



August 23, 2025

Chad Hudson, Forest Supervisor
ATTN: Bridger-Teton National Forest Plan Revision Team
340 North Cache Street
PO Box 1888
Jackson, WY 83001
RE: Public Comment on Bridger-Teton National Forest Draft Assessment and Species of Conservation Concern

Submitted via electronic USFS comment portal
at:<https://cara.fs2c.usda.gov/Public/CommentInput?project=63628>

Dear Planning Team Leader,

We appreciate the opportunity to comment on the draft assessment (DA) and species of conservation concern (SCC) for the Bridger-Teton National Forest (BTNF). The BTNF's incredible wildlife, fisheries, recreation and other values are important to Sierra Club members in western Wyoming, supporters of Wyoming Wildlife Advocates (WWA), and people throughout the state, region and country. This forest plays a critical role in the continued recovery of grizzly bears, recently federally protected wolverine, elk, deer and so many other native wildlife species. It offers tremendous recreational opportunities that our members deeply value. Sierra Club is thankful that the Forest Service is engaging the public as we work to improve management of the BTNF, and we are eager to work with the agency on this important project.

Formed in 1892, Sierra Club is the nation's oldest and largest environmental advocacy organization. Our mission is to explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environment and to use all lawful means to carry out these objectives. We have a long history of working to protect wildlands and wildlife in Wyoming generally, specifically in protecting and connecting public lands in and around the Greater Yellowstone Ecosystem (GYE).

Wyoming Wildlife Advocates (WWA) informs, educates and empowers communities to preserve our wild legacy, protect our shared wildlife and modernize wildlife management across the state. We envision a Wyoming that leads the nation in exceptional and innovative wildlife

management; all stakeholders are valued equally, and management decisions are driven by the best available science. As stewards of some of the most pristine wild habitats in the world, we believe that ecosystems must be managed to maximize biodiversity.

Sierra Club & WWA agree that the BTNF is in need of a revision to its forest plan, which was completed in 1990. Under the Forest Service's 2012 planning rule, which the BTNF is currently operating under, it is required that the responsible forest official must, "document the assessment in a report available to the public...(and) document in the report how the best available scientific information was used to inform the assessment (§ 219.3)."¹ While the Supplemental Assessment Information (SAI) provides a reasonable level of detail in this regard, the DA itself leaves much room for improvement. Considering the DA is most likely the only document reviewed by the public, it would have benefited both the public and the Forest's planning efforts to provide more detailed information on how the best available science is being incorporated and how it will affect the planning process. Additionally, there are areas where the best available science has not yet been incorporated, as detailed in the comments below.

Key areas of concern

Climate change

Climate change and shorter, warmer, drier winters have posed serious challenges for the BTNF and the state of Wyoming as wildfires have grown more intense and the fire season has lengthened. The DA rightly identifies climate change as the primary ecosystem stressor in the Bridger-Teton.

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.

See Draft Assessment at 11.

We support the use of the "business as usual, RCP 8.5" and the "moderate emission, RCP 4.5" scenarios for climate projections, as they are the most likely scenarios for greenhouse gas emissions for the near and mid-term future, and likely for the life of this updated forest plan. See SAI at 23.

While we understand it is difficult to predict, it is nevertheless important for the forest to consider external threats when it comes to the impacts of a warming climate. The draft assessment notes that there are "Indirect Effects and Shifts in Disturbance Regimes" as a result of climate change,

¹ https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5362538.pdf

including added stress to waterways as a result of drought and over allocation to surrounding states and communities and subsequent impacts to vegetation, wildlife, etc. See SAI at 28.

In a 2018 literature review of forest management responses to climate change, researchers Hagerman and Pelai noted that:

“...the emphasis on maintaining existing ecological patterns can also be read as a reasonable strategy given uncertainties and concern about the loss of forest diversity in existing ecosystems. In some (or perhaps many) instances in the near term, managing for current ecological patterns may be the best understood, least ecologically risky, and most socially acceptable, institutionally supported, and economically viable management alternative. A common recommendation by practitioners in the context of adapting to climate change is to carefully and deliberately pursue multiple strategies (including a mix of conventional and transformative approaches), ideally accompanied by close monitoring. At the same time, this precautionary perspective may be entangled with an attachment to what is ecologically familiar (and thus with a preference to manage for known historical assemblages rather than unknown novel ecosystems). The roles of place attachment and social– ecological memory in communities and groups (e.g. Barthel et al. 2010) in the context of rapid climate change and novel responses represent compelling and under-examined topics for future research. As climate change and other drivers make managing for past systems untenable, the importance of exploring multiple ecological futures will become crucial.”

Hagerman, S. M., & Pelai, R. (2018)²

Indeed the future of the BTNF as it changes and responds to a changing climate poses a difficult management scenario. This is noted in the SAI information, where forest managers frequently provided a rating of “low” when assessing the ability of the “forest to positively affect ecological integrity in the long-term (by 2050)”. The forest notes in two cases for managing fur and fur-spruce ecosystems that “climate change may push this ecosystem beyond a point where the Bridger-Teton can actively manage at a large enough scale to affect change.” See SAI at 56-57.

When faced with the myriad challenges presented by climate change, Haerman and Pelai suggest, and we agree, that “governance processes that incorporate multiple perspectives, values, and knowledge systems when considering potential future forests, and that reveal potential inequities in the distribution of costs and benefits, are crucial when transformative – and potentially controversial – forest management options are being considered.”

However, the DA expresses another constraint when considering management options generally, stating that “ the projected levels of products, services, and rates of implementation are, to a significant degree, dependent on annual Congressional budgets and external

² Hagerman, S. M., & Pelai, R. (2018). Responding to climate change in forest management: two decades of recommendations. *Frontiers in Ecology and the Environment*, 16(10), 579-587.

economic factors.” See DA at 10. Budgetary constraints, shifts in administrative priorities, and future uncertainty about the climate are exactly why this planning process will be so important and why forest managers should closely monitor the stressors identified in this DA.

Initial considerations for the Forest Service include:

- Continue to include climate modeling impacts in future planning and proposed actions.
- Engage with local, state, federal, and tribal communities and governments to plan for these ever-changing scenarios and to the maximum extent possible.

Water

As noted in the DA, declining annual snowpack raises serious concerns about the future of the hydrologic systems in the forest. In addition, the complex regulatory landscape and fluctuating drought conditions make it difficult to predict when entities with existing water rights (neighboring states, agricultural producers, etc.) will draw on the rivers and lakes in the BTNF. The SAI states that “the most significant water resources stressor on the BridgerTeton and in the broader region is climate change.” See SAI at 135.

Increased drought, more frequent wildfires, recreational pressure, and agricultural demands are all connected to climate disruption. These factors are likely to contribute to growing conflicts over water use in the BTNF. The SAI elaborates on some of these concerns when discussing reasonably foreseeable water resource projects: “the use of large reservoirs allowed the development of present-day irrigation and agricultural practices; however, damming rivers to create reservoirs alters fundamental hydrologic and geomorphic processes of natural waterways, which eliminates or adversely impacts many ecological riverine processes, species habitats and populations of both native aquatic species and non-native sport fish.” See SAI at 143.

A 2024 study found that landscapes in the Western U.S. are already taking longer to recover from drought, with recovery becoming increasingly difficult:

This slowing recovery has tangible negative impacts: on reduced water flows across the western US, including stressing the already over-allocated Colorado Basin, and leading to deficits in ecosystems, such as poor forage on rangelands and forest mortality...This highlights the need for increased water resiliency, involving placing less demand on water during drought, such as through water conservation and adaptive agricultural systems, and broader scale water adaptations, such as managed aquifer recharge to smooth effects across wet and dry times. The models suggest that as warming continues from climate change, drought recovery probabilities will decline further over the coming decades, increasing the need for drought planning efforts to factor in longer duration droughts and adaptation approaches to reduce detrimental drought impacts on society and the environment.

As climate predictions become reality the Forest Service must consider the compounding effects of these stressors on water supply and quality, particularly when evaluating new water resource projects.

Considerations for the Forest Service include:

- Limit management decisions that may reduce the forest's ability to naturally retain water or that might impair water quality.
- Proactively and collaboratively plan with neighboring entities that may hold claims to water within the BTNF.

Fire Management

We are generally supportive of efforts to restore a more natural fire regime on the forest, and allow some wildfires to burn and fulfill their historic role in forests and meadows that evolved to burn periodically. We also support, where appropriate, prescribed fire as a management tool to help restore forest health. The revised plan should explore those issues and work toward a more natural fire regime. While we understand it has a place, mechanical treatments of forests should be focused in close proximity to homes, buildings and public infrastructure, not spread throughout the forest on a large scale.

Prescribed burning and allowing for larger managed forest are becoming more common on forests today.

Mechanical treatments are constrained by land management allocations and their enabling legislation (e.g., wilderness and roadless areas), operational constraints (e.g., steep slopes, distance to roads, costs), and administrative boundaries (e.g., riparian areas, areas managed for species of concern)...In light of these constraints, some researchers and managers have called for the expanded use of landscape-scale prescribed burns and managed wildfires in addition to fuel reduction treatments as a promising approach to expand the pace and scale of adaptive management. Increasingly collaborative restoration partnerships with Indigenous cultures can increase opportunities for re-instating tribal stewardship practices (Lake et al. 2018, Long and Lake 2018). Under appropriate weather and safety conditions, and where infrastructure is not at risk, managed wildfire may serve as a useful and cost-effective tool for reintroducing wildfire to fire-excluded forests and achieve broad-scale management goals.

³ Williams, E. L., Abatzoglou, J. T., Hegewisch, K. C., & Williams, A. P. (2024). Anthropogenic climate change has reduced drought recovery probabilities across the western U.S. *Communications Earth & Environment*, 5(1), 546.

Considerations for the Forest Service include:

- Continue to use the best available technology to assess fuel availability, moisture, etc. to evaluate wildfire risk and to determine appropriate times for prescribed burning.
- Expand efforts to educate people in the wildland urban interface (WUI) and provide resources when possible to create Firewise communities.
- Work with tribes and indigenous communities to identify opportunities to incorporate indigenous knowledge and history into fire management and mitigation practices.

Wilderness, Roadless Area, and Wild and Scenic Rivers

While we understand that decisions regarding Wilderness and Wild and Scenic Rivers will be made through a future process, we share these initial comments in hopes of expanding on these issues as the planning effort progresses.

The DA notes that two of the three existing wilderness areas are not meeting wilderness stewardship performance standards. In the Bridger Wilderness, the wilderness character is reportedly declining, citing "frequent SARs, campsite/human waste increases." See DA at 61. It goes on to briefly describe conditions in the two designated wilderness study areas (WSA's), Palisades and Shoal Creek. The DA notes that "while both areas remain physically undeveloped and wild, there is controversy around the future of snowmobile, heli-ski, and mountain bike access. Congress ultimately must decide whether these areas should be designated or released from protection as Wilderness, but meanwhile, there is an opportunity to provide better forest plan direction for stewardship of the areas since the current plan provides very little guidance." See DA at 61.

We agree that guidance is needed to provide better stewardship of these areas and encourage the forest to provide a robust analysis of their conditions and how they have maintained compliance with the 1964 Wilderness Act and 1983 Wyoming Wilderness Act in preserving the wilderness character of these landscapes. According to the Wyoming Wilderness Act, snowmobiling in the Palisades and Shoal Creek WSAs was to be allowed in the same manner and degree as prior to the Act's enactment. By all accounts and noted in the DA, snowmobiling has become more popular throughout the forest and has become a contentious issue in Palisades WSA specifically, along with heli-skiing and mountainbiking, which are not named exclusively in the 1983 Wyoming Wilderness Act. See DA at 61. The BTNF should account for these recreational impacts to WSAs in any upcoming inventory and analysis and provide the public with reasoning for its management decisions.

⁴ Prichard, S. J., Hessburg, P. F., Hagmann, R. K., Povak, N. A., Dobrowski, S. Z., Hurteau, M. D., ... & Khatri-Chhetri, P. (2021). Adapting western North American forests to climate change and wildfires: 10 common questions. *Ecological applications*, 31(8), e02433.

The SAI states that “now that the forest plan revision process has begun, inventorying and evaluating areas potentially suitable for inclusion in the National Wilderness Preservation System is required, but only Congress can designate Wilderness. The inventory and evaluation of potential areas will be provided in a separate document available for public comment later in the planning effort.” See SAI at 350. We look forward to being able to provide substantial feedback on updates from existing wilderness monitoring as well as suggestions for new wilderness and wild and scenic river designations.

As the Forest develops the process for inventorying and evaluating potential wilderness, it may be worthwhile to first revisit prior evaluations and update them based on current conditions. For example, in 2008, the Forest published a document titled *Bridger-Teton National Forest Evaluation of Areas with Wilderness Potential* as part of the Wyoming Public Lands Initiative. While that initiative ultimately ended with limited consensus among the parties, the document offers a useful starting point for evaluating wilderness potential holistically. The evaluation identified several areas with the highest degree of wilderness potential, including Grayback, Shoal Creek, Grizzly Lake, Spread Creek–Gros Ventre, Pacific–Blackrock, and Palisades (including the WSA). This document is still publicly available and is submitted here with our comments for consideration.

The DA also includes a section on Inventories Roadless Areas (IRAs) and describes that 1,417,493 acres within 19 areas are designated in the 2001 Roadless Rule.

IRAs are governed by the 2001 Roadless Area Conservation Rule (36 CFR 294) that limits timber harvesting and road construction, although there are some exceptions under specific criteria. Inventoried roadless areas have a long history starting in the late 1960s and 1970s as the mechanism to inventory and evaluate lands for potential inclusion in the National Wilderness Preservation System. The 2001 Roadless Rule was driven by three primary concerns: (1) the long-term loss of roadless area values and characteristics, (2) budgetary constraints that limited the agency’s ability to adequately manage the size of the existing road system, and (3) controversy around roadless area management that generated costly and time-consuming appeals and litigation.

See DA at 65.

The DA goes on to state that “IRAs in the Forest currently overlap multiple management areas and desired condition categories in the current forest plan including overlap with other administratively protected areas. While the requirements of the Roadless Rule must be met, there is an opportunity to better integrate and ensure consistency across these multiple designations.” See DA at 350.

It does make some sense to identify areas where administratively protected areas or potential wilderness might overlap with IRAs and provide a scenario in the upcoming forest plan where those administrative protections might be drawn to the boundaries of an IRA. Doing so could

clarify management expectations and reduce the need for duplicative stipulations in overlapping areas.

One emerging concern is the USDA's recent announcement that they plan to rescind the 2001 Roadless Rule.⁵ While the Secretary's rationale, according to their statement, is primarily economic with a note about wildlife mitigation - the data tells a more complex story. As noted above, one of the primary drivers for the enactment of the Roadless Rule was "budgetary constraints that limited the agency's ability to adequately manage the size of the existing road system". Coupled with evidence that wildfires actually have an increased likelihood of starting near roads⁶, it calls into question the decision to rescind the rule, especially when considering the future impacts of climate change, the ability to manage higher value timber while maintaining a healthy ecosystem. As the rescission decision moves forward, the BTNF should consider the local benefits of maintaining or expanding roadless areas to wildlife, for quiet recreation, and on their annual budgets.

Considerations for the Forest Service include:

- Provide a robust analysis of the current conditions of existing wilderness areas, WSAs, and Wild and Scenic River designations, including how these areas have been managed to maintain their wilderness character.
- Develop a scenario in the forest plan where existing IRAs are retained, regardless of the status of the 2001 Roadless Rule, and include comprehensive ecological and socioeconomic analysis if any removal is proposed per USDA's direction.
- Assess the potential for combining protections across existing and future administratively protected areas, wilderness, and IRAs to streamline management and enhance conservation outcomes.

Wildlife

As stated in the SAI, "The number one reason people travel to Wyoming is to view wildlife." See SAI at 179. We appreciate the work of the forest to document and analyze the plants and wildlife to compile a potential list of species of conservation concern (SCC). We recommend additional entries to this list: the bighorn sheep, the Yellowstone cutthroat trout, and Bonneville cutthroat trout. While each species was considered for the SCC list, these two trout species are of particular social value and are likely to suffer from the adverse impacts of climate change on the BTNFs hydrological systems. Rationale for including Bighorn Sheep on the SCC list is provided in the section below.

⁵<https://www.usda.gov/about-usda/news/press-releases/2025/06/23/secretary-rollins-rescinds-roadless-rule-eliminating-impediment-responsible-forest-management>

⁶ Johnston, J. D., Kilbride, J. B., Meigs, G. W., Dunn, C. J., & Kennedy, R. E. (2021). Does conserving roadless wildland increase wildfire activity in western US national forests?. *Environmental Research Letters*, 16(8), 084040.

We also ask the forest to more deeply analyze the growing threat of Chronic Wasting Disease (CWD) within the plan area, and to provide this analysis, alongside more recent data collected by cooperating agencies, in the final assessment.

Elk

GYE elk are dependent on the forest during their migration, summering habitat and stopover locations. Though the assessment recognizes the significance of these migrations, factors such as recreation usage, livestock conflict and feedground reliance all will require stronger plans to ensure long-term sustainability. Given that CWD has been present within the Jackson Elk Herd, there is a sense of urgency to this issue especially since the feedgrounds are encouraging artificial concentrations of elk.

The inherent and unavoidable concentration of elk during artificial winter feeding increases the risk of CWD and has a significant effect on the environment. Winter feeding of elk also increases the prevalence of brucellosis and many other transmissible diseases in the herd.⁷ Winter elk feeding is highly controversial, with many scientists and members of the public fully aware of its detrimental impacts. It certainly has effects that pose unique risks to the Greater Yellowstone ecosystem's elk herds, including on the BTNF. The Greater Yellowstone ecosystem is an ecologically critical area; and continued winter feeding of elk may cause the loss or destruction of significant wildlife resources within that ecosystem. These risks are not speculative; rather, they are known, imminent, and rapidly increasing, with documented cases of chronic wasting disease discovered every year in elk and mule deer, now literally on and adjacent to elk feedgrounds.

While elk may not be eligible for listing as SCC, per the criteria established in SAI pg 156, the DA contains no discussion of disease risk, population impacts, or ecosystem contamination as it relates to elk and CWD. The assessment cites disease as one of the primary stressors affecting the forest, but fails to mention or discuss in detail the threat of Chronic Wasting Disease. The only mention of CWD is found deep in the SAI, a consolation paragraph mentioning the forest's awareness of CWD. Considering the wealth of information and data provided by USFS, WGFD, USGS and others concerning the threat of Chronic Wasting Disease, we urge the forest to further analyze the growing threat of chronic wasting disease and its proliferation on feedgrounds permitted within the plan area.

Considerations for the Forest Service include:

- Limit recreational activity along migration corridors and promote restoration efforts in those areas.

⁷ Submitted with these comments is a report titled "Management Alternatives for Elk Feedgrounds in Wyoming and Surrounding States", which was commissioned by Sierra Club Wyoming Chapter and Wyoming Wildlife Advocates and provides more information on the impacts of elk feedgrounds in the BTNF.

- Develop a plan to eliminate feedground areas in winter since they will increase the risk and spread of disease. This will likely require collaboration with the Wyoming Game & Fish Department.
- Habitat restoration should be the first step in improving and maintaining a healthy forest ecosystem for elk to use. Season closures would need to go into effect in sensitive elk habitat to ensure a thriving forest ecosystem that can support elk populations.

Bighorn Sheep

The most critical threat to bighorn sheep within the Northern Rockies is the transmission of pneumonia from domestic sheep and goats to wild bighorn sheep populations due to overlap in grazing habitats. This overlap has the potential to eliminate entire herds. More protective measures need to be taken in order to maintain these populations.

In addition to pneumonia, hoof rot is an emerging concern for bighorn sheep. This painful disease can limit mobility, reduce foraging ability, and compromise survival. Preventing disease transmission from domestic sheep and goats is the most effective way to protect wild sheep from both pneumonia and hoof rot.

Lastly, bighorn sheep are being increasingly displaced by backcountry recreation – this necessitates the consideration of additional winter closures. “Human activity now frequently extends into habitats that are critical to wintering BHS in this area. In some cases, sheep have effectively lost up to 30 percent of the available winter habitat in their home range because of displacement by skiers.” SAI at 182-3.

Considerations for the Forest Service include:

- Prohibit overlap of domestic sheep and goats in areas of occupied or historically occupied bighorn sheep habitat.
- Require separation standards be implemented to prevent contact risk between livestock and native wildlife.
- Ensure that suitable high-elevation habitat is protected from recreational disturbances

Canada Lynx & Fishers

The assessment indicates low presence of Canada lynx and fails to mention the presence, or lack thereof, of fishers, which were once found in higher numbers within the forest. Since these sensitive species are vulnerable to the impacts of habitat fragmentation, they require high quality habitats that result in old-growth forest, connectivity and an abundance of prey species are essential.

Considerations for the Forest Service include:

- The Northern Rockies Lynx Amendment stated that it’s imperative to designate key habitats and maintain linkage between habitats for this species to thrive. This step must

be completed to ensure this fragile species can continue to increase in numbers to reach a safe and healthy population that it once was able to maintain.

- Place restrictions for recreation and other high intensity activities such as logging or construction in any of the habitats identified as key areas.

Migration

We ask the forest to collect and include all recent data from the Wyoming Migration Initiative, Wyoming Game & Fish Department, and any other relevant sources. The assessment alludes to the growing interest in migration corridor protection and recovery, noting that “gaining increased attention is the importance of the Forest to support long-distance ungulate migrations for pronghorn, mule deer, and elk.” See DA at 5.

Wildlife conflict – human and livestock

Cattle Conflict & the Upper Green Region

According to the assessment, livestock grazing accounts for the majority of land use in the forest with the Upper Green quotas having historically indicated conflict between cattle and wildlife. This particularly pertains to wolves and grizzly bears. Grizzly bear mortality remains high in particular due to grazing cattle since it can result in conflict that also negatively impacts fish and amphibian habitat. It's essential for ranchers to adopt practices that reduce conflict to limit the number of cases where lethal predator control is used.

The Upper Green River allotments are the most conflict-prone grazing areas in the ecosystem, consistently leading to lethal removals of grizzly bears and wolves. Continued livestock use in this area is incompatible with long-term wildlife recovery. We recommend phasing out livestock grazing in the Upper Green and prioritizing wildlife habitat, connectivity, and water quality.

Considerations for the Forest Service include:

- Place stronger limits on livestock grazing in heavy conflict zones, especially within the Upper Green in an effort to reduce mortality rates so that livestock grazing can be phased out.
- Prioritize non-lethal methods including range riders, fladry, drone surveillance, expeditious carcass removal and alternative sources for livestock to access foraging areas and stock tanks.
- Make wildlife connectivity a priority instead of expanding grazing areas in the Upper Green.

Grizzly bears

There is very little mention of grizzly bears in the DA although it does mention it's within the Forest Service's authority to provide “secure habitat for grizzly bears, human-bear conflict prevention, and protecting riparian corridors.” See DA at 24. The assessment should have

included information regarding human-bear conflict, including mortality rates to bears related to these activities. In fact the DA contains no mention of mortalities as a result of conflicts with livestock – this is the prevailing cause of death for grizzlies in the plan area.

Recreation and Roads

We also see the growing impact that outdoor recreation has on the BTNF. We support people getting out to enjoy the outdoors, and their public lands; in fact it is a central part of our mission. Our members recreate extensively on BTNF lands, participating in outdoor activities like hiking, backpacking, fishing, climbing, skiing, and camping. At the same time, we recognize that motorized recreation, and new technologies including ebikes and other mechanized recreation, can put strains on wildlife security habitat. The BTNF needs to take a hard look at those uses and their impacts and ensure that key wildlife security habitat is protected.

We feel the assessment understates ecosystem consequences from across a multitude of forms of recreation since the increase in recreational activity is going to push ungulates and other sensitive species into less than ideal habitats. This also will result in higher stress levels during harsh winter seasons and during calving seasons. Recreation use on the BTNF is increasing at an unprecedented rate. While access to public lands is important, unmanaged recreation can displace wildlife from crucial habitats, increase stress during sensitive life stages, and fragment migration corridors.

Seasonal closures, limits on new trail construction, and restricting motorized use in high-value habitat are necessary to balance recreation with wildlife conservation.

Considerations for the Forest Service include:

- Respect and adhere to seasonal closures in winter and calving habitats for low disturbance rates.
- Placing restrictions on motorized access in wildlife habitat and migration hotspots.
- Use science-based high quality wildlife monitoring to make recreation management decisions.

Conclusion

Thank you once again for the opportunity to provide input on the proposed revisions to the Lincoln National Forest Plan. The Sierra Club and Wyoming Wildlife Advocates greatly value our collaboration with the Forest Service in safeguarding public lands, supporting thriving wildlife and fisheries, and maintaining healthy ecosystems for all to enjoy.

We believe that, through thoughtful planning and effective implementation, we can enhance conditions across the forest, further the recovery of threatened and endangered species, and strengthen the legacy of wildlife conservation that so many Americans hold dear.

We look forward to continuing our work together as this planning process progresses.

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