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Comments: Please see attached, the USFWS comments pertaining to the proposed Livestock Grazing Authorization for the Sweetwater, Blucher Creek, and East Squaw Creek Allotments Project.

Thank you for your Scoping Notice for the Livestock Grazing Authorization for the Sweetwater, Blucher Creek, and East Squaw Creek Allotments, dated and received in our office December 9, 2019. The Bridger-Teton National Forest, Pinedale Ranger District (Forest) of the U. S. Forest Service is proposing to reauthorize livestock grazing on the Sweetwater, Blucher Creek, and East Squaw Creek Cattle and Horse Allotments (Allotments). The Allotments include approximately 33,806 acres and are being considered together, because they are adjacent to one another, have similar terrain and vegetation types, and have similar livestock management (i.e., grazed by cattle with similar seasons of use, limits on utilization, and protection of resources). This action would continue to authorize 593 cow/calf pairs, or equivalent, on the three allotments over the next 10 years, providing an average of 1,240 animal unit months (AUMs) annually with a maximum of 1,655 AUMs. Generally, grazing would occur between July 10 and October 1 of each year, but the season of use is variable as a result of managing livestock in conjunction with adjacent Bureau of Land Management (BLM) allotments. The U.S. Fish and Wildlife Service (Service) is providing comments and recommendations pursuant to the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.).

Grizzly bears (*Ursus arctos horribilis*) have been observed within the Allotments; however, these occurrences are rare and there have been no known livestock conflicts. The grizzly bear population continues to expand in Wyoming; therefore, during the 10-year time period during which the grazing permit would be in effect, grizzly bears may have a greater presence in the Allotments and/or conflicts with livestock may occur.

On Monday, December 16, Lisa Solberg Schwab of my staff spoke with Dave Booth of your staff about the conservation measures that will be part of the Annual Operating Plans for these Allotments. Mr. Booth indicated that the following conservation measure as cited in the Draft Environmental Assessment will be included in the Annual Operating Plans.

[bull] Permittees are required to watch livestock closely, especially for sick or injured animals. Where feasible, sick or injured livestock would be treated or removed from the allotments.

If grizzly bear conflicts occur within the Allotments, the following conservation measures concerning carcass removal will be included in the Annual Operating Plans:

[bull] Carcasses are a major grizzly bear attractant. While cattle carcasses can be difficult to remove due to their size and weight, all carcasses need to be removed from these allotments when practicable. However, no animal or carcass should be handled if human safety is of concern. (Bones and hide are not considered a carcass.)

[bull] All carcasses that are located within 0.25 mile of system trails or camping areas will be removed. However, no animal or carcass should be handled if human safety is of concern. (Bones and hide are not considered a carcass.)

The Service understands that it is an added burden on the permittees to add the two conservation measures regarding carcass removal on the Allotments before grizzly bear conflicts occur. However, the Service recommends taking a proactive approach in implementing these conservation measures before conflicts occur, which will greatly reduce or even avoid the need to remove grizzly bears from the Allotments in the future. In addition, the Service recommends if grizzly bear conflicts occur within the Allotments or when there is an increase in bear occupancy that the Forest should implement the following conservation measures, which are already implemented in other allotments to minimize livestock/grizzly conflicts:

[bull] Bear Sanitation Guidelines will be followed for all camps associated with livestock operations as described and defined in Food Storage Order 04-03-330. Where outdoor toilets are available in Range Camps, keep doors closed and make toilets as "bear proof" as possible.

[bull] The Forest will recommend that all permittees and their representatives (herders, riders, or other employees) carry bear spray while working within allotments. Additional recommendations are that spray canisters be holstered or otherwise carried so that they are available for use in the event of encounters with bears; storing spray canisters in back packs, saddle bags, and vehicles are acceptable methods of storage during non-working time periods. Only brands of Bear Spray certified by the Interagency Grizzly Bear Committee are recommended.

[bull] Continue to identify and implement opportunities that reduce the potential for grizzly bear conflicts. The Forest has investigated and explored additional means of reducing grizzly bear-livestock conflicts, which included assessments of: 1) cattle herding; and, 2) where appropriate, and when permittees are willing participants, study sites may be developed within allotments to "test" new management actions.