

From: [K Lichtendahl](#)
To: [FS-travel-comments-rocky-mountain-shoshone](#)
Subject: Comment on the SNF Travel Management Proposals, NZ-01
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July 2, 2016

Dear Shoshone National Forest,

Following are my Travel Management comments on proposal NZ-01.

I wish to speak to four areas pertaining to NZ-01

1. Ranching and the risks additional ATV traffic creates.
2. Impacts to wildlife and hunting opportunities that additional ATV traffic creates.
3. Current and future Line Ck. erosion/bouldering patterns and how they have created maintenance/expense issues of major proportion.
4. Interconnected habitat along the Beartooth front and its value to preserve.

I am specifically concerned about an area and the interconnected natural system that we have along the Beartooth Front including the Clarks Fork canyon and Bald Ridge. NZ-01 is located within this complex natural system and is described as follows in the Scoping Document. Attached is the map and details.

Table 5: Proposed Changes to Motorized Travel on the North Zone (Clarks Fork, Wapiti, and Greybull Ranger Districts)

Location	Proposal	Change Type	Rationale for Change*
Line Creek	NZ-01	New motorized trail- 65 inches wide.	Provides effective connector; opportunities for youth; low-moderate resource concerns

This 6 miles of connector provides limited ATV opportunities and puts at risk a very complex system of ranching, wildlife calving, hunting opportunities, and wildlife habitat. This seems like a very large loss for habitat and creates further cattle disease risk while adding only a few expensive miles of ATV trail.

As you know, our only vested interest is being a neighbor on the border of the SNF with a conservation easement to protect the habitat we are stewarding over. Our intention is for the right outcome for long term values, recognizing that the habitat and wildlife have no say in the matter.

Here are my concerns and comments;

Concern 1

The SNF area between Line Creek and Little Rock has been without motorized access, only service use by the Tolman's with their 4 fenced and gated grazing allotments with associated piping and watering areas along the front. They have been preserving their ranch, range habitat and open space for **over a century** and they are very concerned about this change as to the unintended outcomes from ATV travel, stressing and spooking elk. Also they have concerns over will gates be closed or will cattle guards be necessary? In addition will the range health be affected and compromised with invasive weeds from ATV traffic? We know from the topography this is a very tight wildlife corridor between the ranch's west line and the steep palisade of Flatiron. Less than a 1 mile pinch point! Attached you will see the Montana Fish and Game report from March finding 6 elk positives for Brucellosis just north of the border about 5 miles north of their ranches. Even with the seasonal closure that is proposed we still have the reality that this elk herd along the front is local as well and not all of the wintering thousands of elk move up to higher forage. Tolman's replacement younger cows remain on the ranch year round.

Concern 2

Our two sections just north of Tolman's combined with the State Section 36 and BLM sections provide a few thousand acres of a "relief valve" for elk and pronghorn all 12 months of the year. The developed spring and trough in the middle on our section 1 has a hub of wildlife trails coming and going. With the underground spring water temperature the overflow keeps it thawed even in the dead of winter. The access by game to this area is the front along Section 1 and state section 36, which has been without stress of motorized use. Again, this proposal can't be positive for wildlife. Hunters as well will no longer be able to horseback in or walk from the north at Line Creek, or up from the south at Little Rock and find quiet

conditions and roaming game. With ATV access and traffic, hunters can horseback, hike or they too can ride their ATV the few miles into this area, and chances are they will find all the game chased out into Montana.

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Concern 3

Line Creek drainage a few years ago had a major forest fire in which the entire drainage to tree line was burned. Post fire, the major rain events have produced a large change in the creek flow, erosion and large boulder movement downstream, all of which are changing the landscape adding an engineering and maintenance/expense issue to future motorized access. Road 123 on the north side of Line creek ends at the old river crossing due to boulder deposits making their way down stream. See photos from 6-13-16 below. Walking further upstream you can see that the banks have huge trapped tree deposits and an ongoing march of boulders headed downstream with each major rain event which will continue until the headwaters are reforested again. With the redundant roads in the area, each taking you to the mouth of the canyon as it is, now may be the time to let nature run its course and dead end Road 123 and avoid this ever changing boulder field and continued expense of maintenance. If you use 123 A on the south side of Line Creek to access the headwaters which are primarily Custer National Forest ground the first stream crossing is again blocked with even larger "car size" boulders and deep erosion preventing further motorized travel through the tight palisade canyon. Topo attachment shows the crossing location and pictures below show the bouldering. Until the headwaters are reforested I can't see how fighting the catastrophic floods with continued maintenance/expense for access or a loop makes sense.

Concern 4

In our experiences hiking the low elevation front, as well as on top of the plateau along the ridge line between Littlerock and Line Creek, we have been totally impressed with the wildness and ecological events that take place there. We are not trained professionals however we can say from our observations that this is a complex area. I won't go into every event since we moved here in the early nineties but our list of ecology based memories is long. Middle and North Bennett are very unique in that they afford a wildlife route to the plateau that avoids the Little Rock-Deep Lake east-west gorge and is the easiest and safest to greener pastures. Elk, sheep and goats that aren't in the Clarks Fork canyon or the Bald Ridge area are usually in the lower elevations of Bennett for 8 months of the year. Up they go when it greens up in July and we have seen the nursery groups of elk and goats that hang around the east edge of the plateau most of the summer. Yes, I would say the front between Line and Little Rock has been quite a sanctuary for the most part.

In summary, our belief is the benefits of a few miles (about 6) of additional ATV riding is not as valuable as the current uses of ranching, hiking, hunting and wildlife. Below are a few pictures that show the tight wildlife corridor and the sanctuary this is, which is available to all with a short hike from the south or the north. We also have a 1.5 mile hike to the front as we have no access as well and we enjoy every step. ATV access that jeopardizes the legacy of natural resources does not seem to be the right direction. We are jeopardizing a lot for 6 miles of additional riding of ATV's.

I hope you can review this proposal again and assess the current values that are at risk with these changes and go back to the current usage pattern we have today.

Thanks for your professional attention to continuing the Shoshone Forest legacy of an American Treasure.

Best regards,
Ken Lichtendahl



Looking south from Section 1. Bottom left is irrigated fields of Tolman Ranch, Tight 1 mile pinch point can be seen between Ranch and Flatiron palisade.



Flatiron and tight corridor with Little Rock drainage in background and Tolman Ranch foreground. Photo taken from Section 1.



Looking north from bottom of Flatiron. Bennett Creek is to the right and North Bennett ridge is to the left. 4 fenced grazing allotments are between Line Creek and Little rock. Far end of low valley is Line Creek.



Higher on Flatiron looking north, Bennett below and North Bennett ridge left.



Looking east from Flatiron at Tolman Ranch. Tight corridor below.



Elk moving up arriving in North and Middle Bennett drainage on the plateau.



Elk grazing on the plateau edge above Bennett.



Elk with calves on our section 1. Steep hillside however they seem content with the quiet conditions and forage.



Line Creek canyon and upper headwaters burned to tree line, creating flash floods and boulder movement out into the grassland creek bed.



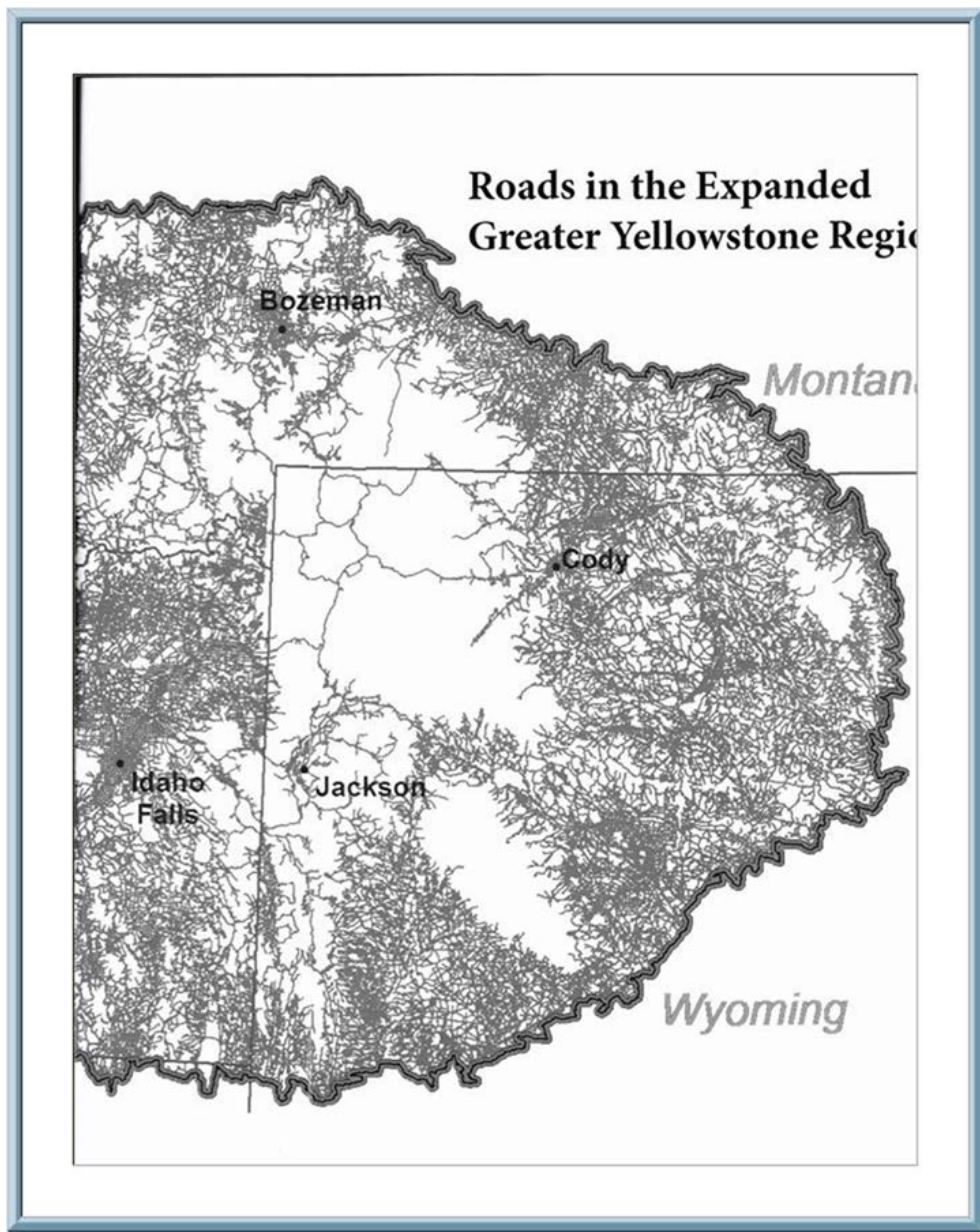
Access to headwaters from south side on 123A leads to crossing blowout and boulders as you enter the palisade at the first crossing. Old road visible in center of photo below and across the creek on the north side.



Road 123 on the north side of Line creek before it reaches the canyon mouth the stream crossing is barricaded with boulders and flood debris.



Upstream from the Road 123 you can see the mega high water marks and boulder movement that will continue to move downstream in future large rain events.



Map reflects the primary reason for our intact ecological treasure here in the Greater Yellowstone Ecosystem. Says a lot about a century of decision making.



Up on top above Bennett in early July. As I hiked by this drift I noticed a hole going back into it.
First Wolverine den I have ever seen.



As I mentioned earlier this is a complex area along the Beartooth's and no one attribute defines it other than it is a very intact habitat and the big reason is wildness and lack of motorized travel.

It needs nothing to continue, just consistent consideration to stay wild and intact!