

REQUEST FOR ADMINISTRATIVE RECONSIDERATION AND DISCLOSURE OF THE ADMINISTRATIVE RECORD

July 5, 2026

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Re: 2026 Annual Operating Instructions Authorizing Cattle Grazing on the Elk Ridge Complex

Dear Forest Supervisor:

I was reviewing the 2026 Annual Operating Instructions for the Pinedale Ranger District and came across an entry in those AOIs on page 39 for the Upper Green River allotment complex which states, *"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."* This comes as a surprise to me and others concerned about this area as we commented on the 2021 Elk Ridge Complex Rangeland Supplementation Project in a process that was never completed.

Yellowstone to Uintas Connection, Alliance for the Wild Rockies, and Native Ecosystems Council respectfully request that the Bridger-Teton National Forest reconsider and suspend those portions of the 2026 Annual Operating Instructions (AOI) authorizing cattle grazing on the Elk Ridge, Lime Creek, Rock Creek, and Tosi Creek allotments until the Forest Service explains the administrative basis for this decision and releases the complete administrative record supporting it.

This request is not based merely upon disagreement with the decision to authorize grazing. Rather, it arises because the administrative history of these allotments, the Forest Service's own environmental analyses, and the agency's current monitoring information raise significant questions regarding the basis for authorizing livestock grazing after nearly a decade of vacancy.

Background

In June 2016, following negotiations resulting in the voluntary retirement of the Elk Ridge Complex domestic sheep allotments, the Forest Service informed permittee Mary Thoman that the allotments would not be restocked with domestic sheep and would instead remain vacant pending a determination regarding their suitability for cattle grazing. The District Ranger explained that cattle grazing had not been analyzed under the National Environmental Policy Act (NEPA) and that future authorization would require environmental review addressing wildlife conflicts, wilderness values, wildlife migration corridors, Forest Plan consistency, infrastructure, and other resource concerns before any decision regarding cattle grazing could be made. That letter is attached for reference.

These commitments formed an essential part of the voluntary retirement agreement. The Wyoming Wild Sheep Foundation subsequently compensated the permittee for relinquishing the sheep permits in reliance upon the Forest Service's stated intention that the allotments would remain vacant pending future environmental review for cattle grazing.

It was also our understanding, based upon discussions with Forest Service personnel, that vacant grazing allotments would ultimately be addressed during revision of the Bridger-Teton Forest Plan. That planning effort is now underway.

I. The Forest Service's Own Monitoring Does Not Demonstrate a Need to Occupy the Elk Ridge Complex

Since the retirement of the Elk Ridge allotments, the Forest Service has continued monitoring livestock use throughout the Upper Green grazing system.

The Forest Service's 2024 Cooperative Monitoring Report documents average Idaho fescue utilization of only **14.6 percent**, with monitored sites ranging from **2.3 percent to 33.8 percent**. Average riparian Carex stubble height measured **10.3 inches**, while average ungrazed Carex height measured **14.1 inches**, indicating substantial remaining riparian vegetation at the end of the grazing season.

Table 1. Summary of Forest Service 2024 Monitoring Results

Monitoring Parameter	Sites	Minimum	Maximum	Average
Idaho fescue utilization	12	2.3%	33.8%	14.6%
Ungrazed Idaho fescue height	12	3.4 in	8.5 in	5.6 in
Carex stubble height	5	7.0 in	13.4 in	10.3 in
Ungrazed Carex height	5	8.9 in	19.1 in	14.1 in

Source: Upper Green Allotment 2024 Cooperative Monitoring Report.

The monitoring results are similarly consistent throughout the Upper Green grazing system.

Table 2. Forest Service Monitoring Summary by Pasture

Pasture	General Monitoring Results
Mosquito Lake	Low Idaho fescue utilization; riparian stubble heights generally well above minimum standards.
Tepee Creek	Light to moderate utilization with substantial remaining forage.
Fish Creek	Idaho fescue utilization remained well below allowable use.
Gypsum Creek	No evidence of widespread heavy utilization.
River Bottom	Utilization remained well below allowable levels.

Source: Upper Green Allotment 2024 Cooperative Monitoring Report.

Accepting these monitoring results as accurate, the Forest Service's own data indicate livestock currently utilize only a small fraction of the available forage resource within the existing Upper Green allotments. If average utilization is approximately fifteen percent while allowable utilization approaches fifty percent, the administrative record does not demonstrate that existing forage resources have been exhausted or that occupation of previously vacant allotments is presently necessary.

II. The Forest Service Previously Recognized That Returning Cattle Required Environmental Review

The Forest Service prepared the **Elk Ridge Complex Rangeland Supplementation Environmental Assessment – Range Specialist Report** dated August 13, 2021. That report recognized that authorizing cattle grazing on these allotments required environmental review and states that the Environmental Assessment would determine whether cattle grazing should occur and under what conditions.

The report therefore appears to implement the commitment made in 2016.

However, the current AOI does not explain:

- whether the Environmental Assessment was completed;
- whether a Decision Notice or Finding of No Significant Impact was issued;
- whether the Responsible Official adopted the analysis;
- whether the analysis was withdrawn;
- or how the current AOI relates to the environmental review initiated in 2021.

III. The Administrative Record Does Not Explain the Current Decision

The Forest Service has effectively authorized grazing on allotments that have remained vacant for nearly ten years.

Yet the available record does not explain:

- what has changed since 2016;
- why the commitments made during the voluntary retirement process are no longer controlling;
- why the Environmental Assessment apparently was not completed;
- why authorization through an Annual Operating Instruction is appropriate; or
- why the Forest Plan revision process is no longer the appropriate venue for determining the long-term disposition of these allotments.

These are fundamental questions that should be answered in the administrative record.

IV. Several Conclusions in the Range Specialist Report Require Supporting Documentation

The Range Specialist Report concludes that:

- livestock grazing will maintain or improve resource conditions;
- capable lands are suitable for grazing;
- moderate grazing may reduce wildfire severity;
- continued vacancy would not substantially improve conditions; and
- cumulative impacts would remain acceptable.

The AOI does not identify the scientific analyses, monitoring information, interdisciplinary findings, or administrative determinations supporting these conclusions under current environmental conditions.

Accordingly, Yellowstone to Uintas Connection et al respectfully request that the Forest Service identify the evidence supporting those conclusions.

V. Request for Disclosure of the Complete Administrative Record

Yellowstone to Uintas Connection et al respectfully request disclosure of the complete administrative record supporting the 2026 AOI, including but not limited to:

- The complete Elk Ridge Environmental Assessment, including all drafts.
- All specialist reports.
- Biological Assessments and Biological Evaluations.

- Interdisciplinary Team reports.
- Forage production analyses.
- Carrying-capacity calculations.
- Ecological Site analyses.
- Suitability analyses.
- Utilization monitoring reports.
- Vegetation and riparian monitoring.
- Wildfire analyses.
- Forest Plan consistency determinations.
- Decision Notices, Findings of No Significant Impact, Decision Memoranda, or Records of Decision.
- Maps, GIS analyses, and spatial modeling.
- Scientific literature relied upon.
- **All directives, policy memoranda, guidance documents, briefing papers, and instructions relating to the AOI decision.**
- **All internal memoranda concerning the Elk Ridge Environmental Assessment.**
- **All emails, Microsoft Teams communications, text messages, meeting agendas, meeting notes, meeting minutes, handwritten notes, calendars, and other internal communications discussing the 2026 AOI or the decision to authorize grazing on the Elk Ridge Complex.**
- **All correspondence among the Pinedale Ranger District, Forest Supervisor's Office, Regional Office, Washington Office, USDA officials, Office of General Counsel, permittees, and cooperating agencies relating to this decision.**
- **Any Secretarial directives, Regional Forester directives, Forest Supervisor directives, or policy guidance concerning reactivation of vacant grazing allotments or increased livestock grazing that were considered in reaching this decision.**
- Any additional analyses relied upon by the Responsible Official.

If any requested documents do not exist, please identify that fact.

If documents are withheld under any asserted privilege, please provide a privilege log identifying each withheld document, its date, author, recipients, general subject matter, and the basis for withholding.

VI. Requested Relief

Yellowstone to Uintas Connection et al respectfully requests that the Forest Service:

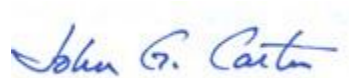
1. Suspend or withdraw those portions of the 2026 AOI authorizing grazing on the Elk Ridge Complex.
2. Explain the relationship between the 2021 Environmental Assessment process and the current AOI.

3. Release the complete administrative record supporting the decision.
4. Explain the quantitative basis for determining that occupation of the Elk Ridge Complex is necessary despite Forest Service monitoring indicating very light utilization within the existing Upper Green grazing system.
5. Identify the environmental, administrative, or policy changes that have occurred since the Forest Service's 2016 commitment that now justify authorizing cattle grazing.
6. Complete any remaining environmental review necessary before authorizing continued livestock grazing on these previously vacant allotments.

Yellowstone to Uintas Connection et al reserve the right to supplement these comments and requests upon receipt and review of the complete administrative record and any additional information relied upon by the Forest Service.

Thank you for your consideration. We look forward to your response.

Respectfully,



John Carter

Ecologist

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