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Working to Protect and Restore Our Public Lands

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August 16, 2025

RE: Forest Plan Assessment Comments

Dear Chad,

36 CFR 219.6 defines the requirements of an Assessment:

§ 219.6 Assessment.

(a) Process for plan development or revision assessments. An assessment must be completed for the development of a new plan or for a plan revision. The responsible official shall:

(1) Identify and consider relevant existing information contained in governmental or non-governmental assessments, plans, monitoring reports, studies, and other sources of relevant information. Such sources of information may include State forest assessments and strategies, the Resources Planning Act assessment, ecoregional assessments, nongovernmental reports, State comprehensive outdoor recreation plans, community wildfire protection plans, public transportation plans, State wildlife data and action plans, and relevant Agency or interagency reports, resource plans or assessments. Relevant private information, including relevant land management plans and local knowledge, will be considered if publicly available or voluntarily provided.

(2) Coordinate with or provide opportunities for the regional forester, agency staff from State and Private Forestry and Research and Development, federally recognized Indian Tribes and Alaska Native Corporations, other governmental and nongovernmental parties, and the public to provide existing information for the assessment.

(3) Document the assessment in a report available to the public. The report should document information needs relevant to the topics of paragraph (b) of this section. Document in the report how the best available scientific information was used to inform the assessment (§ 219.3). Include the report in the planning record (§ 219.14).

(b) Content of the assessment for plan development or revision. In the assessment for plan development or revision, the responsible official shall identify and evaluate existing information relevant to the plan area for the following:

- (1) Terrestrial ecosystems, aquatic ecosystems, and watersheds;
- (2) Air, soil, and water resources and quality;
- (3) System drivers, including dominant ecological processes, disturbance regimes, and stressors, such as natural succession, wildland fire, invasive species, and climate change; and the ability of terrestrial and aquatic ecosystems on the plan area to adapt to change;
- (4) Baseline assessment of carbon stocks;
- (5) Threatened, endangered, proposed and candidate species, and potential species of conservation concern present in the plan area;
- (6) Social, cultural, and economic conditions;
- (7) Benefits people obtain from the NFS planning area (ecosystem services);
- (8) Multiple uses and their contributions to local, regional, and national economies;
- (9) Recreation settings, opportunities and access, and scenic character;
- (10) Renewable and nonrenewable energy and mineral resources;
- (11) Infrastructure, such as recreational facilities and transportation and utility corridors;
- (12) Areas of tribal importance;
- (13) Cultural and historic resources and uses;
- (14) Land status and ownership, use, and access patterns; and
- (15) Existing designated areas located in the plan area including wilderness and wild and scenic rivers and potential need and opportunity for additional designated areas.

36 CFR 219.6 (a) 2 requires that the Forest Service do a ‘data call’ to inform its process at the earliest stages, but the Forest failed to comply with that mandate.

This requirement is echoed in FSH 1909.12 Chapter 10 such as 10.2, 10.4

In a meeting with Randy Griebel and the Planning team a year and a half ago, I raised the issue of a lack of a ‘data call’ and also specifically mentioned a number of datasets that the Forest has that are directly applicable to an Assessment, that, based on the meeting’s conversations, that the Forest was likely not considering. I provided specifics on a few examples.

In reading the assessment, I see that, even after being informed of these directly applicable datasets maintained by the Forest, Randy simply ignored the input and ignored the datasets.

You can not rationally claim to have used the best available science, as mandated under 36 CFR 219.3 when you have purposefully ignored your own science. See also FSH 1909.12 Chapter 10 Sec 11 2c. defining “available”.

Overall, despite its massive volume, the Assessment contained very little real data and information. Much of it read as if it had been generated by AI. Most of the information was not specific to the B-T.

Exemplifying the issue of fluff, the Assessment reads as if it were a poor quality EA, not an Assessment.

The Assessment is packed with general assertions, but little site-specific data.

The Assessment contains a stunning 163 repetitions of the word “could”, 576 receptions of the word “may”, 753 repetitions of the word “can” and 61 receptions of the word “possibly”.

The entire point of an Assessment is to lay out was “is” not what “could”, “may”, “can” be.

The overall impression of the Assessment is that the B-T it trying to blame everything on global warming and since nothing can, or will be done about that, then the Forest can simply throw up their hands and continue with the status quo.

Let’s start out with the summary:

- 1) 25% forested acres have burned in the last 70 years, about another 25% have been clear cut, or using the Forest Service euphemism ‘treated’ and since the mid 1990’s vast areas of mature to old growth that didn’t burn or get cut have been killed. But the Assessment fails to put all this together and fails to discuss the implications of these massive losses and instead argue much more “treatments” (forest removal) are needed.
- 2) “Ecological sustainability is defined as the capability to meet the needs of the present generation without compromising the ability of future generations to meet their needs.” Who came up with that BS? Did that ridiculous statement make it through proofing? Does the B-T stand by that rubbish?
- 3) “Projected changes in the Bridger-Teton climate by 2050 compared to the period from 1971-2000 include: (1) a 39% reduction in the water content within the spring snowpack, (2) the hottest and coldest days could be 7-9 degrees warmer, (3) 21 more days could be hotter than 86 degrees, and (4) the first fall freeze could be 40 days later and last spring freeze could be 14 days earlier.”. The problem is that the Assessment does not deal with the implication of those changes related to the resource extraction it permits.
- 4) Air Resources – Completely ignores your 50 year dataset showing severe acidification, fails to even discuss their CAA violations in the Class I airsheds (Exceedances of Levels of Acceptable Change LACS)
- 5) Fisheries – The Assessment ignores the massive declines in native trout over the last 50 years along with your own condition data. For example, the UGRA NEPA process started in 1999. By the time that process completed more than 2 decades later, a number of the populations of CRCT that existed in 1999 were already extirpated.

- 6) The Assessment basically ignores lynx because it falsely claims that they are “not documented since 2010”. Between the FWS and the B-T, a few people are trying to rewrite history, arguing that the B-T never supported lynx. This argument is absurd. I know with the constant turnover of staff, no one has any experience beyond a few years, but anyone who has been in the area for a long time can see the argument as BS. Bucky Neely trapped 21 lynx out of the Horse Creek drainages in the last winter lynx trapping was legal. That is a single trapper in a single drainage. I also provide again the lynx analysis done by Dr. John Carter which the planning team conveniently ignored.
- 7) “the forest products industry is crucial to help achieve forest objectives, notably related to fuel reduction.” What is a forest? “Fuel”. This is the Forest Service’s “we had to destroy the village in order to save it” Vietnam war mentality.
- 8) “Ranching jobs are still important sectors in all counties except Teton County” Sublette Co is ranching is like 1.6% of employment and less than that is total economic output. The idea that that is “important” stretches the definition past the breaking point. According to the latest statistics from the state of Wyoming, 2,711 people are employed in agriculture, in the entire state, and that includes beets and corn in the Bighorn Basin and dryland beans in the eastern part of the state.
- 9) Roads – “1,561 miles are open for public use. In addition, approximately 998 miles of non-system, user-created routes exist on the landscape.” So a stunning 40% of the total road miles are user created. That is a massive problem. Over the last 40 years, I have spent a lot of time on Forests across R2 and R4 and I have to say the B-T efforts on this problem are the least and least effective of any of the R2 and R4 Forests. Eight times out of 10 the approach is a carsonite stake that they simply drive over.
- 10) “between 2011 and 2018, approximately 36% of all trees on the Forest (died)”. Again, the implications of this massive die off, along with the 70 years of ‘treatments’ and the fires are not connected. Seven year = 36% of the trees. And that does not factor in the massive mature and old growth spruce die-off over the last 6 years.
- 11) Note Figure 37. You started logging in the Pack Trail fires area before it was even out. And note none of the trees in the pic are burned.
- 12) 1990 Plan allocated 279,000 acres of suitable timber. 125,964 acres were ‘treated’
- 13) “East Zone allotments (primarily cattle) show an average utilization rate of only 12%, based on recent measurements, with the defined utilization threshold being 40-60% depending on allotment. Riparian stubble heights averaged 9 inches with the minimum threshold being 4-6 inches depending on allotment.” While this is not an outright lie, it is certainly misleading. This is because the permittees and the range con use Idaho fescue as the key species, which is a low stature increaser species that the Forest’s own data shows only grows to 5.5” and which is hard for cattle to graze it past about 15-20% because of the thickness of the cows lip. The range con specifically uses Idaho fescue because it makes it physically impossible to exceed utilization thresholds.
- 14) “Twenty-five monitoring sites (Kemmerer and Afton RD) showed an average of 18% utilization with less than 3% of the plots exceeding established utilization objectives.” Here again, not an outright lie, but purposefully misleading. Most of this data is using non-palatable species like wyethia, so of course the utilization rate is going to be low.

Moving on to the main Assessment.

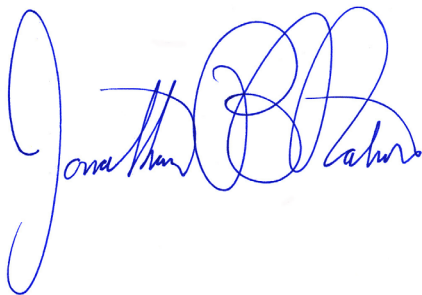
- 1) P29 – “However, wildfire suppression has led to greater biomass accumulation in watersheds and the potential for larger scale, higher intensity wildfires” Virtually all the FRI’s on the B-T forest types are far beyond the time frame of fire suppression. Nearly all the forest types on the B-T are stand-replacing, not low intensity fires like on the ponderosa type. Secondly, fire suppression has only occurred with any effectiveness since after WWII. And even today, most fire suppression is ‘successful’ only during conditions of low fire spread anyway. Most of these types of fires would go out on their own. During fire weather, when the vast majority of acres burn, suppression efforts do basically nothing. Fire suppression has had little to no effect on forest structure on the B-T. This is clear if you simply examine the assertions provided by fire staff. It’s basically a myth which people unquestioningly chose to believe.
- 2) P31 and elsewhere – While the word WUI is mentioned a few times in the document, the current WUI’s are not mapped (or even defined). Changes since 1990 are not displayed. Despite the huge focus on logging and fire and the assertions that all the logging the B-T does is for ‘fuels reduction’ the gap of not defining WUI and mapping it and the structures it is supposed to protect is a glaring omission.
- 3) P31 – “Roads, motorized trails, and their associated use are stressors with some of the greatest impacts to wildlife in non-wilderness portions of the Bridger-Teton.” While certainly roads do impact wildlife, by far the greatest stressor on wildlife is the B-T’s permitting of livestock that 1) spatially impact wildlife 2) remove much of the forage and cover required by wildlife 3) result in the killing of wildlife to protect private livestock 4) fragment and degrade habitat. The acres impacted by roads is a tiny fraction of that impacted by livestock. In addition, this section seems to equate “wildlife” to hunted ungulates, not all wildlife.
- 4) The Invasive section fails to discuss the effectiveness of the current approach, the level of monitoring effort compared to the whole Forest or the trajectory of known infestations. This information is, of course, critical to the development of actions.
- 5) P36 – “On the Bridger Teton, invasive plant species are mostly associated with roads, trails and trailheads where people inadvertently introduce noxious plant seeds transported by: vehicles, stock, pets, or clothing. Additionally, wind and wildlife can also transport invasive species.” Humans are a tiny vector of invasives. The main vector is livestock (both in terms of seed dispersal as well as soil disturbance) and ‘treatments’. Again, the B-T is trying to avoid the fact that it, itself, is the primary driver of the spread of invasives.
- 6) “Rapidly identifying, monitoring, and treating invasive species should be a Bridger-Teton priority” but it is not and never has been.
- 7) The connectivity section displays nice looking maps of model results but studiously avoids discussing the B-T’s active participation of destroying migration routes though its permitting the elk feedlots, or the thousands of miles of fences that only exist to support the livestock industry. Also not discussed is the “take” of grizzly bears by impacting their natural movements through providing tens of thousands of slow, stupid meals walking around for the taking. From the UGRA BO “Although there are exceptions to the take prohibition for grizzly bears, the exceptions do not address all sources of incidental take that may result from the proposed Federal action. For example, harm is further defined by regulation (50 CFR 17.3) to include significant habitat modification or degradation that results in death or injury to listed species by significantly impairing behavioral patterns such as breeding, feeding, or sheltering. Harass is defined as actions that create the likelihood of injury to listed species to such an extent as to significantly disrupt normal behavior

- patterns which include, but are not limited to, breeding, feeding or sheltering.” Your permitting of livestock dramatically degrades the connectivity of this ESA listed species but the Assessment fails to disclose that fact.
- 8) Figure 14 is a classic example of the bias seen throughout the document. While the table is certainly not an outright lie, it is purposefully misleading. From a Forest Planning perspective it is meaningless. Comparing the B-T to the entire US is ridiculous. What should have been done is to map road density against the scientific literature on road impacts to soils, erosion, invasives, wildlife habitat, recreation impacts, etc.
 - 9) The Ungulate Migrations section, like the previous connectivity section, this studiously avoids mentioning that it is the Forest Service, itself, that is the primary source of impacts to ungulate migration through its destructive permitting of the network of elk feedlots and the thousands of miles of fences constructed for the sole support of the livestock industry.
 - 10) Throughout the discussions of HRV, the Forest carefully avoids the fact that its permitting of 32,000 (actually closer to 60,000 head because most are cow calf pairs) along with 40,000 sheep is far outside the HRV. Prior to the European invasion bison, in these parts were very few and likely rarely used what is now the B-T. Therefore, all impacts from the B-T’s permitting of livestock fall far outside HRV. But the Assessment entirely and purposefully ignore this fact. See for instance, Mack and Thompson 1982, RMRS GTR-169. Page 53 defines it properly but the Assessment fails to apply it to anything impacted by livestock.
 - 11) Table 11 – How did the B-T come up with 60% of the engelmann is in 21-33” DBH? This seems wildly off. Of the remnant old growth in the Upper Green there is mortality rate of 75-90% of this age class over the last 5 years. Even setting aside the recent mass mortality, this age class was rare to begin with after 150 years of logging.
 - 12) Aspen – “mainly as a result of fire suppression activities over the last 100+ years.” Again, this far overstates the reality of the effectiveness of fire suppression. It would be 75 year maximum and even then of limited effectiveness. Many researchers have looked at this widespread lack of aspen regeneration and have found the cause to be livestock directly, or livestock removal of most of the above ground biomass forcing wildlife to use aspen far more heavily than if livestock were not removing such a large percentage of the biomass. From a BLM report Aspen Management Guidelines from the primary aspen researcher Charles E. Kay “The status and trend of aspen communities in north-central Nevada, however, is not related to climatic variation, fire suppression, forest succession, or browsing by mule deer. Instead, the condition of individual aspen communities is related to past and present levels of livestock grazing.”. See also attached.
 - 13) P84 – “There is a limited amount of information available on fire regimes and reference conditions in sagebrush” This is not true. We provide a wide range of literature as attachments.
 - 14) The Inter-Mountain Basins Montane Sagebrush Steppe section looks at the situation almost entirely from the perspective of sage brush (which livestock do not eat) and studiously avoids examination of all the other species that livestock do eat, and therefore are directly impacted by the B-T’s permitting of livestock. Table 16 displays this bias nicely.
 - 15) P87-88 provide general “can”, “could”, “may” statements but provides no site specific vegetative condition data for the Forest, nor does it compare it to HCPC. FSH 1909.12 Chapter 10 at 13.32 specifically demands that the Assessment provide:

1. The current range condition in the plan area and trends influencing the range conditions. Relevant information can include current diversity and proportion of grazing arrangements within the plan area (for example, collaborative experiments, conventionally grazed lands, non-use areas).
 2. The current level of grazing activity in the plan area and within the broader landscape.
 3. The capability and productivity of the plan area to support grazing activity.
 4. The impacts of grazing on ecological integrity and species diversity.
 5. The contribution of grazing in the plan area to social, economic, and ecological sustainability. This may include the contributions of grazing in the plan area to social, cultural and economic conditions of communities outside the plan area.
- 16) The closest thing the Assessment contains is found on page 94 that covers a tiny fraction of the Forest. However, it also does not comply with the FSH. Trend without condition is meaningless. A stable trend at 97% of HCPC and a stable trend at 14% of HCPC are identical, except one is what it should be and the other is severely degraded. This is why range cons are so fond of trend is because it tells you nothing and covers up the actual condition.
 - 17) The Air Quality section runs directly counter to the data and analysis that the Forest Service wrote for the Sage Grouse ARMPA EIS, attached. I mentioned this to Randy a year and a half ago and he ignored it.
 - 18) P138 "BTNF staff are already working with partners to minimize the effects of irrigation and other consumptive water use on aquatic and riparian ecosystems. Existing diversion infrastructure is being upgrading or retrofitted to be more efficient while reducing the likelihood of entraining fish and other aquatic organisms." I have to say that this one is rich. I documented water diversions on Forest Service lands (irrigating Forest Service lands) where the diverters were diverting way more than allocated and flushing CRCT out into the fields (Forest Service lands) and the staff person dealing with this said she wouldn't do anything about it.
 - 19) The grizzly bear section is another example of writing that it not an outright lie but is clearly and purposefully misleading. Highway 191 runs north and south, not east and west, but assuming the writer meant Daniel Junction, this is incorrect as there is grizzly activity to the southern end of the Winds and well down the Wyoming Range.
 - 20) "Regulating human-caused mortality through habitat management and conflict prevention are effective approaches, as evidenced by increasing grizzly bear populations in the GYE." The grizzly population on the B-T has been essentially flat for the last decade, while grizzly mortalities and conflicts have significantly increased, indicating that the B-T's current approaches are not working, if the B-T was being honest.
 - 21) Then there is the kicker "An effective habitat management tool for reducing grizzly bear mortality risk on public lands is managing motorized access to ensure grizzly bears have secure areas away from humans. Another important measure to reduce human-bear conflicts is requiring people in grizzly bear habitat to store their food, garbage, and other attractants so that they are inaccessible to bears." This is basically true for northern Forests with no livestock grazing program but is false on

- the B-T. By far, the primary cause of impacts to grizzlies on the B-T is its prioritizing private livestock grazing. Look at a map of grizzly mortalities, conflicts and removals, the areas with no permitted livestock grazing are blank, no conflicts not mortalities and no removals, no matter what the road density is. The same for food storage, you are regulating 0.00001% of the problem but authorizing 30,000,000 pounds of slow, stupid meat all across grizzly habitat. I have to say, where is your honesty, your moral compass?
- 22) The amphib section conveniently ignores the best available science from the DeLong review that Randy so clearly hates because it could impact 'getting out the cut'.
- 23) Continuing with examples of the gross bias displayed by the authors of the Assessment, we see on page 222 the absurd statement "Commercial harvesting on the Bridger-Teton has very little impact on ecological integrity because it annually occurs on less 0.3 percent of the Bridger-Teton." I have to say the person who wrote that has to be either completely ignorant of basic ecology (and is not qualified) or is willing to purposefully deceive (and is therefore, not qualified). In case it's not obvious what the problem of this statement is, so you have timber sales or as the Forest Service euphuistically terms "treatments" which have massive impacts on every possible parameter of ecological integrity over 100-200 years and the author minimizes it down to the acres actually cut in a 12 month period.
- 24) The ROW's/Easement section completely ignores that fact that large swathes of public lands on the B-T lack legal public access. There is no legal access to the Gros Ventre valley from a bit downstream of Slate Creek and all the roads accessing the eastern side of the Wyoming Range except the road into Horse Creek. The B-T has known about these problems for decades but the B-T has done nothing effective to resolve those problems.

I hope the B-T seriously revises its Assessment in order to provide a solid platform for the Forest Planning process. But more broadly, my hope is that the B-T scraps the Forest Planning process entirely as any Forest Plan written now will be significantly worse than the one in place now. All Forest Plans written in the last 25 years are all weaker than the first generation Plans. The reason for this is that the Forest Service was held to account for the promises made in the first generation Plans and so all subsequent Plans were specifically crafted to not allow for accountability because they were all framed in such generalities as to be meaningless.



Jonathan B. Ratner
Director