

August 24, 2025

Dear Supervisor Hudson and Bridger-Teton planning staff,
Thank you for your time and expertise preparing the Bridger-Teton (BTNF) Draft Assessment (DA) and the Supplemental Assessment (SA) and starting the process to update the Forest Plan. I live and recreate in the BTNF and I appreciate BTNF's public outreach and meetings regarding the DA and SA and I look forward to more public meetings and opportunities for public comment.

Below are my comments that I would like included for consideration.

Wilderness:

The SA (p. 4) commits to providing Wilderness Inventory and Evaluation in separate, subsequent documents as part of the Assessment process. For each of the three Wilderness areas, please provide 1) language outlining the distinctive attributes of wilderness especially as it relates to the defining characteristics of the BTNF and the ecological integrity of the landscape, 2) the five qualities of wilderness character, and 3) include an overview of the specific management challenges and successes for each Wilderness. Please ensure the public has adequate notice and opportunity to comment on these subsequent documents prior to finalizing the Need for Change.

Wildlife:

The Assessment should use Best Available Scientific Information, including all available collar data when determining how best to protect big game habitat and migration corridors, including all migration data published by USGS. Include the Common loon, Yellowstone cutthroat trout and Bonneville cutthroat trout on the list of potential Species of Conservation Concern. Elk feedgrounds operated on the Bridger-Teton National Forest should be identified and discussed in the Assessment, including the fact that these sites are known hotspots that harbor and transmit wildlife diseases (chronic wasting disease and brucellosis). Please include the Best Available Scientific Information about feedgrounds and the risk they pose from disease. Potential disease management strategies should also be included in the Draft Assessment.

Forest Road, Trail System, and Infrastructure.

The DA highlights the current backlog of road maintenance across the Forest. "The inability to adequately maintain existing roads could result in reduced access, recreation services and public use. Given these circumstances, the creation of a new Forest Plan offers the opportunity to define a realistic and sustainable desired infrastructure. The Bridger-Teton has a road crew that can address only a small fraction of the ongoing maintenance needs across the Bridger-Teton" (SA p. 334). The final assessment should include statistics on the scale of such the backlog to better inform the new plan so it adequately addresses the need for realistic and sustainable road infrastructure on the Forest.

Inventoried Roadless Areas (IRAs):

Please elaborate on the importance and value of IRAs to ecosystem services and forest health.

Facilities:

The DA notes that the BTNF has a diverse facility portfolio, including radio communication sites, 69 drinking water systems, 46 septic systems, 149 vault toilets, and 201 administration buildings. The DA notes that most facilities were built decades ago and are not built or designed to accommodate the amount and type of current use and all some level of deferred maintenance, including repairs to water and wastewater systems, roof replacements. (p. 50) The final Assessment should specifically identify and describe systems, structures, equipment and other items requiring maintenance.

Wild and Scenic Rivers:

The cold, wild rivers of BTNF are critical to drinking water, recreations, wildlife, and the health of the ecosystem. The Wild and Scenic Eligibility report is vital to understanding Outstandingly Remarkable Values (ORV) and how they might align or dovetail with the Assessment's relevant sections. The DA (p. 62) and the SA (p. 4) commit to including wild and scenic river eligibility findings in separate, subsequent documents as part of the Assessment process. Please ensure the public has adequate notice and opportunity to comment on these subsequent documents prior to finalizing the Need for Change.

Invasive Species:

The SA (p. 35) notes that invasive species infest more than 45,000 acres of the Bridger-Teton and that invasive plants have invaded important big game transition and winter ranges, reducing forage available for migrating and over-wintering wildlife. Cheatgrass is noted as a particularly devastating invasive species because it reproduces rapidly and acts as a fire fuel that increases fire frequency and can dramatically increase the risk of rangeland wildfires. The SA report that funding levels and capacity determine annual treatment levels. The Assessment should identify the Best Available Scientific Information identifying the specific areas where invasive species are most prevalent and pose the highest risk for wildfire and wildlife impacts.

Thank you very much for your consideration.

Best,

Kimberly McMorrow