



June 22, 2021

Rob Hoelscher Pinedale District Ranger Bridger-Teton National Forest P.O. Box 220 Pinedale, WY 82941

Dear Ranger Hoelscher:

On behalf of the 10,000 members of the Wild Sheep Foundation (WSF) and 800 members of the Wyoming Chapter WSF, please accept these comments in response to the Elk Ridge Complex Rangeland Supplementation Scoping Notice. Both our organizations have a long history of involvement with the Bridger-Teton NF (BTNF) regarding effective spatial and temporal separation between bighorn sheep and domestic sheep, on public land grazing allotments. Our organizations were instrumental in incentivizing the previous permittee on the Elk Ridge, Lime Creek, Rock Creek, and Tosi Creek domestic sheep grazing allotments to voluntarily waive those permits back to the BTNF, without preference for another grazing permittee. We stepped up to facilitate this permit waiver back to the USFS to achieve effective separation between wild and domestic sheep, provide management flexibility to BTNF resource managers, and assist the former domestic sheep grazing permittee with their operations.

We support the proposed conversion from formerly-permitted domestic sheep grazing to limited cattle grazing on <u>suitable</u> portions of approximately 31,000 acres on the Upper Green River. Furthermore, our organizations support integrating <u>suitable</u> portions of these allotments into the current cattle grazing system for the Upper Green River, without increasing permitted cattle AUMs. As acknowledged in the BTNF's Scoping Notice, adding additional acreage to graze cattle will better meet the needs of moving cattle away from large carnivore depredation hotspots, as well as responding to seasonal fluctuations in forage availability, weather conditions, and impact(s) from possible wildfires.

We support inclusion of design criteria for achieving and maintaining compliance with BTNF Forest Plan direction, including anticipated language via the ongoing BTNF Bighorn Sheep Forest Plan Amendment. This proposed action on the Upper Green River is consistent with the intent to protect and conserve core, native bighorn sheep herds that spend all or part of the year on BTNF-managed lands. We believe the proposed action is also consistent with the 2004 Wyoming Domestic Sheep/Bighorn Sheep Interaction Working Group September 2004 Final Report and subsequent Wyoming State Statutes, which call for management favoring Wyoming's core, native bighorn sheep herds, as mapped by the Wyoming Game and Fish Department.

We appreciate the opportunity to comment on this BTNF Scoping Notice, and we look forward to our continued involvement as the anticipated Environmental Assessment (EA) is prepared and

circulated by BTNF staff. Please include both WSF and WY-WSF as interested parties on this continuing issue of the BTNF.

Sincerely,

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Kevin Hurley Vice-President for Conservation Wild Sheep Foundation

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Katie Cheesbrough Executive Director Wyoming Wild Sheep Foundation

cc:

Gray N. Thornton, WSF President & CEO WSF Board of Directors WSF Conservation Staff Zach McDermott, WY-WSF President WY-WSF Board of Directors