

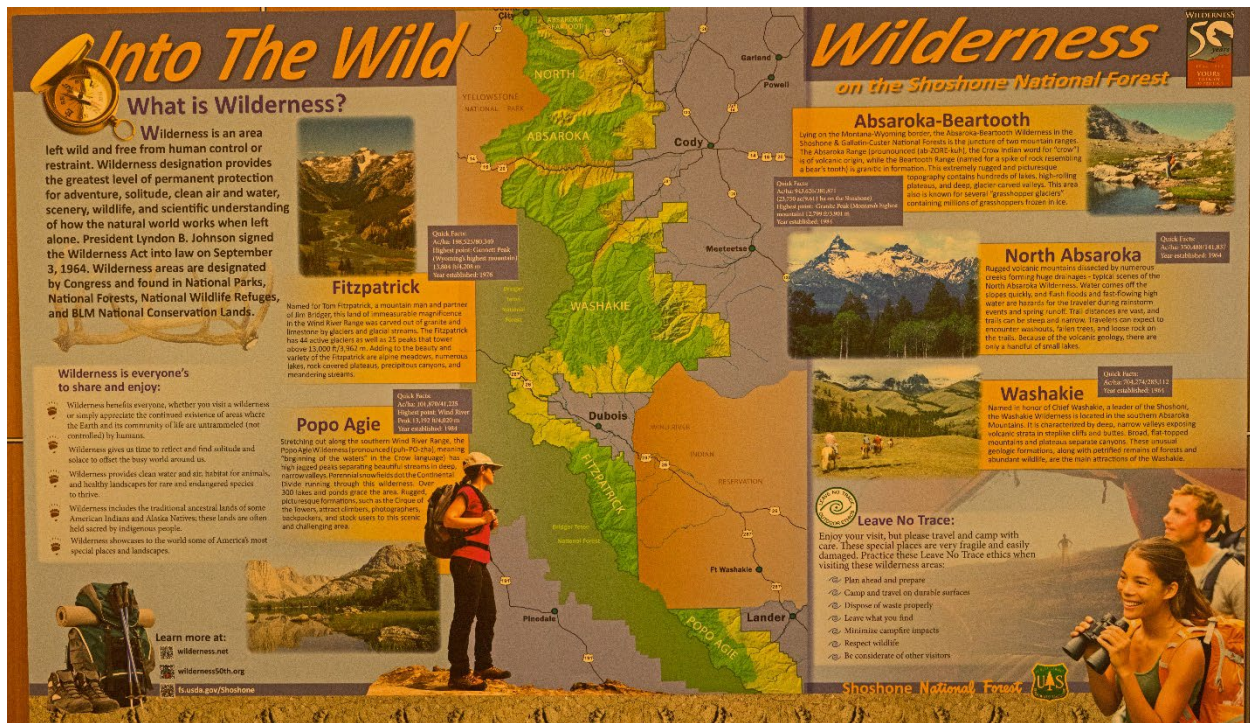
Dec. 5, 2017

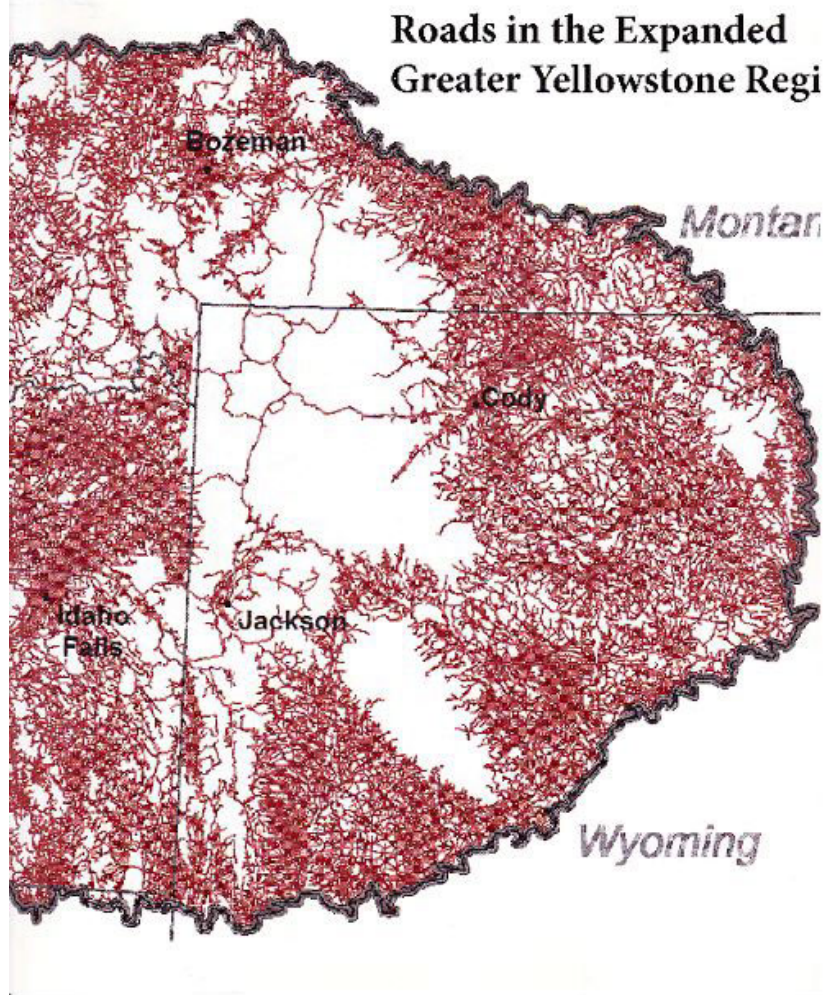
Dear Shoshone National Forest,

The following are my Travel Management comments adding additional detail/specifics to my comments of July 2, 2017 on NZ-01 and perspective on this aspect of the evolving Shoshone Forest Plan in relation to mechanized travel.

First, as a benchmark on the legacy of 126 years since the Shoshone National Forest was set aside in 1891, the agency is still weighing every decision that could affect the viability of this truly remarkable ecosystem. I applaud the thoughtfulness, patience and professionalism that the Shoshone has had for decision making that can and does have long term effects on the treasure we have in the SNF and its interconnectedness to the GYE. My wife and I have developed this appreciation from 30 plus years exploring the backcountry of the GYE, [REDACTED]

Our observations have taught us that it is hard to be part of nature and most humans are apart from nature with associated impacts on the natural world. The Shoshone has recognized those land uses that impact and eliminate all other uses, as well as impair the intact natural system we have in the GYE, however finding balance with changing conditions is difficult. We need to continue this impact analysis and value assessment for any new land use proposals, in my opinion. The SNF and GYE are truly special and the acknowledgement of the interconnectedness of wilderness with wintering areas, wildlife corridors and the collaboration that is needed by all ecosystem land partners is essential to preserving this last of its kind, intact ecosystem, in the lower 48.





Our observations on mechanized travel have also shown us that times are changing as to the number of users, the reasons we use mechanized equipment and the actual equipment that has become bigger, faster, louder and more powerful. This has added significantly to the zone of influence/impacts that mechanized travel has on the environment. People used to ride as transportation to a destination to recreate. However now the main activity is to ride, just to ride. Side by sides, speed, loops and putting mileage on is the entertainment which has its associated stressors on sensitive wildlife and habitat more than ever before. These changes and increase of more users, bigger equipment, speed and desire to ride for miles reminds me of the YNP debate on snowmobiling of a few years ago... "Is it a ride or an experience?" After years of debate and now the new guided tours and best available technology we have great experiences using a snowmobile to tour the park and the impacts on fragile habitat are far less, not impairing the incredible treasure of YNP. The current ATV routes on the SNF face a slow but increasing challenge from the mentioned changes of user habits to maintain a quality experience while not impairing the sensitive, mostly low country, habitat.



So, on with my comments on NZ-01 and the additional details on what I believe is a proposal that has far more impacts, impairments and cost/maintenance than beneficial gain of 6 additional miles of riding.

Concern 1: Ranching



WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699
wgfd.wyo.gov

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November 5, 2015

SOUTH FORK

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The northern portion (Cody Region) of the Shoshone Forest seems to be primarily suited for foot or horseback travel due to the steep rocky terrain and geographical features; however, the Department is agreeable to routes that do not increase erosion, conflict with important wildlife habitats or impact hunter opportunity.

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Road densities can affect elk distribution (Proffitt et al., 2013, Hillis et al. 1991), and new roads can and often times change how elk use the habitat. Low road density forest often serves as security areas for elk and provides refuge from disturbance. Without sufficient refuge on public lands, elk can move onto private lands, or back into wilderness areas to escape disturbance. Because elk in the Shoshone Forest have tested positive for brucellosis, we manage for separation between elk and domestic cattle during high risk periods (Feb-June). New roads could increase disturbance, and potentially brucellosis risk to domestic cattle, in some areas depending on distance to private land, level of disturbance, and timing of use by motorized vehicles.

The Tolman family has been ranching this area for over 100 years and they have coexisted with nature, and thoughtfully preserved the habitat while they have maintained their generations old family business of ranching. In looking at the new trail route several areas will pass in close proximity to their land,

increasing the probability of spooking wildlife that could increase disease transmission. With documented Brucellosis positive elk in the area this is a serious and major concern. The present land uses have worked satisfactory and the risk with the tight wildlife corridor makes NZ-01 a real threat to the Tolman's livelihood. Additionally, at the SNF Cody meeting on Nov 30 when asked if cattle guards would be employed on the 4 separate allotments that NZ-01 passes through, the decision had not been made. Will motorized trail users leave the gates open? The answer from what I have seen is that most will close the gates, but unfortunately, yes, **some will open the gate and drive on**. On the same subject of rules and enforcement, how is the 65" restriction really going to be enforced? One other concern of the Bennett Creek Tolman home owners is a potential fire on Bennett Creek due to more motorized travel just across the fence. Tolman Ranch is a very flat area with the riverbed dense with large trees and thick willows. The creek riparian area is also wide and flowing from the west to the east the same direction as the wind. Clark is known for frequent high winds due to the mountain topography.





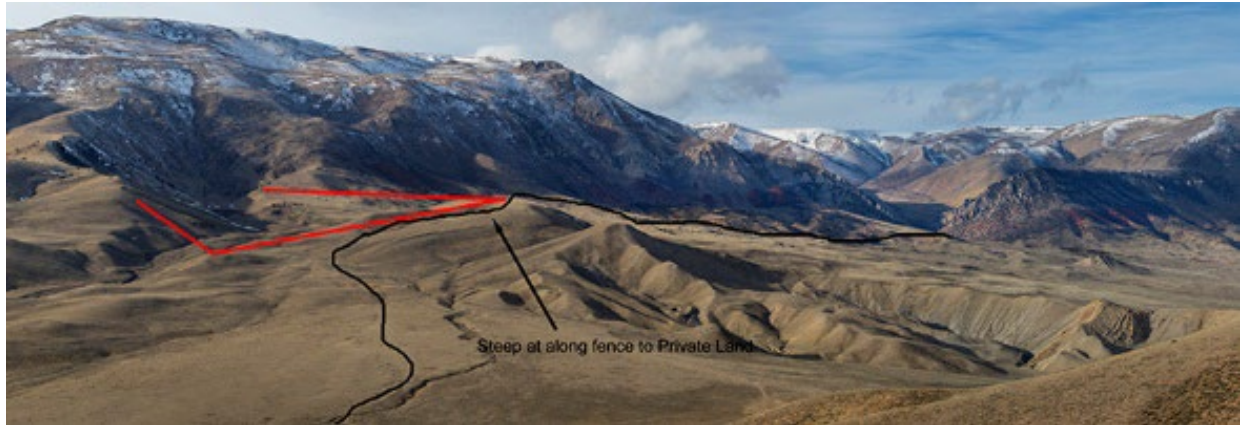
View of Tolman Ranch and narrow corridor between Ranch and Flatiron palisade feature



View from Flatiron looking north, up the corridor, Bennett Creek foreground right.

Concerns 2 and 3: Impacts and difficult terrain to construct and maintain

The topography and limited low country east SNF boundary along the proposed NZ-01 make for the next concerns. First let's take a look at the topography and the route NZ-01 is detailed to take which shows the tight corridor as well as the expense/maintenance issues. The pictures below speak to these points.



View of private land, middle of photo and Line Creek far right.

The steep areas, of which there are several, look like they follow the fall line straight down and will also be continued maintenance due to erosion.



Proposed route right of fence along private land. Very steep and erosion will be big issue.



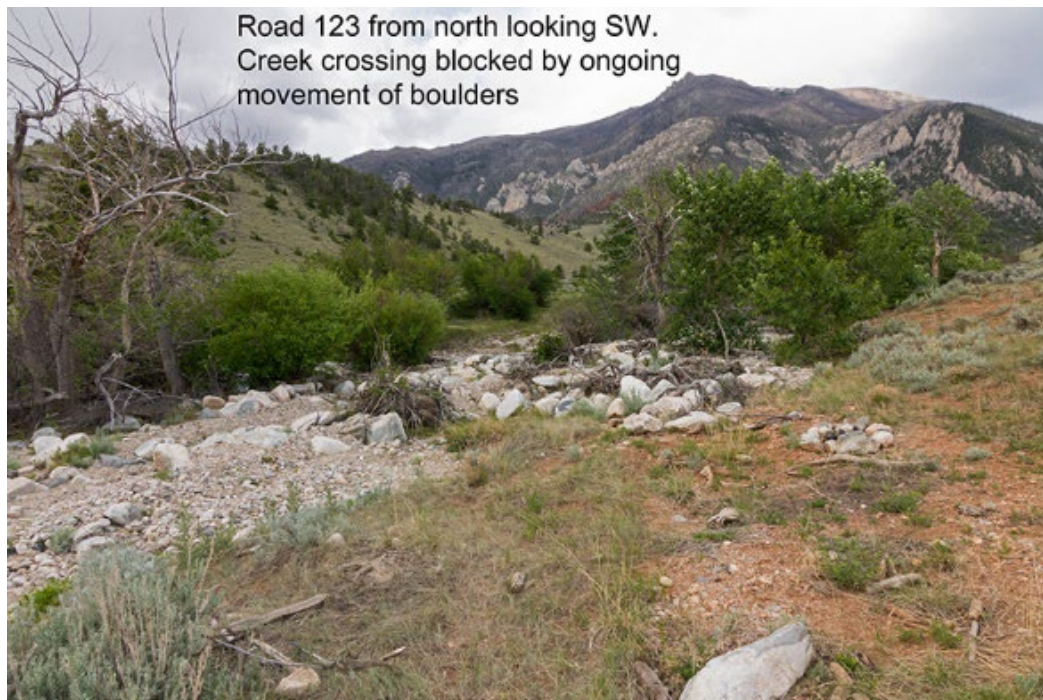
Taken from the far west Tolman fence line on the Bennett Creek bottom land looking at the proposed route, which follows the property line, center of picture up the steep gully to the far left of picture.

Line Creek route 123 is the perfect example of how the recent 2011 fire has changed the variables on road maintenance and feasibility to continue access into the Custer Gallatin Forest which is further up road 123 into Montana. A trip to the dolomite palisade gateway leading into Line Creek's upper mountainous watershed is all you need to see to exhibit how active this area is due to the watershed burn a few years ago. The boulders being moved with major rain events are the size of cars. The other crossing on 123 which is from the north side of Line Creek a short distance from the Gateway is also blocked as it is without a bridge and the large boulders moving down stream now prevent a drive across to the south side.



Road 123 headed up Line Creek to gateway and Custer Gallatin. Until reforestation major rain events will be moving the boulders downstream.





Line Creek, Bennett Creek and Little Rock Creek all have extremely variable flow rate dependent on winter snowfall levels and spring temperatures driving runoff which can last through June. From our observation all three creeks can be very difficult to cross at times and the proposed bridge over Bennett Creek will have to be especially robust like on Line and Little Rock Creeks.

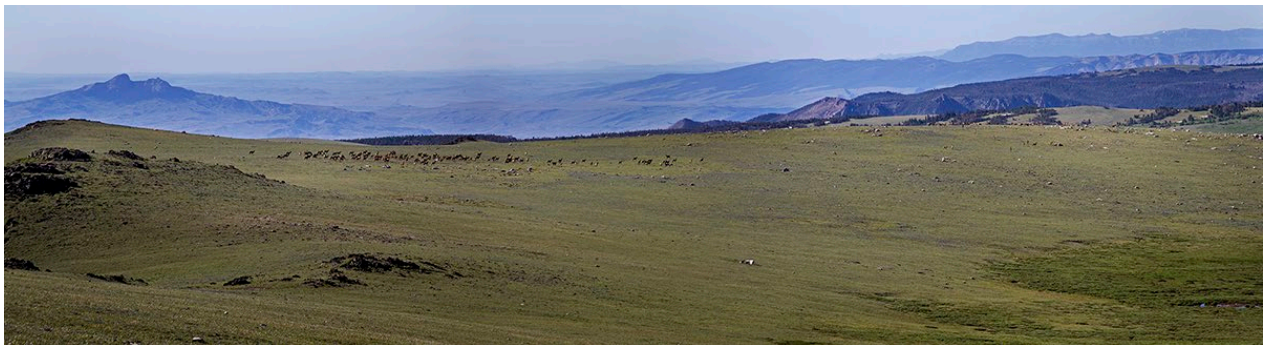


Concern 4: Interconnectedness of corridor and contiguous habitat.

The three drainages that encompass NZ-01, Little Rock, Bennett, and Line Creek are all rugged and have their own uniqueness however they have common attributes of wildness and great wildlife habitat. The seasonal closure of NZ-01 will help to give the wildlife a break however the area is used heavily by wildlife to access the plateau around July when the snow is melted and the grass greens up. The easiest route up and well used is the Bennett drainage, which is again the area where spooking herds and uncertainty are not needed.



View from Flatiron looking north at Middle Bennett left and North Bennett center. Both routes to the Beartooth Plateau



Beartooth Plateau ridge above Bennett taken mid-July with grazing Elk herd.



Up they come and disperse on the Plateau.

The three drainages are also used by the rest of the wintering herds from Bighorn Sheep, Mountain Goats, and the smaller mammals and birds that call the Beartooth Front home.



Goats in June on lower Middle Bennett.

On the narrow prairie corridor Pronghorn are constant travelers, Sage Grouse come and go and Curlews can be spotted wandering the sage flat from time to time. Hunters, horseback riders and hikers can find this wild back country experience only a few miles from either Line Creek or Little Rock Creek. Should NZ-01 be constructed parking and shared usage will be most difficult on Little Rock since parking is so limited and the horse riders will need to share the existing road up to and over the bridge to access trail 613. Currently ATV usage on Little Rock is very sparse and not an issue for horse riders.

The complexity and wildness of how the GYE is bound together to allow for migrating wildlife and sustainable harvests as well as all the apex predators is why the GYE is a Treasure. Appreciating and preserving for future generations this intact ecosystem is a foundation tenant and from that belief it is not reasonable to impair the area with more motorized use.

Across the SNF boundary to the east the community of Clark continues to grow rapidly. Large parcels have turned into fenced 20 and 10 and 2 acre residences. The future holds even more growth and continued mobility restrictions on wildlife passage through this private land making the Forest corridor even more critical than it is today. The tight corridor is becoming the only link between the Bald Ridge critical big game area and the north Beartooth Front and the Beartooth Plateau.



Tolman Ranch from the top of Flatiron and the growing Clark community to the east.

In summary, the cost-benefit analysis does not add up for adding NZ-01 and does not represent consistent decision making around preserving the last intact ecosystem in the lower 48. Motorized travel opportunities exist on the SNF and will continue to grow in usage and degree of difficulty to manage. Adding another route that clearly jeopardizes the livelihoods of several ranching families as well as impairs wildlife movements, reduces likely hunting success and changes the existing wild character of the area does not make sense to us, Buster Tolman or Don Tolman. We hope that you will review this proposal and leave the existing balance as is. Thank you for your professional review and continued care for the SNF.

Ken and Kathy Lichtendahl

