



Shoshone National Forest
Clarks Fork, Greybull, and Wapiti Ranger District
[REDACTED]

November 30, 2015

Dear District Ranger Sue Stresser,

We appreciate this opportunity to comment on the existing motorized use proposals that are being considered by the Clarks Fork, Greybull, and Wapiti Districts as the Shoshone National Forest begins building its December “tentative proposed action for summer travel.”

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 is working to conserve this special place as part of a larger, connected Northern Rocky Mountain Region. 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. The Greater Yellowstone Coalition has approximately 40,000 members and supporters from across the region and nation who have an interest in ensuring the integrity of the natural wild and backcountry character of this ecosystem that encompasses the entire Shoshone National Forest.

We encourage the Clarks Fork, Greybull, and Wapiti Districts of the Shoshone National Forest to maintain the integrity of its existing backcountry wild characteristics during the Travel Management Planning Process. We recommend that the North Zone prioritizes habitat protection by:

1. Refrain from constructing any new summer motorized trails, roads, or routes within:
 - a. big game crucial winter range;
 - b. big game secure habitat;
 - c. big game migration corridors;
 - d. Grizzly Bear Primary Conservation Area;
 - e. high alpine meadows;
 - f. Inventoried Roadless Areas;
 - g. riparian corridors;

- h. wetland, swamp, and fen areas; and within
 - i. one mile from the boundaries of Wilderness, High Lakes WSA, Line Creek RNA, Swamp Lake SIA, and the Grizzly Bear PCA.
2. Consider decommissioning existing trails, roads, or routes that:
 - a. Fall within any of these valuable habitat areas:
 - i. big game crucial winter range;
 - ii. big game secure habitat;
 - iii. big game migration corridors;
 - iv. Grizzly Bear Primary Conservation Area;
 - v. high alpine meadows;
 - vi. riparian corridors; and/or
 - vii. wetland, swamp, and fen areas.
 - b. Meet the SNF LMP guidelines for closing or decommissioning routes.
 3. Continuing to actively enforce its existing summer motorized system.
 4. Consider implementing added resource protections along existing motorized routes.

NEW MOTORIZED ROUTES

We encourage the North Zone Districts to consider the effects of all motorized routes – trails and roads – on wildlife and habitat.

Numerous key wildlife species are more adversely affected by motorized use, including the Grizzly Bear, Rocky Mountain Elk and Big Horn Sheep. The Shoshone National Forest has articulated in various ways the importance of each of these species. Below is one example of research that supports this link between the density of motorized use and its effect on wildlife.

Wisdom et al. (2004) found that elk moved when ORVs passed within 2,000 yards but tolerated hikers within 500 ft. Wisdom (2007) reported preliminary results suggesting that ORVs are causing a shift in the spatial distribution of elk that could increase energy expenditures and decrease foraging opportunities for the herd. Elk have been found to readily avoid and be displaced from roaded areas (Irwin and Peek, 1979; Hershey and Leege, 1982; Millspaugh, 1995). Additional concomitant effects can occur, such as major declines in survival of elk calves due to repeated displacement of elk during the calving season (Phillips, 1998). Alternatively, closing or decommissioning roads has been found to decrease elk disturbance (Millspaugh et al., 2000; Rowland et al.,

2005). (The Wilderness Society, Using Road Density as a Metric for Ecological Health in National Forests: What Roads and Routes should be Included? Summary of Scientific Information, Last Updated, November 22, 2012)

In addition to the stress that wildlife faces in the presence of motorized recreation, there is a great potential for habitat loss or damage. We discourage the North Zone Districts from considering new trails or roads that are within:

- big game crucial winter range;
- big game secure habitat;
- big game migration corridors;
- Grizzly Bear Primary Conservation Area;
- high alpine meadows;
- Inventoried Roadless Areas;
- riparian corridors;
- wetland, swamp, and fen areas; and
- within one mile from the boundaries of Wilderness, the Grizzly Bear PCA, High Lakes WSA, Line Creek RNA, and Swamp Lake SIA.

All of the listed areas are valuable habitat for an array of wildlife. They also are adversely affected by motorized routes, whether they are classified as trails or roads. As noted in the FEIS of the Shoshone National Forest Land Management Plan 2015 Revision (SNF LMP):

The greatest potential impacts to aquatic resources from land management activities are primarily associated with livestock grazing, timber harvest, roads, trails, and motorized use. (Vol. 1, pg. 15, CD Version)

Off-road vehicle activities that create bare or disturbed soil provide conditions for invasive species establishment and spread, including on roads and roadsides, trails, and trailheads, parking lots, developed and dispersed camping sites, popular fishing locations, and heavy-use areas around summer homes and lodges. Off-road vehicle travel has high potential to introduce and spread noxious weeds, and in turn move rangeland vegetation away from desired conditions. (Vol. 1, pg. 172, CD Version)

Motorized travel has high probability of introducing non-native invasive species.

With knobby tires and large undercarriages, ORVs can unintentionally transport invasive non-native species deep into forestlands. For example, one study found that in a single trip on a 16.1 km (10 mi) course in Montana, an ORV dispersed 2,000 spotted knapweed (*Centaurea stoebe*) seeds (Montana State

University 1992). In Wisconsin, a survey of seven invasive plant species along ORV routes found at least one of these exotic plant species on 88% of segments examined (Rooney 2005). ORVs in roadless areas pose a particular risk of spreading invasive non-native species because roadless areas often have less weeds present. Gelbard and Harrison (2003) found that ORVs are the chief vector for invasive species infestation in California roadless areas, which were shown to be very important refuges for native plants. Furthermore, as a result of ORV use, the size and abundance of native plants may be reduced, which in turn permits invasive or nonnative plants to spread and dominate the plant community (GAO 2009). (Switalski & Jones; Off-road vehicle best management practices for forestlands: A review of scientific literature and guidance for managers; Journal of Conservation Planning Vol 8 (2012), pg.16.)

Invasive plant species decrease forage quality for big game and other wildlife. The SNF LMP directs protection and retention of secure habitat which includes the native forage as noted below:

On crucial winter range, management is to maintain the quality and quantity of forage to encourage big game to winter on public lands and not move onto private lands. Management emphasizes the retention of an adequate quantity and quality of forage for wintering wildlife on big game crucial winter range following the commercial livestock grazing period. (SNF LMP, pg. 180, CD Version)

The Shoshone National Forest has a responsibility to manage for native vegetation and prevent the encroachment of invasive species (SNF LMP, pg. 20, CD Version).

In addition to the potential increase of both, road density and invasive species, that new motorized routes could bring, the current maintenance standards don't appear to warrant additional system routes. There are 1,141 miles of system roads, 1,652 miles of non-motorized summer trails, 32 miles of motorized summer trails on the Shoshone National Forest (SNF LMP, pg. 101, CD Version). According to the 2015 SNF LMP objectives, annual maintenance will occur on at least 60% on levels 3, 4, and 5 and at least 5% on level 2 system roads and at least 15 % of system trails (pg. 103, CD Version). Adding more roads and trails will add to the strain of keeping up with the maintenance and enforcement on existing roads and trails.

Hence, we see little justification for adding additional mileage to the authorized system of motorized routes on North Zone.

DECOMMISSIONING MOTORIZED ROUTES

The Shoshone National Forest Land Management Plan, 2015 Revision, states in its objectives for roads and trails that “There are fewer than 1,400 miles of System roads on the Shoshone (pg. 103, CD Version).” Currently there are 1,141 miles of System roads, hence decommissioning at least 141 miles is in line with the forest objectives. We encourage the Wind River District to examine and analyze the System roads throughout the district for ones that could be recommend for decommissioning.

In doing this, we encourage the North Zone to also consider decommissioning roads that exist inside/within:

- big game crucial winter range;
- big game secure habitat;
- big game migration corridors;
- Grizzly Bear Primary Conservation Area;
- high alpine meadows;
- riparian corridors; and/or
- wetland, swamp, and fen areas.

Eliminating motorized roads within these areas, enhances wildlife habitat and vitality. As noted in the SNF LMP the forest has the responsibility to “Restore and maintain a diverse range of ecosystems (pg. 20, CD Version).” Decommissioning roads facilitates ecosystem restoration.

Furthermore, we remind the North Zone of the Shoshone National Forest Land Management Plan, 2015 Revision, guidelines for closing or decommissioning motorized routes:

Close or decommission routes if:

- The travelway cannot be maintained due to natural events or human causes
- Unacceptable damage occurs to soil, wildlife, flora, cultural, aquatic, or other resources
- Financing or partnerships are not available to perform critical maintenance
- Route is not needed for access, or multiple routes exist (pg. 104, CD Version).

These filters appear very appropriate for evaluating the existing System roads on the Districts of the North Zone. The Travel Management Planning Process is an opportune time to review the existing System roads. For example, if there is a duplicate or parallel route, this is a good time to delete the lower quality or less used route. If a route lacks a destination, purpose, or function then it would seem non-essential, and therefore could be eliminated. And if the route proves to have major damage and/or is found incompatible for general maintenance, then it makes sense to decommission the route and remove it from the System.

Hence, decommissioning non-essential and/or problem System roads within sensitive habitat areas is in accord with the Forest Plan. Plus a decommissioned road can become future habitat

for wildlife, particularly in or near sensitive habitat areas. This especially applies within big game crucial winter range, secure habitat and migration corridors; the Grizzly Bear Primary Conservation Area; high alpine meadows; riparian corridors; and wetland, swamp, and fen areas.

ENFORCEMENT OF MOTORIZED ROUTES

Actively enforcing the existing summer motorized system is critical to protecting wildlife, sensitive habitats and water resources. This is noted in the FEIS of the Shoshone National Forest Land Management Plan 2015 Revision (SNF LMP):

On the Shoshone, off-highway vehicle use is following this national trend. Increases in off-highway vehicle recreation in unauthorized areas are leading to increased wildlife disturbance, soil erosion, and sedimentation in streams (FEIS, Vol. 1, pg.8, CD version).

Actively enforcing the existing summer motorized system will also support one of the two goals of travel management planning noted in the Shoshone National Forest Land Management Plan 2015 Revision (SNF LMP):

Reduce the development of unauthorized roads and trails and the associated impacts to water resources and aquatic ecosystems, wildlife, and user conflicts (LMP, pg.104, CD version)

Actively enforcing the existing summer motorized system should be consistent forest wide. There currently exists a stark contrast to what is seen on the ground within the Wind River District, the Washakie District, and the North Zone Districts. The Clarks Fork, Greybull, and Wapiti Ranger District has shown great effort in placing signage that directs recreationalists to use authorized routes and discourages use from unauthorized routes. This same diligence is not as evident on the other Ranger Districts.

We feel enforcement is fundamental to the health of the forest and vitality of the wildlife. Expanded use of tools like signage and blockades should be more widely employed on all Ranger Districts. Blockades placed at the end of in/out or spur routes prevent those routes from creeping beyond the official endpoint. Signage directs users to the authorized system routes and discourages the use of unauthorized routes and creation of more. These measures help enforce the MVUM; further guides users who may not have the MVUM at their fingertips while driving; and show that the Ranger District personnel are actively managing the forest's resources.

Hence, both existing authorized and unauthorized motorized routes should be enforced consistently throughout the Shoshone National Forest before considering the addition of any new motorized routes – trail or road – anywhere on the Forest.

ADDITIONAL RESOURCE PROTECTIONS ALONG MOTORIZED ROUTES

The following recommendations are intended to benefit the land, water, and wildlife resources that act as the interface between motorized and non-motorized use.

First, we recommend that the North Zone Districts establish an end of road blockade at least 200 feet from the high water mark of all lake access motorized routes. This will encourage motorized vehicles to park and proceed by foot to the water source rather than driving to the edge. This is in line with the Forest regulations and will eliminate unnecessary resource damage that has been increasing along lake shores throughout the Forest. These endpoint parking locations can also provide an opportunity for information boards that remind forest users of pertinent regulations on such topics as dispersed camping, leave no trace, and bear safety. These barriers can also provide the visual distance of 200 feet, which is the minimum distance from lakes that camping is allowed.

Second, we recommend that the North Zone Districts proactively addresses all existing motorized route stream crossings to ensure that the highest possible water quality is maintained.

While driving on roads has long been identified as a major contributor to stream sedimentation (for review see Trombulak and Frissell 2000), recent studies have found ORV use on trails to be a significant source of fine sediment in streams (Chin et al. 2004, Ayala et al. 2005, Welsh 2008). Stream sedimentation greatly degrades aquatic habitat (Newcomb and MacDonald 1991). For example, Chin et al. (2004) found that in watersheds with ORV use streams contained higher percentages of sands and fine sediment, lower depths and lower volume – all characteristics of degraded stream quality. (Switalski & Jones; Off-road vehicle best management practices for forestlands: A review of scientific literature and guidance for managers; Journal of Conservation Planning Vol 8 (2012), pg.15.)

Adding culverts and bridges where needed will assist with maintaining and/or improving the stream quality and aquatic habitat.

Third, we recommend that the North Zone Districts consider adding bear safe food storage options (poles/boxes/required approved personal storage containers) in popular road dispersed camping locations that are within the PCA and potentially in other high conflict areas. Realizing there is a potential for an increase in human bear interactions particularly in dispersed camping areas, this would be a proactive measure to reduce potential negative interactions and increase positive interactions for both bears and humans.

Forth, we support appropriate temporary or seasonal closures of roads that may affect calving and migrating ungulates, spawning cutthroat trout, feeding grizzly bears, erosion or resource damage, and other such adaptive management situations.

In summary, the North Zone Districts should consider implementing added resource protections along existing motorized routes that include, but are not limited to things like barriers at lakes, bridges over streams, bear safe food storage options, and seasonal closures.

CONCLUSION

In summary, we recommend that the North Zone of the Shoshone National Forest makes habitat protection a priority. This is the eastern flank of the Greater Yellowstone Ecosystem. Striving to maintain the ecosystem's health and intactness is critical for subsistence of future wildlife populations. This can be done by:

1. Refraining from constructing any new summer motorized trails, roads, or routes within:
 - a. big game crucial winter range;
 - b. big game secure habitat;
 - c. big game migration corridors;
 - d. Grizzly Bear Primary Conservation Area;
 - e. high alpine meadows;
 - f. Inventoried Roadless Areas;
 - g. riparian corridors;
 - h. wetland, swamp, and fen areas; and within
 - i. one mile from the boundaries of Wilderness, High Lakes WSA, Line Creek RNA, Swamp Lake SIA, and the Grizzly Bear PCA.
2. Decommissioning existing trails, roads, or routes that fall within rare and sensitive habitat areas and meet the SNF LMP guidelines for closing or decommissioning routes.
3. Continuing to actively enforce its existing summer motorized system.
4. Implementing added resource protections along existing motorized routes.

Based on our recommendations outlined above, we believe the following proposals should be omitted from further discussion and future consideration:

- NZ-01 bisects a narrow wildlife corridor. Please review Arthur Middleton's research particularly on portion of the Clarks Fork Elk Herd that does not make the trip all the way to Lamar Valley, but is more of a resident herd. Furthermore, during the field trip it was quite evident that those representing the motorized users had no desire to use this area during the summer. But they had expressed a possible fall – winter – spring use. This is when there is also the greatest potential for conflict with wintering wildlife.
- NZ-03 no apparent reason for moving the gate to this location.
- NZ-10 the connection on the south side of 474 and 474.2C is within a riparian corridor and crosses a stream and goes between where the stream forks.
- NZ-12 goes through IRA, Gwinn Creek had been closed previously and wonder why it should be reopened. Path down to timber creek also appears very steep and contributes to habitat fragmentation.
- NZ-13 goes through crucial winter habitat for moose and elk, there is boggy areas and a high potential for resource damage.
- NZ-15 portions that follow riparian corridor, seems like a lot of loops in small area perhaps redundant, and excessive habitat fragmentation.
- NZ-27 appears very close to the rivers.

Based on our recommendations outlined above, we believe the following proposals should continue to be discussed and integrated in to the proposed action for summer motorized travel:

- NZ-19 and N-30 seasonal closures for wildlife and resource protection is a good management tool.
- NZ-05 shows two spurs parallel to each other going into the Wild and Scenic River Corridor and into the PCA. Removing them may help add habitat. This is an opportunity to examine if these spurs are used or not.
- NZ-07 and NZ-08 default to the Shoshone National Forest Land Management Plan, 2015 Revision, guidelines for closing or decommissioning motorized routes
- NZ-18 since this area is popular, surrounded by PCA, and in a fairly narrow drainage; it may be in the highest interest for the habitat and wildlife to develop the campground and discourage dispersed camping.
- NZ-20 there are three parallel roads in very close proximity, which seem very redundant. Removing one or two and perhaps improving areas of the one that is kept could be a better use of resources.
- NZ-22 shows moving the gate to BLM land, however this is a Forest Plan. Perhaps the gate could be placed at the Forest Boundary instead. The Morrison Jeep trail could then be maintained as a summer destination and open to use when the entire route is drivable

up to the Beartooth Highway. This provides extra protections for the wintering Bighorn Sheep, as well as, the Wild and Scenic River Corridor. Perhaps a possible exception would be necessary for those accessing the private property at the end of 119.1D.

- NZ-25 may be worth considering due to the resource damage, especially by those camping on the edge of Fantan Lake. At least a barrier 200 could be place to prevent driving to the lake's edge.
- NZ-28 converting existing system road into a trail may be a good option.

The Travel Management Planning Process is a splendid opportunity for the Shoshone National Forest to examine its current motorized route system and make adjustments that best support the backcountry nature and health of the Forest, as well as the needs of recreationalists.

The Greater Yellowstone Coalition appreciates the time and energy that the Shoshone National Forest staff at large have already invested into this process. We look forward to working together to create an ecological and effective Travel Management Plan in the next few years. Please feel free to contact us if you have any questions.

Respectfully,

A handwritten signature in blue ink, appearing to read "Jenny DeSarro". The signature is fluid and cursive, with the first name "Jenny" and last name "DeSarro" clearly distinguishable.

Jenny DeSarro
Wyoming Conservation Associate
Greater Yellowstone Coalition