



GREATERYELLOWSTONE.ORG
LOCATIONS IN MONTANA, IDAHO & WYOMING

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December 11, 2017

Re: Shoshone National Forest Travel Management #48573 – Revised Proposed Action
Scoping Comments

Shoshone National Forest
Acting Forest Supervisor
808 Meadow Land Avenue
Cody, WY 82414

Submitted Electronically: travel_management_comments@fs.fed.us

Dear Ms. Stresser,

The Greater Yellowstone Coalition is a 501(c)(3) non-profit representing more than 40,000 people from across the region and nation. Our mission is to protect the lands, waters, and wildlife of the Greater Yellowstone Ecosystem, now and for future generations. Since 1983 we have been working to safeguard this rare intact ecosystem that is largely found in Wyoming, while also extending into Idaho and Montana. We have offices in all three states with staff who are engaged in the local communities throughout the ecosystem.

Our supporters have an interest in ensuring the integrity of this ecosystem that encompasses the entire Shoshone National Forest (SNF) – a landscape defined by its backcountry character, diverse habitats, clean cold water, and abundant native wildlife. The Greater Yellowstone Coalition envisions a healthy and intact Greater Yellowstone Ecosystem where critical lands and waters are adequately protected; wildlife is managed in a thoughtful, sustainable manner; and a strong, diverse base of support works to conserve this special place as part of a larger, connected Northern Rocky Mountain Region.

We began engaging in this project during the initial pre-scoping phase attending field trips and meetings. We submitted written comments in the fall of 2015 and in July 2016. We also participated on the Forest's Motorized Use Compliance Working Group developing recommendations for the Forest that were submitted in January 2017. The following comments are additional thoughts to the previously submitted comments. Since our July 2016 scoping comments remain applicable, they are included with this submission for reference.

AMERICA'S VOICE FOR A GREATER YELLOWSTONE

TABLE OF CONTENTS

Purpose and Need Clarification.....	3
Previous Comments.....	3
Additional Wildlife Considerations.....	3
Additional Wild and Scenic River Concerns.....	4
Subpart A: Travel Analysis Report.....	4
Subpart B: Motor Vehicle Roads and Trails.....	4
Subpart C: Over-Snow Vehicle Areas and Trails.....	5
Conclusion.....	6

PURPOSE AND NEED CLARIFICATION

The Shoshone National Forest revised Proposed Action (SNF R-PA) for the Travel Management project released November 2017, has clarified its purpose and need which is appreciated. However, we still contend the metrics have not been articulated to validate the following claim: “There is increasing demand for motorized routes to a growing user group on the Forest, particularly, with regard to motorized loop opportunities.” Please see previous comments for metrics that suggest most people do not desire more motorized opportunities on the SNF. Please provide data to show otherwise.

We remind the Forest that the purpose of travel management is to “provide a manageable system of designated public motor vehicle access routes and areas consistent with the Forest Plan.” This does not translate to creating more motorized loops at every possible location in SNF’s front country. Front country is also valuable to non-motorized recreation and wildlife. There appears to be ample loop opportunities in this proposed action. We discourage the Forest from trying to create unnecessary loop opportunities at the expense of wildlife and habitat elsewhere on the forest. Although the Forest is focused on motorized travel with this planning process, we encourage the Forest to consider non-motorized recreational aspects of the proposed outcome, as well.

PREVIOUS COMMENTS

Our previous comments spoke to our desire for assessment to be included in the upcoming Environmental Impact Statement (EIS) within these categories: Existing Use and Trends; Manageable System; User Compliance and Accountability – Enforcement; Roadless and Backcountry Character; Soundscape; Invasive Plant Species; Stream Sediment & Water Quality; Wildlife Migration Corridors; Seasonal Closures; Decommissioning Routes; Grizzly Bear Conflict Reduction; and Dispersed Camping Spur Extensions/Inclusions. These requests remain pertinent and we ask that you revisit our July 2016 submission.

ADDITIONAL WILDLIFE CONSIDERATIONS

The SNF Land Management Plan, 2015 Revision (SNF LMP 2015) lists elk, moose, mule deer, Clark’s nutcracker and Yellowstone checkerspot as species of local concern (pg. 12). We encourage the forest to thoroughly examine the research produced by the **Starkey Project** (USDA Forest Service and Oregon Department of Fish and Wildlife) specifically to help analyze each alternative’s motorized system’s effect on ungulates in the SNF.¹ Also, please remember that the SNF LMP 2015 seeks, “Densities of roads and trails in big game winter range are generally low (less than 1 mile per square mile),” as a desired condition (pg. 57). Furthermore, SNF LMP 2015 states that “big game vulnerability to mortality, components of habitat security are identified and managed during project planning and implementation” (pg.60). Hence, it is through the travel management process that potential impacts of motorized areas, trails, and roads to big game should be assessed and projected negative impacts mitigated accordingly.

¹ <https://www.fs.fed.us/pnw/starkey/introduction.shtml>

ADDITIONAL WILD & SCENIC RIVER CONCERNS

Please investigate motorized roads 165 and 178-178.1B, which enter the Clarks Fork Wild and Scenic River Corridor, to determine if these routes officially extended into the corridor at the time the Wild and Scenic designation was made. Does it make sense to close the roads at the corridor boundary and provide access via foot to the river's edge? Are both parallel roads, less than a half mile apart needed, if so, what is the justification?

SUBPART A: TRAVEL ANALYSIS REPORT

We appreciate that the Forest has added this important element within the process of Travel Management Planning. The criteria seem reasonable; however, it also seems to lack an on the ground component that considers proximity or duplicative routes. For example, why is all of 479.1K along Aldrich Creek considered likely needed as open to the public? There are three legs that are less than a quarter mile apart from each other and converge with the main route. We would like to see an explanation for keeping such duplicative routes open to public. Is it for dispersed camping, hunting, grazing or other? We understand where there are campgrounds and trailheads, but are unclear about those routes outside of those scenarios. Some examples of routes that appear duplicative and are less than a half mile from each other but classified as likely needed open to public, are not limited to just these, and include 165; 178-178.1B; 333; 334; parts of 540; 554.1E.

SUBPART B: MOTOR VEHICLE ROADS AND TRAILS

Thank you for continuing to improve the Forest's seasonal closure schedule in this revised proposed action. Please review the accuracy of all the new proposed open dates, as we did find some inconsistencies. For instance, Upper Sunlight and Sulphur Creek is now said to be open 7/1-3/31. This does not correlate to other parts of the proposed action. This drainage is unavailable for winter motorized use, hence the open date should not include the winter months. Furthermore, the snow melt can make some of the creek crossings undoable in the spring.

Appendix A was helpful addition to the maps provided in this revised proposed action. We appreciate the Forest's efforts to minimize the impacts of the existing system of motorized trails and roads by eliminating expensive maintenance issues; protecting soil and water resources; removing duplicative/redundant routes; and addressing areas of compliance challenges to improve ease of management. We would like to see the EIS include evaluation of motorized effects on wildlife and non-motorized recreation. Again, please utilize the research produced by the **Starkey Project** (USDA Forest Service and Oregon Department of Fish and Wildlife).

Adding numerous fragments to the system to accommodate dispersed camping may be easier for compliance. However what assurance does this proposed action offer to deter future road creep? Please refer to our previous comments and the SNF Motorized Compliance Working Group's Recommendations.

We have concerns with motorized roads and trails encroaching into the RARE II Roadless Areas within the ecosystem, such as with proposal NZ-45a/b. Furthermore, please evaluate effects of such new routes on the neighboring Elk Secure Habitat and the PCA; as well as effects on wildlife using those habitats.

SUBPART C: OVER-SNOW VEHICLE AREAS AND TRAILS

Thank you for creating a snow machine season with this revised proposed action. We question the rationale for not including the north zone into the High Elevation Zone with the bookend dates of 11/15-4/30 that was established in the south zone of the Forest. We have concerns about the May 15th end on the north zone for several reasons.

First, the forest has an obligation to provide safe and healthy habitat for wildlife. Below is from Yellowstone National Park's science based website about grizzly bear den location preference and emergence timing from those dens in the spring.

In the Yellowstone ecosystem, grizzly bears tend to dig or locate dens on the mid to upper one-third of 30°-60° slopes with northern exposures between 6,562-10,006 ft, =8103 ft (2,000-3,050 meters, =2,470 m) in elevation (Judd et al. 1986). Pregnant females den at higher elevations than other females and male bears (Haroldson et al 2002). ... When temperatures warm up and food is available in the form of winter-killed ungulates or early spring vegetation, bears emerge from their dens. Male bears emerge first, usually from early to mid-March (average days denned = 131 days), followed by solitary females and females with yearlings or two-years olds (average days denned = 151 days) in late March through mid-April (Haroldson et al. 2002). The last to emerge are females with new-born cubs (average days denned = 171), from mid April through early May (Haroldson et al. 2002). Males, subadults, solitary females, and females with yearlings or two-year-olds usually leave the vicinity of their den within a week of emergence while females with new-born cubs remain in the general vicinity of the den for several more weeks (Lindzey and Meslow 1976, Haroldson et al. 2002).²

Based on this research combined with research referenced in our previous comments about the effects of sound on grizzly bears, we strongly encourage the forest to consider an earlier bookend than May 15th in the north zone especially for areas within the Primary Conservation Area and that are below elevations of 8,500 feet.

Secondly, we have concerns that the snow depth along the portion of Trail A between the Beartooth Parking Area and Pilot Creek Parking Area, which is at about 7000 ft, and areas of similar elevation may not warrant over snow traffic throughout April into May. Historically, the grooming of trails in Northwest Wyoming begins in December and runs through March. Comparatively, the east entrance of Yellowstone closes to over snow vehicles mid-March and opens to wheeled vehicles in early May. Moreover, Yellowstone's east entrance route's highest elevation is 8,524 feet at Sylvan Pass. We feel there is

² <https://www.nps.gov/yell/learn/nature/denning.htm>

justification for cohesiveness between neighboring land management entities. The northeast entrance to Yellowstone is along the portion of snowmobile Trail A through SNF.

Lastly, much of the lands available for winter motorized use are also identified as Elk Secure Habitat. We encourage the Forest to evaluate potential overlap of elk and winter motorized uses of areas that could unnecessarily stress elk or deter elk from accessing and utilizing this habitat, especially within the elk calving and crucial winter range. We think that some of the areas in the north zone may be at risk for conflict with a late May 15th closure for winter motorized use.

CONCLUSION

GYC recognizes the importance of recreation and its social and economic role in the GYE. The Shoshone National Forest, America's first national forest, is 2,466,577 acres where 335 species of wildlife reside within an elevation span of 9,204 feet, ranging from sagebrush flats to alpine meadows. This is a unique forest flanking Yellowstone National Park. The Forest's defining characteristic is that it is a backcountry forest.

Critical to ensuring this character is first, maintaining the remaining RARE II status of its front country. Secondly, acknowledging that the south zone will always have more motorized opportunity due to the accessibility of terrain. Third, the north zone should be striving to maintain habitat that is not possible on the south zone due to an already significant established motorized system.

Throughout this process, it is important to recognize that Shoshone National Forest fills the niche of being a backcountry forest. One Forest cannot be everything to everyone, on every square mile. This forest is also part of a much larger landscape of public lands and we hope the EIS analysis will consider this in its study of benefits and impacts of the revised proposed action and develops alternatives accordingly.

We look forward to a travel management planning outcome that supports and perpetuates the wild, Roadless and backcountry characteristic of this special national forest.

Respectfully,

A handwritten signature in dark ink, appearing to read "Jenny DeSarro". The signature is fluid and cursive, with the first name "Jenny" being more prominent and stylized than the last name "DeSarro".

Jenny DeSarro
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