



WYOMING GAME AND FISH DEPARTMENT

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March 1, 2023

WER 14981.00
U.S. Forest Service
Bridger-Teton National Forest
Curtis Canyon Road and Campground Project
Scoping Document
Teton County

Curtis Canyon Road and Campground Project
Bridger-Teton National Forest- Jackson Ranger District
P.O. Box 1689
Jackson WY 83001

Dear Sir/Madam,

The staff of the Wyoming Game and Fish Department (Department) has reviewed the Scoping Document for the Curtis Canyon Road and Campground Project located in multiple Sections of T41N, R115W. The Department is statutorily charged with managing and protecting all Wyoming wildlife (W.S. 23-1-103). Pursuant to our mission, we offer the following comments for your consideration.

The Bridger-Teton National Forest (BTNF) plans to conduct road and campground maintenance in the Curtis Canyon area northeast of the Town of Jackson. The BTNF reports heavy concentration of dispersed camping and off-highway vehicle use combined with a lack of road maintenance has resulted in human safety and resource concerns, human waste issues, and an overall poor visitor experience. As a result, the BTNF has identified the following purpose and need:

- Address the deteriorated condition of the roads and associated safety concerns;
- Increase camping-related infrastructure to better handle camping demand and reduce resource impact;
- Reduce vegetation loss from off-road vehicle use;
- Improve camping available near Jackson and the quality of the camping and hiking experience;
- Improve educational/interpretive opportunities afforded by destination overlooks.

The proposed action to address the identified purpose and need includes five elements. They are:

- Repair the main Curtis Canyon road, with emphasis placed on the first 2.9 miles. All work would occur within the existing road alignment and road closures would be minimized to the extent possible.
- Expand the Curtis Canyon Campground. The BTNF proposes expanding the number of available campsites from 11 to 33 and the number of vault toilets from 2 to 3. The expansion would occur within the forested area near the current campground.
- Decommission Goodwin Lake road and relocated Goodwin Lake trail and trailhead. The BTNF will close and restore to a natural condition 1 mile of dirt road and 0.7 miles of trail. A new trailhead would be placed along the main Curtis Canyon road and 1.56 miles of new trail would be constructed to connect with the Goodwin Lake trail.
- Install overlook interpretive signs. The BTNF would install two interpretative signs at the Curtis Canyon and Sheep Mountain overlooks.
- Repair spur roads and dispersed campsites. The BTNF would improve an existing spur road, place barriers to confine vehicle use around popular dispersed camping sites, and restore off-highway vehicle routes that have been illegally created near dispersed camp sites.

Terrestrial Recommendations:

The Curtis Canyon area receives use by hunters for access and for camping and has the potential for bear conflict. The Department acknowledges the closure of the Goodwin Lake road will impact current hunting access relied upon by some hunters. We support the proposed efforts to minimize and restore resource damage, which will promote use by area wildlife. The Department provides the following considerations while the BTNF proceeds with the proposed action:

- The Goodwin Lake trail is an access point used by bighorn sheep hunters. The Department recommends ensuring the parking area at the trailhead is of sufficient size and design to allow for parking of standard passenger vehicles as well as maneuvering and parking horse trailers.
- Road construction or significant restrictions on use should end by November 1 when hunter activity increases, targeting cow elk harvest in Hunt Area 80. We acknowledge this likely coincides with the primary construction season.
- Campground dates of operation should remain the same with the expansion.
- We acknowledge the proposed project area is within the Food Storage and Sanitation Area of Application and therefore subject to Occupancy and Use Order No. 04-00104, which requires proper storage and handling of food and other potential bear attractants. The Department supports the use of allowable and effective infrastructure and other appropriate actions to minimize the potential for bear conflict in the Curtis Canyon area.

Prevent Establishment of Noxious Weeds and Invasive Annual Grasses

Noxious weeds and invasive annual grasses (IAGs) can cause significant harm to the ecosystem when introduced. Ground disturbing activities can create an environment that facilitates establishment by unwanted plants. They significantly reduce the quality of wildlife habitat and their presence increases the probability of catastrophic wildfire. The potential economic impacts to the State of Wyoming are severe, and once these species become established, eradication is difficult and costly. Prevention of establishment remains the best way to keep Wyoming's habitats free of noxious weeds and IAGs.

The most significant known threat to Wyoming is from cheatgrass, medusahead, and ventenata, with cheatgrass being the primary concern in Teton County. We acknowledge the BTNF has procedures to prevent the establishment and spread of noxious weeds and IAGs. We provide the following components we consider instrumental in successfully limiting their establishment and spread:

- Prevent introduction and establishment by cleaning vehicles and equipment prior to movement to a new location in order to minimize the potential for transporting seeds.
- Develop and implement a plan to assess, treat, and monitor for noxious weeds and invasive plants at the project scale and in the adjacent landscape where they are present.
- Implement and fund long-term plans for successful restoration of disturbed sites. See <https://wyagresearch.org/imagine/> for more information.

Aquatic Recommendations:

Portions of the proposed action will occur within relatively close proximity to Sheep Creek, which is within the Nowlin Creek and Flat Creek Watersheds, both of which are Department-designated Aquatic Restoration Habitat Priority Areas. Sediment from construction activities and pollutant runoff can run into nearby waterways and negatively impact water quality and habitat for aquatic wildlife. Therefore, the Department recommends Best Management Practices be used to control erosion and prevent sediment from reaching waterways, including:

- Preserving existing vegetation wherever possible.
- Stabilizing all exposed surfaces with vegetation, mulch, and/or soil binders.
- Utilizing rolled erosion control products, temporary slope drains, fiber rolls, compost socks, and/or silt fences where appropriate.
- Cleaning, fueling, and maintaining vehicles and equipment at designated off-site areas.
- Properly containing stockpiles of materials and locating them away from waterways or areas of potential storm water concentrated flow.

Thank you for the opportunity to comment. If you have any questions or concerns please contact Ross Crandall, Habitat Protection Biologist, at (307) 367-5615.

Bridger-Teton National Forest- Jackson Ranger District
March 1, 2023
Page 4 of 4 – WER 14981.00

Sincerely,

A handwritten signature in black ink, appearing to read 'Will Schultz', with a stylized, flowing script.

Will Schultz
Habitat Protection Supervisor

WS/rc/ct

cc: U.S. Fish and Wildlife Service
Chris Wichmann, Wyoming Department of Agriculture