



Mr. Chad Hudson, Forest Supervisor  
Bridger-Teton National Forest  
340 N. Cache Street  
PO Box 1888  
Jackson, WY 83001

**Wyoming Native Plant Society**  
**P.O. Box 2449, Laramie, WY 82073**

Re: Draft Forest Plan  
18 August 2025

Dear Mr. Hudson:

Wyoming Native Plant Society (WNPS)<sup>1</sup> commends the Bridger-Teton National Forest (BTNF) on the Draft BTNF Revision (#63628; July 2025) and recommends additional actions. The draft assessment provides a wealth of information to help identify where the Forest should focus on updating its Forest plan. We recognize the merit of the planning work while identifying key information gaps that remain.

Bridger-Teton National Forest is the largest of eight national forests in Wyoming, and one of only three that lie entirely within state boundaries. It is also the only national forest in Wyoming that adjoins other national forests of Wyoming (Caribou-Targhee, Shoshone), as well as both national parks, signifying both hub and spokes in the Greater Yellowstone Ecosystem. As such, planning that relates to habitat continuity and transportation are important for not only the Forest, but also at State and Regional scales.

Chapter 2 Terrestrial Ecosystems: Major Findings p.10-18

Key Ecological Characteristics of BTNF ecosystems all have botanical and ecological underpinnings based on native plant resources. Protected lands advance conservation of Wyoming native plant resources, and we concur with the need for more direction and goal-setting in the revised Forest Plan. Vulnerabilities within Ecological Systems provide a basis for setting conservation targets or management guidelines to address the climax form of the Rocky Mountain Subalpine mesic-wet spruce-fir forest, and the most intact Subalpine Forb community as under-represented in the BTNF RNA and SIA system, both of which are sensitive to management or its absence.

Invasive plants, i.e., non-native plants, are addressed within this section as warranting attention in the face of mainly early invasions, vital to all other resources even though constrained by federal budget cuts.

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<sup>1</sup> We are dedicated to the appreciation and conservation of Wyoming plant species and vegetation and were founded in 1981. Our mission is also to advance education, research, and understanding of Wyoming native plant resources. Our outreach is directed to a statewide membership and the general public through the newsletter, Facebook, Instagram, fieldtrip events, art contests, promotion of Wyoming Native Plant Month, and information we post on the homepage ([www.wynps.org](http://www.wynps.org)).

Chapter 2 Aquatic, Wetland and Palustrine Ecosystems: Major Findings p. 18-20

Likewise, the best-developed of numerous BTNF Groundwater Dependent Ecosystems are highly vulnerable to management or its absence as appropriate for inclusion in the BTNF RNA and SIA system. We note that for the Kendall Warm Springs SIA that the native submerged flora includes filamentous green algae (*Spirogyra* spp.) that are apt to represent eutrophication, i.e. water quality degradation at the head of the warm springs, rather than random invasion of non-native plants, and recommend expanded water quality assessment to address possibilities of proactive intervention to restore water quality and habitat integrity.

Chapter 2 Diversity of Plant and Animal Species p. 24-27

We are providing comments on individual at-risk species found in BTNF including five SCC review documents for which we provide additional distribution information that support SCC recognition and propose one more species that is a recent addition to the Forest flora. The information populating the review criteria for each species is correct but incomplete. All six are native species known to occur within the Forest and we think that their persistence in the Forest may be integral to overall species' viability. Five of the six species have a NatureServe global rank indicating that they are or could be Globally Vulnerable (G3 or G3G4). We think that the planning area may play a critical role in viability of the species overall and elucidate concerns regarding their long-term persistence in the planning area on attached pages.

Four of the six species that we address have all or a preponderance of their populations in alpine wilderness areas. This does not ensure their persistence, whether or not the original reported population numbers were low or high, and the expedient action would be to recognize them as SCC and to initiate a study of them collectively. We note that the fieldwork that generated status information on these four species is over 25 years old, any new information as with more recent collections does not address BTNF status overall, and that most of the recent citations provided in the draft plan are interpretations that draw from the 1990s data rather than being current information. We support elevating this in priorities.

We recognize operational challenges faced by the Forest in light of recent decisions and will do our best to advocate for the BTNF native plant resources and personnel that are critical to the state of Wyoming.

Thank you for this opportunity to comment on important BTNF work.

Sincerely,

Bonnie Heidel, Chair  
Conservation Committee

Enclosure

**Enclosure. Species recommended for re-review as Potential Species of Conservation Concern**

| Species                                    | Status Summary                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Recommendations                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Astragalus terminalis</i>               | Under “Distribution outside the BTNF” we add: This species is equally split between three states separated by unoccupied habitat. The BTNF locations are at the relatively high end of species’ distribution in Wyoming, and represent app. 33% of Wyoming populations.                                                                                                                                                                                                                                                                | This species is a regional endemic that occupies relatively low elevations, making it vulnerable to exotic species encroachment. BTNF distribution is at the upper end of rangewide elevations, having high conservation significance for SCC designation consideration.                                                                                                                                                                                                                                                                                                |
| <i>Braya glabella</i> var. <i>glabella</i> | Under “Distribution outside the BTNF” we add: In the contiguous U.S. this species is only known from 5 sites in central Colorado and the 2 sites in BTNF of Wyoming; also present in Alaska and Canadian provinces. Highly disjunct populations may have important genotypes if more northern populations are more recent recolonizations after glaciation. We note that there is no more recent field data for this species in Wyoming than 1998. The rest of more recent citations are interpretations that draw from the 1994 data. | This species is highly disjunct as present in the plan area. BTNF distribution has very high biogeographic significance with inferred conservation significance. The fact that it is an alpine species with limited potential threats from management action does not preclude conservation consideration. It may be appropriate to address by SCC designation and/or by prioritizing an alpine biodiversity study to get more current data for this and other priority alpine species (see <i>Draba globosa</i> , <i>Parrya rydbergii</i> , <i>Saussurea weberi</i> ). |
| <i>Draba globosa</i>                       | Under “Distribution outside the BTNF” we add: Wyoming has more populations of this species than the rest of Rocky Mountain states, and BTNF in particular has the majority of Wyoming populations.                                                                                                                                                                                                                                                                                                                                     | This species is a species of high elevations in BTNF and Shoshone NF, in addition to national forests in the rest of four other Rocky Mountain states. It may be appropriate to address by SCC designation and/or by prioritizing an alpine biodiversity study to get more current data for this and other priority alpine species (see <i>Braya glabella</i> var. <i>glabella</i> , <i>Parrya rydbergii</i> , <i>Saussurea weberi</i> ).                                                                                                                               |
| <i>Parrya nudicaulis</i>                   | Under “Distribution outside the BTNF” we add: Distribution on BTNF represents about 33% of a limited total rangewide distribution. We note that there is                                                                                                                                                                                                                                                                                                                                                                               | This species is a regional endemic that occupies high elevations in BTNF and Shoshone NF, in addition to national forests of Utah. The                                                                                                                                                                                                                                                                                                                                                                                                                                  |

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|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                         | no more recent field data for this species in the BTNF portion of its Wyoming distribution than 1994.                                                                                                                                                                                                                                         | fact that it is an alpine species with limited potential threats from management action does not preclude conservation consideration. It may be appropriate to address by SCC designation and/or by prioritizing an alpine biodiversity study to get more current data for this and other priority alpine species (see <i>Braya glabella</i> var. <i>glabella</i> , <i>Draba globosa</i> , <i>Saussurea weberi</i> ).              |
| <i>Saussurea weberi</i> | Under “Distribution outside the BTNF” we add: This species is at the center of its distribution as present in Wyoming, where the majority of occurrences are on BTNF. It is also present in Colorado and Montana. We note that there is no more recent field data for this species in the BTNF portion of its Wyoming distribution than 1998. | This species is a regional endemic that occupies high elevations in BTNF and Shoshone NF, in addition to national forests in Colorado and Montana. It may be appropriate to address by SCC designation and/or by prioritizing an alpine biodiversity study to get more current data for this and other priority alpine species (see <i>Braya glabella</i> var. <i>glabella</i> , <i>Draba globosa</i> , <i>Parrya rydbergii</i> ). |

### Added Species recommended for review as Potential Species of Conservation Concern

SPECIES: Scientific [common] names –

*Botrychium tunux* [moosewort]

Forest: Bridger-Teton National Forest

This species is Native to and established in the Plan Area, known from 1 BTNF location at Sheep Pass in the Wyoming Range as documented in 2024 (Legler 2025). It is the first record in Wyoming and the only known location of it in the BTNF. This species is sparse throughout its range and may be the rarest *Botrychium* species among those present in BTNF.

### Criteria Rationale

Distribution outside the Bridger-Teton National Forest:

Available information outside BTNF suggests it warrants S1 rank in Wyoming as not known outside BTNF, but was not known at the time of the most recent Wyoming S-rank update. It is similarly ranked S1 in all other states except for being S2 ranked in Colorado and Alaska (Figure 1 – next page).

### Reference

Legler, B. 2025. Surveys for *Botrychium* spp. (Moonworts) on the Bridger-Teton National Forest, Wyoming. Rocky Mountain Herbarium, in cooperation with Wyoming Natural Diversity Database,

University of Wyoming, Laramie, WY. Posted at:

<https://wyndd.org/reports/?columns=title%7Eappendices%7Eauthors%7Eyear&panel=true&origin=window&authors=Legler%2C+B&year=1986%7E2025> .

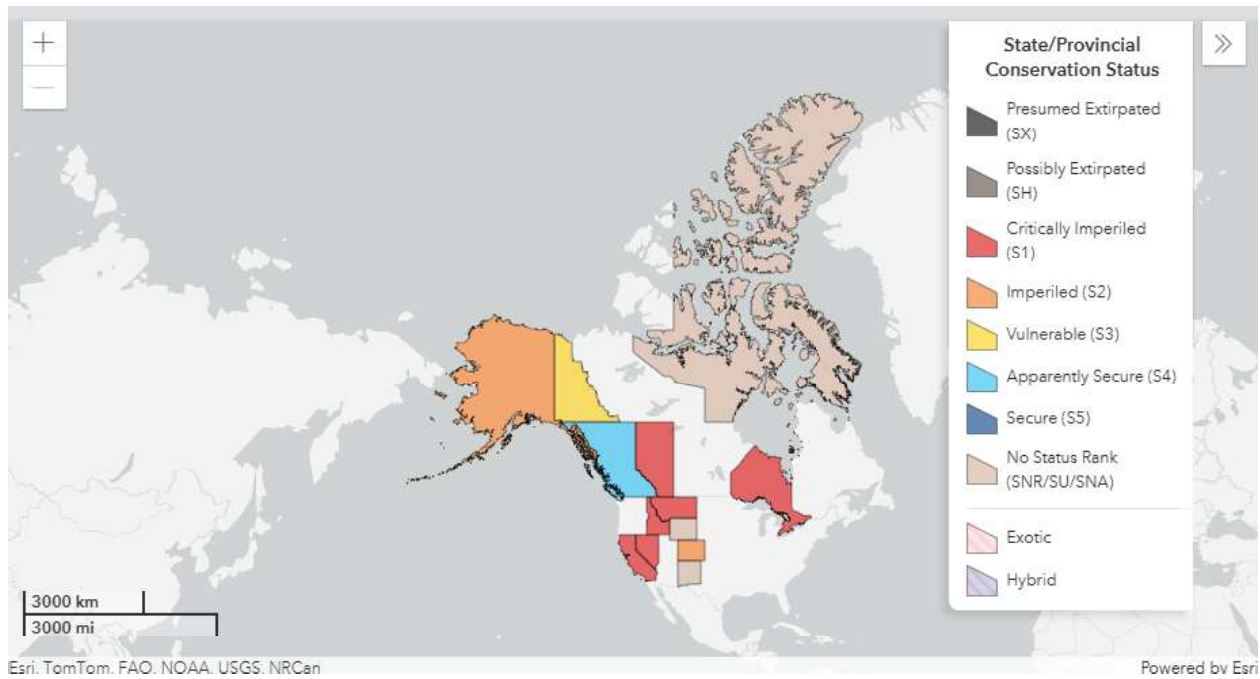


Figure 1. Rarity rank of *Botrychium tumux* throughout its range (NatureServe 2025)