



August 23, 2025

Chad Hudson
Forest Supervisor
Bridger-Teton National Forest
340 North Cache Street
Jackson, WY 83001

Submitted via webform: <https://cara.fs2c.usda.gov/Public/CommentInput?project=63628>

RE: Bridger-Teton National Forest Plan Revision #63628 – Draft Assessment & Supplemental Assessment Information

Dear Supervisor Hudson,

On behalf of The Pew Charitable Trusts (Pew), please accept these comments on your Draft Assessment and Supplemental Assessment Information for the Bridger-Teton National Forest Plan Revision (Assessment). Pew's U.S. Conservation project advances commonsense solutions that address the impacts of a changing environment on nature and communities by advancing policies and plans that build a more resilient and adaptable environment for people and for nature.

The Assessment is an important phase of the forest planning cycle because it evaluates and summarizes the Best Available Scientific Information on relevant ecological, social, and economic conditions and trends within the plan area. It thereby serves to inform the Need to Change the Plan (FSH 1909.12 21.21) and the description of the forest's Distinctive Roles and Contributions (FSH 1909.12 22.32) – both of which are critical for providing focus and direction in the development of responsive plan components and other plan content. As such, we request you consider including the following information in the finalized Assessment.

List the Key Ecosystem Characteristics used to evaluate Ecological Integrity

Foundational to the U.S. Forest Service's 2012 planning rule (36 CFR part 219) is the concept of "ecological integrity," which it defines as "the quality or condition of an ecosystem when its dominant ecological characteristics (for example, composition, structure, function, connectivity, and species composition and diversity) occur within the natural range of variation and it can withstand and recover from most perturbations imposed by natural environmental dynamics or human influence" (36 CFR 219.19). Further, the planning rule requires a forest plan to include plan components that "maintain or restore the ecological integrity of terrestrial and aquatic ecosystems and watersheds" (36 CFR 219.8(a)). Because of this importance, the Forest should explicitly list in its Assessment the specific Key Ecosystem Characteristics (KECs) that it used to assess the ecological integrity of the forest's ecosystems, which the Forest describes as Task 2 in the Supplemental Assessment ("Select key ecosystem characteristics that can be used to predict whether future conditions will have ecological integrity")(Supplemental Assessment Information, p.52). However, as currently drafted, Table 10, *Summary of Ecological Status and Trend for Eight Terrestrial Ecosystems on the Bridger-Teton* (p.56), only provides the Forest's conclusions regarding ecological integrity based on its review of KECs (see Supplemental Assessment Information, Appendix A, *Terrestrial Ecosystem Workshops and Integrity Report* (p.419, et seq.)), but it

does not appear that the KECs themselves are articulated anywhere in either the Draft Assessment, Supplemental Assessment Information, or the appendices, despite the term being listed in the Glossary. The Forest's conclusions regarding the status of ecological integrity of these ecosystems and its ability to positively affect their ecological integrity in both the near and long terms (see Supplemental Assessment Information, Table 10) will be significant drivers of the plan components in the revised forest plan. Therefore, in order for the public to adequately understand how the Forest assessed the ecological integrity of ecosystems in conformance with the 2012 planning rule's definition and to aid in their future understanding of how the Forest designed appropriately responsive plan components to those conclusions, the KECs should be clearly listed in the finalized Assessment ahead of Table 3, *Summary of Ecological Status and Trend for Eight Terrestrial Ecosystems on the Bridger-Teton*.

Report: "Ecological Value of Lands in the Bridger-Teton National Forest"

Produced in collaboration between Conservation Science Partners and Pew, this report¹ spatially identifies the top 10 percent of unprotected lands in terms of their relative ecological value on the forest. This report is critical for understanding how different areas of the forest contribute to a range of ecological considerations ranging from biodiversity to connectivity. This information can aid the Forest in its design of responsive strategies, such as the allocation of management areas, to best meet the Forest's multiple use mission. Comparable reports produced for the Lolo and Grand Mesa, Uncompahgre, and Gunnison National Forests have been recognized by those Forests to meet the Best Available Scientific Information standard and were incorporated into their respective recent or ongoing plan revision processes. The report for the Bridger-Teton National Forest is attached to this letter for your consideration.

Reports: Corridor Mapping Team Data

In addition to the use of generic species models to delineate high-value connectivity areas for large and midsized species, Pew strongly encourages the Forest to incorporate into the Final Assessment the migration corridor data² compiled by the Corridor Mapping Team, a partnership between the U.S. Geological Survey, state wildlife agencies (including the Wyoming Game and Fish Department), and the Native American Fish and Wildlife Society. Derived from GPS collar data, this information provides a 'ground-truthing' of ungulate movements across the landscape, which is critical for designing responsive plan content to sustain these critical pathways for wildlife movement.

Forest Service Analyses: Wild & Scenic River Eligibility and Recommended Wilderness Evaluation

Consideration of wild and scenic river eligibility and the potential recommendation of wilderness are required aspects of the forest plan revision process (36 CFR 219.7(c)(2)(v) and (vi)). While considered 'concurrent studies' to the Assessment, along with the identification of potential Species of Conservation Concern, these two analyses are vital for providing an understanding of the resource conditions on the forest. As such – like the Forest's already released list of potential Species of Conservation Concern – the Forest should also release drafts of these two analyses for public review and feedback prior to proceeding into the planning phase and an articulation of its Need to Change the Plan. It is important to

¹ Conservation Science Partners. 2021. *Ecological value of lands in the Bridger-Teton National Forest*. Final Report. Truckee, CA.

² See, US Geological Survey, *Ungulate Migrations of the Western United States*, Vol. 1-5, available at <https://www.sciencebase.gov/catalog/item/66dee5dcd34eef5af66da144>.



distinguish these analyses, which provide an understanding of *existing resource conditions* on the forest, from *management determinations* on whether an eligible river segment is suitable for inclusion in the National Wild and Scenic River Preservation System or whether an area with wilderness characteristics is recommended for inclusion in the National Wilderness Preservation System. This is particularly relevant because the Draft Assessment identifies the Bridger-Teton's Distinctive Roles and Contributions to include "Water and Snow" and "Wildlands and Dispersed Recreation" (Draft Assessment, pp. 5-6). Without these analyses, any description of these Distinctive Roles and Contributions remains incomplete.

Additional Comments on the Draft Assessment

In addition to our recommendations here, Pew supports the recommendations provided in the comment letter from the Bridger-Teton Working Group, dated August 22, 2025.

Thank you for your consideration of our recommendations for improving the Assessment for the Bridger-Teton National Forest Plan Revision. We look forward to continuing to work with the Forest, our local partners, and the broader community as this important process proceeds. If you have any questions, please do not hesitate to reach out at bbusse@pewtrusts.org or (720) 822-5998.

Sincerely,

A handwritten signature in blue ink, appearing to read "Blake Busse".

Blake Busse
Officer, Federal Policy
U.S. Conservation
The Pew Charitable Trusts