



National Wildlife Federation

Northern Rockies, Prairies, and Pacific Regional Center

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Plan Revision Team
Bridger-Teton National Forest, Supervisor's Office
P.O. Box 1888
Jackson, WY 83001

RE: Bridger-Teton National Forest Plan Revision – Draft Assessment comments (submitted electronically)

Dear Plan Revision Team,

Thank you for the opportunity to review and comment on the draft assessment that was prepared as part of the Bridger-Teton National Forest's Plan Revision process. The Bridger-Teton National Forest contains numerous important natural resources and covers a diverse landscape, both ecologically and socially. The National Wildlife Federation (NWF) has a long history of working on wildlife conflict resolution in the Greater Yellowstone Ecosystem, along with a number of partners, and some of this work has been within the Bridger-Teton National Forest (BTNF). NWF is committed to supporting the conservation of native wildlife and finding solutions to resolving conflicts with wildlife.

We understand that the assessment will be an evolving document that provides baseline information on the BTNF in support of the plan revision process. After reviewing the assessment documents, we would like to provide some additional information and resources for your consideration, broken down by topic.

Grazing (both in the Range Management section and the Subalpine Forb section)

- The summary of the Range Management section of the Supplement Assessment contains the following statement: "Grazing management can serve as an effective tool for vegetation manipulation, removing fine fuels and contributing to more manageable fire behavior (Ratliff et al., 2022)." The research on this topic is much more nuanced, and outcomes are heavily dependent on the ecological conditions of the area being grazed. Additional papers should be included to better represent the effect grazing has on fire risk and behavior.
- In the summary of the Range Management section of the Supplement Assessment Information, a connection between conserving private agricultural lands and access to public land for grazing is drawn. While it is a common theory that without public land grazing, private agricultural lands would be sold and converted to other uses,

such as residential, this is not a trend that has been substantiated with data. On the contrary, a research paper published in 2024 looked at outcomes for ranchers participating in permit waivers, and did not find that these transactions were associated with subdivision, residential development, or land use conversion. (Wittman, T.M. and D. Bennett. 2024. *Cows or Condos: Rancher and Land-Use Outcomes Following Compensated Federal Grazing Permit Waivers. Rangeland Ecology and Management. Vol 93 (pg 62-71).*).

- In the section on Subalpine Forb Ecosystems in the Supplement Assessment Information, there is a statement on sheep grazing as a historic and present source of impact to these sensitive communities and that there are 30 active sheep allotments that overlap with subalpine forb communities. To better understand the spatial pattern and extent of these, it would be helpful to provide a map as well as a better sense of stocking rates on those lands. While the section points out that overall sheep grazing has been reduced across the forest over time, that doesn't provide specifics about sheep grazing trends over time in subalpine forb communities and current status. There is also a statement that shifting grazing time to start in July has reduced impacts, but monitoring data to show the change isn't provided. Data to support this would be a helpful addition to the section.

Grizzly Bear (Federally Recognized Species and Range Management section)

- In the Federally Recognized Species section of the Supplemental Assessment Information, the part on grizzly bears describes factors that influence the grizzly bear population within the forest and Greater Yellowstone Ecosystem at large. One of these factors is human-grizzly bear conflict prevention and it is stated that this is one aspect the BTNF can control related to grizzly bear recovery. However, there is no data provided on the trends related to human-grizzly bear conflicts, including a breakdown of type/source of conflict, location of conflicts, and number of conflicts. This data would be helpful to include in the assessment to better understand the scope, extent, and potential management actions.
- This section also describes the legal and management status of grizzly bears but does not provide an overview of the population's status. It would be helpful to have broader information on Greater Yellowstone Ecosystem grizzly bear population, such as population trends, mortality, and conflicts.
- Specific to Range Management section in the Supplemental Assessment Information, it would be helpful to provide more details on grizzly bear conflicts with livestock, including trends, patterns, steps that have been taken, and any monitoring data.

Bighorn Sheep (in the Other Highlighted Species, Terrestrial Wildlife section and the Evaluation for Potential Species of Conservation Concern)

- Discussion of bighorn sheep's status and trends doesn't provide the important context that current bighorn sheep herds only cover a small portion of their historic range, and current population levels are far below what they were historically. Estimates of bighorns in the West during the 1800's range from 1.5-2 million, and early explorers in Wyoming documented "droves" of wild sheep too numerous to count. It is well recognized that bighorn sheep populations in western North America were greatly reduced following European settlement and have not recovered, in spite of management efforts, and that this decline coincided with domestic livestock grazing in areas occupied by bighorn sheep.
- The bighorn sheep herd population trends and status descriptions don't take into account the stochastic nature of disease transmission events between bighorn sheep and domestic sheep. All 14 public-land grazing states with bighorn sheep have experienced at least one bighorn sheep respiratory disease die-off in the last 14 years, and most have had numerous events. Recent examples include the bighorn sheep herd die-off in the Missouri River Breaks area in Montana, a herd that had until then been stable.
- There are multiple references to the Darby herd as a non-emphasis herd based on the Wyoming Statewide Bighorn/Domestic Sheep Interaction Working Group, and the risk of contact model results referenced reflect this classification with a 'low-risk' result. While the Wyoming Fish and Game Department (WFGD) has assigned a low priority to the herd, the BTNF was not a signatory to this document and information should still be provided in the assessment on the status and trends of this herd, especially considering it has remained below the population objective. In addition, the risk of contact assessment needs to include an assessment of risk to the Darby herd that does not factor in the management priority decision of WFGD. Specifically for the Darby herd, there are four grazing allotments permitted for domestic sheep grazing that either overlap or are directly adjacent to the herd. It would be helpful to see a summary of the ROC model results being referenced in the Assessment.
- Related to the Species of Conservation Concern assessment, in 2009 the Region 4 Regional Forester added bighorn sheep to the Regional Forester's Sensitive Species list due to the numbers of bighorn sheep being less than 10 percent of historical numbers, and their distribution was less than a third of its pre-settlement distribution. The facts and science that support Sensitive Species designation have not changed. Those same facts and the best available science reinforce the need to

designate BHS as SCC on many forests, including the BTNF. Failure to do so would be contrary to the 2012 Planning Rule and USFS implementation guidance (FSM 1920 and FSH 1909.12).

- In addition, the SCC analysis for the BTNF on bighorn sheep should also assess the broader area, including the risk of disease transmission from domestic sheep on nearby private land, not just domestic sheep on forest service grazing allotments.

NWF appreciates all the time and energy that has been put into this phase of the Forest Plan revision, and we look forward to engaging more in the process as it continues. Please reach out if you have any questions regarding these comments or would like additional information.

Sincerely,

A handwritten signature in cursive script that reads "Kali Becher".

Kali Becher
Wildlife Conflict Resolution, Sr. Program Manager
National Wildlife Federation