



Sue Stresser, District Ranger
Clarks Fork, Greybull and Wapiti Ranger Districts



November 28, 2015

Dear District Ranger Stresser:

Sierra Club Wyoming Chapter and Sierra Club's Our Wild Greater Yellowstone Campaign offer the following pre-scoping comments on the Shoshone National Forest's (SNF) upcoming Travel Management Plan (TMP) process.

Since 1892, the Sierra Club has worked to help people enjoy, explore and protect the planet, and today we speak on behalf of 2.4 million members and supporters throughout the United States. Many of our 5,000 members and supporters who live in Wyoming, and thousands of others across the country, appreciate the backcountry character and wildlife values of the SNF and visit the SNF for a wide variety of non-motorized recreational activities. Maintaining the opportunity to enjoy these activities, especially in accessible areas of the SNF near developed areas, is very important to our members.

These informal, pre-scoping proposals and comments precede initiation of the formal National Environmental Policy Act (NEPA) process. Given the simultaneous deadline for submitting proposals and for commenting on those same proposals, it is obvious that interested parties will not be able to evaluate and comment on all proposed changes to the TMP. Some proposals will not be accessible for review until after the comment deadline, a situation that casts doubt on the value of commenting on only a subset of proposals. Trying to work in good faith within the limitations imposed by this unusual approach, we offer the following comments and proposals, with the caveat that our comments represent a broad overview of major concerns and are by no means comprehensive.

We offer a few broad comments and suggestions relevant to the forest-wide TMP, followed by brief comments on proposals that were made available with enough time to at least superficially review, as well as some additional new proposals.

TMP should support and promote backcountry values of SNF

Through the SNF Plan, the Shoshone identifies its highest value as a wild, backcountry forest, and Supervisor Joe Alexander (Supervisor's Traveler Edition 1) and Wapiti Ranger District Sue Stresser (09/23/2015 Cody Public meeting) both have clearly articulated that any proposed changes to the TMP should reflect this backcountry value. Preserving natural values in inventoried roadless areas, important wildlife habitat, and easily-accessible areas for non-motorized recreational activities (hiking, horseback riding, foot and horseback hunting, wildlife watching, etc.) should be a tight screen for all proposals for any additional motorized roads or trails.

The Forest Service must properly manage the current motorized system before any new motorized roads or trails are authorized

Illegal use must be effectively controlled before any additions to the system are allowed, forest-wide. Working with concerned citizens, we have spent the last three years inspecting the legal road system on the SNF and documenting examples of rampant illegal motorized activities. Illegal use ranges from accidental use of old constructed roads that aren't properly closed (or even signed) to flagrant illegal creation of tracks and trails wherever users choose to go. Until the Forest Service can demonstrate through effective action that it has the resources and is committed to properly managing the existing road system, adding a single additional mile to the motorized system cannot be justified.

A critical first step to properly managing the legal road system is to appropriately identify open and closed roads on the ground, and to take whatever steps are necessary to enforce adherence by motorized users to the legal road system. We request that the following guidelines be included in every proposal for changes to the SNF TMP:

1. The Forest Service will identify all non-system roads (old constructed roads that are not part of the legal road system), clearly mark them on the ground as closed, and take necessary action to stop their illegal use.
2. The Forest Service will identify (with maintained field signage), and take effective action to close all user-created motorized tracks and trails.
3. The Forest Service will identify and clearly mark in the field all system roads and trails. System roads will be signed at regular intervals along their routes.
4. The TMP will identify resources to maintain route signage and closures across the forest.
5. The Forest Service will demonstrate through its actions that it has the resources and the ability to effectively control illegal motorized use and to correct resource damage that results from illegal use, before new motorized routes are authorized.

Until we see implementation of effective efforts that allow typical forest users to know which roads are open or closed, effective control of illegal use, and effective reclamation of damage caused by improperly maintained roads and illegal roads, Sierra Club opposes the opening of any new motorized routes on the SNF.

The Forest Service should not allow any illegal motorized routes to become part of the legal road system

The Forest Service should start with the assumption that no illegal motorized routes will become part of the legal road system. Including these routes would exacerbate the current problem of illegal use by sending the message that persistent illegal use can lead to eventual acceptance and inclusion in the road system by the Forest Service. Accepting illegal routes into the system will only encourage additional illegal use, and would be a disservice to non-motorized users, responsible motorized users, and the public at large.

Comments on submitted proposals, and submission of new proposals

NZ-01 Line Creek

Sierra Club opposes the proposed new motorized routes in this area, because of unacceptable impacts to wildlife. This narrow, one-to-two mile wide undeveloped corridor of the forest is constrained by development across the forest boundary to the east and the steep Beartooth Front to the west. It provides an important movement corridor for elk, mountain goats, bighorn sheep, and deer, and is occupied grizzly bear habitat. Several thousand elk winter on Bald Ridge nearby, and disperse through and use the corridor in spring, summer, and fall.

If additional motorized use is allowed in this narrow corridor, connectivity between Bald Ridge and Red Lodge areas will be lost. Increasing motorized access here could transform it into a motorized recreation destination, which would fragment habitat and disrupt or completely prevent wildlife movement between seasonal habitats.

We recommend that the gate should be moved back to where the blacktop ends, to protect wintering area. Local ranchers with grazing leases should have appropriate keyed access to address livestock needs.

We also support closure of the following motorized routes in the Line Creek area:

- 123.1A, 123.1B, 123.2C, 140, 121.B, and the last ~2 miles of 121 up Littlerock Creek. Roads 123.1A, B, & 123.2C are redundant, too close together, serve no purpose, and increase wildlife impacts due to density.
- Road 140 should be closed with a locked gate where it turns off from road 123, and where it enters the national forest on section 2 (from the south.)

- In the southern part of this area, roads 121 and 121.1B are not frequently used, don't go far, serve no real purpose, and should be closed. Road 121 should be closed with a gate or impassable barrier in the northeastern quarter of section 26, just above where 121.1H joins, in a defensible location.

NZ-03 Morrison Jeep Trail

Sierra Club opposes the proposal to move the gate above the switchbacks, and instead supports moving the gate about five miles back down to the SNF boundary, in a defensible location to prevent illegal passage. We support moving the gate back down to protect the values of the Clark's Fork Wild and Scenic River corridor and wildlife habitat.

NZ-04 Little Sunlight Trailhead parking area

Sierra Club does not support the proposal to develop additional parking across the road from the existing Little Sunlight Trailhead parking area. Our understanding is that the Back Country Horsemen have invested considerable time, money, and effort into developing the current parking area and trailhead, and the current (and growing) level of ATV use is not safe or pleasant for horseback riders. We do not support improving the informal parking that has been allowed in the riparian area across the road, because of impacts to the riparian area, and because a better solution is available.

We support the proposal to move the ATV parking and staging area up to the mouth of Gas Creek to avoid conflicts at Little Sunlight trailhead. Old campsites exist at Gas Creek, the area is relatively flat, and it is mostly used for ATVs now. The access road to the campsites could be improved as needed, and with appropriate signage and encouragement, ATV users should be persuaded to use the Gas Creek area and to leave the Little Sunlight trailhead for horses.

NZ-05 Clark's Fork Wild & Scenic road spurs

Sierra Club supports the proposed closure of two short (~1/3 - 1/2 mile) spurs that penetrate the Clark's Fork Wild and Scenic River corridor, to protect wild and scenic river values, and to prevent resource damage by ATVs. We recommend that the Forest Service select one of these roads to close with a locked gate, with kayakers able to check out a key for take-out purposes.

We recommend the Forest Service consider closing short spurs off road 165 and 178 that don't go anywhere.

NZ-07 Sweetwater Creek road

Sierra Club supports this proposed closure. Since the lodge burned seven years ago, there is no need for this road to ever be reopened again, and a multitude of reasons to permanently close it. The route is highly erosive, washes out regularly, and the Forest Service has wasted significant resources repeatedly rebuilding in past years. The only reason the Sweetwater drainage wasn't included in the grizzly bear Primary Conservation Area (PCA) originally was because of the lodge; the PCA boundaries were drawn around it. Now that the lodge is gone, this area should be incorporated into the PCA. This rare deciduous riparian valley is extremely valuable ecologically and biologically, and it should be fully protected.

NZ-08 Elk Fork Creek road

Sierra Club supports this proposed closure, to protect valuable ecological resources and to prevent resource damage. This valley has many of the same biological and ecological values as Sweetwater Creek: its deciduous riparian vegetation is very biologically diverse, and comprises unique, important wildlife habitat. Current motorized use causes substantial resource damage when trucks drive through wet meadows (as they do every year). The large campground developed near the highway would be a logical place to end the road.

NZ-10 Carter Mountain

Sierra Club is concerned with this proposal, primarily because of existing road density in the area, and the impact of high road density on wildlife. We ask that the Forest Service consider closing some of the short spur roads in the area, such as 474.2, which is very close to 474.2C and therefore redundant, to reduce overall road density.

NA-12 Gwinn Creek

Sierra Club opposes re-opening this closed road. The existing barrier where the road is closed works well, and is passable for horses but not for ATVs. This is a valuable horse trail and should be left as is.

NZ-13 Aspen Trail

Sierra Club opposes opening this horse and foot path to motorized use. The trail passes through prime habitat for elk, grizzlies, whitetail deer, and moose, and crosses numerous bogs and wet meadows. It is valuable winter elk habitat, and very rich biologically. The trail is quite steep in places, and would be very difficult or impossible to maintain and prevent erosion damage from ATVs. ATVs would damage wet meadows and boggy areas.

The trail is located within an inventoried roadless area, and motorized use would bisect what now is a decent-sized non-motorized area that is very popular for horseback and foot hunting, recreational horseback riding, and hiking. Allowing motorized use would be incompatible with these current uses.

After current logging contracts in the area are completed, 201 1A should be gated and closed. We support closure of 201.1C, 201.1A after logging is completed, and closure of the unnumbered short spur that goes ~1/3 mile up Gooseberry Creek, to protect wildlife habitat, prevent resource damage, and protect current non-motorized uses.

NZ-14 Gooseberry Creek

Sierra Club opposes these proposals. The new proposed routes are redundant with existing nearby roads, and would be detrimental to secure wildlife habitat.

NZ-15 Grass Creek

Sierra Club opposes the proposed new motorized access in this area. The proposed new construction would destroy the only non-motorized hiking trail in this area. The proposed new construction would go too close to the wilderness boundary, and would negatively impact wilderness values. The proposed new roads are too close together, too close to existing roads (especially the segment in section 17), duplicative, and would displace hikers.

After logging contracts are completed, logging roads should be closed and gated or effectively barricaded to prevent illegal use.

New Closure Proposal: Sulphur Creek

Sierra Club supports the proposed closure of Sulphur Creek Road about a half mile below the private parcel, with the landowner having keyed access through a locked gate near the old mining camp. Moving the end of the road back down below the private parcel would protect wildlife values, scenic values, and would preserve quiet and beauty for hikers going to the top of the pass.

New Closure Proposal: Galena Pass

Sierra Club supports a proposed closure of the Galena Pass road, at a logical and defensible place along Sunlight Creek. This road passes through important grizzly bear habitat, including opportunistic moth sites. If old mining claims still carry legal access rights, these could be met with a locked gate.

New Closure Proposal: Blackwater Creek road

Sierra Club supports a proposal to permanently close this road, as mitigation for the zip line at Sleeping Giant ski area. The riparian valley would be more biologically valuable without the road, and closing the road would help offset the impacts of the zip line. Existing parking down by the river is adequate to allow people to park and hike or horseback ride up the valley.

New Proposed Closure 149.1

Sierra Club supports a proposal to close this road where it divides to go down to Fantan Lake, to protect grizzly bears and their habitat. This area is increasingly used by grizzly bears, and should be protected.

New Proposed Closure – Sunlight Road at final creek crossing

To protect wildlife and non-motorized recreation including fishing, horseback riding and hiking, Sunlight Road should be closed at the final creek crossing of Sunlight Creek before it goes up the hill to the mining district. Sunlight Road becomes a free-for-all on many weekends with heavy ATV use. The lock on the bear gate has been broken and the creek bed has been damaged by motorized use. This is important grizzly bear habitat and should be protected. The Forest Service does not have the capacity to supervise and/or control existing ATV use.

Thank you for your consideration of our comments. We look forward to working with you throughout the Travel Management Process.

Sincerely,

Connie Wilbert, Organizing Representative
Wyoming Chapter

Bonnie Rice, Senior Representative
Our Wild Greater Yellowstone Campaign