Upper Green River Cattle Association (UGRCA)

Comments on

**Supplemental Assessment Information for the Bridger-Teton National Forest**

The Bridger-Teton National Forest is part of the fabric that has woven the custom and culture of Sublette County, and it helps define who we are as a community and a county. Livestock grazing, along with outfitting and logging, are some of the oldest uses on forest service land in the Upper Green.

The Upper Green River Cattle Association (UGRCA) was first established in 1916, to help administer cattle grazing on the Upper Green River Cattle Allotment (UGRC Allotment). Today, there are 12 ranches who are permitted to graze over 7,000(?) head of cattle on the UGRC Allotment, which consists of over 140,000(?) acres of land. Some members’ families have grazed in the Upper Green prior to the establishment of the Forest Service in 1905.

To the members of the UGRCA, the Upper Green is part of our way of life and our heritage dating back generations. The movement of those cattle from the low country to the high country has become known as the “Drift”. This Supplemental Assessment even states, “Nowhere is the history and importance of grazing and the ranching lifestyle more evident than with the Green River Drift, a 58-mile-long cattle trail that has been continuously used since the 1890s to drive cattle with horses, cowboys, and dogs between spring pasture in the desert to summer pasture in the Bridger-Teton (Figure 4 and Figure 5). Individual herds from the various ranches are moved via trails to the Upper Green River cattle allotment, the largest allotment in the Bridger-Teton, where they intermingle until cold weather arrives, and cows begin to “drift” down to lower elevations, where cowboys spend weeks separating the cows into their home ranch herds. The significance of this trail was recognized in 2014 when the Green River Drift became the first ranching-related traditional cultural property listed on the National Register of Historic Places.”

Due to the UGRCA having such a connection to this landscape and reliance on this landscape to earn a living, we would like to comment on this Assessment. This Assessment is designed to: build a common understanding about current conditions and trends with the public and interested parties before starting the plan revision; provide information that helps identify the need to change current forest plan direction; and develop a more complete understanding of complex topics and the integration of ecological, social, and economic considerations across a large and diverse landscape. We appreciate the fact that the Forest Service is asking for our input on the existing condition of the B-T National Forest. We applaud the participation that cooperating agencies have had in commenting on this document.

We are choosing to comment on the Supplemental Assessment Information for the Bridger-Teton National Forest, because it appears to be the base document for the Bridger-Teton Draft Assessment. In development of a B-T Forest Plan, the forest service seems obligated to follow the 2012 Planning Rule. According to your documents, the 2012 Planning Rule states, “Ecological sustainability is defined as the capability to meet the needs of the present generation without compromising the ability of future generations to meet their needs. For purposes of this part, “ecological sustainability” refers to the capability of ecosystems to maintain ecological integrity (36 CFR Part 219.19).”

This Assessment contemplates three ranking levels for “ecological integrity”. They are high, moderate, and low. It is not clear in the Assessment when an ecosystem moves from one to the other. This is important, because this Assessment makes an assumption that an ecosystem might attain a different level of “ecological integrity” by manipulating one of the “drivers” or “stressors” like livestock grazing.

Much of the rangeland in the UGRC Allotment is in the **Inter-Mountain Basins Montane Sagebrush Steppe Ecosystem**. This Assessment on a Page 58 graph states that this ecosystem can be moved from “moderate ecological integrity” to “high ecological integrity” in ten years by implementing invasives control, prescribed fire, modifying livestock grazing, conifer removal, and managing unauthorized vehicle use. What are the ramifications for livestock grazing, since it was singled out as a means to move this ecosystem to “high ecological integrity”?

Further, on Page 451, in the ecosystem integrity evaluation of key ecosystem characteristics, the Assessment document states, “Analysis conducted by the Forest (USDA 2023), concluded there is a deficit of S-Class B. The relative amount of S-Class A and C is similar to the NRV across the Forest. There is a limited amount of information available on fire regimes and reference conditions in sagebrush due to overgrazing (the herbaceous component is severely impacted, and current information cannot exclude the effects of cattle and sheep). Nearly all sagebrush communities today have been grazed – there are few known refugia to use as reference conditions.”

Where is the scientific cite and the data to substantiate the highlighted section above? The UGRCA has 30 years of solid data saying we are not overgrazing.

The Assessment document lacks consistency. On Page 11 the Assessment elaborates on the cultural heritage of livestock grazing but then in ecosystem services, the Cultural Services sections on Pages 422, 497 and 504 livestock grazing is left out, while recreation remains a cultural service. Why?

In the ecosystem services section on Page 503, under Provisional Services (Food), livestock are left out. Livestock clearly provide food in nearly all of these ecosystems.

There appears to be no analysis on the socio-economic impact of ranching in these affected counties. Page 227 lists the active permitted livestock use but not the economic impact that has. Back-of-the-napkin estimate, If half of the permitted numbers are marketable cattle, then those 15,903 head of cattle are worth over $40 million in today’s market. Will economic analysis take place in the Forest Plan itself? At least Recreation, on Page 297, gets some attention for its economic contributions.

The UGRCA appreciates the opportunity to provide comments, and we value our longstanding partnership with the US Forest Service in managing the Upper Green River Cattle Allotment. We still have unanswered questions on the accuracy, completeness, and consequences of the analysis in the **Supplemental Assessment Information for the Bridger-Teton National Forest.**