



COALITION OF LOCAL GOVERNMENTS

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FORT BRIDGER, WY 82933

COUNTY COMMISSIONS FOR LINCOLN, SWEETWATER, AND UINTA - WYOMING, AND DAGGETT- UTAH;
AND CONSERVATION DISTRICTS FOR LINCOLN, LITTLE SNAKE, STAR VALLEY, SUBLETTE, SWEETWATER,
AND UINTA - WYOMING

August 24, 2025

VIA Email: mary.cernicek@usda.gov; laine.mccall@usda.gov

Mary Cernicek
Laine McCall
Bridger-Teton National Forest
P.O. Box 1888
Jackson, WY 83001

Re: Comments on the Bridger-Teton National Forest Draft Assessment

Dear Ms. Cernicek and Ms. McCall,

The Coalition of Local Governments (Coalition) submits the following comments on the Bridger-Teton Draft Assessment, Supplemental Assessment Information, and Species of Conservation Concern List. There are some Coalition members that are cooperators in this planning process, and the Coalition incorporates by reference and directs the Forest Service to their previously submitted cooperating agency comments on the Draft Assessment. To the extent those comments have been addressed and the Assessment revised, the Coalition appreciates the Forest Service working with cooperators to address concerns and update the Assessment accordingly. The following includes additional discussion and comments on specific issues remaining in the Draft Assessment and the Supplemental Assessment Information.

National Forests should be administered for “outdoor recreation, range, timber, watershed, and wildlife and fish purposes,” and the Secretary is “directed to develop and administer the renewable surface resources of the national forests for multiple use and sustained yield of the several products and services obtained therefrom.” 16 U.S.C. §§ 528-529. The Coalition continues to support management of the National Forest consistent with its multiple use and sustained yield requirements, as well as to protect, restore, and enhance the forest ecosystem and to protect watershed, forest, and rangeland health. 16 U.S.C. § 1601(e)(1); 16 U.S.C. § 6501(3), (6).

I. STATEMENT OF INTEREST

The Coalition is a voluntary association of local governments organized under the laws of the State of Wyoming to educate, guide, and develop public land policy in the affected counties. Wyo. Stat. §§11-16-103, 11-16-122, 18-5-201. Coalition members include Sweetwater County, Uinta County, Lincoln County, Lincoln Conservation District, Sweetwater County Conservation

District, Uinta County Conservation District, Sublette County Conservation District, Little Snake River Conservation District, and Star Valley Conservation District, Wyoming, in addition to Daggett County, Utah. The Coalition serves many purposes for its members, including the protection of vested rights of individuals and industries dependent on utilizing and conserving existing resources and public lands, the promotion and support of habitat improvement, the support and funding of scientific studies addressing federal land use plans and projects, and providing comments on behalf of members for the educational benefit of those proposing federal land use plans and land use projects.

Both the Counties and the Districts have authority to protect the public health and welfare of Wyoming and Utah citizens while promoting and protecting public lands and water resources. Wyo. Stat. §§ 11-16-122, 18-5-208; Utah Code § 17-27a-102(1)(a). The Districts have statutory authority to develop and implement comprehensive resource use and management plans for range improvement and stabilization, conservation of soil, water and vegetative resources, control and prevention of soil erosion, and for flood prevention. Wyo. Stat. § 11-16-122(xvi). The Districts' jurisdiction includes matters pertaining to the acquisition, construction, operation or administration of any land utilization, soil conservation, erosion control, erosion prevention, flood prevention projects, conservation of water, water utilization, disposal of water in watershed areas, and other water projects. Wyo. Stat. § 11-16-122(xix). In carrying out this statutory authority, the Districts are working "to stabilize ranching and farming operations, to preserve natural resources, protect the tax base, control floods, prevent impairment of dams and reservoirs, preserve wildlife, protect public lands, and protect and promote the health, safety and general welfare of the people of this state." Wyo. Stat. § 11-16-103(b). The Districts also work cooperatively with federal agencies in the development and implementation of federal land use plans to ensure consistency with local land and resource plans. Wyo. Stat. § 11-16-122(viii).

By statute, the Wyoming Counties are "deemed to have special expertise on all subject matters for which it has statutory responsibility, including but not limited to, all subject matters directly or indirectly related to the health, safety, welfare, custom, culture and socio-economic viability of a county." Wyo. Stat. Ann. §18-5-208. As such, the Counties "may regulate and restrict . . . the use, condition of use or occupancy of lands for residence, recreation, agriculture, industry, commerce, public use and other purposes in the unincorporated area of the county." Wyo. Stat. Ann. §18-5-201. Daggett County also possesses the general land use authority to protect the tax base, foster the state's agricultural and other industries, facilitate growth, and provide for the health, safety, and welfare of its citizens. Utah Code § 17-27a-102(1)(a)(i)-(ii), (iv), (vi).

II. TIMBER PRODUCTION AND HARVESTING

Under the current Forest Plan, only 279,400 acres are designated as suited for timber harvesting and the remaining Forest lands are either withdrawn from timber production or not suited for harvesting. *See* Draft Assessment at 54. There can be no further reduction in the number of acres identified as suitable for timber production and the Coalition encourages the Forest Service to increase this number in areas it can. It further encourages the Forest Service to make

available at least 5 million board feet of timber annually, which is what is the current objective for the Forest Service. In addition, the Draft Assessment should recognize that the U.S. Secretary of Agriculture announced that the U.S. Department of Agriculture is rescinding the 2001 Roadless Rule. *See id.* at 54, 65; *see also* Supplement Assessment Information at 355, 375-378. The procedure required for rescinding the Rule has not occurred, but an official announcement has been made. The rescinding of the 2001 Roadless Rule would open additional opportunities for timber harvesting and allow more flexibility in managing the National Forest to reduce wildfire risk.

The Forst Service should look at establishing designated firewood gathering areas for local firewood access. As the Draft Assessment explains, an average of 10,239 cords of fuelwood are sold per year and continues to increase. *Id.* Firewood gathering areas should primarily be located along existing roads to avoid conflict with commercial timber sales.

III. RECREATION AND THE NATIONAL FOREST ROAD SYSTEM

The Bridger-Teton National Forest provides various recreational opportunities that also support the local economies and provide a substantial amount of employment opportunities for the local communities. This includes both motorized and non-motorized recreation, and access to the National Forest for hunting. For these types of activities to continue and grow with the expanding demand, the Forest Service must ensure proper access to public lands. The Draft Assessment recognizes the importance of roads for the protection, administration, and use of forest land and resources, and acknowledges the backlog of maintenance for forest roads. Draft Assessment at 46. The Draft Assessment also states that “the current road system may need to be altered to serve future management needs.” *Id.* The Forest Service needs to increase maintenance of heavily used forest roads and look to increases in funding to ensure this occurs. There should not be additional closures of roads and/or trails due to the failure of the Forest Service to maintain the roads, unless such closures are coordinated with and supported by the local governments.

The condition of recreational trails in the Bridger-Teton National Forest are also a major concern as outlined in the Draft Assessment. *See id.* at 47-48. Some access trails are poorly maintained, with limited signage in parts of the Forest. Trails need to be maintained, but making trails too accessible with over-grooming can cause high volumes of users resulting in increases in illegal off-route users. There needs to be a balance between maintaining trails and limiting the amount of fully groomed trails that exist to avoid overuse and improper use of the existing trail systems.

The Draft Assessment discusses the amount of outfitter-guide permits that have been issued on the Bridger Teton National Forest. *Id.* at 38. However, the Forest Service should look at conducting a Needs Assessment and Capacity Analysis for commercial hunting outfitter camps, including spike and drop camps, to ensure consistent permitting and eliminate administrative confusion. In the meantime, spike and drop camps should be allowed with approval only by the Bridger-Teton National Forest supervisor’s office.

Finally, the Draft Assessment discusses social conflict as one of the challenges that must be addressed in the plan revision process. It states: “To avoid conflict, there will be increasing pressure for managers to separate conflicting uses, either spatially or temporally, or modify visitor expectations to accept more shared use.” *Id.* at 43. The Coalition encourages the Forest Service to first look at modifying visitor expectations and allowing for continued shared use of the National Forest consistent with statutory direction to administer for “outdoor recreation, range, timber, watershed, and wildlife and fish purposes,” and overall multiple use. 16 U.S.C. §§ 528-529. In the past, National Forests have attempted to resolve conflicts between various users by excluding one of the users. For example, calling for the removal of livestock grazing where it conflicts with recreational users. The Coalition objects to this type of management because shared multiple use of the National Forests was anticipated and has occurred for decades. It is better to inform and educate the public on the shared uses versus separating or excluding a specific use.

IV. LIVESTOCK GRAZING

As recognized by the current Plan, livestock grazing is one of the oldest land uses on the Bridger-Teton National Forest with the majority of the local ranches depending on the National Forest for summer forage. Livestock grazing is also a good vegetative management tool that can help improve the overall forage and range condition. The Coalition supports adaptive management for livestock grazing that is based on reaching desired conditions without set utilization and stubble height standards. Adaptive management must define the management objectives and invest in monitoring to ensure they are achieved.

The Draft Assessment identifies 18 vacant unavailable allotments and 29 closed allotments within the Bridger Teton National Forest. Draft Assessment at 55. The Forest Service should consider re-evaluating these allotments, specifically the vacant unavailable allotments, to see if resource conditions have improved and would support grazing. Proper grazing use on these allotments would help eliminate the fine fuels that cause extreme wild land fires.

The Coalition also continues to request that the Forest Service expand its sampling pool of monitoring sites in active livestock allotments, especially in the West Zone of the National Forest. The majority of the monitoring information is from only 13 allotments and includes monitoring sites in subalpine forb areas only. *Id.* at 57. Subalpine forb areas make up only 2% of the Bridger Teton National Forest land mass. *See id.* at 13. In addition, the Forest Service continues to focus on the impact livestock grazing alone has had on the subalpine forb ecosystem on the Bridger Teton National Forest. *See Supplemental Assessment Information* at 96-101. However, data from Sublette County Conservation District shows that a significant number of monitoring sites (45%) in certain subalpine forb areas “show a downward trend since grazing was removed from the area, indicating variables other than livestock grazing” are affecting these areas. *Id.* at 99. Despite acknowledging this data, the Forest Service continues to focus solely on adverse impacts of livestock grazing. Recreation has had an impact on this ecosystem and must be discussed as a threat.

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The Coalition appreciates the Forest Service's consideration of these comments, and its members look forward to continued coordination and cooperation on the development of a Forest Plan that recognizes the multiple uses that occur on the Forest and works towards maintaining and restoring Forest health and protecting important watersheds.

Sincerely.

A handwritten signature in cursive script that reads "Eric South".

Eric South, Chairman
Coalition of Local Governments