



WYOMING GAME AND FISH DEPARTMENT

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February 11, 2011

WER 8303
Forest Service
Greys River Ranger District
Star Valley Ridge Riders Annual Snowmobile
Hill Climb on the Bridger-Teton National Forest near Grover
Lincoln County

Adam Mendonca
District Ranger
Greys River Ranger District
PO Box 339
Afton, WY 83110

Dear Mr. Mendonca:

The staff of the Wyoming Game and Fish Department (WGFD) has reviewed the Star Valley Ridge Riders Annual Snowmobile Hill Climb near Grover on the Bridger-Teton National Forest (BTNF). We offer the following comments.

We have provided written comments regarding the Afton Hill Climb, as well as snowmobile travel on crucial wildlife winter ranges in the Star Valley area in letters dated December 7, 1993, June 13, 1994, January 30, 1996, May 23, 1996, November 4, 1996, December 2, 2008, and November 23, 2009. In our discussions with Greys River Ranger District personnel we have expressed our concerns about the importance of maintaining the integrity of crucial big game winter ranges by restricting snowmobile travel in these areas, located in the Salt River watershed. We continue to encourage the BTNF to incorporate these recommendations as a precondition for issuance of the 2011 special use permit and implement the comprehensive winter travel plan for the Salt River watershed, which was approved by the responsible agencies and concerned parties in October 1996. In addition to our previous letters we offer the following information regarding wildlife.

The proposed project area is designated as crucial winter/yearlong range for the Afton Elk Herd, Wyoming Range Mule Deer Herd, and Sublette Moose Herd. The project area is within an important daily and seasonal big game migration corridor and parturition area. In addition, the area is utilized by black bears and mountain lions. Black bears are suspected to build winter dens on the steeper, heavily timbered, north exposures in the general vicinity of the project area. The area has been used as a travel corridor by wolverines.

While much has changed in terms of the level of human development and increased snowmobile use in the Salt River watershed since the late 1980s, the importance of the west facing slopes of the Salt Mountain Range as big game winter range has not. The importance of winter ranges from Alpine to Smoot is crucial. Due to the level of impacts and associated habitat fragmentation caused by human development in the Star Valley area, we believe it is time to offer a comprehensive level of protection to crucial wildlife winter ranges.

We have invested considerable resources in the development of the existing Forest Plan, which addresses motorized travel within important wildlife habitats (i.e. DFC 10, 12). The original intent of WGFD and BTNF efforts was to insure the integrity of such areas for the duration of the Forest Plan. Since the 1993 and 1996 environmental review process was initiated for the annual Afton snowmobile hill climb, we have advocated motorized winter travel planning that would provide protections for wildlife populations and crucial habitats throughout the entire Salt River watershed. These protections include, but are not limited to, adoption of the most current big game seasonal range designations, restricting motorized travel to designated routes, and closure of crucial wildlife winter ranges to snowmobile travel as outlined in the Forest Plan (i.e. DFC 10 and 12; LRMP, p. 124). Lastly, incorporation of the comprehensive winter travel plan for the Salt River watershed, as outlined in the October 9, 1996 Environmental Assessment, would provide protection of crucial wildlife winter ranges for the long-term.

Therefore, we support the issuance of a special use permit only on a year-by-year basis for the proposed Star Valley Maverick Ridge Riders' Snowmobile Hill Climb request. We recommend that the following BTNF Standards and Guidelines be analyzed during the development of the Decision Document:

- Elk Security and Habitat Effectiveness Standard
- Big Game Winter Range Standard
- Identification of Mitigation Measures
- Big Game Habitat Guideline
- Analysis of Cumulative Impacts
- Desired Future Condition 12. Backcountry Big-Game Hunting, Dispersed Recreation, and
- Wildlife Security Areas – The general theme of areas designated DFC 12 in the LRMP are managed for high quality wildlife habitat and escape cover, big game hunting opportunities, and dispersed recreation activities” (LRMP, page 241). Livestock grazing is permitted on other big-game ranges if it does not conflict wildlife needs.” (LRMP pgs. 241-242).

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- Desired Future Condition 10. The theme for areas designated as DFC 10 is “an area managed to allow for some resource development and roads while having no adverse and some beneficial effects on wildlife (LRMP, p. 233).
- The management emphasis for Management Prescription 10 is “to provide long term and short term habitat to meet the needs of wildlife managed in balance with timber harvest, grazing, and minerals development. All surface-disturbing activities are designed to have no effect or beneficial effects on wildlife...” (LRMP, p. 235).
- Management Prescription 12. Management Emphasis - “Management emphasis is on providing such important habitat for big-game as winter ranges, feedgrounds, calving areas, and security areas. Management provides for habitat capability and escape cover, and maintained semi-primitive, non-motorized opportunities that emphasize big game opportunities” (LRMP, p. 242).
- Management Prescription 12. Fisheries and Wildlife Prescription – “Habitat will be managed to help meet the game populations, harvest levels, success, and recreational-day objectives, and to fully achieve the fish populations, harvest levels, success, and recreation-day objectives identified by the Wyoming Game and Fish Department and agreed to by the Forest Service.” (LRMP, p. 243).

Thank you for the opportunity to comment. We would like to be active participants and cooperators in the development of a final Decision Document. If you have additional questions, please contact Gary Fralick, Jackson Region Wildlife Biologist, at 307-883-2998 or Tim Fuchs, Jackson Region Wildlife Supervisor, at 307-733-2321.

Sincerely,



For John Emmerich
Deputy Director

JE/mf/gb

cc: USFWS
Tim Fuchs, Jackson Region
Gary Fralick, Jackson Region