

Shoshone National Forest

Dear Mr. Robertson:

Following are my comments on the Shoshone National Forest's (SNF) Travel Management May 2016 Plan.

The Forest Service's (FS) official response (Objection Tracking Number 14-13-00-0120) to my objections to the Revised Land Management Plan, Final Environmental Impact Statement, and draft Record of Decision must now be used as official FS directives in implementing the SNF 2016 Travel Management Plan.

The SNF's proposal to continue implementing maintenance and repair projects on the useless dead-end roads up the Elk Fork and Sweetwater River Valleys is not legal within the bounds laid out in the Washington FS's specific official response to my objections relative to the constraints all Federal Agencies must follow when conducting activities in wetland and floodplain areas on our Public Lands. On page 62 of the Washington Office FS response, it specifically quotes EO 11990, "to avoid to the extent possible, the long- and short-term adverse impacts associated with the destruction or modification of wetlands ... Federal agencies are required to preserve and enhance the natural and beneficial values of wetlands."

The official Washington FS Central Office response to my objections states that the 1982 Planning Rule, Section 209.23 requires, "adoption of measures, as directed in applicable Executive orders, to minimize risk of flood loss, to restore and preserve floodplain values, and to protect wetlands." Further, it states, "All management prescriptions shall [...] protect streams, stream-banks, shorelines, lakes, wetlands, an other bodies of water. [And further,] special attention shall be given to land and vegetation for approximately 100 feet from the edges of all perennial streams, lakes, and other bodies of water. This area shall correspond to at least the recognizable area dominated by the riparian vegetation. No management practices causing detrimental changes in water temperature or chemical composition, blockages of water courses, or DEPOSIT OF SEDIMENTS (emphasis added) shall be permitted within these areas which seriously and adversely affect water conditions or fish habitat."

These two destructive dead-end roads (like Senator Stevens Bridge-To-Nowhere in Alaska) could be used by the FS as text book examples to illustrate blatant violation of an Executive Order and the FS's own stated policies for the protection of streams and riparian wetlands which are the highest valuable fish and wildlife habitats on FS Public Lands in the Greater Yellowstone Ecosystem, the largest and most intact ecosystem in the lower 48 states.

When citizens are caught by the FS tearing-up Public Land stream beds and riparian habitat with 4-wheel drive and 4-wheeler vehicles, they are issued citations in accordance with the damages they caused. Yet, the SNF allows the same damages to occur to stream beds and riparian habitat by maintaining these two dead-end roads. It is time for the SNF to embrace EO11990 and Official FS Policy by holding itself to the same standards placed on citizens of this Country. The SNF should take a new high road in the management of our Public Lands by closing these two useless roads and restoring these two important riparian/wetland corridors and important trout spawning streams (sedimentation from these roads constitutes a direct major detriment to survival of trout eggs and invertebrate food sources.)

Sincerely,

Richard L. Kroger

Private Citizen and Professional Fish and Wildlife Biologist for over 50 years

