August 24, 2025

Chad Hudson, Forest Supervisor
Bridger Teton National Forest
340 N. Cache Street
Jackson, WY 83001

Re: Bridger-Teton National Forest Plan Revision Draft Assessment

Dear Supervisor Hudson and Bridger-Teton National Forest Planning Team,

The Wyoming Wild Sheep Foundation appreciates the opportunity to provide comments on the Draft Assessment for the Bridger-Teton National Forest (BTNF) Plan Revision process. The BTNF is home to some of the most important wildlife habitats in the Greater Yellowstone Ecosystem, including all four Core Native bighorn sheep herds that exist in Wyoming.

As the Forest Service works to revise the Forest Plan, it is essential that the plan provide strong, science-based guidance to ensure the long-term persistence of these iconic herds and the many other wildlife species that depend on the BTNF. Our comments focus on four key priorities: (1) the inclusion of bighorn sheep as a Species of Conservation Concern (SCC), (2) the integration of modern scientific and technological advances into wildlife habitat monitoring and management, (3) the establishment of clear, enforceable wildlife habitat standards, and (4) ensuring that the plan reflects the principles of Multiple Use and Sustained Yield (MUSYA) by balancing all statutory purposes. We also provide suggested improvements to the Draft Assessment's use of Key Ecosystem Characteristics (KECs) and the SCC identification process that should be considered to ensure compliance with the 2012 Planning Rule.

Bighorn Sheep Status and Species of Conservation Concern Designation

Bighorn sheep are among the most iconic species of the American West, with ecological, cultural, and economic importance that extends well beyond the BTNF. The planning area is especially significant, as it provides habitat for the only existing Core Native herds in Wyoming, which together represent the majority of Wyoming's statewide population. These Core Native herds are designated in the Statewide Domestic/Bighorn Sheep Interaction Working Group Plan (commonly referred to as the "Wyoming Plan) under state statute (WY Stat § 11-19-604) as being the "highest priority areas for bighorn sheep management in Wyoming." By definition, Core Native herds have persisted without reintroduction or augmentation, making their protection a matter of national conservation importance.

Despite being home to 85% of Wyoming's bighorn sheep populations, the BTNF bighorn sheep herds remain far below historic levels and face ongoing threats that jeopardize their long-term persistence. Disease, particularly pneumonia associated with *Mycoplasma ovipneumoniae*

(Movi), continues to cause catastrophic die-offs and chronically limits herd recovery. Habitat degradation from invasive weeds, forest succession, increasing recreational disturbance, and increases in development further restricts their ability to thrive. Competition with non-native mountain goats and potential for risk of contact with domestic sheep and goats compound these pressures. Given all of these challenges, the stability of populations across the planning area and in the state could change quickly, and as such, adaptive management strategies should be considered.

Bighorn sheep clearly meet the criteria for designation as a **Species of Conservation Concern (SCC)** under the 2012 Planning Rule. In Wyoming, they are listed as a **Species of Greatest Conservation Need (SGCN)** in the State Wildlife Action Plan, recognized as a **Sensitive Species** by Regional Foresters in Regions 2 and 4, and classified by **NatureServe** as imperiled or vulnerable. Several herds within the BTNF show documented population declines since the current 1990 Forest Plan was written, due to restricted ranges and increased vulnerability to disease and disturbance.

Equally important, the Draft Assessment's SCC process seems incomplete. The Forest identified only six potential SCC (four vertebrates and two invertebrates), leaving out many species with well-documented concerns, including bighorn sheep. A critical category of SCC, species with "local conservation concern" under FSH 1909.12 §12.52d(f), didn't seem to receive consideration. We were also unable to find documentation within the Assessment for why the species considered were excluded. Finally, the Forest did not provide the public with the required opportunities to contribute to SCC identification. These omissions should be considered as the Forest Revision process continues.

For these reasons, we think it necessary for the Forest to designate bighorn sheep as a Species of Conservation Concern. This designation will ensure that proactive, science-based conservation measures are developed and implemented, including the protection of seasonal ranges and crucial habitats, measures to reduce the risk of disease transmission, and standards that maintain habitat effectiveness. Without such recognition, the long-term viability of these unique Core Native herds, and the ecological and cultural values they represent, could be at risk.

Integration of Modern Scientific and Technological Advances

The BTNF has an opportunity to strengthen its Forest Plan by fully integrating the best available science and modern technological advances into its wildlife management framework. Over the past two decades, rapid progress in research, monitoring tools, and data analysis has transformed how agencies and partners understand and respond to the needs of wildlife and sensitive species such as bighorn sheep. The revised Forest Plan should reflect and incorporate these advances to ensure effective, adaptive management.

Wildlife Movement and Habitat
Advances in GPS collar technology and statistical modelling allow managers to track wildlife

movements and analyze them with unprecedented precision. These data identify migrations, seasonal ranges, and crucial habitats that are critical to the persistence of wide-ranging species. For bighorn sheep, collar data have been invaluable in mapping habitat use, movement behavior, and potential risk of contact with disease vectors. The revised plan should explicitly recognize the use of these technologies to manage big game species as a whole, but certainly for the high Core Native bighorn sheep herds on the planning unit.

Disease Research and Monitoring
Research on *Mycoplasma ovipneumoniae* (Movi) and other pathogens affecting bighorn sheep has advanced considerably since the last Forest planning effort, underscoring the need for proactive monitoring and management. The Forest Service should incorporate disease surveillance results, risk-of-contact models, and the outcomes of test-and-remove strategies into plan components. Doing so will strengthen the agency's ability to minimize the risk of catastrophic die-offs and maintain population viability across the forest, and maintain the integrity of Wyoming's Core Native bighorn sheep herds.

Habitat Quality and Disturbance Metrics
Monitoring habitat quality using measurable indicators, such as vegetation composition, forage availability, invasive species presence, and disturbance thresholds, provides essential context for assessing ecological integrity. Statistical and spatial modeling tools are now widely available to analyze these metrics and predict future conditions under different management scenarios. The revised plan should incorporate these tools to establish baselines, track trends, and guide adaptive management decisions.

Recommendation
To ensure the long-term viability of bighorn sheep and other sensitive species, the revised Forest Plan should explicitly commit to integrating GPS collar data, the most up-to-date disease research, habitat quality metrics, and advanced statistical modeling into its management framework. By doing so, the Forest Service will align its planning process with the best available science and enhance its ability to adapt to changing conditions and emerging threats.

Establishing Wildlife Habitat Standards in the Forest Plan

While broad management goals are important, they are not sufficient on their own to ensure the long-term persistence of sensitive wildlife populations. The revised Forest Plan must include **clear, measurable, and enforceable wildlife habitat standards** that provide consistent protection and accountability across the Bridger-Teton National Forest. Without such standards, critical habitat values for species like bighorn sheep may be eroded over time by incremental pressures from other uses.

Need for Specific Standards
General guidance and discretionary objectives do not provide adequate safeguards for wildlife. Instead, the Forest Plan should establish standards that define thresholds for habitat conditions

and human disturbance, ensuring that management actions consistently support ecological integrity and species viability. Standards are especially important for species such as bighorn sheep, which are uniquely vulnerable to disease transmission, habitat disturbance, and displacement.

The Draft Assessment did not fully address several **Key Ecosystem Characteristics (KECs)** that are central to evaluating wildlife habitat. Vegetation composition and structure, human activity, wildlife diversity, and disease prevalence, among the most important KECs for wildlife, were either omitted or inconsistently applied. Addressing these gaps in the revised plan will strengthen ecological integrity assessments and provide a more complete foundation for wildlife concerns.

Recommendation
The inclusion of enforceable wildlife habitat standards in the revised Forest Plan will help provide the necessary framework to maintain ecological integrity, meet the requirements of the 2012 Planning Rule, and ensure that management actions consistently support wildlife viability. These standards will give the Forest Service and its partners clear benchmarks for conserving habitat while balancing multiple uses of the forest.

Multiple Use and Sustainable Yield

The Bridger-Teton National Forest is managed under the Multiple-Use Sustained-Yield Act of 1960 (MUSYA), which requires the Forest Service to balance the purposes of outdoor recreation, range, timber, watershed, and wildlife and fish. To achieve this balance, the Forest Plan must fairly account for all purposes, ensure that none are given disproportionate emphasis, and recognize that management constraints are a fundamental part of sustainable use.

Historical Context and Livestock Reductions
The Draft Assessment highlights reductions in domestic sheep numbers since the early 1900s, with a 70% decline between 1924 and 1987. However, it fails to note the corresponding 90% reduction in bighorn sheep populations during the same period. Given that livestock permit waivers and retirements were identified as a primary driver in domestic sheep allotment availability, the benefits and/or reasons those allotments were closed or retired were not discussed. These voluntary allotment retirements and waivers have delivered substantial benefits for watersheds, rangeland health, and wildlife, including reducing disease transmission risk to bighorn sheep. These conservation gains should be explicitly recognized as part of the Forest's progress toward multiple-use balance.

Socioeconomic Values of Multiple Uses
The Draft Assessment's socioeconomic discussion emphasizes recreation and grazing, but gives little attention to other statutory purposes under MUSYA, such as watershed, wildlife, and fish. In reality, wildlife and fish, through hunting, fishing, wildlife viewing, and birdwatching, contribute substantially to local and regional economies. Watersheds originating in the BTNF provide critical irrigation and municipal water supplies that extend far beyond forest boundaries.

Additionally, surveys consistently show that the public places a higher value on wildlife, water, and non-motorized recreation than on livestock grazing or timber harvest; as such, these values should be reflected in the revised plan's economic analysis and management priorities.

The Role of Management Constraints

The Draft Assessment's "Management Constraints and Opportunities" section discusses opportunities but overlooks the importance of constraints. Management constraints, including Desired Future Conditions (DFCs), standards, and guidelines, are central to multiple-use management because they prevent overuse of one purpose from degrading others. For example, constraints under DFC 2A have preserved primitive and semi-primitive recreation settings, while constraints under DFC 4 have protected municipal water supplies. Similarly, constraints under the 1990 Forest Plan, such as the Habitat Effectiveness Standard and Security Area Standard, were essential for safeguarding wildlife habitat effectiveness in the face of increasing road and recreation use. Recognizing and reinstating these types of constraints will ensure that the BTNF continues to deliver on all MUSYA purposes, not just grazing and recreation.

Recommendation

The revised Forest Plan should recognize the historic reductions not only in livestock, but also in bighorn sheep numbers, and provide context for past efforts to maintain separation between domestic and wild sheep. It should highlight the conservation benefits of permit waivers and allotment retirements as meaningful progress toward multiple-use balance, while also expanding its socioeconomic analysis to include the substantial contributions of wildlife, fish, and watersheds alongside grazing and recreation. Finally, the plan should reinstate and strengthen management constraints, such as standards for habitat effectiveness, secure areas, and watershed protection, which remain essential tools for achieving sustainable multiple-use management.

By taking these steps, the Bridger-Teton National Forest will fulfill its responsibility under MUSYA to manage resources in a way that reflects public values, sustains ecological integrity, and balances the full range of purposes entrusted to our national forests.

In conclusion, the Bridger-Teton National Forest has a unique responsibility and opportunity to safeguard one of the most important strongholds of native bighorn sheep in North America, while also ensuring that other wildlife and ecosystems remain resilient in the face of mounting pressures. To achieve this, we respectfully urge the Forest Service to:

1. **Designate bighorn sheep as a Species of Conservation Concern (SCC).**
2. **Incorporate technological advances and best available science** into the assessment and long-term management of wildlife movement, disease, and habitat conditions.
3. **Include specific, measurable wildlife habitat standards** in the Forest Plan to ensure meaningful protections and accountability.
4. **Correct important gaps in the Draft Assessment** by more fully addressing Key Ecosystem Characteristics and ensuring that the public is meaningfully involved in the process of identifying Species of Conservation Concern.
5. **Ensure compliance with the Multiple-Use Sustained-Yield Act (MUSYA)** by recognizing the full range of statutory purposes, including wildlife, fish, watersheds, and recreation, alongside grazing and timber, and by reinstating management constraints that safeguard these values.

We commend the Bridger-Teton National Forest for its ongoing efforts to reduce risks to bighorn sheep and other wildlife, and we look forward to continued collaboration in the planning process. Thank you for the opportunity to comment, and for your dedication to conserving the ecological integrity of this remarkable forest.

Respectfully,

Katie Cheesbrough
Executive Director
Wyoming Wild Sheep Foundation