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Pinedale, WY

Albert Sommers
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. My family has grazed in the Upper Green prior to the establishment of the Forest Service in 1905, and was a founding member 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 my family's connection to this landscape and reliance on this landscape to earn a living, I 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. I appreciate the fact that the Forest Service is now asking for our input on the existing condition of the B-T National Forest.

I am 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)."

Appendix A states the following, "The 2012 Planning Rule (36 CFR 219.19) defines ecological integrity as: "The quality or condition of an ecosystem when its dominant ecological characteristics (for example, composition, structure, function, connectivity, and species composition and diversity) occur within the natural range of variation (NRV) and can withstand and recover from most perturbations imposed by natural environmental dynamics or human influence."

“The NRV is a tool for assessing the ecological integrity and does not necessarily constitute a management target or desired condition. The NRV can help identify key structural, functional, compositional, and connectivity characteristics, for which plan components may be important for either maintenance or restoration of such ecological conditions (FSH 1909.12 zero code, p. 14). However, in a changing world, being within the NRV does not guarantee ecosystem integrity and being outside the NRV may represent a new sustainable, high-integrity state as the ecosystem responds to new conditions.”

How the forest service defines the natural range of variation (NRV) is critical on how uses, like grazing, interplay with “ecological integrity”. Apparently to have “ecological integrity”, the land must be within NRV? There seems to be no real explanation of how the Forest Service developed NRV, the “reference state”, but it appears to be a feature of Landfire and other resources. How was the “reference state” chosen? Do these “reference states” have Bison on them, or are they isolated from herbivore? Is livestock grazed land being compared to land without herbivore?

Utilizing the NRV information the forest service then ranked the level of “ecological integrity” on the different ecosystems in the B-T National Forest. A rating of “High ecological integrity” means that “Drivers, stressors, and key ecosystem characteristics exhibit the range of variation that was common in the past.” What “past” is this Assessment contemplating? Prior to the influence of man? Certainly, that included herbivore from Bison.

This Assessment contemplates three ranking levels for “ecological integrity”. They are high, moderate, and low. There is no real quantifiable division demonstrated in this document between these three levels, particularly as it relates to the herbaceous component, what livestock eat. 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.

The Assessment states on page 54, “Therefore, a clear, concise assessment of ecological integrity that identifies the status and trend of key ecosystems, which ecosystems are threatened or compromised and the threats to those ecosystems, and how changes in ecosystem status affects desired ecosystem services, will inform priorities for each step in planning.” The three levels of “ecological integrity” are written so loosely that it is hard to ascertain what it would take to move from one to the other, and the ranking is certainly not “clear, concise”. In Appendix A, even the Revision Team qualifies their rating system by rating how well they can rate each ecosystem by the use of terminology like “High Certainty” or “Low Certainty”, but no definition is given on how this rating of the rating system is determined?

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.

This Assessment will then drive the rest of the planning process and the alternatives to move this ecosystem to “high ecological integrity”. The **Inter-Mountain Basins Montane Sagebrush Steppe Ecosystem** consists of approximately 355,618 acres. Will the UGRC Allotment have to be in “high ecological integrity” in ten years? Based upon the chart on Page 452, it would appear that shrub cover in the 10-30% range (mid-development) needs to increase and shrub class in the 30-50% range needs to decrease to meet “high ecological integrity” in ten years. What needs to occur in the herbaceous

understory to meet your ten- and 50-year goals? Specifically, what are your goals? There are sage grouse on the UGRC Allotment, which generally precludes the forest service's ability to manipulate sagebrush. What are the ramifications for livestock grazing, since it was singled out as a means to move this ecosystem to "high ecological integrity"? I have the same concerns in the **Rocky Mountain Aspen Forest and Woodland Ecosystem**.

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 data and the cites to prove the highlighted section on the historic impact of livestock grazing? The UGRCA has 30 years of solid data saying we are not overgrazing. To suggest that all sagebrush land was **severely** impacted by grazing seems ludicrous. Prior to cattle and sheep, nearly all sagebrush communities were grazed on this landscape by Bison and other herbivores. So, to look for a "refugia" from herbivore is also ludicrous.

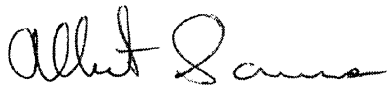
The Assessment document lacks consistency. On Page 11 the Assessment elaborates on the cultural heritage of livestock grazing but then in ecosystem services, the Cultural Services sections on Pages 422, 497 and 504 livestock grazing is left out. Why?

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.

Perhaps I don't understand the Assessment process, but the Socio-economic section is totally lacking and inaccurate. Page 202, states for Sublette County, "Economically, cattle ranching has been the main industry with a boom in oil and natural gas drilling emerging in the 1990s." Oil production occurred very early in Sublette County, a long time before the 1990s in the area south of Big Piney. There is no analysis on socio-economic impact of ranching in these affected counties. Page 227 lists the active permitted livestock use but not the economic impact that has to these counties and communities. Back-of-the-napkin estimate, if half of the permitted numbers are marketable cattle, then those 15,903 head of cattle are worth nearly \$40 million in today's market. Will an economic analysis take place in the Forest Plan itself? At least Recreation, on Page 297, gets some attention for its economic contributions.

I appreciate the opportunity to provide comments, and I value my longstanding partnership with the US Forest Service. I still have a lot of unanswered questions on the accuracy or the completeness of the analysis in the **Supplemental Assessment Information for the Bridger-Teton National Forest**.

Respectfully,

A handwritten signature in black ink, appearing to read "Albert Sommers".

Albert Sommers
Sommers Ranch