	100.0
%	35.0	26.2	14.6	24.2		100.0

Total Suitable	13,738	44.1%
Total Secondary Ⓢ	2,718	8.7%
Unsuitable	2,049	6.6%
7t (heavy timber)	1,821	5.8%
7 (waste)	4,981	15.9%
8 (rock)	5,863	18.9%
Total Acres	37,170	100.0%
	31,170	

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Tosi Basin Cattle Suitability

<u>Type</u>	<u>Excellent</u>	<u>Good</u>	<u>Fair</u>	<u>Poor</u>	<u>Total</u>	<u>%</u>
S1 Grassland		125			125	3.5
S2 Meadow	542	1310			1852	51.9
S3 Forb						
S4 Sagebrush		1266	155		1421	39.8
S5 Willow	170				170	4.8
S6 Grazeable Timber						
S10 Aspen						
TOTAL	712	2701	155		3568	
%	19.9	75.8	4.3			100.0

①	449				449	32.4
②	201	434			635	45.8
⑥	302				302	21.8
TOTAL	952	434			1386	
%	68.7	31.3				100.0

Total Suitable	3,568	27.0%
Total Secondary ⑤	1,386	10.5%
Unsuitable	1,192	9.0%
7t (heavy timber)	-	-
7 (waste)	1,805	13.7%
8 (rock)	5,252	39.8%
Total Acres	13,203	100.0%

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Elk Ridge (excluding Tosi Basin) Cattle Suitability

<u>Type</u>	<u>Excellent</u>	<u>Good</u>	<u>Fair</u>	<u>Poor</u>	<u>Total</u>	<u>%</u>
S1 Grassland						
S2 Meadow	2023	1724			3747	36.8
S3 Forb	188	436			624	6.1
S4 Sagebrush		1253	2622	50	3925	38.6
S5 Willow	139	119	48		306	3.0
S6 Grazeable Timber	113	1034	126		1273	12.6
S10 Aspen		148	147		295	2.9
TOTAL	2463	4714	2943	50	10,170	
%	24.2	46.4	28.9	.05		100.0

⑤ 4 Sagebrush	279	398	655	1332	100.0
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Total Suitability	10,170	56.6%
Total Secondary ⑤	1,332	7.4%
Unsuitable	853	4.7%
7t (heavy timber)	1,821	10.1%
7 (waste)	3,176	17.8%
8 (rock)	<u>614</u>	<u>3.4%</u>
Total Acres	17,967	100.0%

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D. Current Condition of Ecological Components

1. Range

a. Tosi Basin Area

Tosi Basin is in the west portion of the resource area. In size, it is over 1/3 the acreage of the resource area. Elevations are generally high including subalpine and alpine types and range from 11,380 feet on Tosi Peak to 8,600 feet along Tosi Creek. Soil textures vary from red clays of the Wasatch formation to recent glacial moraines. Vegetation associations include alpine sedge types, whitebark pine forests and alpine sagebrush. Drainage is to the north and east by Tosi Creek.

Alpine sedge communities are dominated by the following species: Sedge (*Carex* spp.), Idaho Fescue (*Festuca idahoensis*), Tuff Hair Grass (*Deschampsia caespitosa*), Aster (*Aster* spp.), and Avens (*Geum triflorum*).

Alpine sagebrush types are characterized by shallow rocky soils and are dominated by the following species: Idaho Fescue (*Festuca idahoensis*), Kings Fescue (*Hesperchloa kingi*), Horsemint (*Agastache* spp.), Groundsel (*Senecio* spp.), Aster (*Aster* spp.), Pussytoes (*Antennaria* spp.), Cinquefoil (*Potentilla* spp.) and Big Sagebrush (*Artemisia tridentata*).

Whitebark pine types are conspicuous as growing on red clay outcrops or escarpments that are generally bare or have low production. The understory contains Kings Fescue (*Hesperchloa kingi*), Bromegrass (*Bromus marginatus*), Sedge (*Carex* spp.), Sunflower (*Helianthella uniflora*), and Sagebrush (*Artemisia tridentata*).

Water abounds throughout the Tosi Basin in numerous small potholes and lakes. Some areas still show indications of heavy past use. Raw, bare gullies and drainage banks are still prevalent even though the area has been ungrazed for several years. These old gullies do show some evidence of healing. These erosion features are typical of alpine range and are attributable to both natural geologic processes and past management.

If sheep grazing were reinstated in this area, these gullies would be further impacted because of their fragile nature and the thin succulent vegetal cover.

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Severe to moderate gopher (*Thalpnopsis thalpoidea*) infestations are common throughout the Basin. Roughly 320 acres (2.5% of the total area) are heavily infested, 580 acres (4.5% of the total area) are moderately infested, and 1640 acres (12.5% of the total area) are lightly infested. This amounts to nearly 20% of the Tosi Basin area, (13,203 total acres).

Large numbers of elk and moose also summer in Tosi Basin.

b. Klondike-Lime Creek Area

The Klondike-Lime Creek drainages form the northeast portion of the resource area. Elevations vary from 10,221 feet on Elk Ridge to 8,600 feet in lower Lime Creek. Soils are generally well developed, dark colored and fertile. Subsurface horizons in valleys contain large amounts of rock. A large portion of the area was sprayed in 1959 to control sagebrush. Drainage is to the east.

Topography is a series of broad, open ridges and valleys covered with abundant vegetation. The lower drainages and bottoms are interspersed with stringers and small patches of timber, mainly subalpine fir and lodgepole pine.

Grassland-meadow vegetal associations include the following species: Sedge (*Carex* spp.), Nodding Bromegrass (*Bromus anomalus*), Idaho Fescue (*Festuca idahoensis*), Bearded Wheatgrass (*Agropyron subsecundum*), Needle and Thread Grass (*Stipa columbiana*), Bluegrass (*Poa* spp.), Oniongrass (*Melica spectabilis*), Sulphur Eriogonum (*Eriogonum umbellatum*), Yarrow (*Achillea lanulosa*), and Geranium (*Geranium fremontii*).

Water is found in Klondike and Lime Creeks until late summer at which time portions of these creeks dry up depending upon seasonal precipitation.

Much of this range is classed as secondary cattle range because of the water situation, particularly in the fall.

There is an opportunity to prescribe burn or spray a few hundred acres of big sagebrush in the lower Lime and Klondike Creek areas to increase forage production.

The extreme upper portions of tributaries to Lime Creek underlying Elk Ridge have very unstable soils and thin vegetal cover. These areas are influenced by melting snowbanks on the north-facing slopes of Elk Ridge and are

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very susceptible to accelerated erosion if mismanaged.



View of the ridge between Klondike and Lime Creeks looking west. Sagebrush on this area was sprayed in 1959. A large percentage of this area is classed as secondary cattle range, particularly in the fall, because of the lack of water on the area. There exists the potential to construct runoff stock water ponds on the area or to run a water pipeline with associated troughs from upper Lime Creek down the top of this ridge. This developed water would benefit both domestic livestock and wildlife.

c. Whiskey-Eagle Creeks and Lower Rock Creek Area

The Whiskey-Eagle and Rock Creek drainages lie in the east and south portions of the resource area. Elevations vary from 9,950 feet on Elk Ridge to 7,800 feet along Rock Creek. Soils are generally well developed, but become shallow and rocky as one progresses westward toward Elk Ridge. South of Rock Creek, soils are very shallow and loose. Streambanks are unstable in localized areas. All drainages flow to the east. The majority of the suitable open range was sprayed in 1959 to control sagebrush. Whiskey and Eagle Creeks are located on a high sloping plateau. Topography is a series of benches and shallow swales covered with generally productive vegetation. This grades eastward into conifer and sagebrush ranges. The Rock Creek drainage is a steep dissected canyon.

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Grassland-meadow vegetal associations include the following species: Nodding Brome (*Bromus anomalus*), Idaho Fescue (*Festuca idahoensis*), Kings Fescue (*Hesperchloa kingi*), Sedge (*Carex* spp.), Sulfur Eriogonum (*Eriogonum umbellatum*), Yarrow (*Achillea lanulosa*), Geranium (*Geranium fremontii*), Aster (*Aster* spp.), Valerian (*Valeriana occidentalis*), Senecio (*Senecio serra*), and Porter's Wild Carrot (*Ligusticum porteri*). Much of the higher range is also interspersed with tall larkspur (*Delphinium barbeyi*). Conifer-sagebrush benches on the east are dominated by the following understory: Idaho Fescue (*Festuca idahoensis*), Oniongrass (*Melica spectabilis*), Sedge (*Carex* spp.), Aster (*Aster* spp.), Lupine (*Lupinus* spp.), Meadowrue (*Thalictrum fendlerii*), Yarrow (*Achillea lanulosa*), and Cinquefoil (*Potentilla* spp.).



General view of the area between Lime and Eagle Creeks looking northeast. Upper Green River valley in center of picture. Kendall Ridge (timbered) in near background. Continental Divide and Bridger Wilderness in far background.

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The Lower Rock Creek bottom shows indications that past livestock use has been heavy. Dominant species include: Idaho Fescue (*Festuca idahoensis*), Eriogonum (*Eriogonum umbellatum*), Senecio (*Senecio serra*), Sunflower (*Helen-thella uniflora*), many other forbs and annuals, and Big Sagebrush (*Artemisia tridentata*).

Water is lacking over most of the area. Whiskey and Eagle Creeks are dry most of the summer except on the lower ends. Other water is limited to a few natural snowmelt collection ponds.

There is an opportunity to construct runoff collection stock ponds at numerous locations where shallow natural potholes and swales exist.

Some sagebrush could be sprayed or prescribed burned in lower Whiskey Creek to increase forage production.



Rock Creek lies in a narrow dissected valley on the south boundary of the resource area. Notice the unstable sideslope conditions. Photo taken looking to the east.

2. Wildlife

The wildlife resource on the Elk Ridge resource area is rich and varied. The area was once historical range for buffalo, grey wolf and grizzly bear. Today, indigenous big game animals are elk, moose, mule deer and black bear. Mountain sheep are known to inhabit the Gros Ventre Range at the head of Tosi Basin.

Important furbearing animals include badger, mink, beaver, muskrat and marten. Predatory animals are bobcat, coyote, porcupine, skunk and weasel. Occasional occurrences of lynx and wolverine have been recorded.

Upland game birds and mammals include bluegrouse, ruffed grouse, sage grouse, greater sandhill crane, snowshoe hare and white-tailed jackrabbit.

Golden eagles and various other raptors are commonly seen throughout the allotment. The bald eagle is an occasional visitor, being sighted more often during the fall and winter.

Other wildlife represented in varying numbers and distribution include yellow-bellied marmot, pika, least chipmunk, Uinta ground squirrel, golden-mantled ground squirrel, red squirrel, northern flying squirrel and pocket gopher. Numerous small mammals including shrews, moles, mice and woodrats are also represented.

Marked contrasts in plant communities support a wide variety of birdlife. The highest populations are found along drainages where aspen and willow grow in association with conifers. Cavity nesting birds such as the chickadee, mountain bluebird, tree swallow, house wren and yellow-bellied sapsucker have a particular affinity to aspen. Some species common to drainage bottoms and aspen stands include the warbling vireo, ruby-crowned kinglet, yellowthroat, olive-side flycatcher, Oregon junco, white-crowned sparrow, yellow warbler, Audubon's warbler, goldfinch, raven, red-tailed hawk, robin and tree sparrow. Bird life in closed conifer stands is of low density. Species common to conifers include raven, gray jay, Clark's nutcracker, chickadee, Oregon junco and the hairy and downy woodpecker. 1/

1/ Wildlife Resource Inventory, Union Pass Planning Unit, George Gruell, Bridger-Teton National Forest, January 1974.

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Topographically, the resource area is divided northwest to southeast by Elk Ridge. Wildlife abounds on the area with large herds of elk, in particular, frequently observed in the higher valleys. Mule deer bucks favor the high rocky slopes of Elk Ridge. Photo taken from Elk Ridge looking east of the head of Lime Creek.

In accordance with the Endangered Species Act of 1973, the Federal List of endangered and threatened fauna has been reviewed. There is no record of an endangered species occurring on the unit. The grizzly bear and/or grey wolf may inhabit the more remote, less disturbed parts of Tosi Basin.

The Wyoming State list has also been checked. Species found in or thought to occur on the allotment and their state classification are: wolverine - rare, Colorado cutthroat trout - rare.

The Colorado cutthroat trout is found in Rock Creek and Tosi Creek. Its habitat and range are decreasing from inbreeding and competition with the introduced Snake River cutthroat trout and brook trout.

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The lower portions of Lime and Klondike Creeks off the allotment have fisheries habitat.

Populations of big game are high on the area with approximately 50 moose and 200-300 elk utilizing the ranges. Elk calving areas are found scattered through the aspen-sagebrush-conifer communities of the area. Mule deer are common but the total population is unknown.

3. Recreation

Recreation use is mainly confined to big game hunting. A few backpackers currently use the Tosi Basin area. This use will increase if the area is designated part of the Gros Ventre Wilderness.

4. Timber

Some of the timber between Klondike Hill and Rock Creek is considered to be of commercial value. Portions of this may be harvested in the future. It is current Forest Service policy that regeneration will be obtained in all clearcuts (natural or planted) within 5 years after harvesting and that these areas be fenced to protect tree regeneration from livestock grazing if livestock cannot be controlled by other means.

E. Special Problems

1. Lack of Stock Water

The area lacks perennial water with most streams, ponds and seeps drying up by late summer. Much of the area, particularly for cattle, is considered secondary range or unuseable because of its distance from water.

2. Gopher Activity in Tosi Basin

Although gopher activity is causing moderate to severe soil disturbance on some sites, no attempt will be made at this time to control infestations because of the area's possible inclusion for wilderness study.

This is in accordance with direction in Forest Service Manual 2322.33 which states, "Rodents in National Forest Wilderness shall be exempt from control programs, except where overpopulations constitute a serious threat to other Wilderness values."

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3. Class of Livestock to Use the Area

The Schwabacher family has requested that the class of livestock on the area be changed from sheep to cattle; however, since that time sheep grazing has been reinstated on the area under temporary permit. If cattle were placed on the allotments, the permittee would be responsible for the construction of structural range improvements that would be needed to properly manage them.

Because the area is in inventoried roadless status and will possibly be included in the Gros Ventre Wilderness study area, the wilderness character cannot be changed until it is determined if the area is going to be classified as wilderness. Range management plans in Wilderness or Wilderness study areas according to law, must emphasize practices which minimize the impact of grazing on the wilderness resource. Intensive cattle management would be contrary to this requirement; as would the several miles of allotment boundary fence and interior management fence that would need to be constructed. Unlike sheep which can be herded, cattle must often be confined by fence to keep them on the allotment. Construction vehicle access would also be prohibited if the area is designated as Wilderness. Because boundary fence construction is needed to control cattle, conversion to cattle in the Tosi Basin area would not be permitted; this area would be closed to grazing. If the remainder of the Elk Ridge resource area were converted to cattle use, the area can easily be fenced to exclude cattle grazing by rebuilding the 7 miles of fence common to the Upper Green River Allotment outside the roadless area boundary. One-half mile of fence is also needed near Wells Peak Pass to prevent cattle drift into Tosi Creek. However, this area is within the roadless boundary. In the interim, this short line could be herded to control cattle.

4. Inventoried Roadless Status of Entire Allotment Area

Range management plans within the study area must emphasize practices which minimize the impact of grazing on the wilderness resource.

Until the roadless area question is resolved new improvements can only be made following the determination that they are necessary for proper management and/or protection of the wilderness values.

5. Numerous Gullies and Bare Streambanks in Tosi Basin & Rock Cr.

Numerous gullies and bare streambanks in Tosi Basin and Lower Rock Creek are at least partly attributable to past grazing use. Reintroduction of grazing onto these sensitive areas would further impact them because of their fragile nature and thin succulent vegetation.

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6. Livestock Trailing

In the past, livestock trailing to the allotments used the existing Green River Driveway. Portions of this driveway are currently in poor and very poor condition. Reintroduction of more use on the driveway would only aggravate the situation. An alternate method of moving livestock to and from the allotment would be very desirable. Corral sites on or adjacent to the allotment are not feasible or desirable. This is mainly because of poor access roads to the allotment and the Green River visual retention zone adjacent to the allotment. Only temporary yearly corrals would be allowed for loading sheep. No facilities would be permitted for cattle because of the large area which would be impacted.

7. Poison Plants

There are localized areas containing fair amounts of tall larkspur at the head of Whiskey and Eagle Creeks. Some losses of cattle may be expected if this class of livestock were to graze the area.

8. Predatory Animals

Due to the fact that the area has not been grazed for several years and no predatory animal control has taken place, it can be assumed that natural populations of coyote and bear are high. If sheep grazing were reinstated, losses to predatory animals could be expected.

9. Bighorn Sheep Winter Range in Tosi Basin

The south facing slope and top of the ridge from Hodges Peak sloping eastward into Tosi Basin is bighorn sheep winter range. Forage produced in this area should be reserved for that species.

10. Unstable Soils and Erosion Potential at the Head of Lime Creek

Vegetation is very thin in this area and is influenced by snowbanks on the north slope of Elk Ridge.

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View of the Elk Ridge resource area in the vicinity of Eagle Creek. Range forage production is generally excellent. Water is lacking in this particular area.

F. Estimated Grazing Capacity

The total allowable use of forage is dependent upon development of stock water. More forage is available in some locations than there is water to use. Without further stock water development livestock distribution is restricted. More forage could be utilized if water was developed.

Allowable Use

Vegetation on much of the area can be considered to be in a climax stage. Total non-use for several years together with sagebrush spraying has virtually restored most of the area to pristine conditions.

Vegetation types outside of Tosi Basin are composed of tall, robust species such as nodding brome, bearded wheatgrass, Columbia needlegrass, kings fescue and grassland sedges. These tend to mature early because vigor is high. The lower stalks and leaves of these tall growth form species tend to be unpalatable to livestock because of their high lignin content (straw). Many tall forb species also occur on the area and these likewise tend to be unpalatable towards the base and dry up in late summer.

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If livestock grazing were reinstated, the areas around available water would be utilized heaviest first. The outlying area vegetation away from water would mature and become unpalatable and rank as the grazing season progressed.

Because these vegetative conditions exist, special considerations must be taken into account when calculating allowable use and grazing capacity.

It can be assumed that much of the available forage will not be utilized because of low palatability, trampling, etc. In a recent study in southeast Idaho and Montana, Laycock ^{2/} pointed out that the commonly-used measures of forage utilization are assumed to reflect the amount of material actually consumed by livestock. However, considerable discrepancy often occurs between estimates of pounds of forage utilized and realistic appraisals of expected consumption.

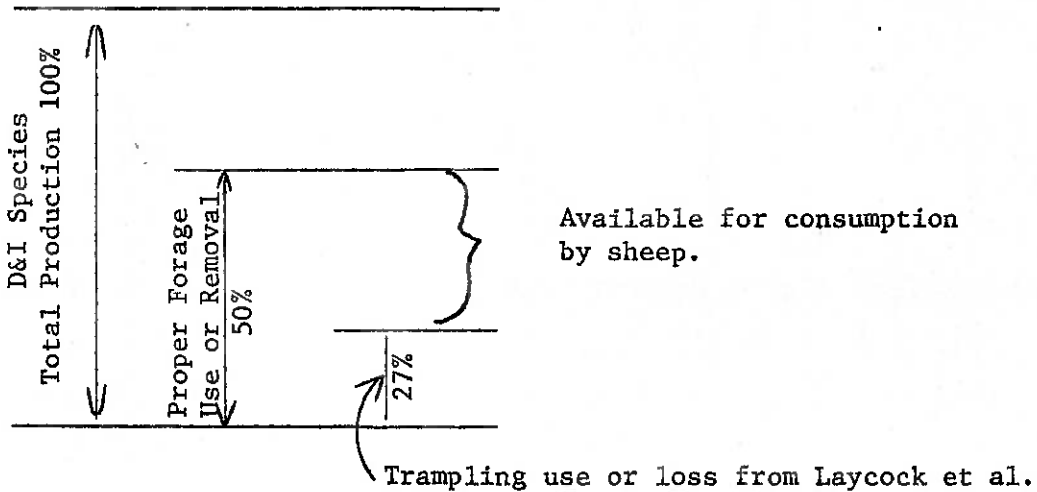
He found that trampling accounted for 27 percent of the total standing crop "utilized" on open range grazed by herded sheep in late summer, and 18 percent on pastures grazed by cattle all summer. Laycock's study illustrated the magnitude of forage lost by trampling and indicated the need for quantification of trampling damage on many vegetation types and evaluation of the physiological effects of trampling on individual plant species.

Assuming that proper use of total vegetation (desirable and intermediate plant species) under Laycock's study was 50%, then with 27% trampled under sheep grazing, this amounts to over $\frac{1}{2}$ of the available forage not contributing to the carrying capacity. With 18% on cattle grazed pastures, this amounts to over $\frac{1}{3}$ of the available forage not contributing to the carrying capacity.

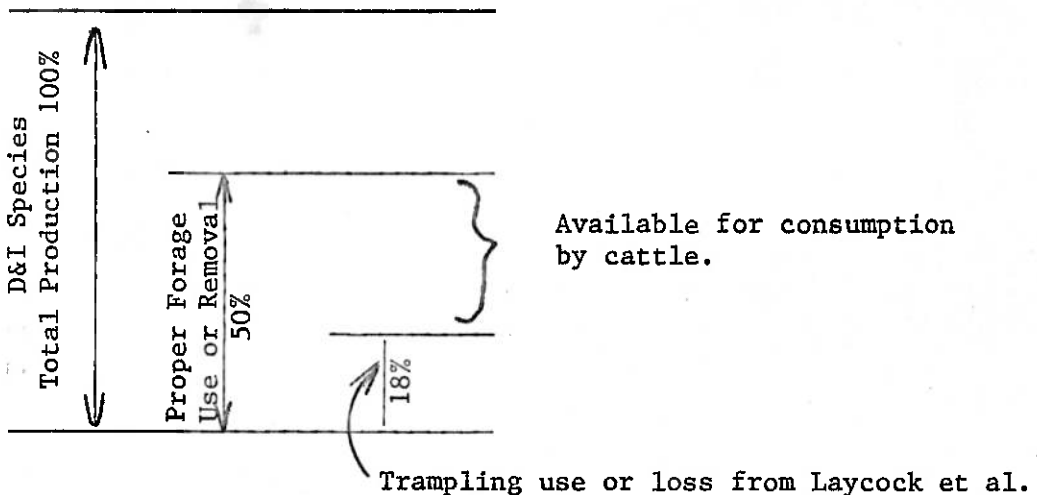
2/ Laycock, William A., and Harniss, Royal O., 1974 Trampling Damage on Native Forb-Grass Ranges Grazed by Sheep and Cattle, Intermountain Forest & Range Experiment Station, USDA-FS. In International Grassland Congress 12th proceedings, Sectional Papers; Grassland Utilization, Moscow, 10-20, June 1974, p. 349-354.

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Sheep Grazing

27% trampled + 50% proper total use = Approx. 50% ($\frac{1}{2}$) of proper forage use or removal lost to trampling.

Cattle Grazing

18% trampled + 50% proper total use = Approx. 33% ($\frac{1}{3}$) of proper forage use or removal lost to trampling.

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Sheep utilization of total forage (desirable and intermediate plant species) standards for the Elk Ridge resource area are as follows: (allowable use figures are after 50% of the total forage produced has been deducted to allow for trampling loss).

FRES Management Strategy C (Extensive Management)

No development of water - simple deferred system = 28% allowable use D&I species

FRES Management Strategy C (Extensive Management)

Initiation of intensive management system only = 40% allowable use D&I species

FRES Management Strategy D (Intensive Management)

Moderate Development of stock water and intensive management = 50% allowable use D&I species

This information is based on available knowledge and information from range areas of similar vegetative composition and range condition. No grazing capacity increase from range revegetation has been included in the following figures.

Range Environmental Analysis Capacity
Based on % Utilization of D&I Species (Sheep Months)

<u>Area</u>	<u>28%</u>	<u>40%</u>	<u>50%</u>
Tosi Basin	5382	(5382)*	(5382)*
Elk Ridge	15557	22224	27780
Loss for trampling, palatability, wild- life use, etc. (50%)	-10469	-13803	-16581
Indicated Capacity SM	10470	13803 (-rested unit)	16581 (-rested unit)

Current Permitted Stocking - 4162 sheep - 9711 sheep months

*Use in Tosi Basin not to exceed 28% use of D&I species to maintain Wilderness character of area.

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Cattle utilization of total forage (desirable and intermediate plant species) standards for the Elk Ridge resource area are as follows: (allowable use figures are after 33% of the total forage produced has been deducted to allow for trampling loss).

FRES Management Strategy D (Intensive Management)

3 or 4 year rest-rotation cycle - full development of water = 50% allowable
use D&I species

2 or 3 year deferred cycle - full development of water = 40-45% allowable
use D&I species

FRES Management Strategy C (Extensive Management)

2-3 year deferred cycle - moderate water development = 35-40% allowable
use D&I species

2-3 year deferred cycle - no development of water = 28-35% allowable
use D&I species

FRES Management Strategy B (Environmental Management)

Season long grazing system - no water development = 28% allowable use
D&I species

Range Environmental Analysis Capacity
Based on % Utilization of D&I Species (Cattle Months)

<u>Area</u>	<u>28%</u>	<u>35%</u>	<u>40%</u>	<u>50%</u>
Tosi Basin (to be closed to cattle grazing)				
primary range (879)*		-	-	-
secondary rg. (263)*		-	-	-
Elk Ridge				
primary range 2945		3681	4207	5259
secondary rg. (207)*		104	104	207
		(103)*	(103)*	
Loss for trampling, palatability, wild-life use, etc. (33%)	-972	-1249	-1423	-1803
Permitted Use CM 1973		2536	2888	3663
				(-rested unit)

*Not counted in grazing capacities.

Any cattle permits would be held in a temporary status for five years to firm up the carrying capacity.

G. Range Management Objectives

1. Continuation of livestock grazing at a level consistent with the carrying capacity of the suitable range and in coordination with other resource uses and activities.
2. Production of high quality water and elimination of sedimentation attributable to livestock grazing from entering the Green River system.
3. Increase the overall forage production and improve range that is currently in unsatisfactory condition.
4. Increase and distribute stock water.
5. Resolve conflicts between livestock use and other resources.
6. Allocate all National Forest lands in the allotment to a prescribed management system that will meet the above objectives.
7. Maintain the Wilderness character and values in Tosi Basin.

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II. Range Management Alternatives

The alternative description section is divided into two topics where separate management directions or decisions are required. These are (A) Non-Structural Range Improvements and Structural Stock Water Improvements, and (B) Determination of Kind of Livestock (Sheep or Cattle) and Grazing Management Systems. Although not mentioned in this report, the alternative or possibility of consolidating the allotment with the adjacent Upper Green River Allotment is not ruled out as a future decision.

Economic Analysis - Elk Ridge Resource Area
Basic Assumptions

Fence Construction - \$5000/mile initial cost
 Life of fence - 20 years
 Stock Water Ponds - \$600/each initial cost
 Stock Pipeline w/Troughs - \$3000/mile initial cost
 Fence Maintenance - \$80/mile year 1 through 10
 \$120/mile year 11 through 20
 Pipeline Maintenance - \$75/mile year 1 through 10
 \$100/mile year 11 through 20

Herder and riding costs for sheep or cattle grazing are approximately the same and considered fixed costs. They do not vary between proposals.

The value of an AUM is \$11.00.

All derived income in AUMs is considered as benefits.

A. Range Improvements

Range improvements to obtain optimum livestock forage production and utilization would be classed under FRES Management Strategy D (Intensive Management). Revegetation or rejuvenation projects are feasible in the following areas: spray with 2,4-D or prescribe burn several areas in lower Lime Creek, Klondike Creek and Whiskey Creek drainages. The primary objective would be to increase livestock forage production.

Several sites on the area have potentials or the need to develop stock water. These are: (1) potential for numerous runoff stock ponds over the entire area; no development will be allowed in Tosi Basin, (2) pipeline from head of Lime Creek to fill natural ponds and/or potholes between Lime and Eagle Creeks, (3) pipeline from head of Lime Creek down the ridge between Lime and Klondike Creeks.

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Projects totaling several miles of plastic pipe could be feasibly constructed. The primary objectives would be to increase water on suitable range to improve livestock distribution and also distribute water on areas that are classed as secondary livestock range.

B. Determination of Kind of Livestock (Sheep or Cattle) and Grazing Management Systems

The scope and options available to initiate an intensive management system on the area are numerous and vary in complexity, feasibility and economics.

The following grazing system alternatives illustrate prescriptions that will meet the overall range management objectives for the Elk Ridge Resource Area.

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Alternative #1 - Convert to Cattle Use Under this proposal, the livestock use would be converted to cattle. Use would be prescribed under an Intensive or Extensive FRES Management System. All structural range improvements would have to be constructed by the permittee. Stocking would be at the 35% use D&I species FRES Extensive Management level under a temporary permit for a trial period of five years to determine the carrying capacity. Tosi Basin would be closed to grazing, (FRES Strategy A, Environmental Management Without Livestock). Seven miles of fence would have to be constructed common with the Upper Green River Allotment and $\frac{1}{2}$ mile of fence would have to be constructed near Wells Peak to prevent cattle trespass off the allotment.

Advantages

1. Less trailing damage to the range.
2. Less predator problems than with sheep.
3. More palatable forage species available to cattle than sheep.

Disadvantages

1. Tosi Basin would be closed to grazing because the several miles of allotment boundary fence that need to be constructed in Tosi Basin to contain livestock on the allotment would change the wilderness character.
2. Competition with elk would be increased because both prefer grass species.
3. Some fence would need to be constructed. Fences may conflict with wildlife.
4. More range would be unused because cattle will generally travel shorter distances from water.
5. More water developments would be necessary for proper distribution.
6. Cattle are more susceptible to poisonous plants, particularly tall larkspur.
7. Cattle access to the allotment would not be allowed on the Green River Driveway. Cattle must either be (a) trucked to the allotment and trailed off by fording the Green River at the Forest boundary, or (b) trailed on and off the allotment up the west side of the Green River from private land.

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Alternative #1-A - Cattle Grazing Rest-rotation system on suitable area with no new fence for division of units. Area to be grazed for three consecutive years and rested the fourth.

<u>Year</u>	<u>Elk Ridge Area</u>
1	Graze
2	Graze
3	Graze
4	Rest-No cattle permitted on area for entire year

Simple deferred grazing would be used on years area is grazed with control of livestock by riders.

Advantages

1. No division fencing required.
2. Low costs to permittee for fence maintenance.
3. Little modification of natural aesthetics by fence.
4. Few impacts to soil, vegetation, wildlife, etc. by fence construction.

Disadvantages

1. Permittee must have a flexible operation to not stock cattle the fourth year.
2. Would require a great deal of riding and herding to distribute cattle.
3. Likelihood of livestock distribution problems and overuse around available water.

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Alternative #1-A - Cattle Grazing Rest-rotation system on suitable area with no new fence for division of units.

<u>Year</u>	<u>Elk Ridge Area</u>	<u>Strategy C (No Development of Water)</u>	<u>Strategy C (Moderate Devel. of Water)</u>	<u>Strategy D (Full Devel. of Water)</u>
1	Graze	2536	2888	3663
2	Graze	2536	2888	3663
3	Graze	2536	2888	3663
4	Rest-No cattle permitted on area for entire year.	0	0	0
	Average CM	1902	2166	2747

	<u>Season</u>	<u>No. Cows</u>	<u># Yearlings or Steers (1,33</u>
No development of water = 2536 CM	7/1-10/15	725	964
Moderate water development = 2888 CM	7/1-10/15	825	1097
Full development of water = 3663 CM	7/1-10/15	1047	1392

<u>Structural Range Improvements Required</u>	<u>(\$)/Cost/Unit</u>	<u>Total Cost</u>
Range Fence		
Green River Boundary 7.0 miles		
Wells Pass Drift 0.5 miles		
7.5 miles	5000/mile	37500
Stock Water		
Moderate Development		
Ponds 15	600 ea	9000
Full Development		
Ponds 15	600 ea	9000
Pipeline 5 mi. w/troughs	3000/mile	15000

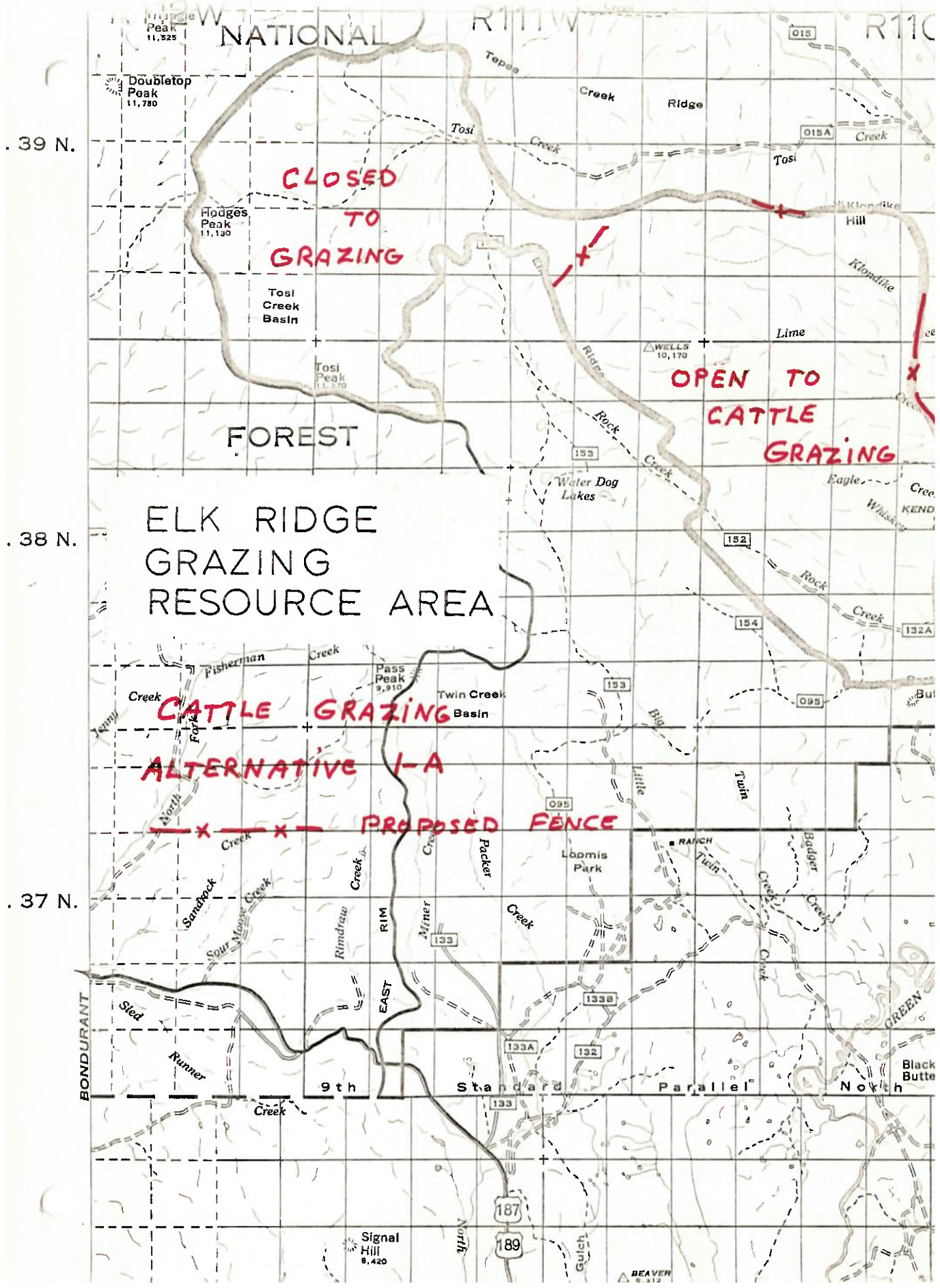
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Investment Analysis - Elk Ridge Resource Area

Cattle Grazing, Alternative #1-A,

<u>FRES Strategy</u>	<u>Water Development Potential</u>	<u>Proj. Descrip.</u>	<u>Benefits</u>		<u>Costs \$</u>	<u>Discounted @ 6%</u>		<u>Pres Net W \$</u>
			<u>AUM</u>	<u>\$11/AUM</u>		<u>Benefits</u>	<u>Costs</u>	
C	None	Fence Const.						
		(7.5 miles)...	1902...	20922..	5000/mi..	239975..	37500	
		Fence Mtce.						
		(7.5 miles)						
		Year 1-10			80/mi.....	4416		
		Year 11-20.....			120/mi.....	6624		
						239975	48540	1914
C	Moderate	Fence Const.						
		(7.5 miles)...	2166...	23826..	5000/mi..	273284..	37500	
		Fence Mtce.						
		(7.5 miles)						
		Year 1-10			80/mi.....	4416		
		Year 11-20.....			120/mi.....	6624		
		Stock Pond						
		Const. (15)			600 ea.....	9000		
						273284	57540	2157
D	Full	Fence Const.						
		(7.5 miles)...	2747...	30217..	5000/mi..	346589..	37500	
		Fence Mtce.						
		(7.5 miles)						
		Year 1-10			80/mi.....	4416		
		Year 11-20.....			120/mi.....	6624		
		Stock Pond						
		Const. (15).....			600 ea.....	9000		
		Pipeline						
		(5 miles).....			3000/mi.....	15000		
		Pipeline Mtc.						
		Year 1-10.....			75/mi.....	2760		
		Year 11-20.....			100/mi.....	3680		
						346589	78980	2676



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Alternative #1-B - Cattle Grazing Divide suitable area into 2 grazing units. Approximately 3 miles of new interior fence construction would be necessary. Management to be a two-pasture four-year rotation sequence with variable yearly stocking.

<u>Year</u>	<u>Unit 1</u>	<u>Unit 2</u>
1	Defer	SL
2	Rest	SL
3	SL	Defer
4	SL	Rest

Rest=Rest unit entire season

Defer=Defer unit until seed ripe

SL=Season-long grazing use

Advantages

1. Would require less riding than Alternative #1-A and result in better cattle distribution.

Disadvantages

1. Three miles of fence required.
2. Increased cost to permittee for fence construction and maintenance, Lower functional life of fence because of high snowloads.
3. Fence may modify the natural aesthetics.
4. Some soil and vegetation may be disturbed during fence construction.
5. Wildlife may become injured or entangled from collisions with fence.
6. Permittee must have somewhat flexible operation to vary stocking from year to year.

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Alternative #1-B - Cattle Grazing Rest-rotation system on suitable area with 3 miles of new division fence. Area to be grazed with variable yearly stocking.

<u>Year</u>	<u>Elk Ridge Area</u>		<u>Strategy C</u> <u>(No Development</u> <u>of Water)</u>	<u>Strategy C</u> <u>(Moderate</u> <u>Development</u> <u>of Water)</u>	<u>Strategy D</u> <u>Full Development</u> <u>of Water</u>
	<u>#1</u>	<u>#2</u>			
1	Defer	SL	1902	2166	2747
2	Rest	SL	1268	1444	1832
3	SL	Defer	1902	2166	2747
4	SL	Rest	<u>1268</u>	<u>1444</u>	<u>1832</u>
	Average CM		1585	1805	2290

	<u>Season</u>	<u>No. Cows</u>	<u># Yearlings</u> <u>or Steers (1.33)</u>
No development of water			
Years 1 & 3	7/1-10/15	543	722
Years 2 & 4	7/1-10/15	362	482
Moderate development of water			
Years 1 & 3	7/1-10/15	619	823
Years 2 & 4	7/1-10/15	413	549
Full development of water			
Years 1 & 3	7/1-10/15	785	1044
Years 2 & 4	7/1-10/15	523	696

<u>Structural Range Improvements Required</u>	<u>(\$)/Cost/Unit</u>	<u>Total Cost</u>
Range Fence		
Green River Boundary 7.0 miles		
Wells Pass Drift 0.5 miles		
Division Fence <u>3.0 miles</u>		
10.5 miles	5000/mile	52500
Stock Water		
Moderate Development		
Ponds 15	600 ea.	9000
Full Development		
Ponds 15	600 ea.	9000
Pipeline 5 mi.w/troughs	3000/mile	15000

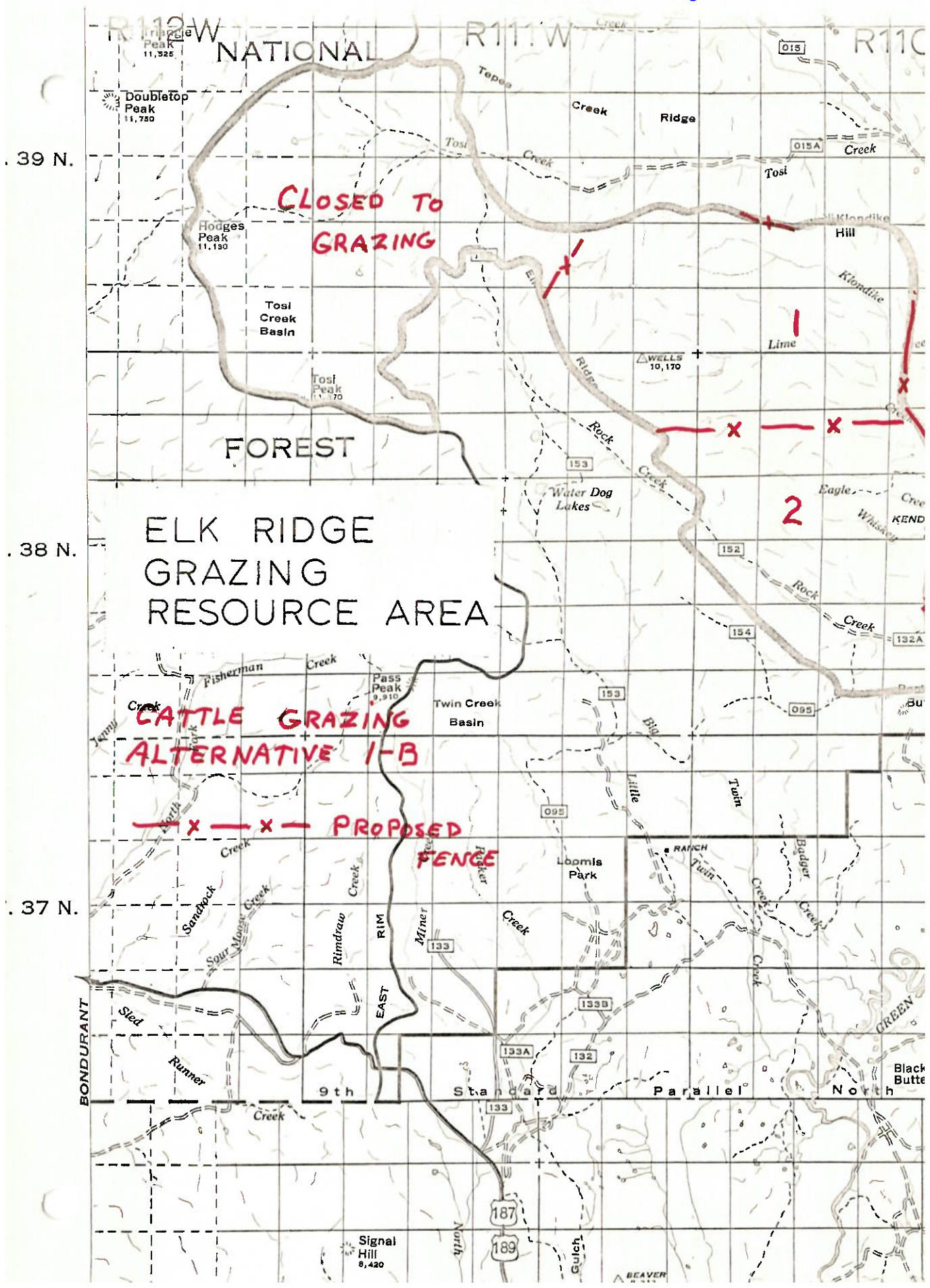
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Investment Analysis - Elk Ridge Resource Area

Cattle Grazing, Alternative #1-B,

<u>FRES</u> <u>Strategy</u>	<u>Water</u> <u>Development</u> <u>Potential</u>	<u>Proj. Descrip.</u>	<u>Benefits</u>		<u>Costs</u> <u>\$</u>	<u>Discounted @ 6%</u>		<u>Pres</u> <u>Net W</u> <u>\$</u>
			<u>AUM</u>	<u>\$11/AUM</u>		<u>Benefits</u>	<u>Costs</u>	
C	None	Fence Const.						
		(10.5 miles)...	1585	17435	5000/mi..	199979	52500	
		Fence Mtce.						
		(10.5 miles)						
		Year 1-10			80/mi.....	6182		
		Year 11-20			120/mi.....	9274		
						199979	67956	1320
C	Moderate	Fence Const.						
		(10.5 miles)...	1805	19855	5000/mi..	227737	52500	
		Fence Mtce.						
		(10/5 miles)						
		Year 1-10			80/mi.....	6182		
		Year 11-20			120/mi.....	9274		
		Stock Pond						
		Const. (15).....			600 ea.....	9000		
						227737	76956	1500
D	Full	Fence Const.						
		(10.5 miles)...	2290	25190	5000/mi..	288929	52500	
		Fence Mtce.						
		(10.5 miles)						
		Year 1-10			80/mi.....	6182		
		Year 11-20			120/mi.....	9274		
		Stock Pond						
		Const. (15).....			600 ea.....	9000		
		Pipeline						
		(5 miles).....			3000/mi.....	15000		
		Pipeline Mtc.						
		Year 1-10			75/mi.....	2760		
		Year 11-20			100/mi.....	3680		
						288929	98396	1900



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Alternative #1-C - Cattle Grazing Two-unit deferred rotation system. Three miles of new division fence required.

<u>Year</u>	<u>Unit 1</u>	<u>Unit 2</u>
1	Early	Late
2	Early	Late
3	Late	Early
4	Late	Early

Advantages

1. Would require less riding than Alternative #1-A and result in better cattle distribution.
2. Uniform number of cattle stocked yearly.

Disadvantages

1. Three miles of fence required.
2. Increased cost to permittee for fence construction and maintenance. Lower functional life of fence because of high snowloads.
3. Fence may modify the natural aesthetics.
4. Some soil and vegetation may be disturbed during fence construction.
5. Wildlife may become injured or entangled from collisions with fence.
6. Probably least effective alternative or management system in maintaining range trends and production.

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Alternative #1-C - Cattle Grazing Two-unit deferred rotation system. Three miles of new division fence required.

Year	Elk Ridge Area		Strategy C (No Development of Water)	Strategy C (Moderate Development of Water)	Strategy D (Full Develop- ment of Water)
	#1	#2			
1	Early	Late	1973	2536	2888
2	Early	Late	1973	2536	2888
3	Late	Early	1973	2536	2888
4	Late	Early	<u>1973</u>	<u>2536</u>	<u>2888</u>
	Average CM		1973	2536	2888

	<u>Season</u>	<u>No. Cows</u>	<u># Yearlings or Steers (1.33)</u>
No development of water	7/1-10/15	564	750
Moderate development of water	7/1-10/15	725	964
Full development of water	7/1-10/15	825	1097

<u>Structural Range Improvements Required</u>	<u>(\$)/Cost/Unit</u>	<u>Total Cost</u>
---	-----------------------	-------------------

Range Fence

Green River Boundary	7.0 miles		
Wells Pass Drift	0.5 miles		
Division Fence	<u>3.0 miles</u>		
	10.5 miles	5000/mile	52500

Stock Water

Moderate Development			
Ponds	15	600 ea.	9000
Full Development			
Ponds	15	600 ea.	9000
Pipeline	5 mi. w/troughs	3000/mile	15000

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Investment Analysis - Elk Ridge Resource Area

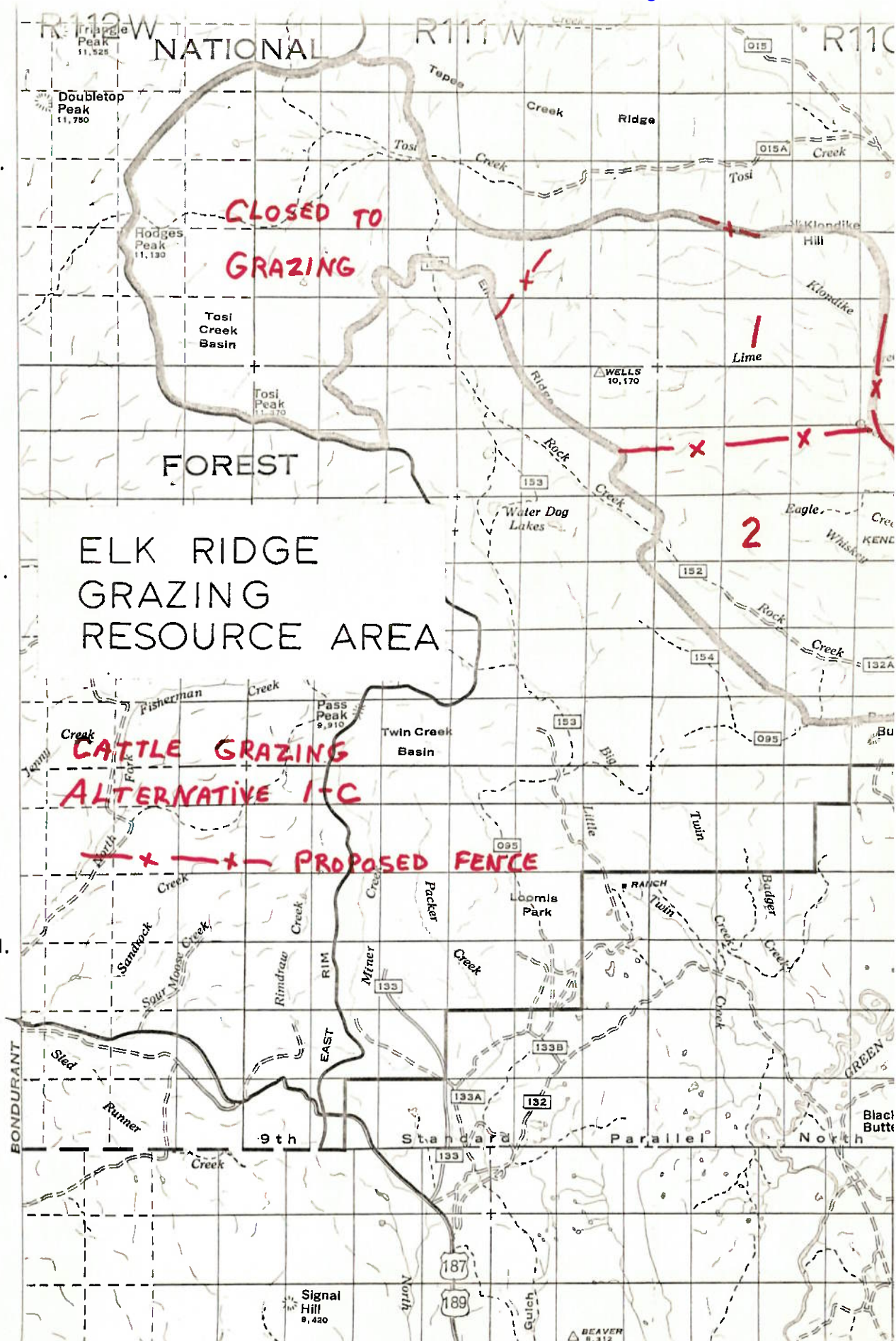
Cattle Grazing, Alternative #1-C,

<u>FRES</u> <u>Strategy</u>	<u>Water</u> <u>Development</u> <u>Potential</u>	<u>Proj. Descrip.</u>	<u>AUM</u>	<u>\$11/AUM</u>	<u>Costs</u> <u>\$</u>	<u>Discounted @ 6%</u> <u>Benefits</u>	<u>Costs</u>	<u>Pres</u> <u>Net W</u> <u>\$</u>
C	None	Fence Const.						
		(10.5 miles)...	1973...	21703..	5000/mi..	248933...	52500	
		Fence Mtce.						
		(10.5 miles)						
		Year 1-10			80/mi.....	6182		
		Year 11-20.....			120/mi.....	9274		
						248933	67956	18097
C	Moderate	Fence Const.						
		(10.5 miles)...	2536...	27896..	5000/mi..	319967...	52500	
		Fence Mtce.						
		(10.5 miles)						
		Year 1-10			80/mi.....	6182		
		Year 11-20.....			120/mi.....	9274		
		Stock Pond						
Const. (15).....			600 ea.....	9000				
				319967	76956	24301		
D	Full	Fence Const.						
		(10.5 miles)...	2888...	31768..	5000/mi..	364585...	51500	
		Fence Mtce.						
		(10.5 miles)						
		Year 1-10			80/mi.....	6182		
		Year 11-20.....			120/mi.....	9274		
		Stock Pond						
		Const. (15).....			600 ea.....	9000		
		Pipeline						
		(5 miles).....			3000/mi.....	15000		
Pipeline Mtc.								
Year 1-10.....			75/mi.....	2760				
Year 11-20.....			100/mi.....	3680				
				364585	98396	26618		

39 N.

38 N.

37 N.



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Alternative #1-D - Cattle Grazing Divide suitable area into three grazing units. Approximately 7 miles of new unit division fence construction would be necessary. Management to be a three-pasture rest-rotation system.

<u>Year</u>	<u>Unit A</u>	<u>Unit B</u>	<u>Unit C</u>
1	Rest	Early	Defer
2	Defer	Rest	Early
3	Early	Defer	Rest

Advantages

1. Need for less riding.
2. Better cattle distribution.
3. Uniform number of cattle stocked yearly.

Disadvantages

1. Seven miles of division fence required.
2. Increased cost to permittee for fence construction and maintenance.
3. Fence may modify the natural aesthetics.
4. Some soil and vegetation may be disturbed during fence construction.
5. Wildlife may become injured or entangled from collisions with fence.
6. Lower functional life of fence because of high snowloads.

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Alternative #1-D Cattle Grazing Divide suitable area into three grazing units. Approximately 7 miles of new unit division fence construction would be necessary. Management to be a three-pasture rest-rotation system.

Year	Elk Ridge Area			Strategy C (No Development of Water)	Strategy G (Moderate Development of Water)	Strategy D (Full Development of Water)
	A	B	C			
1	Rest	Early	Defer	1691	1925	2442
2	Defer	Rest	Early	1691	1925	2442
3	Early	Defer	Rest	<u>1691</u>	<u>1925</u>	<u>2442</u>
	Average CM			1691	1925	2442

	<u>Season</u>	<u>No. Cows</u>	<u># Yearlings or Steers (1.33)</u>
No development of water	7/1-10/15	483	643
Moderate development of water	7/1-10/15	550	732
Full development of water	7/1-10/15	698	928

<u>Structural Range Improvements Required</u>	<u>(\$)/Cost/Unit</u>	<u>Total Cost</u>
---	-----------------------	-------------------

Range Fence

Green River Boundary	7.0 miles		
Wells Pass Drift	0.5 miles		
Division Fence	<u>7.0 miles</u>		
	14.5 miles	5000/mile	72500

Stock Water

Moderate Development			
Ponds	15	600 ea.	9000
Full Development			
Ponds	15	600 ea.	9000
Pipeline	5 mi. w/troughs	3000/mile	15000

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Investment Analysis - Elk Ridge Resource Area

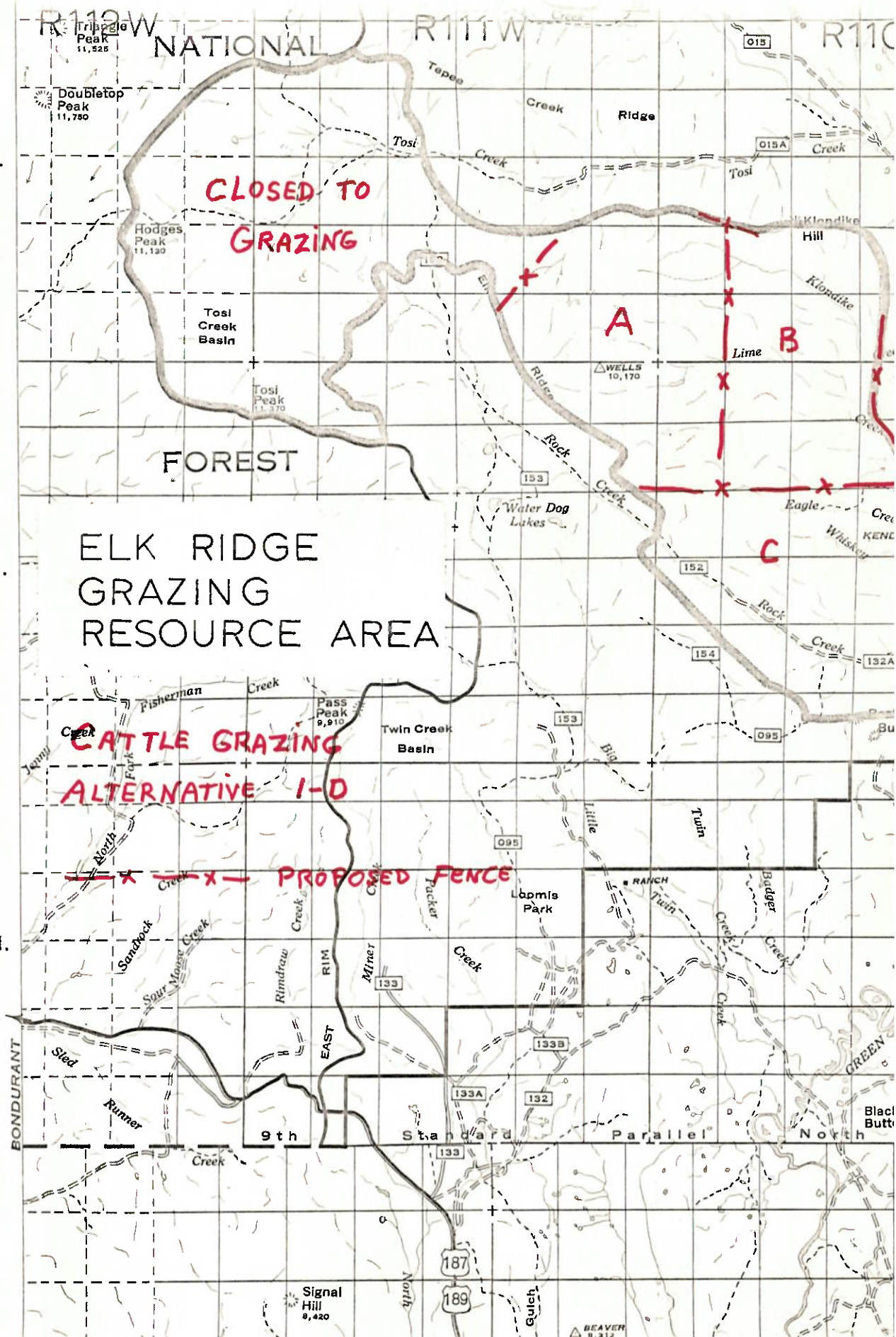
Cattle Grazing, Alternative #1-D,

<u>FRES</u> <u>Strategy</u>	<u>Water</u> <u>Development</u> <u>Potential</u>	<u>Proj. Descrip.</u>	<u>Benefits</u>		<u>Costs</u> <u>\$</u>	<u>Discounted @ 6%</u>		<u>Pres</u> <u>Net V</u> <u>\$</u>
			<u>AUM</u>	<u>\$11/AUM</u>		<u>Benefits</u>	<u>Costs</u>	
C	None	Fence Const.						
		(14.5 miles)...	1691	18601	5000/mi	213353	72500	
		Fence Mtce.						
		(14.5 miles)						
		Year 1-10			80/mi		8538	
		Year 11-20			120/mi		12806	
						213353	93844	11950
C	Moderate	Fence Const.						
		(14.5 miles)...	1925	21175	5000/mi	242877	72500	
		Fence Mtce.						
		(14.5 miles)						
		Year 1-10			80/mi		8538	
		Year 11-20			120/mi		12806	
		Stockpond						
D	Full	Const. (15).....			600 ea		9000	
						242877	102844	14003
		Fence Const.						
		(14.5 miles)...	2442	26862	5000/mi	308107	72500	
		Fence Mtce.						
		(14.5 miles)						
		Year 1-10			80/mi		8538	
D	Full	Year 11-20			120/mi		12806	
		Stockpond						
		Const. (15).....			600 ea		9000	
		Pipeline						
		(5 miles).....			3000/mi		15000	
		Pipeline Mtc.						
		Year 1-10			75/mi		2760	
D	Full	Year 11-20			100/mi		3680	
						308107	124284	18382

39 N.

38 N.

37 N.



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Alternative #1-E - Cattle Grazing Divide suitable area into three grazing units. Approximately 7 miles of new unit division fence construction would be necessary. Management to be a three-pasture deferred-rotation system.

<u>Year</u>	<u>Unit A</u>	<u>Unit B</u>	<u>Unit C</u>
1	Use 1st	Defer	Use 2nd
2	Use 2nd	Use 1st	Defer
3	Defer	Use 2nd	Use 1st

Advantages

1. Need for less riding.
2. Better cattle distribution.
3. Uniform number of cattle stocked yearly
4. This proposal has the highest present net worth potential with stock water development of the cattle grazing alternatives.

Disadvantages

1. Seven miles of division fence required.
2. Increased cost to permittee for fence construction and maintenance.
3. Fence may modify the natural aesthetics.
4. Some soil and vegetation may be disturbed during fence construction.
5. Wildlife may become injured or entangled from collisions with fence.
6. Lower functional life of fence because of high snowloads.

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Alternative #1-E - Cattle Grazing Divide suitable acres into three grazing units. Approximately 7 miles of new unit division fence construction would be necessary. Management to be a three-pasture deferred-rotation system.

Year	Elk Ridge Area			Strategy C	Strategy C	Strategy D
	A	B	C	(No Development of Water)	(Moderate Development of Water)	(Full Development of Water)
1	Early	Late	Mid	1973	2888	3249
2	Mid	Early	Late	1973	2888	3249
3	Late	Mid	Early	<u>1973</u>	<u>2888</u>	<u>3249</u>
	Average CM			1973	2888	3249
				<u>Season</u>	<u>No. Cows</u>	<u># Yearlings or Steers (1.33)</u>
No development of water				7/1-10/15	564	750
Moderate development of water				7/1-10/15	825	1097
Full development of water				7/1-10/15	928	1235
<u>Structural Range Improvements Required</u>				<u>(\$)/Unit</u>	<u>Total Cost</u>	
Range Fence						
Green River Boundary				7.0 miles		
Wells Pass Drift				0.5 miles		
Division Fence				<u>7.0 miles</u>		
				14.5 miles	5000/mi	72500
Stock Water						
Moderate Development						
Ponds				15	600 ea	9000
Full Development						
Ponds				15	600 ea	9000
Pipeline				5 mi.w/troughs	3000/mi	15000

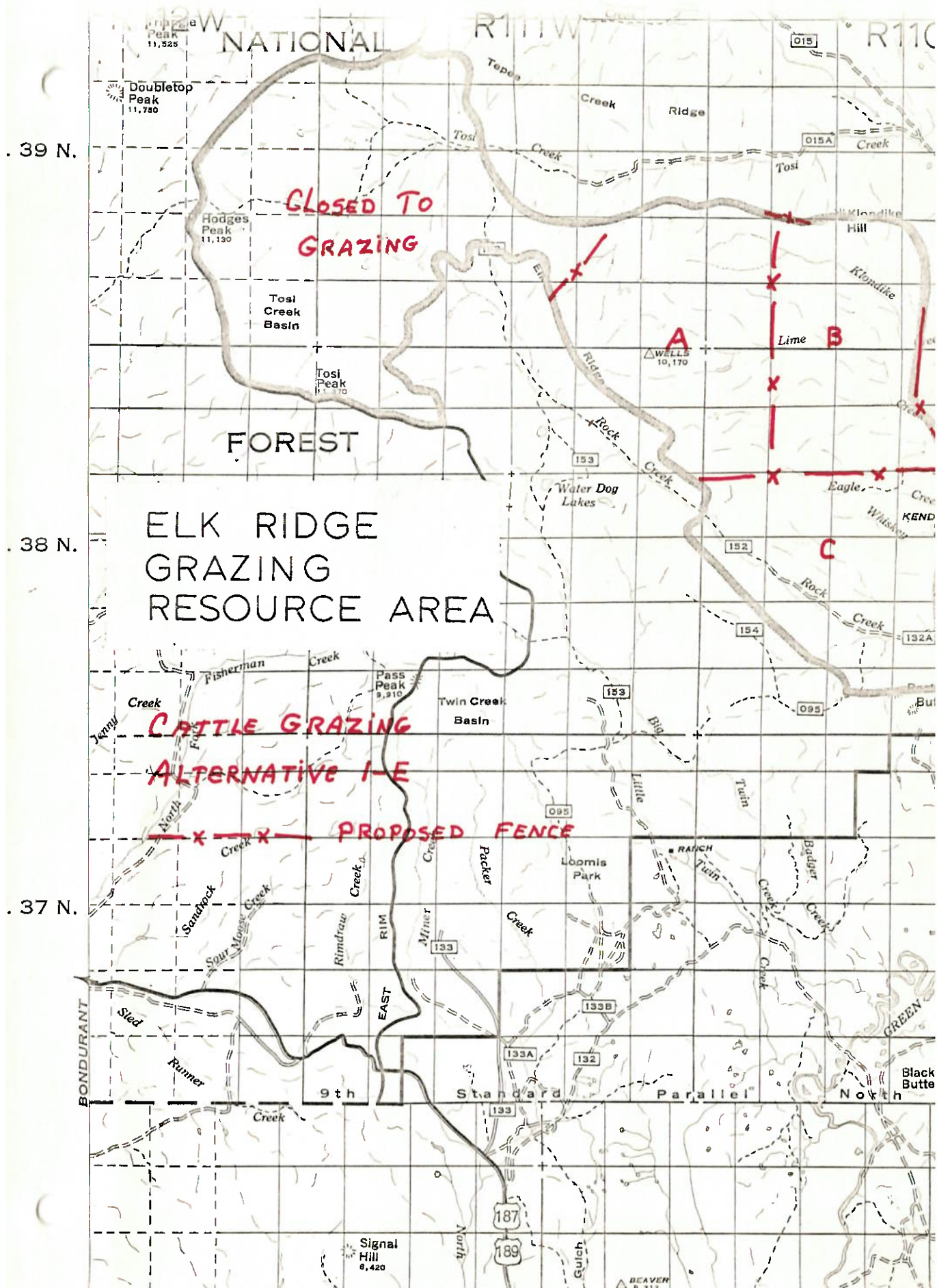
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Investment Analysis - Elk Ridge Resource Area

Cattle Grazing, Alternative #1-E,

<u>FRES</u> <u>Strategy</u>	<u>Water</u> <u>Development</u> <u>Potential</u>	<u>Proj. Descrip.</u>	<u>Benefits</u> <u>AUM</u>	<u>\$11/AUM</u>	<u>Costs</u> <u>\$</u>	<u>Discounted @ 6%</u> <u>Benefits</u>	<u>Costs</u>	<u>Pres</u> <u>Net W</u> <u>\$</u>
C	None	Fence Const.						
		(14.5 miles)...	1973...	21703..	5000/mi..	248933...	72500	
		Fence Mtce.						
		(14.5 miles)						
		Year 1-10			80/mi.....		8538	
		Year 11-20.....			120/mi.....		12806	
						248933	93844	15508
C	Moderate	Fence Const.						
		(14.5 miles)...	2888...	31768..	5000/mi..	364379...	72500	
		Fence Mtce.						
		(14.5 miles)						
		Year 1-10			80/mi.....		8538	
		Year 11-20.....			120/mi.....		12806	
		Stock Pond						
		Const. (15).....			600 ea.....		9000	
						364379	102844	26153
D	Full	Fence Const.						
		(14.5 miles)...	3249...	35739..	5000/mi..	409926...	72500	
		Fence Mtce.						
		(14.5 miles)						
		Year 1-10			80/mi.....		8538	
		Year 11-20.....			120/mi.....		12806	
		Stock Pond						
		Const. (15).....			600 ea.....		9000	
		Pipeline						
		(5 miles).....			3000/mi.....		15000	
		Pipeline Mtc.						
		Year 1-10			75/mi.....		2760	
		Year 11-20.....			100/mi.....		3680	
						409926	124284	28564



Alternative #2 - Continue Sheep Class Use Under this alternative sheep would continue to use the allotments. The four current sheep allotment boundaries would be modified to obtain equitable grazing capacities. Individual allotment stocking may vary. Use would be prescribed under an Intensive or Extensive FRES Management Strategy. Stocking in Tosi Basin would not exceed the proper use criteria for FRES Management Strategy B (Environmental Management of Livestock), or 28% use of D&I species. If the current permittee could not stock this kind of livestock, sheep could be transferred from problem areas in the Bridger Wilderness or elsewhere on the forest to the Elk Ridge Resource Area.

Advantages

1. Sheep utilize ranges further away from water than cattle. Fewer water developments would be necessary.
2. Less need for structural range improvements including allotment boundary fence.
3. Less forage competition with elk.
4. Fewer wildlife conflicts because of less fencing.
5. Less conflict on the stock drive as the sheep could more feasibly be trucked to and from the allotment.
6. No serious poisonous plant problems.
7. More total acres suitable for sheep including Tosi Basin.
8. More feasible to manage sheep without structural improvements within the wilderness study area. Tosi Basin not closed to grazing.
9. If sustained as sheep allotments it could result in resolving part of the sheep driveway use in the Bridger Wilderness.

Disadvantages

1. Utilization more dependent upon proper herding.
2. Sheep grazing would aggravate bare gullies in Tosi Basin.
3. More trailing damage to the range.
4. Would require numerous herder camp locations.
5. Potential for future wilderness-grazing conflict if Tosi Basin added to Gros Ventre Wilderness candidate area.
6. May compete with or pose as disease hosts to bighorn sheep in Tosi Basin.
7. Sheep access to the allotment would not be allowed on the Green River stock driveway. Sheep would either have to be (a) trucked to and from the allotment, temporary yearly loading corrals would have to be constructed; or (b) sheep trailed to and from the allotment along the west side of the Green River across private land.

Alternative #2-A - Sheep Grazing Four separate allotments of approximately 1000 head each would be managed under individual 4-unit each rest-rotation grazing systems.

Advantages

1. Manageable number of sheep in each herd.
2. Smaller herds will require less water in localized areas.

Disadvantages

1. Harder to control livestock from drifting or trespassing into rested or deferred units. More chance for herds to unintentionally mix.
2. More expense for permittee to run four herds instead of three.
3. Four different management prescriptions.

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Grazing Capacity Estimate and Stocking Rate - Sheep Grazing Alternative #2-A
 FRES Management Strategy C (Extensive Management) No development of stock water

	<u>Indicated Capacity</u>	<u>-Rested Unit</u>	<u>Grazed Yearly (SM)</u>	<u>Season</u>	<u>No. of Sheep</u>
Tosi Creek	(2691)*	-673	2018	7/16-9/25	867
Lime Creek	3704	-926	2778	7/16-9/25	1191
Elk Ridge	3704	-926	2778	7/16-9/25	1191
Rock Creek	3704	-926	2778	7/16-9/25	1191
			<u>10352</u>		<u>4440</u>

FRES Management Strategy D (Intensive Management) Moderate development of stock water

	<u>Indicated Capacity</u>	<u>-Rested Unit</u>	<u>Grazed Yearly (SM)</u>	<u>Season</u>	<u>No. of Sheep</u>
Tosi Creek	(2691)*	-673	2018	7/16-9/25	867
Lime Creek	4630	-1158	3473	7/6-9/30	1226
Elk Ridge	4630	-1158	3473	7/6-9/30	1226
Rock Creek	4630	-1158	3473	7/6-9/30	1226
			<u>12437</u>		<u>4545</u>

* Use in Tosi Basin not to exceed 28% use of D&I species to maintain wilderness character of area.

Alternative #2-B - Sheep Grazing Four allotments would be managed together under a rest-rotation grazing system. Within the rest-rotation system, individual allotments would be grazed under simple deferred systems.

Rotation Diagram

<u>Year</u>	<u>Tosi Creek</u>	<u>Lime Creek</u>	<u>Elk Ridge</u>	<u>Rock Creek</u>
1	Graze	Rest	Graze	Graze
2	Graze	Graze	Rest	Graze
3	Graze	Graze	Graze	Rest
4	Rest	Graze	Graze	Graze

Advantages

1. Better control to prevent livestock drift or trespass into rested units.
2. Three sheep herds instead of four. Less expensive to permit-tee to run.
3. One management prescription for all allotments.
4. Less chance for herds to unintentionally mix (only three herds versus four).

Disadvantages

1. Large numbers of sheep in each herd may be hard to manage.
2. May be more trampling of range by large herds.
3. Large herds will require more water at localized areas.

Environmental Analysis ReportGrazing Capacity Estimate and Stocking Rate - Sheep Grazing Alternative #2-BFRES Management Strategy in Sheep Months

Sample Year	(1)	C	D	(2)	C	D	(3)	C	D	(4)	C	D
Tosi Creek	Graz	(2691)*	(2691)*	Graz	(2691)*	(2691)*	Graz	(2691)*	(2691)*	Rest	0	0
Lime Creek	Rest	0	0	Graz	3704	4630	Graz	3704	4630	Graz	3704	4630
Elk Ridge	Graz	3704	4630	Rest	0	0	Graz	3704	4630	Graz	3704	4630
Rock Creek	Graz	3704	4630	Graz	3704	4630	Rest	0	0	Graz	3704	4630
		10,099	11,951		10,099	11,951		10,099	11,951		11,112	13,890

Average Use - FRES Management Strategy C

= 10,352

Average Use - FRES Management Strategy D

= 12,437

Herd size and season of use - Sample Year 3Herd size & season of use - Sample Year 3

Herd #1	Tosi Basin	1153 sheep	7/16-9/25	2691 SM	Herd #1	Tosi Basin	1153 sheep	7/16-9/25	2691 SM
Herd #2	Lime Creek	1307 sheep	7/6-9/30	3704 SM	Herd #2	Lime Creek	1323 sheep	7/1-10/15	4630 SM
Herd #3	Elk Ridge	1307 sheep	7/6-9/30	3704 SM	Herd #3	Elk Ridge	1323 sheep	7/1-10/15	4630 SM
Rock Creek	Rest-No Grazing	-	-	-	Rock Creek	Rest-No grazing	-	-	-
		3767		10,099			3799		11,951

* Use in Tosi Basin not to exceed 28% use of D&I species to maintain wilderness character of area.

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Investment Analysis - Elk Ridge Resource Area

Sheep Grazing, Alternatives #2-A and #2-B,

<u>FRES</u> <u>Strategy</u>	<u>Water</u> <u>Development</u> <u>Potential</u>	<u>Proj. Descrip.</u>	<u>Benefits</u> <u>SM</u>	<u>\$2.20/SM</u>	<u>Costs</u> <u>\$</u>	<u>Discounted @ 6%</u> <u>Benefits</u>	<u>Costs</u>	<u>Pre</u> <u>Net</u> <u>\$</u>
C	None	No development	10352..22774.....	0.....	261218.....	0.....	2612	
D	Moderate	Stock Pond Const. (15)....	12437..27361...	600 ea...	314702...	9000...	3057	

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Alternative #3 - FRES Management Strategy A - Environmental Management Without Livestock - (exclude all livestock grazing on the allotment) This alternative would meet environmental objectives but at the expense of the local economy. The livestock industry is an important part of the social and economic fiber of this region. Excluding grazing would impose economic hardships and create some local adverse public reaction. Restoring and maintaining the environment can be better achieved by other alternatives. This alternative will not be discussed further.

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Summary of Economic Analysis - Elk Ridge Resource AreaWater

<u>Alternative</u>	<u>FRES Mgt. Strategy</u>	<u>Development Potential</u>	<u>Benefits AUM</u>	<u>\$11/AUM</u>	<u>(\$)(Total Costs over 20 yrs.</u>	<u>Discount. @6%/20yr</u>	<u>Present Net Worth</u>
<u>Benefits</u>							
<u>Costs \$</u>							
<u>Cattle Grazing</u>							
#1-A	C	None	1902	20922	52500	239975	191435
7.5 mi. fence	C	Moderate	2166	23826	61500	273284	215744
1 pasture							
rest-rotation	D	Full	2747	30217	85250	346589	267609
#1-B	C	None	1585	17435	73500	199979	137023
10.5 mi. fence	C	Moderate	1805	19855	82500	227737	150781
2 pasture							
rest-rotation	D	Full	2290	25190	106250	288929	190533
#1-C	C	None	1973	21703	73500	248933	180977
10.5 mi. fence	C	Moderate	2536	27896	82500	319967	243011
2 pasture							
rest-rotation	D	Full	2888	31768	106250	364585	266189
#1-D	C	None	1691	18601	101500	213353	119509
14.5 mi. fence	C	Moderate	1925	21175	110500	242877	140033
3 pasture							
rest-rotation	D	Full	2442	26862	134250	308107	183823
#1-E	C	None	1973	21703	101500	248933	155089
14.5 mi. fence	C	Moderate	2888	31768	110500	364379	261535
3 pasture def- erred rotation	D	Full	3249	35739	134250	409926	285642
<u>Sheep Grazing</u>							
#2-A & #2-B	C	None	SM 10352	\$2.20/SM 22774	0	261218	261218
Rest-rotation	D	Moderate	12437	27361	9000	314702	305702

III. Analysis of Alternatives

A. Range Improvements

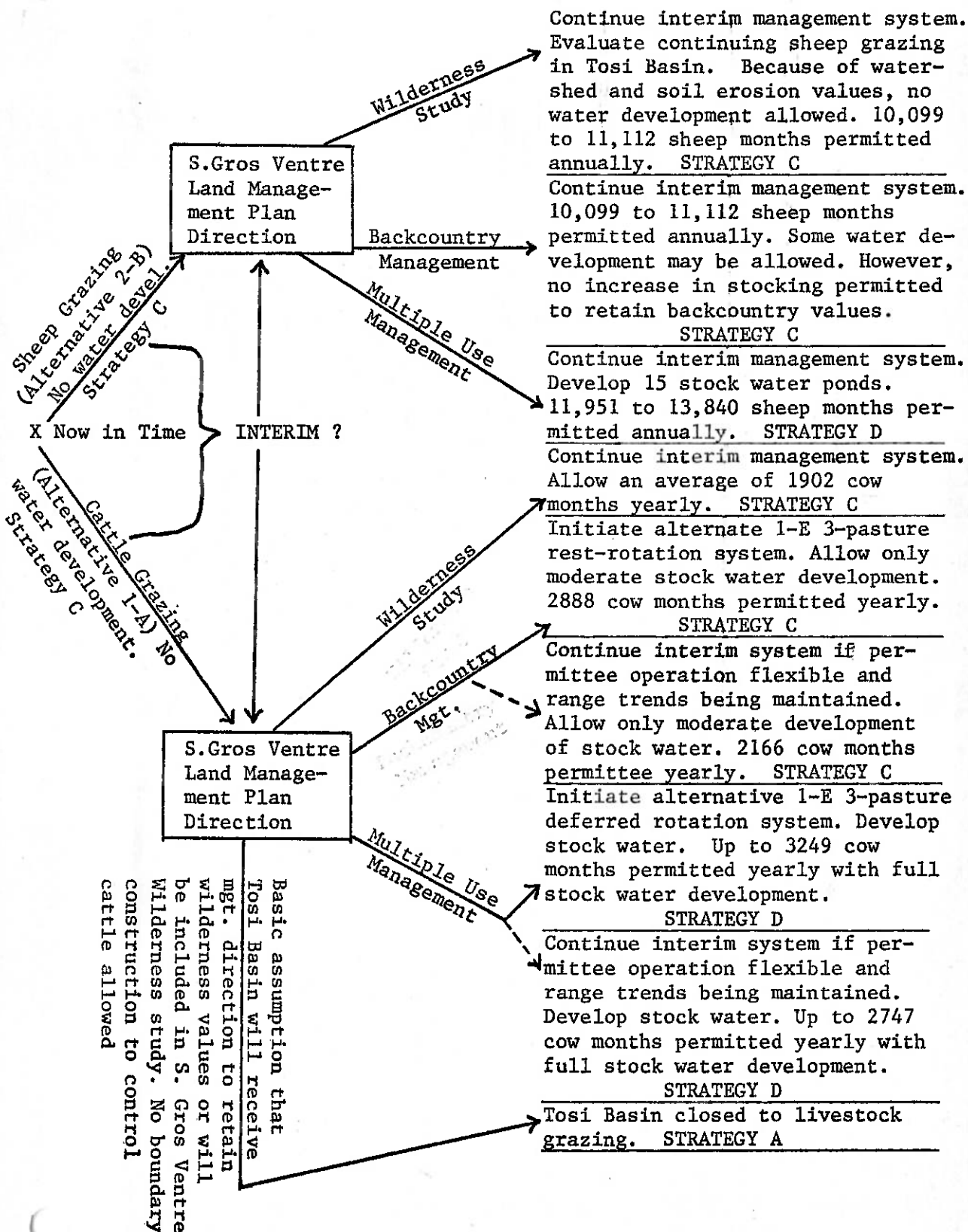
All opportunities to increase optimum livestock and wildlife forage production and water developments (FRES Strategy D-Intensive Management), will be undertaken when and if inventoried roadless areas are cleared from wilderness study and resume under multiple use management. In the interim no work will be permitted (FRES Strategy C-Extensive Management) recognizing that the total amount of available forage is dictated by available water. Lower forage utilization standards will be in effect until more water can be developed along with more intensive livestock management.

Since the specific effects of individual projects cannot be determined until boundaries are established on the ground after review by the Forest Interdisciplinary Team and Stage II soil survey as the final steps of the planning process, this EAR may have to be supplemented by project work plans or addendums with information on specific effects. However, sufficient information concerning the proposals has been assembled to adequately evaluate management alternatives and feasibility.

B. Kind of Livestock and Grazing Management System

With the inventoried roadless classification and potential wilderness study of the area, it should be recognized that the overall coordination and factors for wilderness are more favorable for sheep grazing. However, a commitment has been made with the permittee for conversion to cattle on a trial basis. Currently the area is being grazed by sheep under temporary permit. Option selection shall remain open and flexible on class of livestock until a final decision is made. Until that time, sheep grazing shall be managed under a four-allotment combined rest-rotation system; Alternative #2-B (FRES Management Strategy C-Extensive Management).

The only management option available for cattle grazing at this time is Alternative #1-A (FRES Management Strategy C-Extensive Management) which is a rest-rotation system on the entire contiguous Elk Ridge area. Tosi Basin would be closed to livestock grazing (FRES Management Strategy A). There would be no division fencing required and the area would be grazed with variable yearly stocking. At least 7 miles of allotment boundary fence would have to be rebuilt. This would be considered an interim management system until the roadless and wilderness study issues are resolved. Also at this time in the future, a decision would be made if to convert to cattle permanently or return to sheep grazing use and if to proceed with FRES Management Strategy D-Intensive Management. The economics and impacts of forage and water development under each management system will vary with the final land management designation of the area and these decisions will also be made at that time.

Suggested Management Pathway

IV. Environmental Impacts of Selected Alternatives

Impacts attributable to the selected alternatives are dependent upon the final management direction in land management plans, RARE II evaluation and wilderness study. These conclusions will dictate which FRES Management Strategy will be instigated,

A. FRES Strategy A - Environmental Management Without Livestock

No environmental impacts will occur from livestock grazing under this strategy. The environment is protected from resource damage.

B. FRES Strategy B - Environmental Management With Livestock

This management strategy will not be considered or used on the Elk Ridge Resource Area.

C. FRES Strategy C - Extensive Management of Environment and Livestock

The potential impacts from this strategy are mainly in the form of actual on-the-ground changes in livestock management and movement.

Past localized heavy grazing and trampling have impacted the soils and vegetation on the allotment. In some areas vegetal cover succumbed to past heavy use leaving areas of bare soil. In addition, livestock use of the area has altered soil permeability through soil compaction.

Loss of vegetation and litter cover in some areas has exposed the soil to weather elements which has created a xeric soil microclimate. This mesic to xeric environment change alters the soil chemical composition and microorganisms, thus affecting soil fertility. Removal of the leaves of the plant through grazing reduces the photosynthetic surface area, thereby reducing the amount of food made and stored by the plant. Non-use during the last five years has done much to offset effects of past grazing. Defoliation of vegetation is most harmful when plant root reserves are lowest and may result in loss of plant vigor and eventually, if continual heavy grazing occurs, death of the plant. Livestock will selectively graze plants and heavy use (defoliation) of selective plants will result in the selected plants fading out of the stand composition and being replaced with other species; i.e., altering the species composition of the plant community. Initiation of better management on the allotment through rest or deferred rotation grazing systems will tend to improve the general range condition even further.

Grazing has indirectly influenced the wildlife to some extent through successional changes in the plant communities. Some species of wildlife live within definable ecological niches and may be affected to localized heavy grazing. Conversely, wildlife which is mobile is largely unaffected by grazing competition.

Rock Creek and the lower portions of Klondike and Lime Creeks support permanent fisheries. The amount of sediment in streams can affect fish spawning and their overall habitat. High sediment content also tends to raise water temperatures by absorption of solar heat. Fish are directly affected by water temperature. They have a range of temperatures in which their growth and development is optimum. Also, the amount of oxygen dissolved in water is inversely proportionate to water temperature. Removal of streambank vegetation assists in increasing water temperature and eliminates habitat for invertebrates that are a principal source of fish food.

Past grazing has altered the natural infiltration runoff relationships by:

1. Reducing the protection afforded by vegetative cover.
2. Reducing and scattering litter.
3. Compacting the soil through trampling.
4. Increasing the sediment in streams.

Nitrates may be increased in streams from animal body wastes. There may also be bacterial contamination of the water; however both would tend to be reduced by stream turbidity and sunlight so that the contamination would only occur locally and would not influence downstream water quality.

D. FRES Strategy D - Intensive Management of Environment and Livestock

The potential impacts from implementation of this strategy in addition to the grazing impacts outlined in Strategy C beforehand, are by physical disturbances from fence construction and range stock water developments or habitat type conversion by prescribed burning and/or herbicide spraying programs.

Right-of-way clearing for fences would affect the timber and visual resources. Cattle grazing on clearcut areas may impact seedling establishment.

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Delivery of fence supplies and the use of construction equipment could cause some soil disturbance and vegetation trampling. Construction of stock water ponds and/or pipelines would cause soil disturbance and displacement and destroy some vegetation. After development, livestock will tend to congregate near water sources further trampling and compacting the soil. Over-utilization of vegetation on these sites may occur.

Fencing may pose a hazard to big game if they become entangled or injured from collisions with the fence. If not properly located and/or designed, fences may also affect the normal movements of big game animals.

The air is clear and unpolluted on the project area. Burning of sagebrush could produce smoke containing large amounts of particulates.

There is no general agreement that fire is detrimental or beneficial to the soil, but the preponderance of reported effects suggests chemical properties of the soils are usually improved while measurable physical damage is possible, but uncommon. Following fires, available phosphorus, calcium, potassium, and magnesium are increased and soil acidity is reduced. With increased p.H., nitrification increases and vegetation growth is usually more luxuriant. In some cases, fire may increase erosion by exposing the soil surface to wind and water.

Fires may affect soil textures, porosity, and infiltration either positively or negatively, depending on initial fuel loads, intensity of the fire, frequency of burning, type of soil, and soil moisture content.

After burning, soil temperatures increase with ash exposure to sunlight. This releases more soil nitrogen.

Prescribed burning will temporarily alter plant communities. Burning may also cause a temporary loss of habitat to some wildlife species. Some small forms of wildlife may be burned.

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V. Summary of Probably Adverse Effects Which Cannot Be Avoided

A. FRES Management Strategy A

None

B. FRES Management Strategy C

1. Grazing competition with some species of wildlife.
2. Some contamination of water by animal body wastes.
3. Soil compaction by livestock.
4. Some changes in plant community compositions by grazing.

C. FRES Management Strategy D

1. Grazing competition with some species of wildlife.
2. Some contamination of water by animal body wastes.
3. Soil compaction by livestock.
4. Some changes in plant community compositions by grazing.
5. Some soil disturbance may occur during fence and water development construction.
6. Fence lines may modify the natural aesthetics of the area.
7. Wildlife may become injured or entangled by fence.
8. During construction of stock ponds, troughs and/or pipelines, some disturbance of vegetation and soils will occur.
9. Livestock will tend to congregate near developed water sources; therefore, some vegetation will be trampled and soils compacted.
10. Smoke in the atmosphere during prescribed burning operations.
11. Soil exposure to wind and water erosion will increase temporarily following burning.
12. Fire temporarily destroys habitat for most forms of wildlife.
13. Some small forms of wildlife may be burned.

VI. Relationship Between Local Short-Term Uses of Man's Environment and the Maintenance and Enhancement of Long-Term Productivity

Grazing on National Forest land complies with the overall program of the Department of Agriculture by benefiting local economies through stabilizing and maintaining the livestock industry. Livestock grazing is an old and well-established industry in this region, having strong traditional roots in the social-economic principal marketable outputs of range ecosystems. The most consistent feature of the historical role of the range has been its use as a low-cost feed source.

Past livestock use on this allotment reduced the state of the environment through soil deterioration and reduced forage quality and quantity. Revegetation projects and non-use has restored this. If improper grazing use were instated, long-term productivity of the resources may be affected. However, under proper management, forage is a renewable resource and lends itself to management practices which would give a sustained yield of forage and enhance the long-term productivity without significantly reducing the state of the environment.



General view looking southeast from Elk Ridge at area between Lime and Eagle Creeks. There are numerous sites to develop stock water in this area to better distribute livestock and more evenly utilize forage. Bridger Wilderness in background.

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VII. Irreversible and Irretrievable Commitment of Resources

Past overgrazing has removed varying amounts of topsoil and reduced the forage quality and quantity on the allotment. Most of this has been negated or mitigated by non-use. This past loss may be considered as an irreversible or irretrievable commitment of resources. If in the future natural processes were again reinstated on the remainder of the allotment by elimination of grazing, and/or removal of structural improvements, the degree of irretrievability would not be significant; and original or near-natural conditions could be achieved over time if it became appropriate to follow this course of action.

It should be remembered however, that rangeland ecosystems developed under grazing by wild ungulates and that grazing is part of and to some extent necessary to perpetuate and maintain the natural environment.



Conifer-sagebrush benches form the east boundary of the resource area. Water availability for livestock is generally good throughout this vegetal association.

VIII. Management Requirements and Constraints

1. Recommend approval of this report.
2. Permittee be given until January 1, 1978 to indicate which class of livestock he will graze on the resource area. The following special conditions will apply:

Special Conditions with Cattle Grazing

- a. Tosi Basin be closed to grazing.
- b. A full-time rider will be required to distribute livestock.
- c. No conversion to cattle will be allowed until the boundary fence is reconstructed to control and restrict cattle to the allotment. The permittee is to provide labor, tools, and equipment to reconstruct approximately 7 miles of boundary fence in FY 1978. The Forest Service is to provide the materials. Afterwards, maintenance responsibility to be split with the Upper Green River Cattle Association.
- d. Grazing Alternative #1-A FRES Management Strategy C be initiated.
- e. Wells Peak Pass drift fence be constructed by the permittee (approx. ½ mile) if after completion of study, area is released from RARE II and wilderness proposal.
- f. Cattle permit be issued on a five-year temporary permit trial basis.
- g. If unmitigating circumstances such as adverse grazing use, lack of water, unable to meet fencing commitments, etc., arise during or after the trial period, the Forest Service will consider reverting the permit back to sheep.

Special Conditions with Sheep Grazing

- a. Grazing Alternative #2-B FRES Management Strategy C be initiated.
- b. A term permit be issued for sheep grazing.
- c. Tosi Basin be reevaluated after 5 years of grazing use to determine if grazing is compatible with watershed and soil values, wildlife and recreation wilderness use.
- d. Forest Service to rebuild approximately 7 miles of boundary fence in FY 1983. Afterwards maintenance to be the responsibility of the Upper Green River Cattle Association.

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3. Upon completion of RARE II, wilderness study and land management plan direction, an evaluation will be made if to proceed from FRES Management Strategy C to Management Strategy D.

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IX. Consultation with Others

Personal contact was made with the State Department of Game and Fish in Pinedale. Jim Straley, Game Biologist stated he had no preference between sheep or cattle grazing as long as there was good management. He recognized that water was lacking for wildlife on the area, and any such development would help. Jim stated that cows can affect elk summer distribution as shown in the South Gros Ventre study. He recommended that the area should not be too intensively developed because the more intense the management, the more people that would be needed to take care of the allotment and its facilities. This would in turn affect elk summer distribution.

Prescribed burning of sagebrush was favorable if confined to small treatment areas. Jim recommended that the small interspersed patches of sagebrush (2 to 5 acres) in aspen or willow be left for elk calving habitat. Treated areas should have large edges of sagebrush remaining after burning.

Bighorn sheep winter on Hodges Peak and on the ridge leading from Hodges Peak to Tosi Creek. If domestic sheep were kept lower and off this area, there would be little competition.

Glen Dunning, Area Fisheries Supervisor, commented he was mainly concerned with protection of the willow bottom areas and maintaining streambank cover and habitat.

Exhibit C

Upper Green River
Annual Operating Instructions
2026

These Annual Operating Instructions (AOI) are made part of your grazing permit consistent with Part 1, item 3 and Part 2, Item 8(a) of your Term Grazing Permit for the Upper Green River Cattle Allotment and are an extension of your term grazing permit.

I. Authorized Use for UGRCA 2026

- Wapika Ranch, LLC-250 Yrl, 250 C/c, 15 B
- Michael R. Beard-565 C/c
- Jeannie and Millford Lockwood-90 C/c
- Murdock Land and Livestock-500 C/c
- Roberts Cattle Co.- 475 Yrl
- KM Cattle Co.-75 Yrl
- Klaren Cattle Co.-70 Yrl, 195 C/c, 11 B
- TY Ranch LLC- Complete Resource protection Non-Use
- Price, Charles and DeeAnn-142 Yrl, 204 C/c, 12 B
- Price, Kent-279 Yrl, 151 C/c, 12 B
- Sommers Ranch, LLC-300 Yrl, 340 C/c, 25 B
- Window Sash, LLC-270 Yrl, 300 C/c
- Garland and Rhonda Swain-160 Yrl, 20B
- Grubbing Hoe Ranch Partnership-70 Yrl, 380 C/c
- Stanley G. Murdock Living Trust- 345 Yrl, 320 C/c, 30 C, 24B
- Upper Green Association-25 Horse

II. Pasture Rotation Sequence

Mud Lake-Fish Creek-2800 Cattle

- MLW-June 16-July 20
- Fish Creek- July 20- Sept. 5
- MLE/Roaring Fork- Sept. 5-October 15

Mosquito Pastures- 1200 Cattle

- SWMP-June 16-July 15
- NWMP-July 15-August 15
- NEMP-August 15- September 15

- SEMP-September 15- October 15

Tosi-Tepee Pastures-700 Cattle

- Moose Lake- September 20-October 10
- Tepee Flats- June 19- August 19
- Tepee Ridge- August 19-September 20

Gypsum Rotation-1245 Cattle

- Upper Gypsum-July 01-September 15-585 Cattle
- Lower Gypsum- August 15- October 15-660 Cattle

Pot Creek Pastures-660 Cattle

- Pasture 2- July 1-July14
- Pasture 3-July 7-July 30
- Pasture 1-July 30-August 15
- Pasture 4- July 1-August 15- 50 Cattle

Resource Protection Non-Use is being authorized for all Upper Green permittees due to the Dollar Lake Fire and persistent drought. Any permittee that requested resource protection non-use has been approved. Approximately 585 cattle will be grazed in the vicinity of the Dollar Lake Fire utilizing Virtual Electric Fence. Additionally, approximately 660 cattle will be grazing the Pot Creek Pastures to decrease total livestock numbers in the Upper Gypsum Pasture. If necessary, temporary grazing may occur on the Elk Ridge Complex from August 15 through October 15 to assist with livestock distribution and burned area restoration. A thorough NEPA sufficiency review has been completed on the Elk Ridge Complex and consultation with USFWS has occurred.

The move-on date is only a guide since the on-date will be when range readiness occurs. Move dates are dependent on precipitation and temperature and their effects on vegetation production. Forage utilization will indicate when moves need to be made earlier. Longer pasture stays can be arranged if an excess of forage exists but must be coordinated with the Forest Service Rangeland Management Specialist.

All food, pet food, processed livestock feed and grain, and refuse must be made unavailable to bears. Any carcass or animal remains will be moved at least 100 yards from live water and roads. Animal carcasses must be moved at least 200 yards from system trails.

The Upper Green River Cattle Allotment lies within the area covered by the Biological Opinion dated April 29, 2019 issued by the United States Fish and Wildlife Service. Therefore, permittees associated with the allotment will assist the Forest Service in achieving the 4 Conservation Recommendations.

Utilization levels will not exceed 50% in uplands/riparians and greenline stubble heights of 4”

and 6" shall be maintained dependent on the site as identified in the ROD.

Place salt in areas where past and or present forage use is light. Salt should be used to spread utilization across the pasture being grazed. Place salt at least a ¼ mile from riparian areas and at least 200 yards from system trails. Salt should be picked up and moved when an area has been sufficiently used. A salting plan has been created for the Upper Green and will be provided at each cow camp.

Range improvements must be maintained prior to placing cattle on the allotment. Any plans to reconstruct or build new improvements on the National Forest must first be coordinated with the Range Specialist. Improvements and associated maintenance specifications are listed in your grazing permit. Improvements must be maintained in years of total nonuse and total rest. This includes putting up and taking down fences if needed for adjacent pasture management.

Grazing fees must be paid before livestock can enter the National Forest.

Due to increasing public use, gates are often left open and cattle stray into the wrong pasture. I realize this is a problem and an inconvenience. Routine checks need to be made by you and your riders. Please communicate with the Forest Service Rangeland Management Specialist if you experience any abnormal rotation complications.

Situations may develop during the grazing season which require changes to these instructions. If this becomes necessary, or if it appears you cannot comply with some of these instructions, contact Gary Hayward and obtain approval from the District Ranger before initiating changes or deviating from these instructions.

If you have any questions concerning these Annual Operating Instructions, please call Gary Hayward in Pinedale at 367-5723.

/s/Kate Olsen

6/8/2026

KATE OLSEN
Date District Ranger

Date

Permittee or Authorized Agent

Exhibit D

File Code: 1950

Date: 6/22/2026

Subject: Review of Environmental Compliance Documents,
Elk Ridge Complex
USFS-BTNF-Pinedale RD

To: File

A. Background

The Elk Ridge Complex Environmental Assessment (EA, 1978) was developed to evaluate management actions on a forested landscape that had departed from its natural ecological condition due to factors such as fire suppression and past land uses. This EA evaluates and sets livestock grazing levels and management within the Elk Ridge Complex.

The primary focus of the EA was on:

- Grazing for both cattle and sheep
- Determining appropriate stocking rates and seasons of use
- Evaluating what impacts grazing has on the landscape such as:
 - Vegetation
 - Soils
 - Watershed conditions
 - Wildlife habitat

The need for the project stemmed from concerns that existing grazing practices may have been exceeding the land's capacity, which could be leading to resource degradation and the need to adjust the use to be in line with sustainable conditions. Also, the need for these allotments to be grazed by either sheep or cattle.

B. Previous Decision

The EA selected alternative "C" Extensive Management of Environment and Livestock which states "Management systems and techniques, including fencing and water developments, are applied as needed to obtain relatively uniform livestock distribution and plant use and to maintain plant vigor. Full utilization of the Animal Unit Months (AMUs) and no attempt will be made to maximize livestock forage production by cultural practices such as seeding. The native forage is used in a uniform fashion. The strategy may include sage brush spraying or burning only if it is done for distribution and not for forage production.

This alternative modified existing grazing practices rather than eliminating grazing. The alternative selected was a managed use alternative designed to bring livestock use in line with what the lands capabilities are. The selected alternative established; an adjusted AMU for both cattle and sheep, defined grazing seasons and pasture rotations, and potentially reducing or redistributing grazing pressure from sensitive areas.

- Defining grazing capacity (AMUs)
 - The maximum allowable AUMs for both cattle and sheep are based on the available forage, the range conditions, and soil and watershed protection needs.
- Allotment based management
 - The project area was divided into specific grazing allotments this decision assigned AUMs to each allotment. It recognized that different areas had different carrying capacities. It also allowed management to be tailored by location rather than a one size fits all.
- Grazing system implementation

- One of the key parts to this selected alternative was establishing a grazing system such as a rest rotation where different allotments would be rested during certain years. As well as a deferred rotation where grazing would be delayed in order to protect the plant growth periods. By having these grazing systems, it would allow for vegetation to recover periodically, it would improve the long-term forage productivity, and it would reduce continuous pressure on the same areas.
- Season of use Controls
 - In the selected alternative it set specific timing for grazing such as when the livestock can enter and leave the designated allotments. By doing this it will limit grazing during times of early plant growth and during particularly wet times of year avoiding or limiting soil damage.
- Resource protection measures
 - In this selected alternative there were protections for areas such as riparian areas (streams, wetlands), erosion prone soil areas, and wildlife habitat. This will be accomplished by reducing or excluding grazing in these sensitive areas as well as spreading livestock use more evenly across the landscape.

This alternative was chosen because it balanced both livestock production along with resource protection. It addressed concerns about the decline in the range condition. It avoided the economic impact of eliminating grazing entirely. And it would be able to be implemented using existing management tools.

C. Modification

The primary modification to the original project is that we are intending to use these acres as relief from fire burned areas adjacent to this portion of the landscape through a temporary grazing authorization to multiple pastures in the Upper Green Rangeland Grazing decision, areas which burned in the 2025 Dollar Lake fire creating the need. For the NEPA, changed conditions include changes to the ESA species list, including the listing of grizzly bears as Endangered within the project area, and the Gros Ventre Wilderness designation which occurred by the Wyoming Wilderness Act of 1984.

D. Context and Justification

Impacts to grizzly bears are being addressed with the US Fish and Wildlife service but will not lead to significant effects to the species. All other ESA species and their habitat within the project area will not be impacted.

The activity of grazing predates the Wilderness act and thus is allowed to persist on the landscape within the area of special designation. The proposed action would not have significant effects on the character of the Gros Ventre Wilderness.

This temporary grazing authorization will allow for up to two seasons of grazing within the Elk Ridge Allotment complex and the proposed grazing falls within the scope of the proposed action for both seasonality and maximum allowable use. The goal here is to move cows off of the burned Moose-Gypsum pastures that burned in the 2025 Dollar Lake fire and move them temporarily to the vacant Elk Ridge Allotments for the summer of 2026 and/or 2027 as far as range conditions allow. Allowing rest for recovery of burned areas is a benefit at the landscape and this temporary grazing authorization will allow for this recovery without detrimental impacts to our permittees.

E. Determination

After reviewing the environmental compliance documents, holding multiple discussions with Forest staff and cooperating agencies, I find that:

No additional effects beyond what have already been disclosed in environmental compliance documents (the Management Plan and EA) will occur as a result of allowing permittees to temporarily graze the Elk Ridge Allotment for two seasons.

I have determined that this action will not have a reasonably foreseeable significant impact on the quality of the human environment (7 CFR Part 1b.6(b)(3)).



Digitally signed by
KATE OLSEN
Date: 2026.06.22
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Kate Olsen

District Ranger, Pinedale Ranger District, Bridger-Teton National Forest