



2024 Final Report

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INTRODUCTION

Yellowstone to Uintas Connection (Y2U) continues to participate in the National Environmental Policy Act (NEPA) process by submitting science-based comments on many Forest Service (FS) and Bureau of Land Management (BLM) project scoping, analysis and decisions. Y2U also provides feedback on agency monitoring protocols and works towards creative solutions to help these underfunded agencies accomplish their stated conservation and restoration goals.

During 2024, Y2U submitted comments on twenty-five (25) Forest Service and Bureau of Land Management (BLM) Environmental Impact Statements, Environmental Assessments and Categorical Exclusions for proposed projects occurring in the Bitterroot, Boise, Bridger-Teton, Flathead, Helena-Lewis Clark, Lolo, Nez Perce-Clearwater, Shoshone and Uinta-Wasatch-Cache National Forests and BLM managed lands in Idaho, Montana, and Wyoming. The proposed projects included Forest Plan Revisions and Amendments, grazing and grazing improvements, logging, mining, stream rehabilitation, trails and vegetation treatments.

During 2024, Y2U filed nine (9) Objections to Forest Service public land management decisions in the Boise, Caribou-Targhee, Dixie, Flathead, Nez-Perce-Clearwater, and Uinta-Wasatch-Cache National Forests including a pipeline in Southeast Idaho, two regarding a vegetation management projects in Southwest Idaho and Utah, one regarding a Land Management Plan in Idaho, one regarding a vegetation management project in Montana and one regarding a vegetation management project in Utah. We also **filed Appeals on two BLM decision** regarding a vegetation management project in Montana.

During 2024, four (4) projects were cancelled by the Forest Service or Bureau of Land Management due to our detailed comments, fear of litigation or litigation!

During 2024, Y2U filed five (5) Complaints in U.S. District Courts. These were for vegetation management projects in Utah, Idaho and Montana.

During 2024, Y2U secured legal representation to investigate potential NEPA, NFMA, FLPMA, CWA and ESA violations **on eight (8) more project authorizations** including one mining and one mining dump project in Southeast Idaho, one pipeline project in Idaho, one vegetation management project in Montana, two vegetation management projects in Utah, one vegetation management project in Wyoming and one on an Elk feedground in Wyoming.

William Pendley/BLM Litigation: On January 19th, 2021, Yellowstone to Uintas Connection, the Center For Biological Diversity, WildEarth Guardians, Western Watersheds Project, and Rocky Mountain Wild filed a lawsuit for declaratory and injunctive relief to challenge Federal Defendants' unlawful approval of nine Resource Management Plans ("RMP") and related projects. These RMPs govern the management of more than 6.5 million acres of public lands and minerals, Defendant William Perry Pendley's exercise of the duties of Acting Director of the U.S. Bureau of Land Management ("BLM") was unlawful under the Appointments Clause, U.S. Const. art. 2, § 2, cl. 2; the Federal Vacancies Reform Act of 1998, 5 U.S.C. §§ 3345 et seq. ("FVRA" or "Act"); and the Administrative Procedure Act, 5 U.S.C. §§ 701 et seq. ("APA"). The projects include the Dairy Syncline phosphate mining project (See the Mining Section below) and the Gemini Solar project. To view the complaint, see our web page at the following link: <https://www.yellowstoneuintas.org/issues/science/item/123-simplot-company-s-proposed-dairy-syncline-mine>

On June 22nd, 2021, a meeting to discuss potential avenues for resolution of *Center for Biological Diversity et. Al. v. U.S. BLM, et. Al.* took place. Following that meeting we conferred with the plaintiffs to generate a set of preferred outcomes for the eight RMP-related decisions challenged in our complaint.

On March 19th, 2024, a settlement agreement was reached with the BLM that provided funding for off-site mitigation, sage grouse studies and road density studies. Our opposition of this project started in 2018. This illustrates the length of time that many of these project proposals and the NEPA process take.

Y2U will continue to be the voice for wildlife and habitat connectivity throughout the Corridor. We will continue to advocate for the use of sound science in land management decisions and when necessary, we will support litigation efforts to oppose projects that are projected to have a negative impact on wildlife and habitat.

Ashley National Forest Aspen Restoration Project

In October 2019, the Ashley National Forest released the Scoping Letter for the Ashley NF Aspen Restoration Project. This project will occur on **177,077 acres** of which 147,000 acres was proposed in Roadless Areas. Under Categorical Exclusion, the project was intended to move forward without any input, appeal, or objection opportunities from the public, which frees the Forest Service to cut, burn, masticate, sell, girdle, cut roots, and potentially destroy ecosystem function without any public oversight or input. In December 2019, Yellowstone to Uintas Connection along with Alliance for the Wild Rockies and Native Ecosystems Council, submitted comments to the Ashley National Forest regarding the Aspen Restoration Project.

On **April 22nd, 2024**, Y2U, Alliance for the Wild Rockies, Native Ecosystems Council and the Center for Biological Diversity filed a Complaint against the Forest Service in regard to the authorization of the Ashley National Forest Aspen Restoration Project.

On **June 24, 2024**, the Chief of the Forest Service granted the Forest Supervisor of the Ashley National Forest authority to withdraw the decision.

On July 3rd, 2024, the Ashley National Forest Supervisor withdrew the decision and authorization of the Ashley National Forest Aspen Restoration Project due to our litigation!

Pintler Face Project

On July 6th, 2016, the Wise River Ranger District of the Beaverhead-Deerlodge National Forest proposed the Pintler Face Project. The project is located 10 miles northwest of Wise River, Montana, on the south face of the Anaconda-Pintler Mountains in the Wise River and Wisdom Ranger Districts.

On **February 16th, 2024**, Yellowstone to Uintas Connection, Alliance for the Wild Rockies, and Native Ecosystems Council filed a Complaint in the U.S. District Court District of Montana in regard to the authorization of the Pintler Face Project.

In November of 2024, the Federal Court granted our request for an injunction stopping burning and precommercial logging in grizzly and lynx habitat for the massive Pintler Face Project on the Beaverhead-Deerlodge National Forest!

AGENCY OVERSIGHT

The screenshot shows the USDA Forest Service website for the Caribou-Targhee National Forest. The page is titled "Caribou-Targhee National Forest" and includes a navigation menu on the left with options like "Home", "Special Places", "Recreation", "Alerts & Notices", "Passes & Permits", "Maps & Publications", "Land & Resources Management", "Learning Center", "Working Together", "About the Forest", and "News & Events". The main content area is divided into several sections:

- Projects**: A section titled "Schedule of Proposed Actions" stating that the Forest publishes a Schedule of Proposed Actions (SOPA) four times a year: January, April, July and October. It directs users to visit the [Forest Service SOPA page for the Caribou-Targhee National Forest](#).
- Caribou-Targhee National Forest Current and Recent Projects**: A section with a "Subscribe to this feed" button and a table with columns for "Sort By", "Name", "Status", "Management Unit", "Purpose", and "Type".
- Developing Proposal**: A section detailing two projects:
 - Fleming Canyon Trail (#4079) Reroute**: The proposed action would utilize an old sheep herder trail that is already on a fairly sustainable grade and would take minimal work to bring it up to Forest Service standard for a trail class 3 single track motorized trail.
 - Lake Canyon Trail (FS#206) Project**: Reroute approx. 3/10 of a mile at head of canyon putting it on a grade of 5 to 10%. Close and rehab old segment to eliminate eroding section of trail. Reroute 2/10 of a mile at mid trail to eliminate rock hazards.
- Under Analysis**: A section partially visible at the bottom.

Key Contacts: Doug Herzog, Forest Planner, Primary Phone #: 208-557-5763

Advanced Notice of Proposed Rule Making (ANPR) for Mature and Old Growth Forests

Status

The Advanced Notice of Proposed Rulemaking (ANPR), 88 Fed Reg 24997 et seq., was published April 21, 2023. On June 28th, 2023, a large group of conservation organizations including Yellowstone to Uintas Connection (Y2U) submitted comments.

The ANPR asks for comments on how the agency can adapt its policies to manage the national forest system in the face of climate change. The short answer, on which more detail is provided below, is that **the agency must change its policies and culture to emphasize protection of critical resources found on national forests and grasslands.** First and foremost, conserving old forests is the main emphasis in the President's Executive Order 14072, which is the reason the agency is undertaking this rulemaking. Managing to retain and enhance old forests also promotes other critical values of our national forest system: conserving native biodiversity, or the web of life, and protecting watersheds, which supply much of the nation with drinking water.

It is important to recognize that these critical values, especially old forest retention and conservation of biological diversity, must be provided on federal public lands, especially on national forests. Only the national forest system, and to a lesser extent, BLM lands, have the large blocks of forested habitat that, if managed appropriately, can meet the needs of a wide variety of wildlife, plant, and fish species, and provide major carbon storage that is critical in the effort to limit the damage from climate change.

Since the end of World War II, the Forest Service has been mainly concerned with providing commodity outputs, especially raw material for wood products and forage for domestic livestock.

The Forest Service has a golden opportunity to protect the inestimably valuable asset of older forest ecosystems and help ensure earth has a fighting chance to protect native biodiversity and reduce the impact of climate change. The Forest Service must write a strong rule that prohibits commercial exploitation of these forests and protects them to the maximum degree possible, consistent with valid existing rights, safety, and common sense.

On **February 1st, 2024**, additional comments were submitted by the same group of conservation organizations including Y2U.

The proposed amendment must reflect the ecological reality that old growth, existing and future, is best left alone to be retained as, or develop into, old growth. The proposed amendment must have standards that will ensure mature stands will be protected and allowed to become old growth so that old growth will persist on the landscape. The exception for Alaska must be deleted from the proposed amendment.

Expected Outcome

Unknown

Land Management Plan Revision for the Lolo National Forest

Status

On **March 31st, 2024**, Yellowstone to Uintas Connection, the Alliance for the Wild Rockies, Wildlands Defense, Council on Wildlife and Fish, Center for Biological Diversity, and Native Ecosystems Council submitted comments on the proposed Land Management Plan Revision for the Lolo National Forest.

The Lolo National Forest Land Management Plan retains the decision for managing Canada lynx habitat from the 2007 Northern Rockies Lynx Management Direction Record of Decision. In 2007, the Northern Rockies Lynx Management Direction amended the existing plans of 18 national forests in Montana, Idaho, Wyoming, and Utah including the Lolo National Forest. The record of decision was signed by the regional foresters of the USDA Forest Service Northern Region, Intermountain Region, and Rocky Mountain Region on March 23, 2007.

The purpose of the Northern Rockies Lynx Management Direction was to incorporate into national forest plans management direction that conserves and promotes recovery of Canada lynx by reducing or eliminating adverse effects from land management activities on National Forest System lands, while preserving the overall multiple use direction in existing plans. In retaining the Northern Rockies Lynx Management Direction, the Lolo National Forest Land Management Plan carries forward the objectives, standards, and guidelines that were developed to conserve the Canada lynx. The use of the terms “standards,” and “guidelines” in the Northern Rockies Lynx Management Direction is consistent with the definitions of these terms found in the Lolo National Forest Land Management Plan. The definition of “objectives” in the Northern Rockies Lynx Management Direction is consistent with the definition of “desired conditions” found in the Lolo National Forest Land Management Plan.

The Lolo National Forest Land Management Plan thus defines the Northern Rockies Lynx Management Direction “objectives” as “desired conditions.” The Northern Rockies Lynx Management Direction is incorporated into the revised Lolo Land Management Plan in its entirety, to include required monitoring within the Northern Rockies Lynx Management Direction and those terms and conditions that were incorporated from the U.S. Fish and Wildlife Service Biological Opinion on the Northern Rockies Lynx Management Direction.

Expected Outcome

Unknown

Land Management Plan for the Nez Perce-Clearwater National Forests

Status

On **January 19th, 2024**, Yellowstone to Uintas Connection (Y2U), Friends of the Clearwater (FOC), Alliance for the Wild Rockies and a group of additional conservation groups submitted comments on the proposed Land Management Plan for the Nez Perce-Clearwater National Forest (NPCNF). **If adopted as written, the revised Plan will conflict with President Biden’s Climate Policy**, which includes the 30 by 30 initiative (Executive Order 14008) and Executive Order 14072 directing government agencies to weigh the role mature and old-growth forests play in mitigating climate change. It also threatens wildlands proposed for protection under the [Northern Rockies Ecosystem Protection Act](#) (See NREPA below) introduced in Congress as S 1531. We asked the Council on Environmental Quality to do everything in its power to pressure the U.S. Forest Service into withdrawing and reformulating the revised Forest Plan.

The Forest Service’s [revised Forest Plan](#) for NPCNF breaks commitments President Biden made in his Executive Order 14072 regarding mature and old-growth forests. In its [EIS](#) for the original 1987 Forest Plan for the Nez Perce National Forest, the agency recognized the need to balance timber production with maintaining old-growth forest conditions: “One of the most critical elements of diversity in a managed forest is old growth. If sufficient old growth is retained, all other vegetative stages from grassland through mature forest will be represented in a managed forest.” Decades later, and as recognized by President Biden in his Executive Order 14072, the global climate crisis highlights previously unappreciated ecosystem services these older, intact forests provide: their [capability to sequester carbon](#) from the atmosphere and store it in trees and soil. But in ignoring this science, the new revised Forest Plan for the NPCNF removes the mandates for protecting old growth and mature forests found in the original forest plans and targets the remaining old growth and mature forests for logging almost everywhere outside congressionally designated Wilderness. The new Plan calls for vastly increased clearcutting across the NPCNF, setting annual quotas more than double the highest cut this century and raising the normal maximum limit on clearcuts to over 200 acres. A 2023 [report](#) commissioned by FOC estimates significant increases in carbon emissions from logging and other NPCNF management actions under the revised Forest Plan.

On **January 29th, 2024**, Y2U, FOC, Alliance for the Wild Rockies, Flathead-Lolo-Bitterroot Citizen Task Force, WildEarth Guardians, Western Watersheds Project, Wilderness Watch, Friends of the Bitterroot, Paul Sieracki, WildWest Institute, Bluwater Solutions LLC, Blue Mountains Biodiversity Project, Friends of the Wild Swan, Swan View Coalition,

Conservation Congress, and Yellowstone to Uintas Connection, **filed an Objection** to the Nez Perce-Clearwater National Forests Land Management Plan (LMP) and its accompanying draft Record of Decision (draft ROD) and Final Environmental Impact Statement (FEIS).

Expected Outcome

Unknown

Letter to Congressional Leadership Opposing Public Lands Package

Status

On **December 12th, 2024**, a large group of conservation organizations including Yellowstone to Uintas Connection (Y2U) submitted a letter to congressional leaders opposing the Public Lands Package and urging congress to reject the proposal during the Lame Duck congressional session.

While Congress must enshrine protections for more of our public lands and waters, conserve biodiversity, and foster climate resilience and adaptation, the bills considered by this Congress that have passed out of Committee fall short of these ideals. In fact, many of the bills likely to be considered as part of a public lands package will undermine these values and set bad precedents that will greatly complicate conserving and protecting wildlife and wild places in the decades to come.

When Congress overwhelmingly passed the 1964 Wilderness Act, it recognized humans as part of a larger “community of life,” which has a right to exist in Wilderness free from the incumbrances of motorization, mechanization, manipulation, and development. **The human population in the United States has roughly doubled since 1964, and human pressure into our last, wildest landscapes is greater than ever.** Yet, most of the Wilderness proposals that Congress would entertain in a public lands package would escalate human pressures through nonconforming provisions, including low-level military overflights and unnecessary installations, among others.

Expected Outcome

Unknown

Northern Rockies Ecosystem Protection Act (NREPA)

Status

The Northern Rockies Ecosystem Protection Act (NREPA) is a visionary piece of legislation that would designate over 22 million acres of roadless country in the Northern Rockies as Wilderness and enshrine them in the protections of the 1964 Wilderness Act. In the Clearwater NF for example, over 1.5 million acres of roadless country, currently at risk of logging, road-building, and mineral leasing, would become secure for wildlife, water flows, recreation, and the other benefits Wilderness provides.

Scientists and advocates crafted NREPA in the 1990s to prevent the loss of roadless areas to development. Since then, over 30,000 acres of roadless country has been logged in Idaho and Montana, showing the weaknesses in current roadless regulations. American wilderness advocate (and songwriting legend) Carole King recently wrote that the bill, **“NREPA would protect more public land in the lower 48 than any other currently proposed legislation.”** Representative Carolyn Maloney introduced NREPA this year, and it’s time we get it passed.

Yellowstone to Uintas continued supporting the effort to get NREPA passed throughout **2024**.

Sublette County Wyoming Moyes 40 Rod Road Development

Status

On **November 17th, 2024**, Yellowstone to Uintas Connection Staff Ecologist Dr. John Carter submitted comments to the Sublette County Commissioners on the Moyes project in advance of the meeting scheduled for November 19, 2024. Over nearly 3 years, the public has shown up to express their opposition to this development. Based on the continuing advancement of this project in spite of the evidence and opposition, the County Plan and Required Findings, the Planning and Zoning Board and the BOCC appear to have turned a deaf ear to the public and favored the interests of one developer over our wildlife and long-standing values.

Turning this down now can resolve this situation and reinforce that the County Comprehensive Plan means something and that the 40+ citizens who spent 18 months putting it together did not spend their time in vain.

In an attached letter, regarding the wildlife migration corridor, Dr. Carter makes the case that the evidence supporting a passageway through the development is that provided by the Wyoming Game and Fish letter dated **July 12, 2024**. **Mr. Moyes has not provided evidence that his plan will preserve migration corridor function.** Mr. Moyes has made conflicting or misleading statements that he would not be allowed to make in a court of law. A few hours listening to the recording of the **November 8, 2024**, meeting shows this to be the case.

Expected Outcome

Unknown

Sublette County Wyoming Mule Deer Migration Corridor Considerations in Land Use Planning

Status

On **January 22nd, 2024**, Yellowstone to Uintas Connection Staff Ecologist Dr. John Carter submitted recommendations to the Sublette County Planning and Zoning members in regard to the **current revision process for the Sublette County zoning regulations and to maintain Corridor function.** These recommendations summarize considerations including the Governor's Executive Order and County Policy documents. We analyzed data from the County database to help focus the recommendations and illustrate the relative portions of county private and public lands occurring within and affected by the Corridor.

Our analysis shows only small areas of private land are affected. Corridor zoning or other mechanisms to prevent or modify subdivision, conditional use permits, or dense development would involve 4% of the County's Agricultural land and 0.4% of its Residential land. The High Use portion of the Corridor is less with Agriculture being 1.15% and Residential being 0.06% of the County. Effects of zoning or other changes to the property tax revenue are small given that oil and gas revenues are the majority of revenues at 89% of the total and property taxes on land and buildings are the other approximately 11%. A major emphasis in the Policy documents we reviewed is providing funding for conservation. We recommend pursuing funding for a County Coordinator position to address Corridor issues. This role would include integrating and analyzing these policies, engaging with the Game and Fish Department to solicit input and analysis, providing recommendations to public land managers and County officials on proposed projects, and pursuing funding for conservation on private lands.

Sublette County could pursue State funding for this Coordinator position to get it started or fund it out of Reserve funds. The Executive Order expresses support to the Counties affected when they implement changes. Establishing this position could be seen as a positive step by Sublette residents concerned about wildlife and open space. We listed some initial potential funding sources in the recommendations.

Expected Outcome

Unknown

USDA Forest Service proposal specific to Forest Service Manual (FSM), Section 2355 - Climbing Opportunities

Status

On **November 22nd, 2024**, Yellowstone to Uintas Connection (Y2U), Friend of the Bitterroot (FOB), and a group of other conservation organizations submitted comments in response to the November 2023 USDA Forest Service proposal specific to Forest Service Manual (FSM), Section 2355 - Climbing Opportunities establishing code, caption, and direction for climbing opportunities on National Forest System lands.

Our organizations have been **concerned with the effects of climbing on cliff-dwelling species** since before the Mill Creek sport climbing area was installed on the Bitterroot NF in Recommended Wilderness. The unauthorized bolting of 60 routes with over 500 bolts raised the level of concern exponentially and our members have been deeply involved since. We supported Forest Supervisor Matt Anderson's 2020 moratorium on unauthorized fixed anchor route installations. FOB members were involved throughout the lengthy effort to develop a Bitterroot NF Climbing Management Plan (CMP) before it was put on hold pending final climbing directives; and they worked with eighteen other environmental organizations to develop a recommended Citizen's Climbing Management Plan.

While recognizing the substantial amount of work that has gone into this proposal and with appreciation that fixed anchors and equipment are finally and clearly recognized as permanent installations, there are numerous concerns with the proposed directive. First and foremost is the origin story: climbing organizations, frustrated by Agency wilderness bolting prohibitions and funded by a recreation industry focused on monetizing public lands, successfully lobbied select members of Congress to mandate Forest Service climbing directives, including on use of permanent installations in wilderness. The proposed directives restrict five critical and foundational aspects of the proposed directive with "as funding and resources allow" and then proposes "leveraging funding or other forms of assistance through cooperative agreements with climbing organizations" and "working with local and national climbing organizations and manufacturers of recreational equipment to achieve climbing program objectives" at the exclusion of other interested and invested parties – a clear bias and betrayal of public trust in the process used to arrive at this proposed directive. The resulting direction does little to address the significant existing and emerging resource issues and use conflicts that result from the explosion of this sport, instead repeatedly puts the proverbial fox in charge of the henhouse, and decisions based on this policy, if not revised, will be challenged in court.

In summary, we recognized the amount and importance of work put into responding to the 2021 Consolidated Appropriations Act mandate for climbing direction, especially after our years-long involvement on the Bitterroot NF. The importance of this work, however, **requires it not be based on appeasing the climbing community through a compromise in stewardship of public wildlands.**

We urged revision of the proposed directive as outlined in our comments to better accomplish management of climbing opportunities in wilderness and non-wilderness and to address the significant existing and emerging resource issues and use conflicts that results from the explosion of this sport.

Expected Outcome

Unknown

ADVOCACY AND EDUCATION



Environmental Advocacy

Status

During **2024**, Jason Christensen, Yellowstone to Uintas Connection's (Y2U) Director, tabled at several events promoting the work that we do at Y2U.

Jason also uses his position as Board Chair and Watermaster on the Paris Creek Water District to **teach the local farmers the importance of having beaver occupy the system and to promote water conservation methods** that can be used locally to curb the dewatering of the Bear River and the Great Salt Lake.

Jason and his wife Kandis hosted several youth groups and their leaders at Kiesha's Preserve's campground throughout the **summer of 2024**. Y2U staff members **built an educational trail at the Preserve that includes interpretive signage and handbooks that educate the guests about the history and geology of the Bear River Range in Southeast Idaho and the plant and wildlife communities that occur at Kiesha's Preserve.**

Throughout **2024**, Dr. Carter has been working to **educate the local government and prevent several large developments** in the Bondurant Wyoming area. These projects are located in the midst of **critical migration routes** for several species of wildlife. An article about this development and Dr. Carter's involvement can be found here:

<https://www.sweetwaternow.com/billionaire-seeks-zoning-change-to-construct-resort-in-bondurant/>

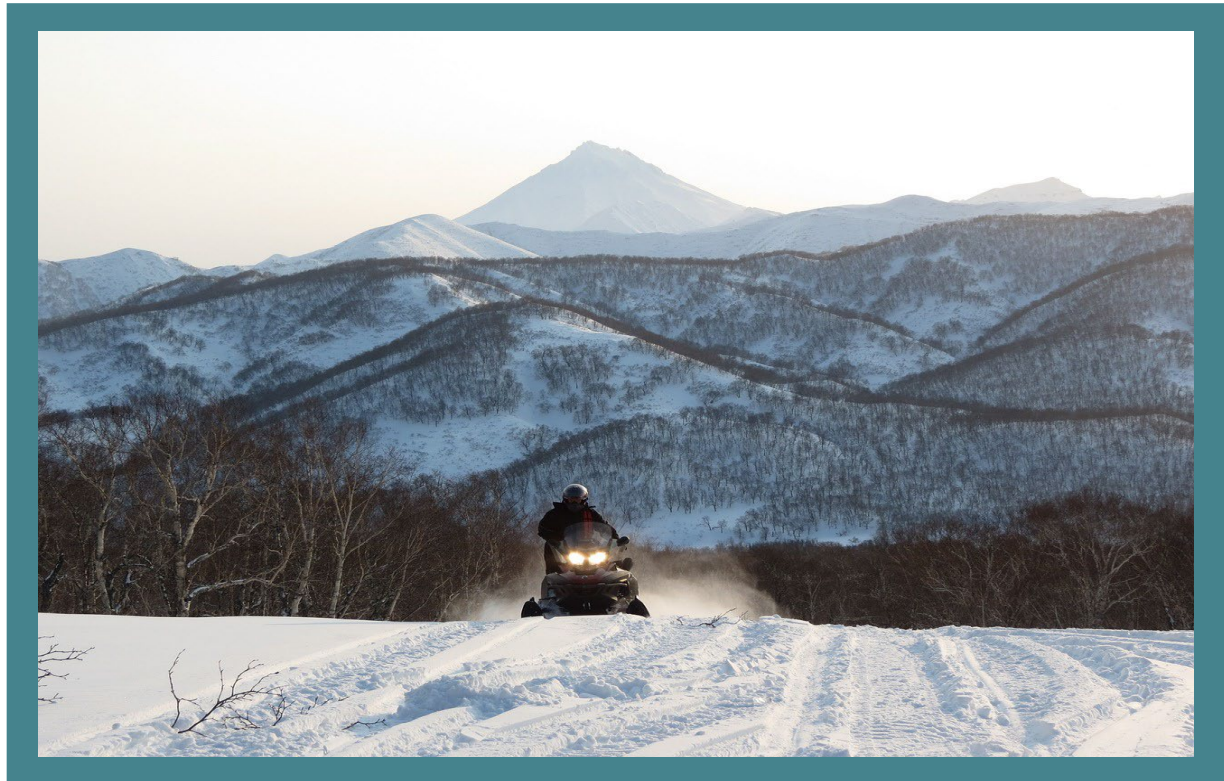
It is of note that the Jackson Fork Resort project on the Upper Hoback River was halted due to being unable to meet permit conditions that drove up the cost. Our involvement in educating the Sublette County Commissioners was critical in this process. That project is now dead for the foreseeable future and the wildlife migration corridor in southwest Wyoming remains functioning.

Throughout **2024**, Dr. Carter worked to provide technical assistance to local communities and landowners affected by the **Hill Air Force Base Superfund Sites**. For years this work was done as a consultant through an EPA Technical Assistance Grant to his consulting company, Environmental & Engineering Solutions. After Yellowstone to Uintas Connection was established, Dr. Carter terminated his consulting work and EPA TAG grant but has continued to provide technical assistance without charge through Yellowstone to Uintas Connection. Issues currently being addressed are **contaminated groundwater** and **arsenic contaminated soils** and **the ongoing inadequate monitoring**. Currently he is assisting with review of Air Force documents and answering questions regarding local development and liability.

Work Plan

- Dr. Carter will continue to write articles about the Corridor for publication in national and regional media outlets. (See an example [here](#).)
- Y2U staff members continue to submit Op Eds and subject material to media outlets about the Yellowstone to Uintas Connection corridor. See Dr. Carters recent article about Climate Breakdown – Losing Aspen in The West [here](#).

ATVs/OHVs/OSVs/MOUNTAIN BIKES



Motorized Travel

Status

Big Game security areas are defined as an area of cover over 0.5 miles from an open motorized route and over 250 acres. These areas are important for limiting disturbance and hunting vulnerability to big game animals (but provide benefits to other animals as well). Because of the number of roads and trails within our National Forests and BLM managed lands there are very few security areas.

Road density and the status of all roads and OHV/ATV/OSV trails (legal, illegal, open, temporary, closed, user-created and other classifications), not just OMRD, should be mapped and the density per square mile determined and compared to the best available science and be considered in the Cumulative Effects of any project NEPA analysis. This should be done at the project level and analyzed for impacts on watersheds affected by the proposed projects. These analyses should determine additional route closures necessary to provide security areas for wildlife such as deer, elk, and moose as well as the migration corridors for Canada lynx, wolverine, and Grizzly bears.

There have been numerous publications on the **benefits of roadless areas and the negative effects of roads** regarding noise pollution and wildlife. Roads increasingly provide vehicle access into more and more remote areas, forcing sensitive species to be eliminated or greatly reduced especially when the cumulative impacts from livestock, oil, gas and mineral exploration and development are included. Roads and groomed trails provide increased access that can be used in summer and winter to damage environmental resources and displace or disrupt wildlife.

Motorized vehicles, OHV/ATVs and snowmobiles, with their ability to travel large distances cross-country, often have negative environmental impacts whether the trail is open, closed, or user created. The ecological effects of roads and/or mechanized use include erosion, air and water pollution, spread of invasive weeds, avoidance of road or machine-affected areas by wildlife, and habitat fragmentation.

Winter disturbance or stress caused by humans on snowmobiles, snowshoeing or skiing jeopardizes an animal's ability to survive and reduces females' chances of successfully raising offspring.

When we disturb wildlife on public lands it can also push animals onto private land, leading to conflict with landowners.

With advances in outdoor gear and new technologies that have made winter recreation more accessible, along with population growth, recent years have brought more encounters between winter recreationist and wildlife. As a result, recreation impacts on wintering wildlife is a growing conservation concern.

During the **fall of 2024**, we have been working with the Idaho Fish and Game and the Bear Lake County law enforcement departments to put up signage at groomed snowmobile trailheads and along the groomed trails that **educate the public regarding the effect winter has on the animals and how we can avoid disturbing them while recreating on public lands during the winter.**

Work Plan

- Y2U will continue to monitor the impacts of motorized travel, OHV/ATV/OSV on every proposed project occurring on Public Lands.
- Install Wintering Wildlife signage at groomed snowmobile trailheads and high-risk areas.
- Y2U will address this issue through comments provided to the agencies during the NEPA process.

Expected Outcome

Unknown

FISHERIES



Paris Creek Restoration

Status

The project goal is to restore habitat for Bonneville cutthroat trout in the 3-mile reach of Paris Creek affected by an irrigation diversion on the adjacent Caribou National Forest. **Our goal is to increase stream flows in this mostly dewatered reach of Paris Creek.** Dr. John Carter, Y2U staff ecologist, has been working on this project for nearly two decades, engaging the Forest Service and Idaho Fish and Game to conduct fish surveys. Two of the fish surveys were completed in 2001 and 2012, showing that Bonneville cutthroat trout are missing from the dewatered reach. A third fish survey was conducted in **2024** and is discussed below. The Forest Service brought equipment and expertise in 2016 to actively restore stream channels, create pools and riffles and plant willows along the streambank in the portion of Paris Creek on the Forest. Dr. Carter and the Forest Service fisheries biologist looked at the effectiveness of the restoration efforts along the portion of the creek in the Forest and reported great progress. Idaho Department of Environmental Quality surveyed fish, invertebrates, and wildlife along the Kiesha's Preserve reach this summer. We are now engaged with these agencies, private landowners, irrigation district and PacifiCorp to return enough flow to sustain cutthroat trout. During 2020, PacifiCorp announced that they intend to decommission the power plant, thereby not needing to divert the water out of the upper stretch of Paris Creek. PacifiCorp is currently suggesting that a minimum of 16 CFS be released into the creek during the irrigation season. Ultimately, **increased flow will restore the ability of Bonneville cutthroat trout to inhabit this entire 3-mile stretch of Paris Creek** that is currently dewatered. During the summer of **2024** we continued to monitor flows and water quality in relation to Bonneville cutthroat trout habitat specifications. Jason Christensen, Yellowstone to Uintas Connection's Director, was able to get an increase in the flow throughout the summer of 2024 of approximately 10

cubic feet per second. A third fish survey was conducted by the Forest Service and Idaho Fish and Game on **August 27th, 2024**. This survey produced 16 Bonneville Cutthroat trout and 3 Brook trout in the approximately 100 ft section of Paris Creek occurring on Kiesha's Preserve and 3 Bonneville Cutthroat trout on the 100 ft section of Paris Creek occurring below the power plant, the section that has not previously been dewatered. The Bonneville Cutthroat surveyed on Kiesha's Preserve were of varied size and age class showing that the fish are reproducing naturally in Paris Creek. This information will assist us in arguing against the use of Rotenone to kill the non-native Brook trout which would also kill the current population of Bonneville Cutthroat trout. The survey showed that the Bonneville Cutthroat trout not only outnumber the Brook trout but are reproducing and possibly outcompeting the Brook trout in Paris Creek.

Kiesha's Preserve asserted its water rights on Paris Creek and during the summer of 2020 reconstructed the ditch and diversion point for their water rights which will return to the stream on Kiesha's Preserve and give us an additional wedge to force more water to remain in the creek at the diversion structure.

During **2024**, Jason, Yellowstone to Uintas Connection's Director, has continued to be actively involved with the Paris Creek generating station decommissioning working with all affected parties to be sure that the return of the water into Paris Creek meets the needs of the fish and wildlife dependent on the creek. This has included being involved with building new diversion points with Trout Unlimited and ensuring that any stream realignment is appropriate and ecologically sound. Jason is currently serving as the Paris Creek Water District Board Chair and Acting Water Master on the Paris Creek Water District. Kandis, Yellowstone to Uintas Connection's Programs Director serves as the Secretary and Treasurer for the Water District.

Beavers have returned to Paris Creek with the recovery of the riparian aspen, willows and other overstory trees and shrubs. Observations in **2024** indicate that the native Bonneville cutthroat trout are inhabiting the beaver ponds on Kiesha's Preserve.

Work Plan

- We continue to jointly monitor project success of the habitat reconstruction on the upper reach of Paris Creek that occurs on the National Forest. There are already deep pools and riffles on the site because of the restoration. All willow plantings have survived.
- Continue to argue against the use of Rotenone to kill of the non-native Brook trout which will also kill the Bonneville Cutthroat trout.

Expected Outcome

Rocky Mountain Power has now moved the decommission date for the power plant to fall of **2025**. The entire flow of Paris Creek will be returned to the upper 3-mile reach that previously has been dewatered for power generation.

Red Rocks Lakes Grayling

Status

The U.S. Fish and Wildlife Service's (FWS) proposed pipeline project would involve digging a six-foot deep, mile-long trench and installing a 14-inch pipeline to connect Upper Red Rock Lake to a man-made pond just outside the Wilderness boundary. Then, the agency would artificially add oxygenated water to the lake during the wintertime to supposedly manufacture better Arctic grayling habitat. Red Rock Lake National Wildlife Refuge is located near Lima, Montana.

On March 25th, 2023, Yellowstone to Uintas Connection (Y2U), Alliance for Wild Rockies, Center for Biological Diversity, Council on Wildlife and Fish, and Native Ecosystems Council submitted comments on the proposed project. Supplemental comments were submitted on March 27th, 2023.

The project is a blatant violation of the Wilderness Act, which prohibits the agency from intentionally modifying Wilderness habitat and prohibits structures and installations and the heavy equipment the agency plans to use in carrying out the project.

FWS has framed its project as needed to bolster the abundance of adfluvial Arctic grayling—a species of freshwater fish in the salmon family—in Upper Red Rock Lake, but the agency’s misguided plans are directed at intensively manipulating natural habitat and disrupting natural processes, rather than directed at more aggressively mitigating human sources of harm to the fish, like livestock grazing, irrigation diversions, human development, and fishing activity.

Red Rock Lakes National Wildlife Refuge has been protected since the 1930s when it was recognized for its importance as waterfowl and wildlife habitat. Trumpeter swans, which nearly faced extinction in the early 20th century, rely on Red Rock Lakes as a nesting ground.

Arctic grayling is a northern fish in extensive abundance in Alaska, Canada, and Russia. The only native populations of grayling in the Lower 48 occurred in the Upper Missouri River Basin in southwestern Montana and Wyoming and in a few waterways feeding the Great Lakes. The Great Lakes population was extirpated in the early twentieth century, but remnants of the Upper Missouri River Basin population remain. “Fluvial” arctic grayling, which reside in streams, have seen the greatest decline across their former Upper Missouri River Basin habitat. FWS has denied petitions from environmental groups to provide Endangered Species Act protections to the fluvial population around the Big Hole River, and those groups are currently suing the agency over its denial.

FWS has pointed to the presence and persistence of the grayling in Upper Red Rock Lake to justify its refusal of more aggressive regulatory action to protect habitat elsewhere in the region. But the abundance of these grayling is also threatened by human impacts to habitat connectivity, by livestock grazing and fishing, and by one entirely natural barrier that the grayling in Red Rock Lakes face: winter. A harsh winter with extensive ice and snow cover on a shallow lake like Upper Red Rock Lake can lead to oxygen depletion that affects grayling survival and abundance. The species has seen past population swings that correlate with such harsh winter habitat conditions.

On June 26th, 2023, Yellowstone to Uintas Connection (Y2U), Wilderness Watch, Alliance for the Wild Rockies, and Gallatin Wildlife Association filed a lawsuit against the U.S. Fish and Wildlife Service, challenging the agency’s unlawful decision to construct and operate a permanent water-diversion pipeline within the Red Rock Lakes Wilderness in southwestern Montana.

On September 13th, 2023, due to our litigation, **the FWS withdrew its decision** to allow for the installation of the pipeline from Shambow Pond to URRL. The Service will focus on alternative conservation measures for Arctic grayling and continued stewardship of the Red Rocks Lake Wilderness under the Wilderness Act in collaboration with interested parties. Any further action would be subject to additional analysis, with the appropriate public review and input. The FWS stated that will not be taking further action on the Shambow Pond Diversion Pipeline at this time.

On **February 1st, 2024**, FWS released for public review and comment a draft Environmental Assessment (EA) and Minimum Requirements Analysis Framework for Red Rock Lakes National Wildlife Refuge. This latest proposed action is to improve Arctic grayling access to spawning habitat by notching

beaver dams in Red Rock Creek, some of which are within designated wilderness. The proposed notching would remove a portion of each beaver dam with primitive hand tools to ensure grayling have access to upstream spawning areas. As proposed in the EA, notching beaver dams would occur each spring prior to grayling spawning. The FWS states that beavers will typically rebuild these dams over the course of the following summer. No ground disturbance would occur.

On **February 23rd, 2024**, Yellowstone to Uintas Connection (Y2U), Alliance for Wild Rockies, and Native Ecosystems Council submitted comments on Draft EA Beaver Dam Notching Red Rock Lakes NWR.

The degraded water quality and the role livestock play in the water pollution, streambank alteration and habitat modification **must be addressed**. The Draft EA includes no data or analysis of the current grazing management scheme at Red Rock Lakes, nor have we seen any data, reports, photos characterizing the condition of the streams (water quality, hydrology, bank condition, spawning areas) and riparian floodplains upon which arctic grayling depend. This information would provide the needed setting within which the public could understand the current state of habitats. The lack of dissolved oxygen in Upper Red Rock Lake where the grayling overwinter results from excessive nutrient loads. E. coli, nutrients, and sediment are likely the result of two factors. First and foremost, would be the grazing of livestock in the watersheds and allowing their access to streams. They deposit massive amounts of manure in the streams and watersheds, directly increasing nutrient loads and E. coli. In addition, they trample stream banks and alter the bank structure leading to accelerated erosion and sediment loading. This is in addition to the sediments emanating from the grazed watersheds. Both EAs for this project area have ignored these facts and provided no analysis.

The Red Rock Lakes Comprehensive Plan emphasizes maintaining the processes for riparian habitats to support migrant birds, fish, and wintering ungulates. Similarly, emphasis is placed on meadow, grassland, shrub steppe, aspen, mixed conifer habitats. We have seen no reports, maps, or analysis of current and potential conditions as influenced by refuge management and other factors. This leaves the Fish and Wildlife Service as well as the public with a situation that does not lend itself to accurate determinations of causes and effects to the streams, lakes, and habitats within the borders of the Refuge.

When discussing Water Resources, the EA describes notching beaver dams as helpful in the flushing of sediments during runoff. It would seem natural that runoff would help reduce sediment fines in spawning gravels, and those sediments would mostly collect behind the beaver dams. Notching the dams will allow the sediment to pass and move into the lake. This would exacerbate the filling of the lake which reduces depth and volume. This would increase the risk of winter kill.

Work Plan

- Upon release, Y2U will address whether the Final EA adequately analyzed the potential environmental impacts of the project and addressed potential alternatives.
- Y2U will file an Objection if the FEIS does not adequately analyze the potential environmental impacts of the proposed project and potential alternatives.

Expected Outcome

Unknown

LIVESTOCK GRAZING



Bears Ears National Monument Resource Management Plan and EIS

Status

On **March 8, 2024**, The Bureau of Land Management (BLM) and U.S. Department of Agriculture Forest Service opened the public comment period for the Draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS).

On **June 8th, 2024**, Yellowstone to Uintas Connection (Y2U) submitted comments on the Draft RMP and EIS. Our review of the Draft RMP and EIS raised major concerns. The deficiencies in the RMP are too numerous to detail and it needs to be revised to address the protection and restoration of the ecosystem and objects yet undefined. It must assess and report the current state of these upland and riparian habitats and associated wildlife populations compared to their potential and address the causes of environmental degradation. It must provide quantitative and systematic monitoring and management to guide decisions. It must rely on the best available science for decision making going forward. The intent of our laws and regulations must be enforced regardless of political forces or special interests.

While the landscape is magnificent, the lands are terribly degraded by a century and a half of livestock grazing. This has resulted in deeply incised streams that have lost their floodplains with many becoming intermittent or lost due to watershed degradation and removal of bank stabilizing vegetation. Soils are highly erodible and are severely eroding due to the loss of biological crusts and native plants that protect the soil surface. Weeds proliferate. Springs are drying up, and both streams and springs are heavily polluted with livestock waste.

On **October 3, 2024**, The BLM and U.S. Department of Agriculture's Forest Service issued the Proposed Resource Management Plan and Environmental Impact Statement for the Bears Ears National Monument. **Our comments and input were largely ignored.**

Elk Ridge Complex Rangeland Supplementation Project

Status

The Elk Ridge Complex is comprised of four allotments: Lime Creek, Rock Creek, Tosi Creek, and Elk Ridge. Located approximately 32 miles northwest of Pinedale, these allotments encompass 30,577 acres of National Forest System lands in Pinedale Ranger District of the Bridger-Teton National Forest. The Elk Ridge Complex is bordered on two sides by allotments that were analyzed in the Upper Green River Area Rangeland Analysis. **See Y2Us involvement with the Upper Green Rangeland project below.** The Elk Ridge Complex is situated within the Green River Basin between the Gros Ventre Range and the Wind River Range.

In 1978, the Forest Supervisor issued a decision implementing an allotment management plan for the Elk Ridge Complex that provided grazing for 3,631 sheep or 725 cow/calf pairs on the allotments. At that time, livestock operators chose to utilize the allotments for sheep grazing. In 2016, the permittee chose to vacate the allotments because of a buyout negotiated between the permittee and conservation groups. Conflict with grizzly bears motivated their decision. Subsequently, the associated term grazing permits were returned to the USFS as waived without preference. These allotments have remained vacant ever since. Baseline vegetation inventories were conducted in 2019 and 2020 by the USFS and Sublette County Conservation District to determine current conditions for an EA.

On May 24th, 2021, the Forest Service scoping letter proposed to open the bought out and closed Elk Ridge Complex allotments to cattle grazing and sent out a scoping letter stating their intention. The Proposed Action is that the Pinedale Ranger District would like to authorize cattle grazing on the Elk Ridge Complex in rotation with the adjacent Upper Green River Area allotments. This is a single purpose with no other alternative. It has not expressed the intent of evaluating the allotments for permanent retirement from livestock grazing to restore habitats from past damage, or provide wildlife and watershed benefits, meet the increasing demand for primitive recreation, hunting and fishing in the area. Instead, this proposal is being made to satisfy the "desires" of the livestock industry. It will expand the conflict area with grizzly bears in this area of highest bear mortality due to livestock conflicts.

The entire project is highly suspect because of the full collaboration with livestock permittees and the Ag Industry while the BTNF refuses to cooperate with the public on these very allotments. On May 17th, 2021, Yellowstone to Uintas Connection along with Western Watersheds Project requested that the Forest and our groups do joint monitoring of the Upper Green River and Elk Ridge Complex allotments.

The BTNF has denied our multiple requests for the necessary cooperative monitoring needed to validate the current key species as representative of upland utilization on the allotments and whether greenline stubble height monitoring is representative of actual riparian zone utilization and habitat condition.

On May 26th, 2021, Y2U submitted a Freedom of Information Act (FOIA) requesting the NEPA documents including the EA and Specialists Reports be made publicly available with an opportunity to review and comment on those prior to issuing a decision. The fact that the Forest Service received over 3,000 comments on this project shows the high level of public interest. We are requested the following data and information for the Elk Ridge Complex which includes the Lime Creek, Rock Creek, Tosi Creek, and Elk Ridge allotments:

1. Provide the data, documentation, and analysis (capability, suitability, available forage, livestock consumption rates) used for establishing the original cattle and subsequently, the domestic sheep stocking rates for these allotments.
2. Provide trend data, maps and reports for all sites and all years. Include their location coordinates.
3. Provide wildlife reports and analyses to the extent they exist. This is important so we can have knowledge of wildlife populations, their habitat needs and habitat conditions. Also provide reports of conflicts with grizzly bears and wolves.

On June 22nd, 2021, Yellowstone to Uintas Connection, Alliance for the Wild Rockies, Native Ecosystems Council and Western Watersheds Project submitted scoping comments requesting that the project be withdrawn for the following reasons:

- If pursued, an EIS is needed for this project due to the presence of threatened species such as grizzly bear and Canada lynx; wolverine, which are proposed for listing; and numerous special status species. Wilderness values will also be degraded if the Project goes forward. **Wolverines have since been listed as threatened.**
- Alternatives should be analyzed including permanent retirement of livestock grazing from the subject allotments to protect native species and their habitats, water quality and to maximize carbon sequestration for climate benefits.
- A Project and Cumulative Effects Area (CEA) should be delineated for the analysis.
- Analyze all Forest attributes, wildlife core, security areas and connections across the Forest and then at the Project and CEA levels, disclosing their current structural and functional attributes compared to the needs of the special status species and to potential.
- The analysis must adhere to the guidelines provided in the 2010 Forest Service National Roadmap for Responding to Climate Change and the intent of the January 27, 2021, Executive Order on Tackling the Climate Crisis at Home and Abroad to promote carbon sequestration, biodiversity, and connectivity of wildlife populations.
- Update livestock stocking rates to reflect current cattle weights and forage consumption rates, Forest Service Regional criteria for capability, the most recent soil survey, and current forage production based on actual measurements in each plant community intended to be used by livestock.
- Update current allowable use standards which allow up to 65% utilization by livestock to the science-based 20 - 30% level to sustain native species of plants.
- Implement required rest rather than deferment in order that plants may recover their full vigor following years in which they are grazed by livestock. Destock allotments during below normal precipitation years.
- Validate key species and compare current methods and data for monitoring upland species to quantitative assessments of overall grass and forb utilization by clipping caged and uncaged plots and comparing those results to the current "wheel" method.
- Validate the riparian greenline stubble height method to determine whether utilization on sedges is representative of livestock use in the riparian zone. The riparian zone is the area between the greenline and adjacent uplands. This comparison should be made to grazed and caged plots in the riparian zone.
- Cooperate with the public to establish key sites, key species, and methods for monitoring.
- Analyze and report on the results of the prescribed monitoring contained in the Forest Plan for the BTNF and for the Project and CEA.
- Demonstrate through monitoring of populations, the current status of special status species compared to their potential and overall trends. Determine their viability across the entire BTNF.
- Provide monitoring data validating the outcomes of BMPs applied to protect ecosystem attributes.
- Address the issues identified in these comments in relation to the requirements of NEPA, NFMA, and the ESA, including consultation.

On November 23, 2021, the BTNF published the Environmental Assessment (EA) for the project and opened the 30-day comment period. Comments were due on December 27th, 2021. This follows the usual Forest Service procedure of opening comment periods during the holidays to limit public input.

On December 24th, 2021, Yellowstone to Uintas Connection, Alliance for the Wild Rockies, and the Native Ecosystems Council submitted scoping comments for the Elk Ridge Complex Rangeland Supplementation Project Supplemental EA.

The **Forest Service has now placed this project “On Hold”** likely due to our comments and fear of litigation.

On January 27th, 2022, a letter was sent to the BTNF Forest Supervisor requesting permission to install utilization cages, collect the data, and present the results in a report to the BTNF. The letter outlined the fact that there are clear problems with the BTNF "cooperative monitoring" which does not involve the public in the design and carrying out of monitoring. As a result, selection of allowable use standards, selection of key areas and key species are not representative of grazing use nor are they protective of sensitive species. This can be corrected by following the intent of the Forest Service Handbook and monitoring manual that we cited in the letter. A first step would be to carry out the monitoring validation test we have requested. This would include selecting riparian and upland key areas in which to place cages to collect quantitative data for grazed vs ungrazed grasses and forbs. These would be compared to utilization measured as greenline stubble height along the selected stream reaches and Idaho fescue in uplands.

On March 27th, 2022, a similar letter was sent to the District Rangers for the Big Piney Ranger District and the Pinedale Ranger District.

During the summers of 2021 and 2022 Y2U implemented a monitoring program in the Upper Green and neighboring Forest Service grazing allotments. We published two reports, see below, demonstrating that the monitoring program of the Forest Service is heavily biased and unable to accurately measure livestock use. Therefore, the Adaptive Management protocol the Forest Service is using cannot work.

On July 12th, 2022, a Fisherman Creek Allotment, Range Ready Inspection was conducted by Dr. Carter and a report provided to the District Ranger for the Big Piney Ranger District.

Our [April 13, 2023 report](#) showed that livestock use 75% of the available vegetation, while the Forest Service monitoring claims only 10% use. It also demonstrates that the Elk Ridge allotments have not recovered their productivity after being closed to livestock for five years, currently producing less than 25% of potential.

Our [May 15, 2023 report](#) analyzed Forest Service data that they collected using methods similar to ours. Those results validate that their current monitoring methods are biased and that our data represents the actual levels of use by livestock. We are currently negotiating with the Bridger Teton NF to do a joint data validation study to address these monitoring inadequacies. The effort is also intended to address the [10th Circuit Court May 25, 2023 decision](#) to address female grizzly bear mortality and inadequate forage and cover for migrant birds.

Prior to livestock entry into the pastures, we placed utilization cages for later measurement and comparison of the quantitative Paired Plot method to height-weight or stubble height estimates. Following livestock leaving the pastures, the plots were clipped to determine the amount of herbaceous vegetation in the ungrazed caged plot compared to the two grazed plots. Green line stubble heights as well as stubble heights along transects in the riparian AIZ between the caged and grazed plots were measured.

Comparing the outcomes of these different approaches is intended as a way of validating the current monitoring as carried out by the BTNF, SCCD and Permittees. Our results demonstrate that the Upper Green and Fisherman Creek allotments are overstocked based on our measures of average upland and riparian utilization using Paired Plots at 73.1 percent and 75.5 percent respectively. These far exceed the 50 percent utilization or allowable use standard required by the BTNF. They do not meet herbaceous retention needs for wildlife and are nearly triple what range science studies recommend.

On December 1st, 2023, our Monitoring Results Upper Green and Elk Ridge Allotments for 2023 were re-submitted to the new Pinedale District Ranger repeating our request for joint data validation.

Throughout 2024, Y2U and Sage Steppe Wild (SSW) have been pressing the Forest Service to perform joint monitoring with Y2U and SSW. So far, the Forest Service is pushing back on this. They don't want to do joint monitoring and validate the data they currently use for management. Validated data won't support the current status quo.

We expect a decision to be published sometime in **2025**. At that time Y2U will take the appropriate action.

Work Plan

- Y2U continues to monitor utilization and forage production on the Fisherman Creek and Upper Green allotments and continues to put pressure on the Forest Service to accurately measure utilization and use accurate data and range science to affect management decisions including stocking rates.

Expected Outcome

Unknown

Grasshopper Watershed Environmental Assessment

Status

On **March 12th, 2024**, The Bureau of Land Management's (BLM) Dillon Field Office released the Grasshopper Watershed Environmental Assessment (EA). The assessment reviewed the current livestock grazing management in the watershed, along with proposed changes to management, potential rangeland improvement projects, and vegetative management projects. The Grasshopper Watershed is in Beaverhead County and covers **118,978 acres** of BLM-managed public land in Southeast Montana.

On **April 14th, 2024**, Yellowstone to Uintas Connection, the Alliance for the Wild Rockies, Wildlands Defense, Council on Wildlife and Fish, Center for Biological Diversity, and Native Ecosystems Council submitted comments on the Grasshopper Watershed EA.

On **September 5th, 2024**, the BLM published the Finding of No Significant Impact (FONSI) and Proposed Grazing Decision for the Grasshopper Watershed.

On **December 11th, 2024**, the BLM published the Final Grazing Decision for the Grasshopper Watershed.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.
- Y2U will seek legal representation to look at pursuing additional litigation of the violations of the intent of NEPA, NFMA/FLPMA and the CWA.

Expected Outcome

Unknown

Medicine Lodge Watershed Environmental Assessment

Status

On **March 13th, 2024**, The Bureau of Land Management’s (BLM) Dillon Field Office released the Medicine Lodge Watershed Environmental Assessment (EA). The assessment addresses revised or renewed livestock management, vegetation treatments, and range improvement projects on about **40,000 acres** of public land, including 18 grazing allotments within the Medicine Lodge Watershed south of Dillon, Montana.

On **April 14th, 2024**, Yellowstone to Uintas Connection, the Alliance for the Wild Rockies, Wildlands Defense, Council on Wildlife and Fish, Center for Biological Diversity, and Native Ecosystems Council submitted comments on the Medicine Lodge Watershed EA.

On **August 7th, 2024**, the BLM published the Finding of No Significant Impact (FONSI) and the Proposed Grazing Decision for the Medicine Lodge Watershed EA.

On **December 11th, 2024**, the BLM published the Notice of Final Decision and the Decision Record for the Medicine Lodge Watershed EA.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.
- Y2U will seek legal representation to look at pursuing additional litigation of the violations of the intent of NEPA, NFMA/FLPMA and the CWA.

Expected Outcome

Unknown

Uintas Wilderness Domestic Sheep

Status

The Uinta Wilderness covers 453,860 acres with 272,768 acres currently being grazed by domestic sheep and cattle (the rest is inaccessible for livestock grazing). There are a total of 30 active grazing allotments and 11 that have been closed to livestock grazing. Current authorized numbers include over 10,000 cattle and 45,000 domestic sheep. These allotments are grazed during the summer months annually. In 2014, Yellowstone to Uintas Connection organized a coalition of environmental groups and interested individuals to address 11 domestic sheep grazing allotments that are being analyzed by the FS for permit renewal in the High Uinta Wilderness. All the allotments conflict with native bighorn sheep. Y2U has met with the Regional Forester, the Forest Supervisors, and other FS staff members on more than one occasion to delineate our concerns and recommendations.

The currently grazed 272,768-acre area is habitat for Canada lynx, wolverine, bighorn sheep, black bears, cougars, and many other species. It also provides a significant water source for much of Utah and Southeast Idaho.

In September 2018, Dr. John Carter, Y2U staff ecologist, presented to the Intermountain Regional Forester, Uinta-Wasatch-Cache Forest Supervisor, several district rangers and staff the [Forage Capacity & Stocking Rate Determination For High Uintas Wilderness Domestic Sheep](#), an analysis completed by Y2U and Wild Utah Project, which shows a capacity for stocking at 10 percent of the current rate on these High Uinta Wilderness domestic sheep allotments.

The DEIS for these permit renewals was published on June 4th, 2019. On August 5th, 2019, the coalition submitted comments on the DEIS. The full set of comments can be found at <https://yellowstoneuintas.org/issues/projects/item/81-high-uinta-wilderness-domestic-sheep>

In March of 2020, Dr. Carter and our colleagues at Wild Utah Project published the Spatial Analysis of Livestock Grazing and Forest Service Management in the High Uintas Wilderness, Utah which can be found here: https://www.yellowstoneuintas.org/images/pdfs-doc/UintaSheep_SpatialAnalysis_JGIS_03_20_2020.pdf.

As a result of some the comments received by the Forest Service on the DEIS, they added new information to the analysis and prepared a Supplemental Draft Environmental Impact Statement (SDEIS) that was published in June 2023. The coalition submitted comments on the SEIS on August 28th, 2023.

As of **November 25, 2024**, the Forest Service has not published a Final Environmental Impact Statement for this project.

Work Plan

- Upon release, Y2U will address whether the Final Environmental Impact Statement (FEIS) adequately analyzed the potential environmental impacts of the project and addressed potential alternatives.
- Y2U will file an Objection if the FEIS does not adequately analyze the potential environmental impacts of the proposed project and potential alternatives.
- Y2U will be seeking legal representation to litigate the continuation of domestic sheep grazing in the High Uinta Wilderness.
- Prepare articles for media to expose the issues with domestic sheep grazing in the High Uinta Wilderness.

Expected Outcome

Optimistically, the Bighorn Sheep risk analysis will result in the Forest Service recommendation to close some allotments. Our work is intended to show the impact of current stocking rates, which are far too high, and designed to put pressure on the Forest Service and permittees to support voluntary permit retirements through buyouts.

Note: Y2U continues to work with Wilderness Watch on a campaign to permanently close all wilderness areas to livestock grazing. We provide information and data from the many years of monitoring livestock grazing impacts in the High Uinta Wilderness in support of that effort.

Upper Green River Area Rangeland Project

Status

In November 2016, Yellowstone to Uintas Connection, along with Alliance for the Wild Rockies and Wildlands Defense submitted comments on the Draft Environmental Impact Statement (DEIS) for the Upper Green River Area Rangeland Project stating the reasons why we believe the Upper Green River Area Rangeland Project is not in compliance with laws such as the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA), regulations, and policy.

Grizzly bears are suffering mortality while cattle continue to graze, depriving the bears of a basic food source, herbaceous vegetation, upon which they rely. The DEIS notes that 52% of Grizzly bear deaths in Western Wyoming between 2010 – 2014 occurred in the project area, with 18 relocations and all were due to cattle depredation. Conservation measures put in place per the BA and BO are discretionary and ineffective as livestock and hunter conflicts remain a major cause of Grizzly deaths. In January of 2018, Y2U along with Alliance for the Wild Rockies filed an Objection.

In August of 2018 Y2U received a letter from the Forest Service stating that an objection resolution meeting would take place but that the Forest Service was not willing to discuss any of our objection points.

On January 21st, 2020, Y2U along with the Alliance for the Wild Rockies and Western Watersheds Project filed a Notice of Intent to litigate the Forest Service authorization of killing up to 72 Grizzly bears over the next ten years.

On March 31st, 2020, Y2U, along with the Alliance for the Wild Rockies and Western Watersheds Project filed a lawsuit against the Secretary of the Interior David Bernhardt, the U.S. Fish and Wildlife Service, and the U.S. Forest Service for the 2019 decision to allow 72 federally protected Grizzly bears to be killed for the sake of public lands livestock grazing operations in the Upper Green River area of the Bridger-Teton National Forest. To view the comments, the Notice of Intent or the Complaint please see our web page: <https://www.yellowstoneuintas.org/issues/science/item/86-upper-green-river-area-rangeland-3049>

On February 22nd, 2021, Y2U and the other plaintiffs filed a Motion to Complete and Supplement the Administrative Record. On June 2nd, 2021, the magistrate judge issued an order restricting citations to the record based on our claims. This means that when we brief our ESA claims, we can only cite to the "ESA records" lodged in August of 2020, and when we brief our NFMA claims, we can only cite to the "NFMA record" lodged on May 3, 2021. In the same order, the magistrate judge terminated our pending record motions and directed that we re-file any record motions about either the August 2020 records or May 2021 record by July 2, 2021. On July 2nd, 2021, Y2U and the other plaintiffs filed a motion to amend and supplement our petition for review of agency action to bring in the 2021 Annual Operating Instructions (AOIs) and term grazing permits in effect for all six allotments, as well as challenge USFS management of two allotments as inconsistent with relevant Allotment Management Plans (AMPs). On August 6th, 2021, the judge granted our motion regarding the AOIs and AMPs, but denied it regarding the term grazing permits, including permits for four allotments just issued earlier this year that we did not know about until May. She seems to have bought into the ranchers' opposition arguments that there would be on-going questions about the adequacy of the petition and sufficiency of the record if we challenged the new term grazing permits, presumably because at some point USFS will issue new permits for the other two allotments. She also warned that any further motions to amend/supplement the petition will be "strongly disfavored if not summarily denied."

On August 20th, 2021, we filed a motion to complete and supplement the record in the Upper Green case. On September 15th, 2021, Dr. Carter documented with the Forest Service the trespass of 110 trespass cattle in the Lime Creek drainage in the Elk Ridge Complex, part of the Upper Green that is currently closed to grazing. ***See above on page 21 regarding the Elk Ridge Complex.*** On September 27th, 2021, we received a reply brief regarding our record motion. On October 4th, 2021, we filed a motion requesting a status conference in the Upper Green case. On October 6th, 2021, the magistrate judge denied our motion for a status conference to discuss new permits and AMPs. On October 14th, 2021, the magistrate judge issued an order completely denying our record motion. On November 18th, 2021, Jason updated his declaration.

On November 29th, 2021, we filed our opening merits brief and declarations.

On January 1st, 2022, Yellowstone to Uintas Connection and Western Watersheds Project requested the Upper Green Cooperative Range Monitoring report. On June 8th, 2022, Y2U and WWP obtained a Special Use Permit to put out utilization monitoring cages throughout the Upper Green Allotment. In September 2022, Y2U staff members collected utilization data using these monitoring cages.

On February 22nd, 2022, the plaintiffs filed our Petitioners' Reply Merits Brief. On May 17th, 2022, Judge Freudenthal, Wyoming District Court, ruled against all our (and CBD/Sierra Club's) claims regarding the Upper Green Project ROD and BiOp. On June 10th, 2022, the plaintiffs filed our Motion to Appeal in the 10th Circuit Court. On June 26th, 2022, the plaintiffs filed our Docket Statement. On September 15th, 2022, the plaintiffs filed the Opening Appellate Brief. On December 22nd, 2022, the plaintiffs filed our Reply Brief for the Appeal.

On May 5th, 2023, **The U.S. 10th Circuit Court of Appeals ruled that the U.S. Fish and Wildlife Service's authorization of the killing of up to 72 grizzly bears in the Upper Green violated federal law.**

Meant to accommodate private grazing operations in grizzly habitat, the 2019 grazing authorization would have allowed an unlimited percentage of females to be killed in response to livestock conflict, despite the significance of breeding bears to the species' recovery. But now the court has remanded the decision to the agencies to fix the legal deficiencies. The court found that among other issues, the U.S. Fish and Wildlife Service's failure to consider limiting the number of female grizzly bears that could be killed was arbitrary and capricious because killing too many females could jeopardize the grizzly bear population in the project area. In so holding the court acknowledged the importance of protecting female grizzly bears for grizzly bear recovery.

The challenged decision authorized the killing of up to 72 grizzly bears over the 10-year life of the reauthorized grazing program. The decision placed no limits on killing female bears or cubs, even though females with cubs live where the proposed killing would be permitted.

The judges also ruled that the Forest Service failed to follow its own Forest Plan requirements regarding wildlife habitat protections for migratory birds. Some 96% of the lands approved for livestock is zoned in the Forest Plan for a wildlife protection emphasis instead.

During the summers of 2021 and 2022 Y2U implemented a monitoring program in the Upper Green and neighboring Forest Service grazing allotments. We published two reports, see below, demonstrating that the monitoring program of the Forest Service is heavily biased and unable to accurately measure livestock use. Therefore, the Adaptive Management protocol the Forest Service is using cannot work.

On July 12th, 2022, a Fisherman Creek Allotment, Range Ready Inspection was conducted by Dr. Carter and a report provided to the District Ranger for the Big Piney Ranger District.

Our [April 13, 2023 report](#) showed that livestock use 75% of the available vegetation, while the Forest Service monitoring claims only 10% use. It also demonstrates that the Elk Ridge allotments have not recovered their productivity after being closed to livestock for five years, currently producing less than 25% of potential.

Our [May 15, 2023 report](#) analyzed Forest Service data that they collected using methods similar to ours. Those results validate that their current monitoring methods are biased and that our data represents the actual levels of use by livestock. We are currently negotiating with the Bridger Teton NF to do a joint data validation study to address these monitoring inadequacies. The effort is also intended to address the [10th Circuit Court May 25, 2023 decision](#) to address female grizzly bear mortality and inadequate forage and cover for migrant birds.

On May 15th, 2023, the Report on Upper Green was submitted by Yellowstone to Uintas Connection and Western Watersheds Project to the BTNF Forest Supervisor and Big Piney and Pinedale District Rangers.

Prior to livestock entry into the pastures, we placed utilization cages for later measurement and comparison of the quantitative Paired Plot method to height-weight or stubble height estimates. Following livestock leaving the pastures, the plots were clipped to determine the amount of herbaceous vegetation in the ungrazed caged plot compared to the two grazed plots. Green line stubble heights as well as stubble heights along transects in the riparian AIZ between the caged and grazed plots were measured. Comparing the outcomes of these different approaches is intended as a way of validating the current monitoring as carried out by the BTNF, SCCD and Permittees. Our results demonstrate that the Upper Green and Fisherman Creek allotments are overstocked based on our measures of average upland and riparian utilization using Paired Plots at 73.1 percent and 75.5 percent respectively. These far exceed the 50 percent utilization or allowable use standard required by the BTNF. They do not meet herbaceous retention needs for wildlife and are nearly triple what range science studies recommend.

On December 1st, 2023, our Monitoring Results Upper Green and Elk Ridge Allotments for 2023 were re-submitted to the new Pinedale District Ranger repeating our request for joint data validation.

Throughout 2024, Y2U and Sage Steppe Wild (SSW) have been pressing the Forest Service to perform joint monitoring with Y2U and SSW. So far, the Forest Service is pushing back on this. They don't want to do joint monitoring and validate the data they currently use for management. Validated data won't support the current status quo.

Work Plan

- Y2U continues to monitor utilization and forage production on the Fisherman Creek and Upper Green allotments and continues to put pressure on the Forest Service to accurately measure utilization and use accurate data and range science to affect management decisions including stocking rates.

Expected Outcome

Unknown

MINING



Dairy Syncline Mine

Status

The Dairy Syncline Mine Draft Environmental Impact Statement (DEIS) was released in mid-December 2018. This is another open pit phosphate mine on Forest Service and BLM public land near Soda Springs, Idaho. This mine is also proposed in an area already deemed to be a Superfund Site subject to Natural Resource Damages from past mining pollution. The proposed project will further fragment the Corridor, destroy wetlands, wildlife populations, and plant communities while polluting streams in the region with heavy metals. The mine will also cause noise and safety concerns that not only affect wildlife, but also humans. Y2U and Kiesha's Preserve submitted comments on the DEIS on February 21st, 2019. It is important to point out that reviewing, analyzing, and commenting on these DEIS that are over 1000 pages in length takes hundreds of hours of staff time for each one. We urge you to take a look at the Dairy Syncline [comments](#) as an example of the depth of analysis.

On December 8th, 2019, Yellowstone to Uintas Connection and Kiesha's Preserve submitted a protest of BLM's decision to amend the Pocatello Resource Management Plan to conduct a land sale accommodating the Dairy Syncline Mine project in the Pocatello Field Office area. The BLM has proposed a direct land sale and acceptance of a donation parcel to accommodate the tailings pond which is part of the Dairy Syncline project.

According to the Draft Record of Decision (DROD), BLM has reduced the proposed land sale from 1,142.1 acres of BLM land to 500 acres and JR Simplot Co will donate a parcel containing 440 acres.

In addition, to accommodate the proposed tailings pond, the Forest Service has reduced the sale of Forest Service managed land from 631.6 acres to 160 acres with a donation of 640 acres of private land by Simplot as part of the bargain. Y2U filed a protest of BLM's decision to amend the Pocatello Resource Management Plan to conduct a land sale accommodating the Dairy Syncline Mine project in the Pocatello Field Office area on December 9th, 2019. The November 9, 2019, Notice of Availability for the FEIS provided a 45-day comment period for responding to the proposed modifications to the Huckleberry Basin and Sage Creek Idaho Roadless Areas (IRA). On December 19th, 2019, Y2U submitted additional comments on this proposed modification of the Huckleberry Basin and Sage Creek IRAs. On January 2nd, 2020, Y2U filed an Objection to the Forest Service ROD.

On January 19th, 2021, Yellowstone to Uintas Connection, the Center For Biological Diversity, WildEarth Guardians, Western Watersheds Project, and Rocky Mountain Wild filed a lawsuit for declaratory and injunctive relief to challenge Federal Defendants' unlawful approval of nine Resource Management Plans ("RMP") and related projects (this included the Dairy Syncline project), which govern the management of more than 6.5 million acres of public lands and minerals, because Defendant William Perry Pendley's exercise of the duties of Acting Director of the U.S. Bureau of Land Management ("BLM") was unlawful under the Appointments Clause, U.S. Const. art. 2, § 2, cl. 2; the Federal Vacancies Reform Act of 1998, 5 U.S.C. §§ 3345 et seq. ("FVRA" or "Act"); and the Administrative Procedure Act, 5 U.S.C. §§ 701 et seq. ("APA"). This includes the Dairy Syncline phosphate mining project.

On June 22nd, 2021, a meeting to discuss potential avenues for resolution of *Center for Biological Diversity et. Al. v. U.S. BLM, et. Al.* took place. Following that meeting we conferred with the plaintiffs to generate a set of preferred outcomes for the eight RMP-related decisions challenged in our complaint.

On November 10th, 2021, The BLM sent a settlement proposal stating that while the BLM is not willing to withdraw any of the challenged decisions, the agency believes it can offer substantial measures to address concerns plaintiffs have identified, with the goal of improving the projects covered by the subject RMPs going forward. The BLM stated that they have limited ability to provide Plaintiffs our requested relief because we have challenged an RMP decision that supports a now-completed land exchange. Thus, the BLM does not agree to undertake additional RMP level environmental analysis. However, the BLM did state that they are amenable to discussing additional voluntary mitigation measures with the project proponent. The BLM also stated that it would welcome our input on specific voluntary mitigation measures they would like to see implemented in the project area.

Throughout 2023, Yellowstone to Uintas Connection continued settlement discussions with the defendants.

On March 19th, 2024, a settlement agreement was reached with the BLM that provided funding for off-site mitigation, sage grouse studies and road density studies. Our opposition of this project started in 2018. This illustrates the length of time that many of these project proposals and the NEPA process take.

Husky 1 North Dry Ridge Mine

Status

The Husky 1 North Dry Ridge Mine Project Canyon Mine Scoping process for the Draft Environmental Impact Statement (DEIS) was initiated in late December 2020. This is another open pit phosphate mine on Forest Service managed land between Soda Springs, Idaho and Afton, Wyoming. This mine, if approved, will further fragment the Corridor, destroy wetlands, wildlife populations, and plant communities while polluting streams in the region with heavy metals. The mine will also cause noise and safety concerns that not only affect wildlife, but also humans.

Yellowstone to Uintas Connection, the Alliance for the Wild Rockies and Native Ecosystems Council submitted scoping comments for the development of the DEIS on January 19th, 2021. We urge you to look at the Husky 1 North Dry Ridge comments as an example of the depth of analysis. The full set of comments can be found here: <https://www.yellowstoneuintas.org/issues/science/item/152-husky-1-north-dry-ridge-mine>

On October 14th, 2021, the Forest Service published the DEIS for this project. Y2U determined that the DEIS did not adequately analyze the potential environmental impacts of the project and addressed potential alternatives.

The BLM and USFS must comply with the National Environmental Policy Act (NEPA) by analyzing the environmental impacts of mining and reclamation operations along with reasonable alternatives as well as the project's compliance with other environmental laws such as the Endangered Species Act (ESA), the Clean Water Act (CWA), the Federal Land Policy and Management Act (FLPMA), the National Forest Management Act (NFMA), the Approved Resource Management Plan (ARMP), and the Caribou National Forest Revised Forest Plan (CNF RFP).

On December 1st, 2021, Y2U, the Alliance for the Wild Rockies, Native Ecosystems Council, Wildlands Defense, and the Snake River Waterkeepers submitted comments on the DEIS. It is especially troubling that these mines are being approved in an area deemed a Superfund Site subject to Natural Resource Damages from past and/or ongoing mining pollution. In past comments we have questioned whether the economic benefit outweighs the environmental costs of mining phosphate in this region. According to the recent Smoky Canyon East EIS, this region produces 15% of the phosphate rock in the US while Florida and North Carolina produce 85%. There is no evaluation of the value of the Public Lands to present and future generations for its inherent benefits of water supply, fish, wildlife, and recreation. The American People are left with a permanent burden of water pollution, degraded water supplies, lost fish and wildlife habitat, reduced productivity and reduced or eliminated species. These costs are externalized and only a model (HEA) of supposed values (DSAYS) lost from the directly disturbed areas is mentioned. These costs are partially offset by claimed benefits of the reclamation which will not restore what is lost.

On November 18th, 2022, The BLM and USFS published the FEIS and ROD for the Husky 1 North Dry Ridge Mining Project. Yellowstone to Uintas Connection staff members is currently working on an Objection as the FEIS does not adequately analyze the potential environmental impacts of the proposed project.

Pursuant to 36 CFR Part 218, Yellowstone to Uintas Connection, Alliance for the Wild Rockies, Native Ecosystems Council, Snake River Waterkeeper and Wildlands Defense filed an Objection to the Final Environmental Impact Statement (FEIS) for the Husky 1 North Dry Ridge Phosphate Mine and Draft Record of Decision (Draft ROD) Authorization of Off-lease Activities Husky 1 North Dry Ridge Phosphate Mine on January 2nd, 2023.

During the **fall of 2024**, Y2U **secured legal representation** and will file a Notice of Intent (NOI) and our complaint to litigate violations of the intent of NEPA, NFMA/FLPMA and the CWA in the **spring of 2025**.

Expected Outcome

Unknown

North Maybe Mine East Mill Dump

Status

In June of 2021, the Forest Service, proposed a plan for the cleanup of the North Maybe Mine East Mill Dump in Caribou County, Idaho. The Site is a former phosphate mine located in the Caribou-Targhee National Forest. Operation of the mine resulted in the contamination of soils, surface water, vegetation, sediments/soils, and groundwater with metalloids (for example, arsenic and selenium), metals, and uranium daughter products (for example, radium and radon). The Proposed Plan provides background information on the site and the cleanup process, describes the cleanup alternatives that were evaluated, identifies the Forest Service's preferred cleanup alternative, and explains the reasons for their preference. The proposed plan is a document that the Forest Service is required to issue under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund, and the regulations that implement CERCLA, known as the National Contingency Plan (NCP).

Y2U reviewed the Proposed Plan and found it inadequate at the most basic level. It provides no information or mapping of nature and extent of the pollution to groundwater, surface water, soils, vegetation, and wildlife. Instead, it refers the reader to the Remedial Investigation and Focused Feasibility Study (RI/FFS) which are available for viewing at the Soda Springs Ranger District. There is no link on the Forest Service website to project documents such as this where one can access and view the information without a trip to Soda Springs. A FOIA request for the documents could not be addressed within the time frame allowed for commenting. It is unclear how the Caribou Targhee Forest Plan, BLM Resource Management Plan, NEPA, NFMA, APA and other laws and regulations apply here. This is a decision to be issued by the Forest Service based on analysis by the mining company consultants. While CERCLA is cited, there must be other mandates to be met. The public needs to fully understand the legal environment applicable here and it is the duty of the agency to provide that context and additional opportunities for input. Since this is a Forest Service current action, all the rules of NEPA, NFMA, FLPMA, CWA, ESA apply. The public must be given a comprehensive analysis under these laws in addition to that provided under CERCLA. To this date there is no mention of the project, or any documents related to the project on the Forest Service website.

On July 30th, 2021, Yellowstone to Uintas Connection, Alliance for the Wild Rockies, Native Ecosystems Council, Wildlands Defense and Snake River Waterkeepers submitted comments on the Proposed Plan North Maybe Mine East Mill Dump. **Comments for the North Maybe Mine East Mill Dump project are intertwined with and are relevant to the Husky 1 North Dry Ridge project** and were submitted as comments on December 1st, 2021, for that project as well.

On November 18th, 2022, The BLM and USFS published the FEIS and ROD for the Husky 1 North Dry Ridge Mining Project. The North Maybe Mine East Mill Dump Project is intertwined with the Husky 1 North Dry Ridge Project.

On January 2nd, 2023, Yellowstone to Uintas Connection, Alliance for the Wild Rockies, Native Ecosystems Council, Snake River Waterkeeper and Wildlands Defense filed an Objection to the Final Environmental Impact Statement (FEIS) for the Husky 1 North Dry Ridge Phosphate Mine and Draft Record of Decision (Draft ROD) Authorization of Off-lease Activities Husky 1 North Dry Ridge Phosphate Mine.

The North Maybe Mine East Mill Dump project is intertwined with the Husky 1 North Dry Ridge project. During the **fall of 2024**, Y2U **secured legal representation** to litigate violations of the intent of NEPA, NFMA/FLPMA and the CWA for the Husky 1 North Dry Ridge Phosphate Mine project and that legal representation will examine the suitability of this project to include in the litigation of the Husky 1 North Dry Ridge project.

Work Plan

- Y2U is currently trying to find out what the Forest Service is doing with this project as there is no information available to the public on the Forest Service website.

Expected Outcome

Unknown

OIL AND GAS



Crow Creek Pipeline Project

Status

The Crow Creek Pipeline project is proposed by the Forest Service to provide natural gas to the Afton/Star Valley, Wyoming area by pipeline instead of the current use of highway transportation. Y2U's primary concern is that a large portion of the 50-mile-long pipeline route runs through Idaho Roadless Areas (IRA) and further fragments the Corridor. We are specifically concerned about the unintended road that will be created along the pipeline route and the potential for OHV/ATV use in this area. We also want the Forest Service to address concerns such as potential effects of soil disturbance, methane leaks, and the indirect and cumulative ecological impacts which must be analyzed and disclosed in the Environmental Impact Statement. These are particularly of concern where the pipeline route leaves authorized roads and trails that are already in place and enters IRAs.

In February 2018 Yellowstone to Uintas Connection (Y2U) submitted scoping comments on the project. In November of 2018, Y2U and Western Watersheds Project (WWP) submitted comments on the project Draft Environmental Impact Statement (DEIS). The Final Environmental Impact Statement (FEIS) was released in April of 2019 with a Finding of No Significant Impact and the Record of Decision approving the Crow Creek Pipeline was released in November 2019. Upon release, Y2U concluded that the FEIS did not adequately analyze the potential environmental impacts of the project and address potential alternatives. On June 25th, 2019, Y2U filed an Objection on the Crow Creek Pipeline Project.

On January 2nd, 2020, Yellowstone to Uintas Connection along with the Alliance for Wild Rockies filed a Notice of Intent to file a citizen suit pursuant to the citizen suit provision of the Endangered Species Act (ESA). On April 20th Y2U and Alliance for Wild Rockies filed our complaint and filed an amended complaint on September 11th, 2020. You can see the full objection and complaints at <https://www.yellowstoneuintas.org/issues/science/item/124-crow-creek-pipeline-project>

On March 8th, 2021, a federal court in Idaho ruled that a legal challenge to a natural gas pipeline can proceed. The federal agencies had moved to dismiss the case, but the court rejected that challenge. The court held that the motion to dismiss was “meritless” and that challenges to “local distribution” pipelines like the Crow Creek pipeline must proceed in federal district court. The court pointedly held: "Defendants seem to think because the Crow Creek Pipeline will cross the state line of Idaho and Wyoming, the [Natural Gas Act] ipso facto continues to apply despite a local distribution service area determination. But the Natural Gas Act itself, the caselaw cited, and the record in this case conclusively and swiftly put an end to such a meritless legal position."

On May 26th, 2021, a grizzly bear was spotted in Lincoln County, Wyoming, close to the Utah and Idaho borders. An email was sent to the Forest Service asking them to reinstate ESA consultation for the Crow Creek Pipeline based on this information.

On June 15th, 2021, Y2U and Alliance for the Wild Rockies filed a motion to supplement the administrative record. On July 27th, 2021, the plaintiffs filed a brief for the Crow Creek Pipeline case.

On March 29, 2022, the Caribou-Targhee National Forest (CTNF) withdrew a signed 2019 Final Record of Decision (ROD) which would have approved the Crow Creek Pipeline Project authorizing Lower Valley Energy (LVE), to construct and maintain a new pipeline to provide natural gas to western Wyoming. The Office of General Council notified the agency on March 18, 2022, that under the Minerals Leasing Act, the United States Forest Service (USFS) did not have the authority to issue a special use authorization when a pipeline crosses more than one jurisdiction of federally managed lands. This authority resided with the Bureau of Land Management (BLM). Given the lack of authority, the USFS withdrew the 2019 ROD to comply with the Minerals Leasing Act and worked with the BLM on how to use the existing environmental analysis to issue a new decision.

On August 5th, 2022, the government filed a stipulation of dismissal and settlement agreement in the Crow Creek Pipeline and **the project was cancelled by the Forest Service as a result of our litigation.** Yellowstone to Uintas Connection and the Alliance for the Wild Rockies have been fighting a legal challenge against this pipeline for over two years, and our unrelenting efforts just paid off. Not only did the government cancel the pipeline, but it also made a legally binding commitment to conduct a complete environmental analysis before the pipeline could ever be brought back from the dead. What we did in this case was unprecedented: after litigating this case for two years and filing our opening brief, the government tucked its tail and ran, without even waiting for a final court order. We have never seen this in a legal challenge to a pipeline before. What this means is no possibility for any appeals to an ideological Supreme Court that would reverse this win if given the chance. Instead, this win is here to stay. At least until.....

Now, the CTNF has worked with the proponent, Lower Valley Energy (LVE), to alter the route to avoid lands managed by the BLM. On July 14th, 2023, the Montpelier Ranger District of the CTNF published the Crow Creek Pipeline Project Draft Supplemental Environmental Impact Statement (DSEIS). The Forest Service is proposing to issue a Special Use Authorization (SUA) and amendment to the Forest Plan allowing a utility corridor.

On October 8th, 2023, comments were submitted on behalf of Yellowstone to Uintas Connection, Alliance for the Wild Rockies, and Native Ecosystems Council for the Crow Creek Pipeline Project DSEIS.

The comments provided by the above conservation groups included the Canada lynx Species Status Assessment that Y2U Staff Ecologist Dr. John Carter produced and provided to the US Fish and Wildlife Service (US FWS) on January 25th, 2023. Dr. Carter's analysis provided input for the US FWS's current Species Status Assessment and Recovery Plan for Canada Lynx. Those comments are available for review here: [January 25, 2023 comments](#).

In **June of 2024**, the Forest Service published the Draft Record of Decision (DROD) for the Crow Creek Pipeline SEIS and in **July 2024**, the Forest Service published the Final Supplemental Environmental Impact Statement (FSEIS).

On **August 22nd, 2024**, an **Objection was filed** by Yellowstone to Uintas Connection (Y2U), Alliance for the Wild Rockies, and Native Ecosystems Council to the DROD, the FSEIS, and the Forest Plan Amendment for Crow Creek Pipeline Project.

On **August 23rd, 2024**, an additional **Objection was filed** by Alliance for Wild Rockies, Y2U, Native Ecosystems Council, Council on Wildlife and Fish and the Center for Biological Diversity to the DROD, the FSEIS, and the Forest Plan Amendment for Crow Creek Pipeline Project.

We reviewed the FSEIS and DROD and found little change from the prior EIS other than the rerouting of the pipeline to avoid BLM managed lands and Mineral Leasing Act provisions. In our scoping comments, comments on the DEIS, supplemental comments on the DEIS, and our prior objection, we raised a number of points which were summarized in the objection.

During the **fall of 2024**, Y2U **secured legal representation** to litigate violations of the intent of NEPA, NFMA/FLPMA and the CWA in the FSEIS for the Crow Creek Pipeline project in the Caribou-Targhee National Forest.

Work Plan

- Y2U is seeking legal representation to litigate violations of the intent of NEPA, NFMA/FLPMA and the CWA for the second time on this project.
- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

LOGGING/VEGETATION TREATMENTS



Ashley National Forest Aspen Restoration Project

Status

In October 2019, the Ashley National Forest released the Scoping Letter for the Ashley NF Aspen Restoration Project. This project will occur on **177,077 acres** outside of designated wilderness of which 147,000 was proposed in Roadless Areas. Under the Categorical Exclusion, the project is intended to move forward without any input, appeal, or objection opportunities from the public, which frees the Forest Service to cut, burn, masticate, sell, girdle, cut roots, and potentially destroy ecosystem function without any public oversight or input. In December 2019, Yellowstone to Uintas Connection along with Alliance for the Wild Rockies and Native Ecosystems Council, submitted comments to the Ashley National Forest regarding the Aspen Restoration Project.

Following is a summary of our concerns:

1. The use of a CE and lack of programmatic or site-specific project NEPA without addressing the circumstances prevailing in this project area.
2. The lack of site-specific analysis and comparison to ecological criteria, best available science, or Forest Plan intent.
3. The lack of opportunities for public input, objection and appeal.
4. There was no designation of a cumulative effects area and no analysis of cumulative effects.
5. Reliance is placed on Best Management Practices (BMPs) instead of science-based criteria under which to manage the project and overlapping uses such as livestock grazing and recreation.
6. Climate change was not addressed.
7. There was no analysis of the Regionally Significant Wildlife Corridor, ESA, special status species such as goshawk, Canada lynx or wolverine, or for that matter native plants.

8. There was no analysis of NFMA viability requirements for special status species.
9. Old growth was not addressed.
10. Aspen, livestock, active management, beetles all interactions and outcomes not addressed.
11. The costs for proposed fencing and other project elements or activities are not defined. Are contractors to be used? Will this occur in the form of timber sales?

Furthermore, we can find no information that vegetation treatments reduce wildfire risk and the evidence we have seen indicates they have many negative effects.

In January of 2021, the project, as authorized under Categorical Exclusion was halted in its tracks by the Forest Service after Yellowstone to Uintas Connection, the Alliance for the Wild Rockies, and Native Ecosystems Council submitted detailed comments opposing the project and due to our successful litigation of the Middle Henry's Aspen Enhancement Project.

On June 7th, 2021, the Forest Service published a Draft EA after changing the NEPA analysis from a CE for the reason mentioned above. Y2U determined that the Draft EA did not adequately analyze the potential environmental impacts of the project and addressed potential alternatives.

On July 2nd, 2021, Y2U, Alliance for the Wild Rockies, Native Ecosystems Council and Western Watersheds Project submitted comments on the EA. On June 7th, 2022, the Forest Service issued a Draft Decision Notice. On July 23rd, 2022, Yellowstone to Uintas, the Alliance for the Wild Rockies, and Native Ecosystems Council filed an Objection to the project approval. On October 22nd, 2023, the Forest Service published the Final Decision Notice authorizing the Ashley National Forest Aspen Restoration Project.

In **April of 2024**, Y2U, Alliance for the Wild Rockies, Native Ecosystems Council and the Center for Biological Diversity **secured legal representation** to litigate the authorization of this project for the 147,000 acres of the Ashley National Forest Aspen Restoration Project occurring in Roadless Areas.

On **April 22nd, 2024**, Y2U, Alliance for the Wild Rockies, Native Ecosystems Council and the Center for Biological Diversity **filed a Complaint** against the Forest Service.

On **June 24, 2024**, the Chief of the Forest Service granted the Forest Supervisor of the Ashley National Forest authority to withdraw the decision.

On July 3rd, 2024, the Ashley National Forest Supervisor withdrew the decision and authorization of the Ashley National Forest Aspen Restoration Project due to our litigation!

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Ashley NF Forest-wide Prescribed Fire Restoration Project

Status

On February 28th, 2022, the Ashley National Forest proposed the Forest-wide Prescribed Fire Restoration Project. The Forest Service proposed to conduct prescribed fire treatments across the national forest, with burns occurring on up to **24,000 acres per year** for a maximum of 20 years. **480,000 acres!**

The proposed action does not apply to research natural areas, alpine areas, any non-National Forest System lands within the Ashley National Forest boundary, or congressionally designated wilderness areas.

On April 3rd, 2022, Yellowstone to Uintas Connection (Y2U), Alliance for the Wild Rockies and Native Ecosystems Council submitted scoping comments for the Ashley Forest-wide Prescribed Fire Restoration Project. This project should be analyzed with an Environmental Impact Statement (EIS) not a Categorical Exclusion, to assess the cumulative impacts of the proposal along with all other existing and reasonably foreseeable future project impacts in the region and specifically in the Regionally Significant Wildlife Corridor.

On June 7th, 2022, the Forest Service published their Draft Decision Notice. On July 22nd, 2022, Y2U, the Alliance for the Wild Rockies and Native Ecosystems Council filed an Objection to the project authorization.

On October 12th, 2022, the Forest Service published the Draft Environmental Assessment, changing the NEPA from CE to EA, and requested comments. On November 17th, 2022, Y2U, Alliance for the Wild Rockies and Native Ecosystems Council submitted comments for the Ashley Forest-wide Prescribed Fire Restoration Project Draft EA.

On October 2nd, 2023, the Forest Service published the Final EA and a Finding of No Significant Impact.

On November 13th, 2023, Y2U, Alliance for the Wild Rockies and Native Ecosystems Council filed an Objection to the project authorization.

Throughout 2024, Y2U, Alliance for the Wild Rockies and Native Ecosystems Council continued to seek legal representation to investigate potential NEPA, NFMA and FLPMA violations.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

Boise National Forest 2024 Wildfire Impacts Response

Status

On **November 20th, 2024**, the Boise National Forest (BNF) initiated environmental reviews for the landscapes impacted by wildfires this past fire season. Collectively, the fires of 2024 are the largest fire to have occurred on the Boise National Forest. The Forest Service stated that they are looking at a much larger scale of restoration activities than previously attempted on the BNF. They claim that there is an urgent need for an effective and timely management response, particularly for the hazard abatement, and safety aspects of these projects.

On **December 9th, 2024**, Yellowstone to Uintas Connection (Y2U), WildLands Defense, Alliance for the Wild Rockies and Native Ecosystems Council submitted scoping comments on the proposed 2024 Wildfire Impacts Response.

The Boise Forest watershed lands and other Region 4 Forest lands, including the Sawtooth and Payette National Forests are also threatened by massive Forest Service vegetation manipulation and “treatment” projects and increased mining exploration activity.

In our comments we requested that the Boise Forest rescind and reconsider its recent large-scale treatment/logging/burning projects considering the 2024 mega-fires and the scale of both live and dead tree forest cover loss across the region. All the projects already approved with uncut and untreated must be re-evaluated considering the current tree, cover and rare species, migratory bird and other habitat loss on the Boise and surrounding forests.

Work Plan

- Upon release, Y2U will address whether the Final EA adequately analyzes the potential environmental impacts of the project and addresses potential alternatives.
- Y2U will file an Objection if the EA and ROD does not adequately analyze the potential environmental impacts of the proposed project and potential alternatives.
- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

Clark Fork Face Forest Health and Fuels Reduction project.

Status

On **April 17th, 2024**, the Bureau of Land Management (BLM) published the Final Environmental Assessment (EA) for the Clark Fork Face Forest Health and Fuels Reduction project.

The BLM has proposed forest restoration and fuels reduction treatments on BLM managed lands along and north of the Clark Fork River corridor, between Bonner and Drummond, MT. The Clark Fork Face planning area extends approximately 5 – 50 miles east of Missoula, MT in the Clark Fork River sub-basin in west central Montana. The planning area totals **247,191 acres** approximately, with a mix of ownerships including BLM, US Forest Service, The Nature Conservancy, Montana Department of Natural Resources and Conservation, the University of Montana, private ownership and others. For this project, forest restoration and fuels reduction treatments were proposed on BLM managed lands only.

On **May 15th, 2024**, Yellowstone to Uintas Connection (Y2U), Native Ecosystems Council, and Alliance for the Wild Rockies **submitted an Appeal** of the authorization for the Clark Fork Face Forest Health and Fuels Reduction project.

On **July 1st, 2024**, the U.S. Department of the Interior Office of Hearings and Appeals dismissed our Appeal claiming that our organizations did not have standing.

During **2024**, Y2U, Alliance for the Wild Rockies, Native Ecosystems Council and Council on Wildlife and Fish **secured legal representation** to investigate potential NEPA, NFMA, FLPMA and ESA violations.

On **December 3rd, 2024**, Y2U, Alliance for the Wild Rockies, Native Ecosystems Council, Council on Wildlife and Fish and the Center for Biological Diversity **filed a complaint** with the U.S. District Court of Montana.

Expected Outcome

Unknown

-Cyclone Bill Project

Status

On March 6th, 2023, the Tally Lake Ranger District of the Flathead National Forest proposed the Cyclone Bill Project to reduce tree densities and fuel loadings within the wildland-urban interface, improve diversity and resilience of vegetative communities, and contribute to continued timber production and economic sustainability. The Cyclone Bill Project is located on the Tally Lake Ranger District of the Flathead National Forest. The project area is approximately **40,880 acres**, and is located northwest of the Flathead Valley, 13 miles west of Whitefish Montana. The project area is located on the south side of the Star Meadow area and includes Tally Lake and Logan Creek. Approximately 55 percent of the Cyclone Bill project area is in the wildland-urban interface (WUI).

Land ownership within the project area is approximately 81 percent National Forest System (NFS) land, 13 percent private, and three percent State-owned lands. All proposed activities would occur on National Forest System lands. Approximately 55 percent of the project area, or 22,636 acres, is located within the wildland-urban interface.

On March 29th, 2023, Yellowstone to Uintas Connection (Y2U), Alliance for the Wild Rockies, Native Ecosystems Council, Council on Wildlife and Fish and the Center for Biological Diversity submitted scoping comments on the Cyclone Bill Project on the Tally Lake Ranger District of the Flathead NF.

On **September 16th, 2024**, Y2U, Alliance for the Wild Rockies, Native Ecosystems Council, Council on Wildlife and Fish and the Center for Biological Diversity submitted comments on the Draft EA for the Cyclone Bill project.

On **November 13th, 2024**, the Forest Service published the Environmental Assessment (EA) and Draft Decision Notice authorizing the Cyclone Bill project.

On **December 30, 2024**, Y2U, Alliance for the Wild Rockies, Native Ecosystems Council, Council on Wildlife and Fish and the Center for Biological Diversity **filed an Objection** to the EA for the Cyclone Bill project.

Work Plan

- Upon release, Y2U will address whether the Final EA adequately analyzes the potential environmental impacts of the project and addresses potential alternatives.
- Y2U will file an Objection if the EA and ROD does not adequately analyze the potential environmental impacts of the proposed project and potential alternatives.
- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

Dry Riverside Project

Status

On November 18th, 2022, the Hungry Horse and Spotted Bear Ranger Districts of the Flathead National Forest proposed the Dry Riverside. The project area is approximately **54,975 acres** and is located southeast of the town of Hungry Horse, within Flathead County, MT. In general, the project area is located south of Mount Grant, north of Crossover Mountain, east of the Hungry Horse Reservoir, and west of the divide between the South Fork and Middle Fork drainages. Ownership within the project area is 100 percent National Forest System (NFS) lands. All proposed activities would occur on NFS lands. None of the project area is located within the wildland-urban interface (WUI), established by the Flathead County Community Wildfire Protection Plan.

On December 19th, 2022, Yellowstone to Uintas Connection (Y2U), Native Ecosystems Council and Alliance for the Wild Rockies submitted scoping comments on the Dry Riverside Project.

On September 1st, 2023, the Forest Service published the Environmental Assessment (EA) for the Dry Riverside Project. On September 28th, 2023, Y2U, Alliance for the Wild Rockies and Native Ecosystems Council submitted comments on the EA.

On November 1st, 2023, the Forest Service published their Draft Decision Notice authorizing the Dry Riverside Project.

On **December 21st, 2023** (*After Y2U 2023 Final Report*), Y2U, Native Ecosystems Council, Alliance for the Wild Rockies, Council on Wildlife and Fish and the Center for Biological Diversity **filed an Objection** to the authorization of the Dry Riverside Project.

Throughout 2024, Y2U, Alliance for the Wild Rockies, and Native Ecosystems Council continued to seek legal representation to investigate potential NEPA, NFMA and FLPMA violations.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.
- Y2U is seeking legal representation to challenge the NEPA process for this and several other “vegetation treatment” or “fuels treatment” projects.

Expected Outcome

Unknown

East Rim Wildland Urban Interface (WUI) Vegetation Management Project

Status

On **December 18th, 2024**, the Pinedale Ranger District proposed the East Rim Wildland Urban Interface (WUI) Vegetation Management Project in the Bridger-Teton National Forest as a Categorical Exclusion (CE) to the NEPA process.

The East Rim WUI Vegetation Management Project is located 25 northwest of Pinedale, Wyoming. It lies on the western edge of the Pinedale Ranger District of the Bridger-Teton National Forest where it is crossed by US Highway 189, adjacent to the Packer- Miner Creek Road. The project proposes vegetation management activities on approximately **3000 acres**.

On **December 31st, 2024**, Yellowstone to Uintas Connection (Y2U) submitted a Freedom of Information Act (FOIA) Request for the project file for the East Rim WUI Vegetation Management Project. Y2U, the Alliance for the Wild Rockies, Native Ecosystems Council and Sage Steppe Wild will submit comments on the CE for this project.

Work Plan

- Upon release, Y2U will address whether the Final Decision for the CE adequately analyzes the potential environmental impacts of the project and addresses potential alternatives.
- Y2U will file an Objection if the Final Decision does not adequately analyze the potential environmental impacts of the proposed project and potential alternatives.
- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

Eastside Forest and Habitat Improvement Project

Status

On May 11th, 2021, the Bitterroot National Forest in conjunction with the Confederated Salish & Kootenai Tribes (CSKT) proposed a mix of vegetation treatments including prescribed fire and non-commercial thinning which will cover the majority of the “east side” of the Bitterroot National Forest, involving most of the Forest that is east of highway 93 as well as the entire Sula Ranger District, extending from the northern boundary of the Forest on the Stevensville Ranger District near 8 mile creek in Florence down to Conner, following the Darby/Sula Ranger District boundary to the south. The Scoping Proposed Action proposes that this project and its unknown number of site-specific projects will be “categorically excluded from documentation in an environmental assessment or environmental impact statement”. This precludes the public from seeing and commenting on a site-specific analysis and gives no opportunity to comment, object or appeal. It also implies that there will be no Cumulative Effects Analysis (CEA) or “Hard Look” at the direct or indirect effects, or for that matter, no informing the public about existing conditions and the cause and effect related to those conditions in their National Forest.

There is also **no indication of the number of acres** that this project will have an impact on.

On May 21st, 2021, Yellowstone to Uintas Connection (Y2U), the Alliance for the Wild Rockies, Friends of the Bitterroot, and Native Ecosystems Council submitted scoping comments on the project. The Forest Service must complete a full environmental assessment (EA) for this Project because the scope of the Project will likely have a significant individual and cumulative impact on the environment.

On December 5th, 2022, almost a year and a half later, the Forest Service issued a Decision Memo. On December 7th, 2022, Alliance for the Wild Rockies submitted a FOIA request on behalf of the above signed organizations.

In March of 2023, Y2U, the Alliance for the Wild Rockies, Friends of the Bitterroot, and Native Ecosystems Council secured legal representation to challenge the Categorical Exclusion of the NEPA process and subsequent project authorization.

On March 21st, 2023, we **filed a 60 Day Notice of Intent to Sue** under the Endangered Species Act: Bitterroot National Forest Eastside Forest & Habitat Improvement Project & Mud Creek Vegetation Management Project.

At this time our legal team has focused on the Mud Creek Vegetation Management Project (see page 48) and will return to the Eastside Forest and Habitat Improvement Project during 2025.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.
- Y2U has secured legal representation who is looking at pursuing additional litigation of the violations of the intent of NEPA, NFMA/FLPMA and the CWA.

Expected Outcome

Unknown

Green Union Project

Status

On October 5th, 2023, the Shoshone National Forest proposed to conduct vegetation management activities in the western portion of the Wind River Ranger District.

The proposed action included approximately **9,683 acres** of manual and mechanical vegetation thinning as well as the application of prescribed fire. The Green Union project was approved as an authorized emergency action under Section 40807 of the 2022 Infrastructure Investment and Jobs Act (also known as the Bipartisan infrastructure Law). Section 40807 of the Infrastructure Investment and Jobs Act authorized the Secretary of Agriculture to determine that an emergency exists where implementation of emergency actions is necessary to achieve reliefs from hazards threatening human health and safety or mitigation of threats to natural resources on National Forest System land or adjacent land. Based on the risks outlined in the Forest Service's January 2022 Wildfire Crisis Strategy, Secretary Thomas J. Vilsack determined that an emergency exists on 250 high-risk firesheds in the western United States. The Forest Service claimed that the project falls within these designated firesheds. The Dunoir Fireshed, to be specific.

On **March 27th, 2024**, Yellowstone to Uintas Connection, Alliance for the Wild Rockies, Wildlands Defense, and Native Ecosystems Council submitted comments on the authorization of the Green Union Project.

On **March 28th, 2024**, Yellowstone to Uintas Connection, Alliance for the Wild Rockies, Wildlands Defense, and Native Ecosystems Council submitted supplemental comments on the authorization of the Green Union Project.

This “Emergency Action” is not an emergency in that the forested areas planned for treatment range in distance from Dubois, the community that the Forest Service claimed to be protecting, from 3 to 23 miles. The intervening vegetation appears to be shrub/grassland. As we have observed across the West, past logging and treatments have been unable to stop high intensity fires driven by climate. This is clearly a logging and ecosystem manipulation project under the guise of wildfire protection and “restoration”. There is no justification for the need to “restore” or otherwise treat and log this area.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.
- Y2U is seeking legal representation to litigate potential violations of the intent of NEPA, NFMA/FLPMA and CWA.

Expected Outcome

Unknown

Hungry Creek Vegetation Improvement Project

Status

On October 19th, 2021, the Dixie National Forest proposed the Hungry Creek Vegetation Improvement Project. The proposed project is located within Garfield County, Utah on the Escalante Ranger District of the Dixie National Forest. The project consists of approximately **103,351 acres**, an analysis area which covers both the Pine Creek and North Creek 6 HUC watersheds.

Within this boundary, approximately 50,134 acres would receive mechanical vegetation treatment such as thinning, timber stand improvement or mastication. Prescribed fire could be applied following vegetation treatments as well to other units in the project boundary for a total of 71,052 acres of burnable acres.

On November 17th, 2021, Yellowstone to Uintas Connection (Y2U), Alliance for the Wild Rockies and Native Ecosystems Council submitted scoping comments on this project to help guide the development of the NEPA for the Hungry Creek Vegetation Improvement Project.

On January 12th, 2022, the Forest Service published the EA for the project. On March 22nd, 2022, **the project authorization was redacted** by the Forest Service, likely due to our detailed comments and fear of litigation.

On July 28th, 2023, the Forest Service published a new EA for the Project.

On August 28th, 2023, Y2U, Native Ecosystems Council, Alliance for the Wild Rockies, Council on Wildlife and Fish and the Center for Biological Diversity submitted comments on the new Hungry Creek Vegetation Improvement Project EA.

On **May 20th, 2024**, Y2U, Native Ecosystems Council, Alliance for the Wild Rockies and Council on Wildlife and Fish **filed an Objection** to the Hungry Creek Vegetation Improvement Project.

During 2024, Y2U, Alliance for the Wild Rockies, Native Ecosystems Council, Council on Wildlife and Fish **secured legal representation** to investigate potential NEPA, NFMA and FLPMA violations after the Forest Service publishes the Final Decision for the authorization of the Hungry Creek Vegetation Improvement Project.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

Larabee Hat Vegetation Management Project

Status

On **February 5th, 2024**, the Helena Ranger District proposed the Larabee Hat Vegetation Management Project in the Helena-Lewis Clark National Forest. The project area is approximately **43,158 acres**. The project area is located in Powell County on the Helena Ranger District and includes National Forest System lands between the Little Blackfoot River and the western boundary of the Helena Ranger District, south of Highway 12, and north and west of the Electric Peak Recommended Wilderness Area.

On **March 25th, 2024**, Yellowstone to Uintas Connection (Y2U), Alliance for the Wild Rockies, Native Ecosystems Council, Council on Wildlife and Fish, and the Center for Biological Diversity submitted scoping comments on the Larabee Hat Vegetation Management Project.

Work Plan

- Upon release, Y2U will address whether the Final EA adequately analyzes the potential environmental impacts of the project and addresses potential alternatives.
- Y2U will file an Objection if the EA and ROD does not adequately analyze the potential environmental impacts of the proposed project and potential alternatives.
- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

Manti-LaSal NF Restoration and Fuels Reduction Prescribed Fire Project

Status

On July 7th, 2021, the Manti-LaSal National Forest proposed to authorize multiple prescribed burns on **1.1 million acres** Forest-wide and up to 48,000 acres per year. On November 17th, 2021, Yellowstone to Uintas Connection, Alliance for the Wild Rockies and Native Ecosystems Council submitted scoping comments on this project.

On January 11th, 2022, the Forest Service published a Draft Environmental Assessment and Finding of No Significant Impact. The EA aims to radically alter and fragment sagebrush, Pinyon-Juniper and other forested communities, and will expand flammable invasive annual grasses that result in highly unnatural frequent fires dooming recovery of complex native woody vegetation communities. The Silvicultural Report shows **1,002,608 “Total Treatment Acres”**, with treatments apparently planned to extend over the next 32 years.

The Manti-LaSal NF contains approx. 600,000 total Roadless acres. There are 84 Roadless Areas within the project area, with 475,450 roadless acres. Close to 100,000 acres of sagebrush communities are to be destroyed., plus an unknown amount of collateral damage from all the deforestation activity impacts to sagebrush such as pile burning, being driven over, and crushed, bladed into a fire line, etc.

On February 22, 2022, Yellowstone to Uintas Connection (Y2U), Wildlands Defense, Alliance for the Wild Rockies, and Native Ecosystems Council submitted comments on the Manti-La Sal Forest-Wide Prescribed Fire Restoration Project Draft EA and FONSI.

On November 7th, 2023, the Forest Service published the Environmental Assessment, Finding of No Significant Impact and Draft Decision Notice.

On **December 26th, 2023** (*After Y2U 2023 Final Report*), Yellowstone to Uintas Connection (Y2U), Wildlands Defense, Alliance for the Wild Rockies, and Native Ecosystems Council **filed an Objection** on the Manti-La Sal Forest-Wide Prescribed Fire Restoration Project Draft EA and FONSI.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.
- Y2U will seek legal representation to look at pursuing additional litigation of the violations of the intent of NEPA, NFMA/FLPMA and the CWA.

Expected Outcome

Unknown

Mud Creek Vegetation Management Project

Status

On September 6th, 2019, The West Fork Ranger District of the Bitterroot National Forest is proposed the Mud Creek Vegetation Management Project to address forest health, hazardous fuels, and road network concerns in the entire Mud Creek watershed and portions of the Nelson Lake, Little West Fork, Lloyd Creek, Lower Blue Joint and Painted Rocks watersheds areas of the Bitterroot Mountains. The project area is approximately **48,523 acres**; however, most vegetation treatments will focus on the Wildland Urban Interface (WUI).

On April 19th, 2021, Yellowstone to Uintas Connection (Y2U), Alliance for the Wild Rockies, Friends of the Bitterroot, and Native Ecosystems Council submitted comments on the draft EA for the project. The Forest Service must complete a full environmental impact statement (EIS) for this Project because the scope of the Project will likely have a significant individual and cumulative impact on the environment.

On July 6th, 2021, the Forest Service published the Final EA for the project and ROD – Finding of No Significant Impact.

On August 23rd, 2021, Yellowstone to Uintas Connection, the Alliance for the Wild Rockies, Friends of the Bitterroot, Native Ecosystems Council and WildEarth Guardians filed an Objection to the authorization of the project.

On January 13, 2023, the Forest Service published the Environmental Assessment and a Decision Notice and Finding of No Significant Impact.

In March of 2023, Y2U, the Alliance for the Wild Rockies, Friends of the Bitterroot, and Native Ecosystems Council **secured legal representation** to challenge the Categorical Exclusion of the NEPA process and subsequent project authorization.

On March 21st, 2023, we **filed a 60 Day Notice of Intent to Sue** under the Endangered Species Act: Bitterroot National Forest Eastside Habitat and Forest Improvement Project & Mud Creek Vegetation Management Project.

On **January 17th, 2024**, Y2U, the Alliance for the Wild Rockies, Friends of the Bitterroot, Native Ecosystems Council, and WildEarth Guardians **filed a Complaint** with the U.S. District Court District of Montana for the Mud Creek Vegetation Management Project.

On **September 20th, 2024**, the Alliance for the Wild Rockies, Friends of the Bitterroot, Native Ecosystems Council, and WildEarth Guardians **filed an amended Complaint** with the U.S. District Court District of Montana for the Mud Creek Vegetation Management Project.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

Pine Valley Wildlife Habitat and Ecological Resiliency Improvement Project

Status

The proposed project is located within Washington and Iron Counties, Utah on the Pine Valley District of the Dixie National Forest. The Pine Valley Ranger District covers approximately 481,000 acres of which 250,000 acres are located within an Inventoried Roadless Area. An additional 55,000 acres are in designated wilderness. For this project, approximately **320,000 acres** are under consideration for treatment.

On October 13th, 2022, the Forest Service published an Environmental Assessment for the project.

On November 15th, 2022, Yellowstone to Uintas Connection, Alliance for the Wild Rockies, Wildlands Defense, and Native Ecosystems Council submitted comments on the proposed Pine Valley Wildlife Habitat and Ecological Resiliency Improvement Project.

In November of 2024, the Dixie National Forest Supervisor withdrew the decision and authorization of the Pine Valley Wildlife Habitat and Ecological Resiliency Improvement Project due to fear litigation by our organizations!

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

Pintler Face Project

Status

On July 6th, 2016, the Wise River Ranger District of the Beaverhead-Deerlodge National Forest proposed the Pintler Face Project. The project is located 10 miles northwest of Wise River, Montana, on the south face of the Anaconda-Pintler Mountains in the Wise River and Wisdom Ranger Districts.

On September 9th, 2021, the Forest Service published the Decision Notice and Finding of No Significant Impact for the Pintler Face Project

On September 9th, 2021, Yellowstone to Uintas Connection (Y2U), Alliance for the Wild Rockies, and Native Ecosystems Council filed an Objection to the Pintler Face Final EA and ROD – Finding of No Significant Impact. The project was proposed and approved by the Beaverhead-Deerlodge National Forest.

In 2022, Yellowstone to Uintas Connection, Alliance for the Wild Rockies, and Native Ecosystems Council secured legal representation to challenge the NEPA process for Threatened and Endangered Species on this project.

On **February 16th, 2024**, Yellowstone to Uintas Connection, Alliance for the Wild Rockies, and Native Ecosystems Council **filed a Complaint** in the U.S. District Court District of Montana for the Pintler Face Project.

In November of 2024, the Federal Court granted our request for an injunction stopping burning and precommercial logging in grizzly and lynx habitat for the massive Pintler Face Project on the Beaverhead-Deerlodge National Forest!

We are happy that the government will be held accountable for violating the law and that over 7,000 acres of lynx habitat in the Pintler Face project area will be protected while the case is decided.

The decision will also impact and require additional analysis of any other timber sales planned on this forest which will protect a lot more habitat for lynx. It's a good precedent for other areas where the Forest Service wants to destroy lynx habitat.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

Programmatic Vegetation Management Environmental Assessment – Bureau of Land Management (BLM) Dillion Field Office

On **March 21st, 2024**, the Bureau of Land Management’s Dillion Field Office announced that they were preparing a Programmatic Vegetation Management Environmental Assessment (EA) to address the health, function, and/or species composition of vegetation on Dillion Field Office BLM administered land. The Programmatic Vegetation Management EA included the entire Dillion Field Office and primarily focused on restoration activities to promote “healthy rangelands and riparian vegetation”, but also included activities to “improve” the health and resilience of aspen and curl-leaf mountain mahogany communities.

On **April 23rd, 2024**, Yellowstone to Uintas Connection (Y2U), the Alliance for the Wild Rockies, Wildlands Defense, Council on Wildlife and Fish, Center for Biological Diversity, and Native Ecosystems Council submitted comments on the EA for the project.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.
- Y2U will seek legal representation to look at pursuing additional litigation of the violations of the intent of NEPA, NFMA/FLPMA and the CWA.

Expected Outcome

Unknown

Round Star Project

Status

On December 8th, 2021, the Flathead National Forest published the proposed action for the Round Star Project. The project area is located on the northwest side of the Flathead Valley on the Tally Lake Ranger District in Montana. The Round Star Project proposes commercial timber harvest on up to **6,660 acres** and noncommercial vegetation treatments on up to 2,859 acres. To implement the proposed vegetation management activities, approximately 20.8 miles of system roads would be placed on the Forest’s road system. Additional actions would include 3.4 miles of temporary road construction.

On June 17th, 2022, the Forest Service published the Environmental Assessment. On July 18th, 2022, Yellowstone to Uintas Connection (Y2U), Alliance for the Wild Rockies, Montana Ecosystem Defense Council and Native Ecosystems Council submitted comments on the Round Star Project EA.

On August 18th, 2022, the Forest Service published an Updated EA, Finding of No Significant Impact, and Draft Decision Notice for the Round Star Project.

In October 2022, Yellowstone to Uintas Connection, Alliance for the Wild Rockies, and Native Ecosystems Council filed an Objection to the project authorization.

On **April 3rd, 2024**, the Forest Service published the updated EA and Final Decision Notice for the Round Star Project.

On **November 19th, 2024**, Y2U filed a Freedom of Information Act request to the Flathead National Forest. We requested the GIS information (geodatabases, shapefiles, and metadata) for attributes of the Flathead NF for our analysis of the updated EA.

During **2024**, Y2U, Alliance for the Wild Rockies, Native Ecosystems Council and Council on Wildlife and Fish (Formerly Montana Ecosystems Defense Council) **secured legal representation** to investigate potential NEPA, NFMA, FLPMA and ESA violations.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

Rumbling Owl Fuels Reduction Project

Status

On October 30th, 2023, the Swan Lake Ranger District proposed the Rumbling Owl Fuels Reduction Project on the Flathead National Forest (FNF). The project area is approximately **35,848 acres** and is located within Missoula County, MT, approximately 5 miles southeast of the town of Condon, MT. The project proposes vegetation management on **6,200 acres**.

On December 11th, 2023, Yellowstone to Uintas Connection (Y2U), Alliance for the Wild Rockies, Native Ecosystems Council, Council on Wildlife and Fish, and the Center for Biological Diversity submitted scoping comments on the Rumbling Owl Fuels Reduction Project.

On **November 20th, 2024**, the Forest Service published the Environmental Assessment (EA) for the project.

On **December 23rd, 2024**, Y2U, Alliance for the Wild Rockies, Native Ecosystems Council, Council on Wildlife and Fish, and the Center for Biological Diversity submitted comments on the Rumbling Owl Fuels Reduction Project EA.

The EA for the Rumbling Owl Fuels Reduction Project is incomplete and inadequate due to its failure to adequately address the cumulative effects of the Rumbling Owl Fuels Reduction Project and multiple concurrent and reasonably foreseeable future Forest Service land management actions on habitat connectivity between the Swan and Mission Mountain ranges. It also fails to consider reasonable alternatives that would reduce the magnitude, geographical extent, and intensity of these cumulative impacts on habitat connectivity. Any Finding of No Significant Impact (FONSI) based on the EA will violate the Administrative Procedures Act, the National Environmental Policy Act, and Forest Service NEPA regulations. As a result, the FNF must prepare an Environmental Impact Statement (EIS) to correct the serious deficiencies of the EA.

Work Plan

- Y2U will file an Objection if the EA and ROD does not adequately analyze the potential environmental impacts of the proposed project and potential alternatives.
- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

Sage Hen Integrated Restoration Project

Status

On April 13th, 2020, the Boise National Forest published the scoping letter for the Sage Hen Integrated Restoration Project proposing vegetation treatments and to reintroduce fire into the landscape. The project is located along the northwestern boundary of the Boise National Forest and is about 50 miles north of Boise, Idaho. The project boundary is consistent with the ridgeline of the Upper Squaw Creek watershed—an ecological boundary that allows for a more complete approach to restoration—and totals nearly **67,800 acres**. The west side of the project area incorporates private lands, with Bureau of Land Management, state and private lands also adjacent to the project area boundary. The east side of the project area encompasses a portion of the Snowbank Inventoried Roadless Area. On November 12th, 2020 the Forest Service published a Final EA and ROD – Finding of No Significant Impact for the project.

On December 8th, 2020, Yellowstone to Uintas Connection (Y2U), Alliance for the Wild Rockies, Native Ecosystems Council and Wildlands Defense filed an objection to the project

On September 8, 2021, Y2U, Alliance for the Wild Rockies, WildLands Defense and Native Ecosystems Council **filed a Complaint** against the Forest Service and the USFWS for the Sage Hen Project DN. The complaint was amended on November 15, 2021. On December 20, 2021, Idaho Conservation League filed a complaint against the Forest Service and the USFWS for the Sage Hen Project DN. The two complaints were consolidated on March 1, 2022. Authority to withdraw the decision was granted on June 7, 2022 by the Chief of the Forest Service. A final settlement agreement between the parties was executed on October 19, 2022. The terms of the settlement agreement require the Forest Service to withdraw the Decision Notice for the Sage Hen Project on or before December 31, 2022.

On December 30th, 2020, the Forest Service withdrew the decision to authorize the Sage Hen Integrated Restoration Project due to our litigation!

On **January 19th, 2024**, the Forest Service published the Revised Environmental Assessment (EA) and Finding of No Significant Impact (FONSI).

On **May 1st, 2024**, Y2U, Alliance for the Wild Rockies, WildLands Defense and Native Ecosystems Council **filed an Objection** to the EA and FONSI for the Sage Hen Integrated Restoration Project.

On **May 5th, 2024**, Y2U, Alliance for the Wild Rockies, WildLands Defense and Native Ecosystems Council **filed a 2nd Objection** to the EA and FONSI for the Sage Hen Integrated Restoration Project.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.
- Y2U will seek legal representation to look at pursuing additional litigation of the violations of the intent of NEPA, NFMA/FLPMA and the CWA.

Expected Outcome

Unknown

Southwest Idaho Resilient Landscape Project

Status

On August 28th, 2023, the Boise National Forest published the Environmental Assessment (EA) and Finding of No Significant Impact for the Southwest Idaho Resilient Landscape Project. The Forest Service proposed to authorize an increasing number of multiple prescribed burns and associated treatments on up to **77,000 acres** of National Forest System lands within the Boise National Forest each year over the next 20 years.

On September 27th, 2023, Yellowstone to Uintas Connection (Y2U), the Alliance for the Wild Rockies, Native Ecosystems Council and Wildlands Defense submitted comments on the EA for the Southwest Idaho Resilient Landscape Project.

On **April 1st, 2024**, the Boise National Forest published the Environmental Assessment (EA) and Finding of No Significant Impact (FONSI) for the Southwest Idaho Resilient Landscape Project. The EA authorizes prescribed burns and associated vegetation treatments on up to **48,000 acres** of the within the Boise National Forest each year over the next 20 years.

On **May 19th, 2024**, WildLands Defense (lead Objector), Alliance for the Wild Rockies, Native Ecosystems Council and Yellowstone to Uintas Connection (Y2U) **filed an Objection** to the Southwest Idaho Resilient Landscape Project Final EA and ROD – Finding of No Significant Impact.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.
- Y2U is seeking legal representation to look at pursuing additional litigation of the violations of the intent of NEPA, NFMA/FLPMA and CWA.

Expected Outcome

Unknown

Upper Weber Watershed Restoration Project

Status

On **March 5th, 2024**, the Uinta-Wasatch-Cache National Forest proposed implementing a variety of vegetation treatments and fuels reduction activities across **34,056 acres** in the Upper Weber watershed on the Heber-Kamas Ranger District.

On **March 27th, 2024**, Yellowstone to Uintas Connection (Y2U), Native Ecosystems Council, the Alliance for the Wild Rockies, the Council on Wildlife and Fish and Center for Biological Diversity submitted comments on the Draft Environmental Assessment (EA) for the Upper Weber Watershed Restoration Project.

On **June 4th, 2024**, the Forest Service published the Final EA, Draft Decision Notice and Finding of No Significant Impact (FONSI) for the Upper Weber Watershed Restoration Project.

On **July 17th, 2024**, Y2U, Native Ecosystems Council, the Alliance for the Wild Rockies, the Council on Wildlife and Fish and Center for Biological Diversity **filed an Objection** to the Final EA and FONSI for this project.

Work Plan

- Y2U will continue to monitor the impact of this project on wildlife and habitat.
- Y2U has secured legal representation who is looking at pursuing additional litigation of the violations of the intent of NEPA, NFMA/FLPMA and CWA.

Expected Outcome

Unknown

WILDLIFE



Canada Lynx Species Status Assessment/Draft Recovery Plan

Status

The current state of Lynx historical and critical habitat as well as linkage areas occurring in Montana, Idaho and Wyoming must be analyzed and reflect all human disturbances to habitat integrity and quality. This would include mines, roads, ATVs/OHVs and snowmobile activity, rail lines, pipelines, timber harvests, forest and vegetation treatments, livestock grazing and their effects on habitat continuity or fragmentation, understory plant communities and their condition as compared to potential. These all affect the ability of lynx and other species to inhabit the area or migrate through. It is insufficient to claim they will just move around a project area by using other habitat without specificity of the habitat features needed by each species as compared to that available. The quality of the habitat in that periphery is never analyzed in any project NEPA relative to the habitat needs for lynx or the habitat fragmentation that may be precluding lynx from otherwise suitable habitat. There have been no reports of lynx presence in SE Idaho for over a decade. We do not see any analysis as to why this is so since the Caribou Targhee National Forest borders lynx Critical Habitat and lynx historically occurred here.

The Northern Rockies Lynx Management Direction Record of Decision (NRLMD ROD) and its standards and guidelines provide no standard for levels of mature forest habitat within LAUs and provided nothing for habitat not designated in LAUs. While it states that habitat connectivity will be maintained, there is no definition of what constitutes connected habitat, even though this can be defined by current science. The NRLMD does not ensure persistence of lynx, since there are no restrictions on

the amount of an LAU that can be converted to habitats that are avoided by lynx, and to habitats that reduce habitat connectivity via mature forests.

On approximately five-year intervals, the US Fish and Wildlife Service prepares reports on listed species. These are called **Species Status Assessments**. Y2U met with the Fish and Wildlife Service leaders of the lynx management team to argue that their determinations of occupied habitat were erroneous as they omitted many reliable observations of Canada lynx in the Regional Wildlife Corridor that connects the Greater Yellowstone Ecosystem to the Uinta Mountains and Colorado. In addition, our review of the science and regulations, and current Forest Plans show that Canada lynx linkage habitat has no protection from habitat fragmentation. Our [January 25, 2023 comments](#) lay out the problems with current lynx management in detail.

On **January 18th, 2024**, additional comments were submitted on the proposed Canada lynx Draft Recovery Plan during the 60-day public comment period jointly by Yellowstone to Uintas Connection (Y2U), Native Ecosystems Council, the Alliance for the Wild Rockies, the Council on Wildlife and Fish, and Swan View Coalition. The comments are based upon our review of the various associated documents for the "Contiguous United States Distinct Population Segment of Canada lynx (*Lynx canadensis*)" including the 11/23 Draft Recovery Plan, the 11/23 Recommended Implementation Plan (RIP), the 11/23 Species Status Assessment (SSA) Addendum, and the SSA 10/17.

Our general overview of the Draft Recovery Plan being proposed by the U.S. Fish and Wildlife Service (FWS) is: Canada lynx (*lynx*) habitat will not be protected on 69% of moderate and high quality habitat within the Northern Rockies region (Distinct Population Segment Unit 3), while the remaining 31% of this moderate/high quality lynx habitat will have "partial" protections based on what will be "potential tweaking" of the existing regulatory mechanism [the Northern Rockies Lynx Management Direction (NRLMD) by the recommendations of the Western Lynx Biology Team (2022), which are not available to the public at this time, and by the Squires et al. in preparation recommendations, also which are not available to the public at this time. This Draft Recovery Plan will thus allow continued degradation/loss of lynx habitat in Unit 3, which in effect is a "back door" process to implement the lynx delisting process initiated by the FWS in 2017 in order to remove regulatory restrictions within lynx habitat, including critical habitat.

The job of the FWS is to protect wildlife, not government logging programs. This responsibility is clearly absent in the Draft Recovery Plan. It is basically a proposal to allow the continuation, and likely expansion, of logging programs in Unit 3, the Northern Rockies. The Draft Recovery Plan released for public review for the lynx, particularly in Unit 3 or the Northern Rockies, is a clear example of this agency failure to protect listed species and their habitats. **This recovery plan is a violation of the ESA as well as the public trust due government agencies for management of public resources.** A Recovery Plan that actually protects existing lynx habitat to promote conservation and recovery needs to be developed, as this current Draft Recovery Plan is a complete failure for lynx conservation.

On **January 29th, 2024**, additional comments were submitted by Yellowstone to Uintas Connection, Alliance for the Wild Rockies, Conservation Congress, Council on Wildlife and Fish, Gallatin Wildlife Association, Native Ecosystems Council, Sage Steppe Wild, and Swan View Coalition. We also incorporated the comments and analysis submitted to the Fish and Wildlife Service dated January 25, 2023, by Y2U. Those comments reviewed much of the science leading up to listing of Canada lynx and critiqued the regulatory environment, dismissal of many human activities impacting lynx and lynx habitat, providing no criteria for maintaining habitat or linkages, and no criteria for "unoccupied" areas which we argue were formerly occupied. The comments focused on the Greater Yellowstone Ecosystem (GYE) and the linkage corridor to the Uinta Mountains and southern Rockies.

The Draft Recovery Plan does not lay out specific, quantitative habitat parameters and standards to evaluate lynx habitat and correct fragmentation. This leaves each agency to wander around in a maze of deflection and generalization with the same outcome we have now...nothing to protect lynx habitat.

On **February 15th, 2024**, supplemental comments were submitted by Yellowstone to Uintas Connection, Alliance for the Wild Rockies, Conservation Congress, Council on Wildlife and Fish, Gallatin Wildlife Association, Native Ecosystems Council, Sage Steppe Wild, and Swan View Coalition. The purpose of these comments is to call attention to the extremely narrow focus of the Species Status Assessment (SSA) Appendix and Draft Recovery Plan and designated SSA 5 Focal Unit (FU) and SSA 5 Focal Area (FA). These omit large areas of suitable modeled lynx habitat in Central and SE Idaho, Southwestern Montana, and Western Wyoming. It is our contention that the boundaries for the FU and FA are arbitrarily drawn and thereby eliminate consideration of habitat (current and potential) occurring in these wider areas. The FWS has excluded large areas of high and moderate quality habitat. We have pointed out in our prior comments that the SSA 5 FAs in the Bridger Teton National Forest have high percentages of logged areas. The lack of analysis of current and potential forest cover along with areas degraded by timber and mining projects has led to selection of FAs that may not be high or even moderate quality habitat. Our analysis has identified millions of acres at the National Forest and National Park level that contain this high and moderate probability modeled habitat.

Since the GYA and Colorado population models have predicted temperatures to persist longest, greater attention to the entire region surrounding each of these Units is needed. The SSA Unit 5 must be expanded to also include the National Forests we have identified here that are in SW Montana, Central and SE Idaho, and Western Wyoming. These Forests contain millions of acres of potential lynx habitat that will remain without adequate analysis and regulatory protection if this DRP goes ahead under its current, limited focus.

Y2U has **secured legal representation** to challenge the Northern Rockies Lynx Management Direction Record of Decision and subsequent amendments.

Expected Outcome

Unknown

Dell Creek Elk Feed Ground Special Use Permit

Status

On October 13th, 2021, the Bridger-Teton National Forest (BTNF) published a scoping notice stating that Wyoming Game and Fish Commission (WGFC) has requested to use the facilities at Dell Creek feedground on the Big Piney Ranger District to conduct their winter elk management activities. The purpose of the proposal was for a one-year special use permit authorization for WGFC to operate and manage the Dell Creek feedground.

The Dell Creek feedground has been maintained and operated by the WGFC for supplemental winter feeding of elk since 1975. This feedground is one of 22 State operated feedgrounds located in Wyoming. On September 21, 2021, the authorization for WGFC's use of the Dell Creek feedground was determined by a United States District Judge to have expired. Under 36 CFR 251.50, an authorization is required for this use of National Forest System lands. On October 5, 2021, the Big Piney District received an application from WGFC to continue to use the facilities at Dell Creek feedground to conduct their winter elk management activities. Therefore, there is a need for the Forest Service to respond to the WGFC's application request. The one-year special use permit authorization allows for the continued management of the elk feedground on a temporary basis while the Forest Service conducts an environmental analysis

for longer term use. The Forest Service intends to prepare an environmental impact statement to analyze the environmental effects of long term use pursuant to the National Environmental Policy Act. The Forest Service also stated that there are no extraordinary circumstances related to the proposed action that may result in a significant individual or cumulative environmental effects and that they expected that this project would be authorized using a Categorical Exclusion.

On October 22nd, 2021, Yellowstone to Uintas Connection (Y2U), Alliance for the Wild Rockies and Native Ecosystems Council submitted scoping comments stating that in our experience with the Forest Service, we expect years of back and forth in a NEPA process involving an EIS, so this special use permit will likely be back for multiple renewals. It would seem a good time to allow the Dell Creek FG operation to be terminated while the fate of the remaining FGs is determined. This would be beneficial to reducing the incidence of brucellosis in elk, reducing the time spent on private lands and the FG area, and more time spent in the BTNF following natural migration patterns. Seasonal, parturition and crucial ranges would be used longer for the beneficial nutrition these habitats may provide.

Closing Dell Creek would also reduce the risk of Chronic Wasting Disease that can increase when animals are in close quarters such as FGs. The Dell Creek FG serves only a small fraction of the elk in the BTNF area. It is timely to close this FG in combination with other actions. Since not all elk feed at these FGs and elk using FGs have higher rates of disease than those that do not use FGs, it is highly questionable that FGs are reducing, not enhancing disease transmission to each other and to livestock. Contact between elk and livestock is guaranteed by the locations of these FGs in and adjacent to active grazing allotments.

Livestock consume huge quantities of the forage needed by elk and other wildlife. For example, one cow and calf pair consume 50 lbs air dry forage per day¹⁰ while an elk consumes 14 lb/day¹¹. Cattle displace elk from preferred habitats until forage is depleted and then they may come in. Predators and scavengers can have a positive influence by removing diseased animals as well as the disease contaminated offal from birth or abortion by diseased animals. To reduce the dependence of elk on FGs, providing more forage on public (and private) lands in their important crucial, parturition and winter ranges and limiting conflicts with cattle on the BTNF is needed.

On November 8th, 2021, the Forest Service published an authorization, under Categorical Exclusion of the NEPA process, for WGFC to maintain and operate the Dell Feedground. The Special Use Permit authorizes WGFC to operate the feed ground for one year during the winter of 2021-2022.

On November 23rd, 2021, Y2U, along with the Western Watersheds Project, Wyoming Wildlife Advocates, and the Gallatin Wildlife Association secured legal representation to challenge the NEPA process and authorization of this project.

In early 2022, following the filing of our Notice of Intent to litigate the use of Categorical Exclusion to authorize the project, the Forest Service announced that the Special Use Permit will be reauthorized each year while the long-term environmental analysis is completed. The Forest Service will complete an Environmental Impact Statement taking up to three years to decide on an alternative for feeding elk long term as directed by the court.

On January 14th, 2022, the Bridger-Teton National Forest announced that it is conducting an environmental analysis on the effects of reauthorizing two winter elk management special use permits in Sublette and Lincoln Counties. The proposed project consists of reauthorizing Wyoming Game and Fish Commission (WGFC) to operate the Dell Creek (Sublette County) and Forest Park (Lincoln County) elk feedgrounds and utilize existing facilities such as corrals and hay barns.

Winter elk management activities would include feeding, capturing, collaring, vaccinating, and testing elk, and removing seropositive elk from the population. The analysis is to be documented in an environmental impact statement (EIS) titled Dell Creek & Forest Park Elk Feedgrounds: Long-term Special Use Permits Project.

On June 1st, 2022, designated stakeholders in the development of the Wyoming Game and Fish Department (WGFD)'s elk feedground management plan submitted recommendations to the WGFC. The designated stakeholders included Yellowstone to Uintas Connection (Y2U), Sierra Club, Wyoming Wildlife Advocates, Jackson Hole Conservation Alliance, and Western Watersheds Project.

First, we urged the steering committee to adopt a management plan that includes a well-defined, clear plan to begin a controlled phase out of artificial feeding in the winter of **2023-2024**, with artificial feeding ceasing on all feedgrounds operated by the State of Wyoming by **2028**.

Second, we requested that the WGFD meet its mission and vision to conserve, enhance, and protect Wyoming's exceptional fish and wildlife resources by prioritizing the needs of wildlife and working to ensure that wild, free ranging elk and other migratory species can move across the landscape between seasonal ranges without impediment from human development.

Third, we requested that the steering committee explicitly acknowledge in this plan the critical role that carnivores play in maintaining ecological balance between herbivores, carnivores, and vegetation, and ensuring wild and healthy populations of prey species.

Fourth, we urged the steering committee to use this management plan as a vehicle of public education that openly supports a cultural shift toward valuing and prioritizing healthy and free-ranging ungulate herds and carnivores on the land because of their inherent value as native species and their contributions to stable ecosystems.

On June 21st, 2022, the Forest Service published the Scoping Report for the project. On September 27th, 2023, Y2U submitted scoping comments on the project.

On November 20th, 2023, the Forest Service published the Draft Environmental Impact Statement (DEIS) for the Dell Creek & Forest Park Elk Feedgrounds: Long-term Special Use Permits Project.

On **January 15th, 2024**, Y2U, Alliance for the Wild Rockies, and Native Ecosystems Council submitted comments to the BTNF on the DEIS. In addition, Yellowstone to Uintas Connection is a Stakeholder in the ongoing development of the State of Wyoming Elk Feedgrounds Management Plan (See below). We have participated in meetings and submitted comments on the development of this plan and incorporated those comments. We do not support either the model for its omissions and too broad assumptions, nor the DEIS for its conclusory outcome.

It is important that an analysis of each of these issues be done to inform the public of the Forest Service's ability to carry out its proposals. Due to changes in demographic trends with greater emphasis on wilderness and recreation occurring today, changes in management are needed to de-emphasize traditional extractive uses such as livestock grazing and timber harvest and emphasize natural settings, wilderness, primitive, roadless, wildlife habitat, wildlife watching, fishing, hunting, and watershed protection. Note that although Yellowstone National Park is largely roadless compared to the BTNF, millions of visitors come to view wildlife and natural features. Yellowstone National Park allows no livestock grazing and timber harvest, lets fires burn naturally, and brings a large economic return to the region. Similarly, Grand Teton National Park is bringing large economic returns without being dominated by livestock grazing, timber projects or off-road vehicles.

As of **December 28th, 2024**, the Forest Service has not published the Final Environmental Impact Statement (FEIS) for the project.

Work Plan

- Y2U will address whether the Final EIS adequately analyzes the potential environmental impacts of the project and addressed potential alternatives.
- Y2U will file an Objection if the EIS and ROD does not adequately analyze the potential environmental impacts of the proposed project and potential alternatives.
- Y2U **has secured legal representation** to challenge the NEPA process for this project if needed.
- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown

Elk Feed Grounds: A Challenge We Can Take On

Status

Wyoming has 23 feedgrounds for Rocky Mountain Elk. Wyoming began feeding elk over a century ago in Western Wyoming. This was ostensibly to provide forage and eliminate conflicts with livestock on private lands. Today, chronic wasting disease, brucellosis, foot rot and other diseases are growing in Wyoming elk and deer populations. Feedgrounds concentrate the animals leading to greater exposure to these diseases. Wyoming Game and Fish Department has enlisted the public, non-profit and other entities into a long-term management process.

Y2U is a stakeholder and attends meetings, provides input and comments to attempt to get acceptance of closing these disease factories. Basically, the livestock industry is consuming the forage in elk summer and winter range, leaving very little for wildlife. We have submitted [group comments](#) with other organizations outlining the need for closure. Recently, we submitted [comments](#) on the Draft Wyoming Elk Feedground Management Plan. Our problem with the process is it has no conclusion but draws out feeding for decades while diseases increase when the problem would be ameliorated if livestock producers left forage on our public lands and their own property to support the elk.

On September 29th, 2021, Yellowstone to Uintas Connection, along with the Western Watersheds Project, Wyoming Wildlife Advocates, and the Gallitin Wildlife Association, agreed to participate in Phase II of the Wyoming Game and Fish Department's *Elk Feedgrounds: A Challenge We Can Take On* public collaborative process.

Throughout 2022 and 2023, Y2U staff members continued to be involved with this process.

In **February of 2024** the Wyoming Game and Fish Department published the Wyoming Elk Feedgrounds Draft Management Plan.

On **March 12th, 2024**, the Wyoming Game and Fish Department published the Wyoming Elk Feedgrounds Final Management Plan.

Their decision perpetuates the status quo by fragmenting the situation and requiring each of the 23 Feedgrounds to develop a Feedground Management Plan. This effectively delays any meaningful progress indefinitely. Unfortunately, the lack of protection for scavengers and predators who can clean up diseased carcasses and offal will give CWD and other diseases more freedom to infect.

We became stakeholders in Wyoming's years-long process of public input with meetings occurring to update information and discuss options, science, and economics. Unfortunately, we pretty much knew this would be the outcome since the decision on feedgrounds is subject to the approval of the Wyoming Livestock Board.

Work Plan

- Y2U continues to take part in stakeholder meetings regarding elk feedgrounds in Wyoming.
- Y2U will continue to monitor the impact of this project on wildlife and habitat.

Expected Outcome

Unknown