

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.

Into The Wild Wilderness on the Shoshone National Forest

What is Wilderness?

Wilderness is an area left wild and free from human control or restraint. Wilderness designation provides the greatest level of permanent protection for adventure, solitude, clean air and water, scenery, wildlife, and scientific understanding of how the natural world works when left alone. President Lyndon B. Johnson signed the Wilderness Act into law on September 3, 1964. Wilderness areas are designated by Congress and found in National Parks, National Forests, National Wildlife Refuges, and BLM National Conservation Lands.

Wilderness is everyone's to share and enjoy:

- Wilderness benefits everyone, whether you visit a wilderness or simply appreciate the continued existence of areas where the Earth and its community of life are unaltered (not controlled) by humans.
- Wilderness gives us time to reflect and find solitude and solace to offset the busy world around us.
- Wilderness provides clean water and air; habitat for animals, and healthy landscapes for rare and endangered species to thrive.
- Wilderness includes the traditional ancestral lands of some American Indians and Alaska Natives; these lands are often held sacred by indigenous people.
- Wilderness showcases to the world some of America's most special places and landscapes.

Learn more at:

wilderness.net
wilderness50th.org
Bureau of Land Management
BLM.gov/Shoshone

Wilderness

Absaroka-Beartooth

Living on the Montana-Wyoming border, the Absaroka-Beartooth Wilderness in the Shoshone & Gardiner-Custer National Forests is the junction of two mountain ranges. The Absaroka Range (pronounced ab-ZOH-ka), the Crow Indian word for "snow", is of volcanic origin, while the Bearfoot Range (named for a type of rock resembling a bear's tooth) is granitic in formation. This extremely rugged and picturesque range holds hundreds of lakes, high-circling plateaus, and deep, glacier-carved valleys. This area also is known for several "grasshopper glaciers" containing millions of grasshoppers frozen in ice.

Quick Facts:
Area: 184,520 acres (741,877 sq. miles)
Elevation: 12,799 feet (3,900 m)
Year established: 1993

North Absaroka

Rugged volcanic mountains dissected by narrow creeks forming their drainages - typical scenes of the North Absaroka Wilderness. Water comes off the slopes quickly, and fast floods and fast-flowing high water and landslides are frequent during extreme events and spring "mud". Trail distances are vast, and trails can be steep and narrow. Travelers can expect to encounter windfalls, fallen trees, and loose rock on the trail. Because of the volcanic geology, there are only a handful of small lakes.

Quick Facts:
Area: 170,480 (41,837 sq. miles)
Year established: 1964

Washakie

Named in honor of Chief Washako, a leader of the Shoshone, the Washakie Wilderness is located in the southern Absaroka Mountains. It is characterized by deep, narrow valleys exposing volcanic strata in multiple colors and shades. Broad, flat-topped mountains and dramatic meadows canyons. These unusual geologic formations, along with petified remains of forests and shrubland wildlife, are the main attractions of the Washakie.

Quick Facts:
Area: 24,228 (6,112 sq. miles)
Year established: 1961

Popo Agie

Stretching out along the southern Wind River Range, the Popo Agie Wilderness preserves 100,000 acres, offering "fragments of the wilderness" in the Crow language. Its high jagged peaks separating beautiful streams in several narrow valleys. Personal wilderness in the continental divide running through this wilderness. Over 300 lakes and ponds greet the area. Fragrant photo-unique formations such as the Circle of the Towers, arrow streamers, photoglyphs, backpackers, and stock users to this scenic and challenging area.

Quick Facts:
Area: 101,874 (25,469 sq. miles)
Year established: 1981

Fitzpatrick

Named for Fitz Fitzpatrick, a mountain man and partner of Jim Bridger, this land of immeasurable magnificence in the Wind River Range was carved out of granite and limestone by glaciers and glacial streams. The Fitzpatrick has 44 active glaciers as well as 21 peaks that tower above 13,000 feet (3,962 m). Adding to the beauty and variety of the Fitzpatrick are alpine meadows, numerous lakes, rock covered plateaus, precipitation canyons, and meandering streams.

Quick Facts:
Area: 162,200 (40,561 sq. miles)
Year established: 1978

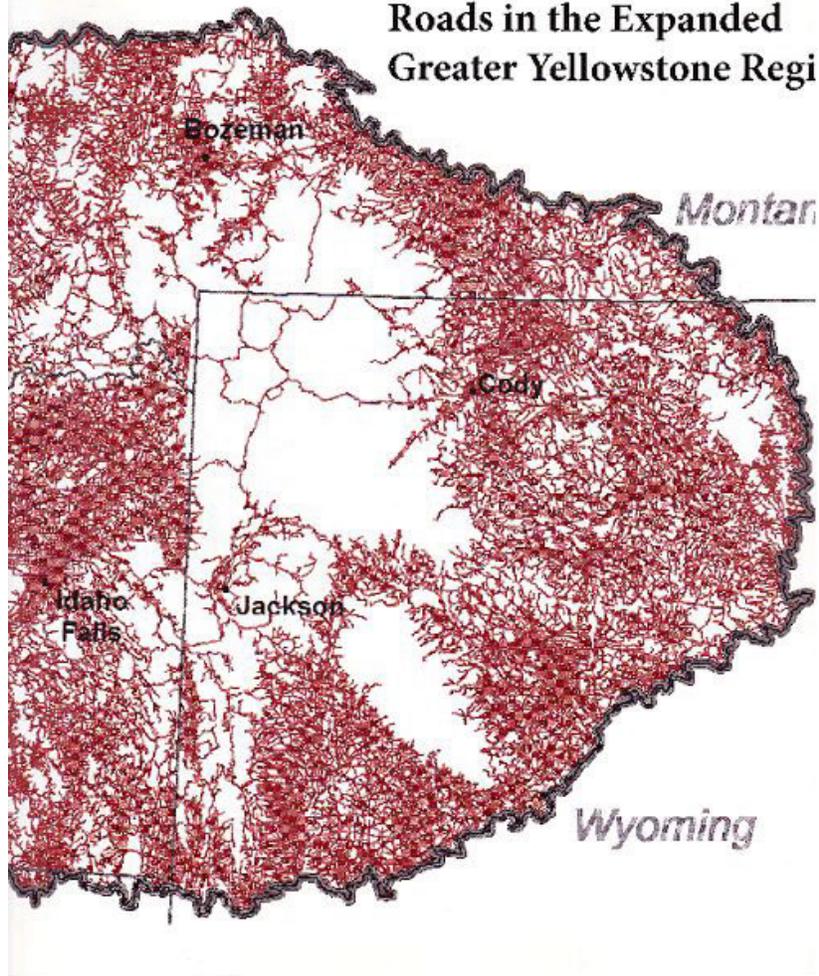
Leave No Trace:

Enjoy your visit, but please travel and camp with care. These special places are very fragile and easily damaged. Practice these Leave No Trace ethics when visiting these wilderness areas:

- Plan ahead and prepare
- Camp and travel on durable surfaces
- Dispose of waste properly
- Leave what you find
- Minimize campfire impacts
- Respect wildlife
- Be considerate of other visitors

Shoshone National Forest U.S. Department of the Interior

Roads in the Expanded Greater Yellowstone Regi



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



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November 5, 2015

South Zone

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.

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.





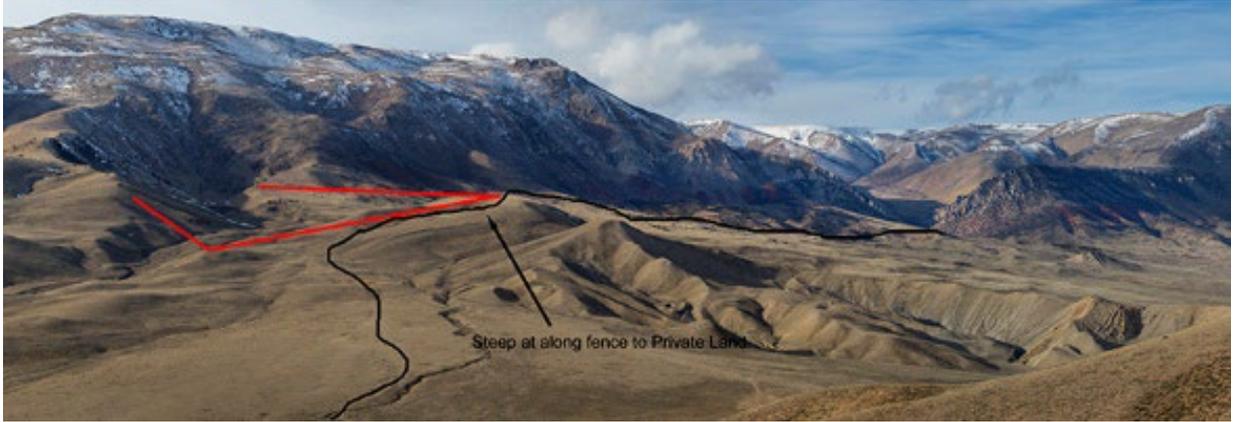
View of Tolman Ranch and narrow corridor between Ranch and Flatiron palisade feature



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.



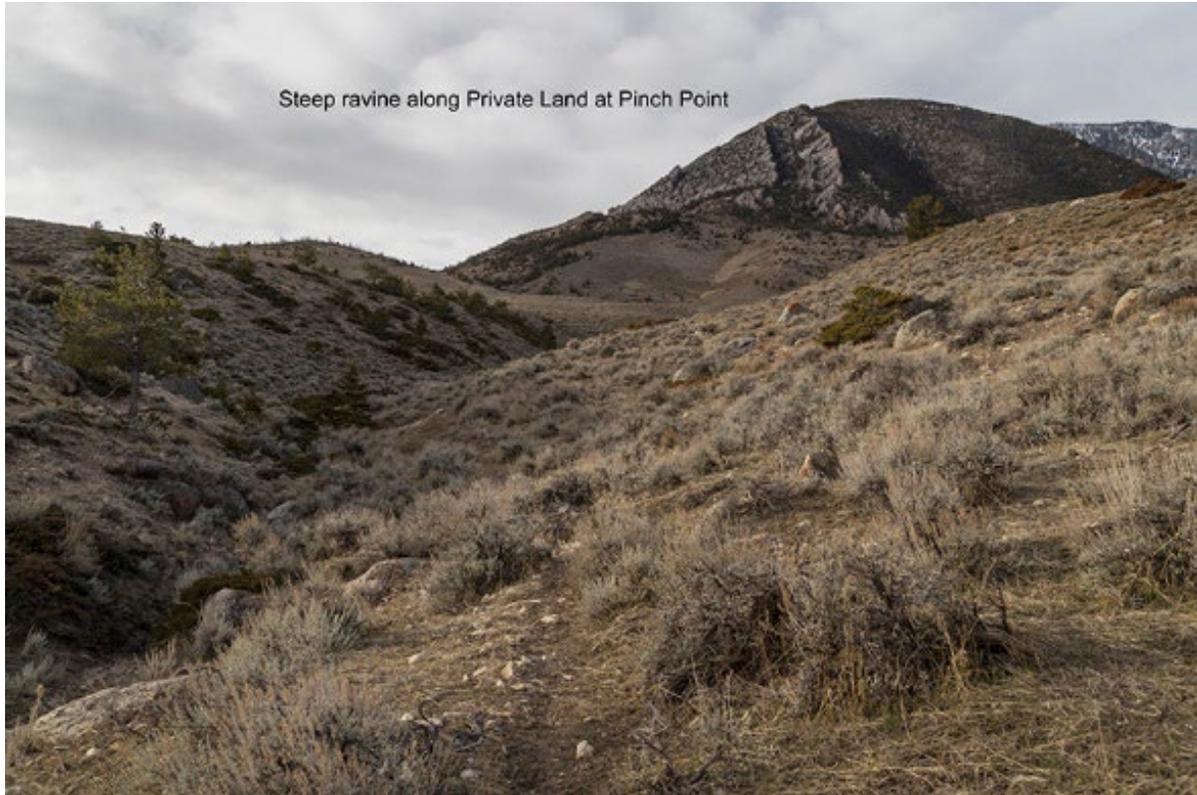
View of private land, middle of photo and Line Creek far right.

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.



Steep fence line along Private Land

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



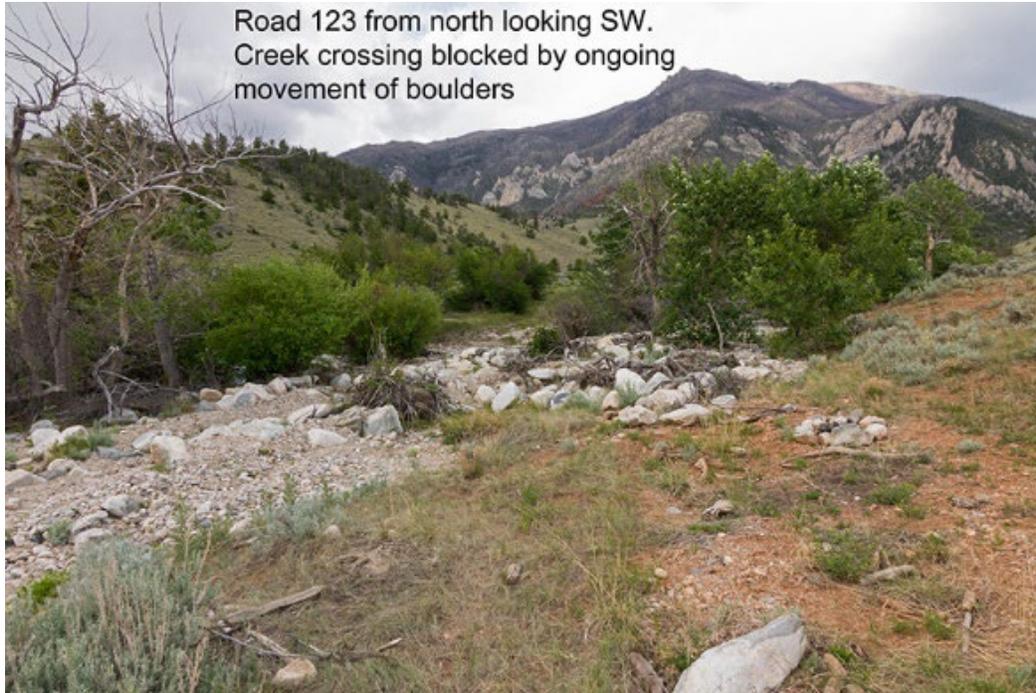
Taken from the far west Tolman fence line on the Bennett Creek bottom land looking at the proposed route, which follows the property line, center of picture up the steep gully to the far left of picture.

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

