



December 5, 2016

Anita DeLong  
Bridger-Teton National Forest All Units  
P.O. Box 1888  
Jackson, WY, 83001

Sent by email to: [comments-intermtn-bridger-teton-greys-river@fs.fed.us](mailto:comments-intermtn-bridger-teton-greys-river@fs.fed.us); [comments-intermtn-bridger-teton-big-piney@fs.fed.us](mailto:comments-intermtn-bridger-teton-big-piney@fs.fed.us); [akdelong@fs.fed.us](mailto:akdelong@fs.fed.us)

Re: One Year Re-Authorization to Operate Forest Park and Dell Creek Feedgrounds #50622

Dear Ms. DeLong,

We submit these comments in response to the November 22<sup>nd</sup>, 2016 notice for the reauthorization of a one-year temporary permit for the Forest Park and Dell Creek Feedgrounds. Please consider these comments relevant to both feedgrounds and convey them to the appropriate District Ranger.

We agree that the continued management of the elk feedgrounds at these sites requires further environmental assessment to provide sufficient analysis pursuant to the National Environmental Policy Act. We kindly request that you notify us of all actions on this and related issues in the next year as the agency begins investigating these environmental impacts.

In the interim, we request that the Bridger-Teton National Forest incorporate the terms and remedies from a similar permitting process at the Alkali Creek Feedground into this one-year reauthorization special use permit. Our organizations were able to formally withdraw our objections (Objection #FY-04-00-0021-OB-218-Non-HFRA) of that feedground permit with the added conditions based on our objection withdrawal agreement. In particular, remedies 3, 8, and 9 are applicable to this short term authorization:

3. The Forest Service will add language to the final ROD endorsing implementation of WGFD's Best Management Practice (BMP) concerning protection of scavengers displayed in the WGFD Jackson Elk Herd Brucellosis Management Plan. This BMP prescribes "No harassment/harvest of scavengers on feedgrounds." The Forest Service will state in the ROD that we consider Gray Wolves a predator as well as a "scavenger" and that our understanding is that this BMP applies equally to wolves as it does to other scavengers.
  
8. The Forest Service will require WGFD to report the start/stop dates annually and specifically indicate the reasons (livestock/private land conflicts/elk migration or others) for feeding initiation.
  
9. The Forest Service will include language in the final ROD that the Forest Service recommends WGFC/WGFD should transition away from the need for supplemental feed and that the WGFC use at Alkali Creek feedground is not intended to be permitted in perpetuity.

We ask that the Forest Service consider the remaining remedies in its future analysis of the environmental impacts at Dell Creek and Forest Park Feedgrounds. We have attached the objection withdrawal agreement for your records.

Please keep us informed of any further actions on these two projects. Thank you for the opportunity to comment.

Sincerely,



Chris Colligan  
Wildlife Program Coordinator  
Greater Yellowstone Coalition  
P.O. Box 4857  
Jackson, WY 83001  
(307) 734-0633



Siva Sundaresan  
Conservation Director  
Jackson Hole Conservation Alliance  
P.O. Box 2728  
Jackson, WY 83001  
(307) 733-9417