Wyoming Outdoor Council

February 2, 2012

Ms. Carrie Christman
Shoshone National Forest
808 Meadow Lane Ave.
Cody, WY 82414

Dear Carrie,

On behalf of the Wyoming Outdoor Council, I appreciate the opportunity to submit comments on the proposed draft forest plan. Founded in 1967, the Wyoming Outdoor Council is Wyoming's oldest, independent statewide conservation organization. We work to safeguard public lands, wildlife and environmental quality in Wyoming. The majority of our members live in Wyoming and most of them do so in large part for the many recreational opportunities our incredible public lands offer. We have participated in the Shoshone's plan revision process since the summer of 2005, when the plan revision first began. We've focused our advocacy efforts on a revised forest plan that safeguards the self-identified niche of the Shoshone as a wild, backcountry forest.

The Outdoor Council is aware that the Forest Service is tasked with managing the national forests in the system for multiple uses. Within the system, however, each forest has a niche. Since the beginning of the revision process, the Shoshone has correctly identified its niche as that of a backcountry forest.[1] With more than half its lands managed as wilderness, and some additional 30 percent backcountry, the Shoshone is unique. With encroaching development and a growing human population, there are fewer and fewer places in the world that are able to offer the kind of scenery, solitude and expansive backcountry experiences the Shoshone provides. It is these qualities we urge the Forest Service to celebrate and safeguard, not only for the benefit of wildlife and natural resources, but also to ensure local communities continue to benefit from the jobs and revenue created as a result of maintaining backcountry areas.

We have numerous questions and comments regarding the draft forest plan. For ease of reference, they are listed chronologically rather than topically.

The Shoshone's setting

Page 8: "The Shoshone National Forest is part of the Greater Yellowstone Area. The Greater Yellowstone Area is one of the last remaining large, nearly intact ecosystems in the northern temperate zone of the earth." This statement underscores the remarkable and rare

[1] Page 10: "It is a back country forest—large expanses of primitive wilderness and back country characterized the Shoshone."

resource that is the Shoshone and the Greater Yellowstone Area. Great care should be taken to ensure that this plan seeks to maintain the Shoshone's current level of "intactness." Incremental small-scale projects (e.g. new roads, new motorized trails, a new oil well, etc.) can have adverse cumulative effects over the 20+year life of a forest plan. Although the plan doesn't authorize projects, it does set a framework for allowable uses. For this reason, we ask the Forest Service to err on the side of protecting the Shoshone from fragmentation and habitat degradation whenever possible. In our opinion, the best way to accomplish this is to safeguard backcountry areas from new roads and industrial surface disturbance.

Vision

Page 11: "The undeveloped character and important values of back country areas are maintained." We wholeheartedly support this vision statement. And as noted above, consideration of settings that would allow even small incursions for new roads or motorized trails into existing backcountry, non-motorized areas should be taken very seriously, and in our opinion, prohibited altogether. There are so few backcountry areas still left in this country. That the Shoshone happens to have a high percentage of backcountry lands is something to safeguard—not whittle away—in the upcoming forest plan.

Management challenges

Page 12-13: Forest health: The term "forest health" is generally used to describe conditions many people believe are undesirable. For example, mature trees are considered "at risk" and in need of "treatment" and little value beyond board feet or biomass is given to dead or dying trees. We recognize that bark beetles, although native to western forest ecosystems, have caused and are continuing to cause widespread tree mortality on the Shoshone. We also respect the inherent management challenges this poses. The Wyoming Outdoor Council is concerned, however, that this reality not be used as a reason to open sensitive areas to logging, especially unroaded, backcountry areas. We urge the Forest Service to address the issue with an eye toward long-term restoration, habitat protection and safeguards to water quality.

The Wyoming Outdoor Council supports a management framework that respects ecosystem processes. Because a human lifetime is not long enough to observe the ebb and flow of these processes, there an understandable tendency to want to fix what is perceived to be a problem. In other words, to undertake projects whose aim is to return forests to a more familiar or appealing composition. Even though dead and dying trees, especially on such a large scale, are difficult to see, and we share the concern many in the public and our land managers have about the future wellbeing of our forests, we believe active management proposals need to be informed by the best available science, undertaken only in appropriate locations and at an appropriate scale.

For many years the Wyoming Outdoor Council has worked constructively with Shoshone staff within the public processes that accompany vegetative treatment projects on the national forest. We've not objected to these projects when there is a documented need to provide defensible space and/or thinning in wildland-urban interface areas and when the treatments do not require new roads or pose significant threats to habitat. Because there are numerous frontcountry and wildland-urban interface areas that remain priorities for treatment on the Shoshone, we urge the Forest Service to continue its focus on active management in already

roaded and previously harvested, frontcountry areas of the Shoshone. Certainly, making sure campgrounds are safe from falling dead trees and removing trees near roadsides that threaten to block access are reasonable action steps.

We ask the Forest Service in general to do more to communicate to the public that "health" is a complex concept when it comes to a forest ecosystems. The presence of dead or dying trees—even in epidemic proportions—may be the reality today, but this condition is not static; it will be a different landscape decades from now. The Forest Service's estimates of "forest health" should be based on a variety of factors, not solely on levels of tree mortality. And the benefits gained from allowing natural processes to play out without active management should be acknowledged. Some of these benefits include: habitat creation for numerous species that rely on snags (e.g. woodpeckers, owls, wrens, hawks, warblers, squirrels, bats, marten, fisher and Canada lynx.), improved soil fertility from decomposing trees left on site, recruitment of large woody debris into riparian areas (creating pools necessary for trout to thrive), and long-term tree species diversity.[2]

Page 13: Climate change: We understand the draft EIS will include more information about climate change and look forward to reviewing that draft. We appreciate the initial information on climate change in the Shoshone's report, *Analysis of the Management Situation*, as well as its citation of recent studies (e.g. Rice et al.) about the challenges a warming climate poses to water resources, species conservation and general forest management. Contrary to the opinion of some that "there's nothing we can do about climate change," there are in fact management decisions the Shoshone can make to better respond to landscape changes that result from a warming climate. The one mentioned in the AMS—and one we support—is to reduce anthropogenic stressors over the next fifteen to twenty years. The forest plan can and should set the stage for those future decisions. As noted in the AMS report,

> Human activities will likely have a large influence on how Shoshone ecosystems respond in the future, especially regarding fire (fire suppression), nitrogen cycling (increase from oil and gas development), and land use (increasing fragmentation).
>
> The interaction of Shoshone ecosystem processes with future climate change could produce unforeseeable or undesirable ecosystem changes, highlighting the need to identify potential resource vulnerabilities, and use this information to help develop adaptation strategies.[3]

The revised forest plan should craft a management framework informed by the best available science in order to aid the Forest Service in making decisions for the long-term benefit of habitat, watershed and species conservation.

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[2] Black, S.H., D. Kulakowski, B.R. Noon and D. DellaSala. 2010. *Insects and Roadless Forests: A Scientific Review of Causes, Consequences and Management Alternatives*. National Center for Conservation Science and Policy, Ashland, OR.

[3] January 2012 report, *Analysis of the Management Situation* at 98.

Page 13: Wildlife/human conflicts: We support the Forest Service in its effort to "provide for species conservation and their ability to persist on the national forest" by imposing "some restrictions that affect management actions . . . such as impacts to the timing, location, and types of human activities allowed on the Shoshone."

Water and soil

Page 16-17: In the background section, the draft plan states that 99% of the watersheds are in good to excellent condition, and that "[c]oncerns are mostly related to historic uses such as heavy grazing or roads associated with timber harvest and motorized recreation." We support the plan's goal of restoring and maintaining healthy watersheds, including wetlands, riparian areas and floodplains. This statement should also serve as a caution for any future designations that would allow new road building or new motorized trail construction, as well as a reminder that grazing can have severe adverse impacts to riparian areas if not managed properly.

Page 18: We support the guideline: "Surface occupancy should not occur for any mineral activity on soils with high erosion hazard." This is a common stipulation attached to oil and gas leases, which means it's mandatory. Therefore, we suggest it be changed to a standard in the forest plan, rather than just a guideline.

Air

Page 20: The protection of air quality related values in wilderness areas on the Shoshone is of great importance to the Wyoming Outdoor Council. We agree with the Forest Service that expansion of energy development in southwest Wyoming, among other things, could cause "air quality issues and concerns to increase" on the Shoshone. Adverse impacts have already been documented. On April 25, 2011, in response to the release of the Shoshone's 2010 report, "Wilderness Air Quality Value Plan," we sent a letter to Regional Forester Cables.[4] We expressed concern that the Forest Service's own data show shown long-term increases in the levels of nitrogen compounds being deposited in the Fitzpatrick Wilderness. As we described, deposition of ammonium and nitrate ions can cause impacts to the ecosystems of this Class I area.[5]

We ask the Forest Service to review its current thresholds for visibility, lake acidification and deposition thresholds for nitrogen and sulfur to determine whether these are still valid or whether new indicators or measures should be adopted.[6] Further, we ask the Forest Service to

[4] Greg Bevenger. 2010. Wilderness Air Quality Value Plan. Shoshone National Forest. This report is available at www.fs.usda.gov/Internet/FSE_DOCUMENTS/ stelprdb5202216.docx.

[5] As we stated in our April 25, 2011 letter, the report describes that at two of the long-term monitored lakes, Lower Saddlebag and Ross, there has been a decrease in the acid neutralizing capacity of the waters in all monitored sections of the lake—the inlet, outlet, epilimnion (upper waters), and hypolimnion (deep waters). Most of these trends are statistically significant. This is an indication the lakes are becoming acidified and that air quality related values in the Fitzpatrick Wilderness are in danger of suffering adverse impacts. AQRVs related to nitrogen compound deposition include concerns about acidification of lakes and streams, leaching of soil nutrients, injury to spruce forests, changes in species composition and abundance (terrestrial and aquatic), changes in nutrient cycling, and unnatural fertilization and eutrophication.

[6] For the Fitzpatrick Wilderness, these thresholds can be found at http://www.fs.fed.us/air/technical/class_1/wilds.php?recordID=22.

specifically adopt "critical loads" for nitrogen and reflect this in a standard or guideline. The Shoshone is already collecting lichen data to indicate the level of impact acid rain is having in the Fitzpatrick Wilderness. We also suggest that some kind of threshold be established using these data and incorporated into the revised plan's standards and guidelines for air quality.

Vegetation

Page 27: The guideline, "Livestock should be removed from the unit when monitoring of key riparian area reflects…greater than 25 percent of the representative streambank within the existing reach has been impaired," is too permissive. We agree with the comments submitted by the Wyoming Game and Fish Department that 25 percent impacted streambank is "much too high of a trigger." As WGFD explained, "If 25 percent of the representative streambank within the existing reach has been impacted, it will likely take a number of years for the streambank to heal." The WGFD recommends the Forest Service change the 25 percent trigger to 10 percent and we agree.

Page 28: We support the guideline: "Surface occupancy should not occur for any mineral activity in riparian areas or wetlands." Surface occupancy is routinely and appropriately denied in riparian and wetland areas and this is reflected in binding oil and gas lease stipulations. For this reason, we ask the Forest Service to include this as a standard in the forest plan, not just a guideline.

Threatened, endangered, proposed and candidate species

Pages 32-3: We have concerns regarding the objective: "Establish one or two sites that provide limited access opportunities for the public to view grizzly bears at army cutworm moth sites for increasing the awareness of this traditional grizzly bear food source." This dovetails with the stated goal of "creating sites to allow for safe, non-disruptive viewing opportunities," and is reflected in the standard, "At moth sites, allow limited, authorized public access that has the least potential to disturb grizzly bears and their use of moth sites consistent with the goal of public education."

We are interested in learning more about this proposal because it strikes us as a risky proposition for both people and bears. Disclosure of moth sites puts these sites at risk of tampering or destruction and increased the chances for human/bear conflicts. Would these opportunities be guided experiences with trained wildlife specialists? Until we know more, we believe there are safer alternatives (e.g. a documentary film available at visitor centers perhaps, or roadside interpretive opportunities) in order to ensure no disruption to bears during crucial feeding times and to ensure public safety.

Page 34: We strongly support the standard: "Do not allow surface occupancy for oil and gas exploration and development within the Primary Conservation Area." It would be helpful, however, to have a map that would show the 1,230,000 acres of the PCA, coupled or overlapping with other areas slated for NSO prescriptions (i.e. backcountry, non-motorized, research natural areas, etc.) and a table or chart specific to this issue.

Page 36: We appreciate the number of standards applicable to T&E species. This is appropriate as the Endangered Species Act is non-discretionary. The plan correctly states: "The

Forest Service is obligated to provide sufficient habitat to contribute to the survival and recovery of all threatened, endangered, proposed and candidate species with habitat on the Shoshone."

Sensitive Species

Page 39: We appreciate the Forest Service's commitment to work with the Wyoming Game and Fish Department to expand populations of Yellowstone cutthroat trout into unoccupied suitable stream habitat within historically occupied drainages. However, we ask that the Forest Service clarify this language by stating that its desired condition for the Yellowstone cutthroat trout's distribution includes "currently unoccupied suitable stream habitat" rather than "previously unoccupied suitable habitat" to clarify that it will be assisting with reintroductions and expansions into historic habitat rather than introductions into new habitat.

We strongly support the Forest Service's commitment to reducing the risk of disease transmission between domestic sheep/goats and bighorn sheep by ensuring that use areas do not overlap.

Page 44: We support the goals outlined in Table 25. However, many of these goals are not targeted to specific needs for all sensitive species. Many species lack any targeted goals that would describe how the Forest Service plans to bolster these populations.

Page 45: We are concerned with the standard regarding northern goshawks. Given the vulnerability of this species, its sensitivity to habitat disturbance, and escalating changes to its habitat from beetle-killed trees and climate change, we do not think proposed vegetation management activities (and their associated disturbances) should proceed when they are likely to impact the suitability of nesting habitat. Identifying alternate and replacement nest stands of comparable habitat quality, while important, does not guarantee that goshawks displaced by management activities will move to these areas, particularly since such quality habitat could already be occupied by other nesting pairs. We believe a better standard should be first to avoid proposed management activities in known goshawk nesting territories, then to identify and protect alternate stands in a given territory if management practices must proceed.

We support the standard that limits human disturbance at caves and abandoned mines where bat populations are documented. Given the serious threat that White-nose Syndrome (WNS) poses to bats and the sensitivity to disturbance of many cave-dwelling bat species, we feel it is imperative that the Forest Service adopts the very strongest protective measures. We urge the Forest Service to close caves and mines that harbor bat populations to human use if WNS is documented in Wyoming or in adjacent states.

We support the intent behind the standards that seek to protect native bighorn sheep. Ensuring domestic sheep and goat allotments do not overlap with core bighorn sheep ranges and disallowing recreational pack goat use in bighorn sheep ranges are important steps to safeguard bighorn sheep from domestic diseases. In 2009, the Wyoming Outdoor Council submitted a letter of support for this management decision at the request of Wyoming Game and Fish Department. The Forest Service's own peer reviewed research supports these standards. We suggest modifying the bighorn sheep standard to read: "Short-term projects designed to improve bighorn sheep habitat such as prescribed burning" should *only* be exempted from the listed timing restriction when it can be demonstrated that such activities will *not* have an adverse effect on

bighorn sheep lambing concentrations.

Timing buffers prohibiting management activities around active goshawk nests (between April 1 and August 31) should be larger than 0.25 miles, given the species' sensitivity to disturbance while nesting and the escalating stressors (e.g., beetle kill and climate-related changes) that are currently impacting its habitat. Furthermore, the Forest Service makes no mention of disturbance-related stipulations, such as no surface occupancy buffers around nests. NSO buffers should be included in the sensitive species' guidelines. Timing limitation stipulations and NSO buffers should be large enough to protect not only the status of the active nest during a particular year, but also the surrounding habitat, including alternate nest sites, post-fledging area, and foraging areas. Without such protection, nesting goshawks are unlikely to persist in a given area.

Page 46: We are very concerned with the guideline regarding the use of prescribed fire in sagebrush communities. Although the Forest Service states, "Prescribed fire should not be used in sagebrush communities in areas with less than 12 inches of annual precipitation," we believe that the use of prescribed fires should be avoided in *all* sagebrush communities. Research has shown that sagebrush taxa are not adapted to fire, did not burn often historically, and do not recover quickly after fires. Moreover, the forage value for sagebrush consumers is not enhanced by promoting the growth of younger plants through artificial control methods such as prescribed fire. Sage-grouse biologists and sagebrush scientists have stated unequivocally that there is no empirical evidence supporting the notion that fire has positive effects on sage-grouse over the short or long term. Furthermore, given the risk to sagebrush habitat of non-native plant species colonization post-fire, the potential adverse consequences of prescribed fires to sagebrush communities are far likely to outweigh any supposed benefits.

The guideline that "Timber cutting activities should avoid altering vegetation conditions within a 30-acre buffer of known goshawk nests," is inadequate to protect this sensitive species, particularly given the Forest Service's stated goal of providing "habitat capable of contributing to conservation and viability of sensitive species." Draft plan at 44. While such a buffer may conserve a particular nest in a given year, it will not protect the habitat that is necessary to maintain an active goshawk nesting territory. In its 2006 "Habitat Guidelines for the Northern Goshawk – Northern Region," the Forest Service states, "Average patch size of *the core nest area* varies based on available habitat conditions, i.e. 30 acres recommended by Reynolds et al. 1992 in the southwestern United States, 40 acres found by Clough (2000) in west central Montana, 74 acres found by McGrath et al. (2003) in northeastern Oregon and central Washington, and 80 acres found by Patla (1997) in Idaho," (emphasis added). Based on these findings, a 30-acre nest buffer in the Shoshone National Forest would be woefully inadequate to protect an active goshawk nest and would fail altogether to protect other critical elements of active goshawk territories, such as alternate nests, the post-fledging area, and foraging areas. Failure to protect these critical components of goshawk breeding territories will render the habitat unsuitable for nesting goshawks and undermine the Forest Service's efforts to sustain viable goshawk populations.

Page 47: With respect to aquatic species, we are concerned with the statement that effects on boreal toads, Columbia spotted frogs, and other aquatic species should be considered

"when introducing fish species into habitat where fish species did not previously exist." While we agree that effects to amphibians and other aquatic species should be considered during the course of any management activities, we do not believe that it is appropriate for the Forest Service to condone introductions of fish into new areas. There are known adverse consequences of non-native fish introductions and ongoing widespread efforts to reverse the ecological impacts of past introductions. As such, the Forest Service should not support such introductions in the Shoshone National Forest. Such introductions could reduce the viability of existing habitats, reduce the ecological function of existing organisms, and lead to a cascade of unwanted ecological consequences. This management approach runs counter to the goal of providing habitat capable of contributing to the conservation and viability of sensitive species.

Management Indicator Species

Page 50: We are concerned that the Forest Service has identified no MIS for sub-alpine or alpine communities. Is this because most of this habitat is located in existing wilderness and the Forest Service wouldn't change its management of the community? Even if this is the reason, we believe having a representative species for every major community is important, especially in light of a warming climate that is predicted to adversely affect these higher elevation communities and species that rely on them.

Page 51: The goal to "provide a mosaic of open (5 percent) to moderate (25 percent) shrub canopy cover" in areas dominated with sagebrush is problematic. Such a prescription is likely to lead to unnecessary habitat manipulations (such as cutting and prescribed fire) to sagebrush communities that are more likely to do harm than good. Furthermore, basing management prescriptions on a specific percent of sagebrush canopy cover necessitates a reliance on shrub canopy cover estimations, which can be highly variable. For example, Wambolt et al. (2006) found that percent cover in sagebrush habitats as determined by agency methods (Bureau of Land Management 1996) was up to 2.6 times greater than that from research applications. Over-estimations of canopy cover could lead to agency actions that reduce the existing canopy cover and subsequently degrade or reduce the ecological function of the habitat for sagebrush obligate species.

The Forest Service should strive to maintain healthy sagebrush habitats that support sagebrush obligate and other sage-dependent species without constraining its management activities with specific prescriptions that may or may not benefit particular species. We urge the Forest Service to strive to maintain existing sagebrush mosaics and habitat types, as long as they have not been degraded by over-grazing and other pressures. Where sagebrush habitat has been degraded, reducing or eliminating factors that have contributed to this degradation and allowing natural regeneration should be management priorities.

Page 51: We object to the standard: "Design prescribed burns in sagebrush communities to create or maintain a mosaic of patches (three to 40 acres in size) of differing age classes with interspersed grass and forb habitat." For the reasons already stated above, we do not think that prescribed burns are appropriate for sagebrush communities.

The guideline, "Management activities that affect sagebrush habitat should avoid fragmenting the habitat into monocultures of native and non-native species," will be far easier to

accomplish if prescribed fires are not conducted in sagebrush habitats. Given the proclivity for non-native species such as cheatgrass to invade native habitats post-fire, the Forest Service should avoid fragmenting sagebrush communities by inadvertently encouraging monocultures of non-native species through the use of prescribed burns in sagebrush habitats.

Species of Local Concern

Page 53: Table 34 shows the minimum desired percentage of a particular herd unit providing security (secure) habitat is lower than the existing percentage of that herd unit currently providing security habitat for every herd unit on the Shoshone. The desired condition, therefore, could have the unintended consequence of encouraging reductions in elk security habitat or, at a minimum, discourage efforts to enhance or maintain elk security habitat. The desired minimum condition regarding elk security habitat appears to conflict with the goal for species of local concern (Table 35) that states, "Secure habitat for big game is being maintained/and or *improved* in elk herd units" (emphasis added). If the desired condition is below existing conditions, there is a disincentive to work to improve security habitat in elk herd units. A clarification could remedy this apparent contradiction by stating that the Shoshone will maintain existing security habitat percentages, and will ensure that security habitat percentages do not fall below a minimum of 30 percent of each herd unit.

Page 54: We support the standard for commercial livestock grazing: "Big game requirements for forage have a priority in the management of winter range used in common by livestock and big game." Maintaining adequate forage for big game on winter range is critical to reducing livestock-elk interactions/conflicts and the transmission of diseases such as brucellosis and chronic wasting disease that are exacerbated by elk use of winter feedgrounds.

Invasive species

Page 59: The Wyoming Outdoor Council certainly supports the Forest Service's efforts to control invasive plant species. We believe it can do more, however, to prevent the spread of new infestations than simply focusing on public education programs. We suggest it make more specific mention of steps it will take or actions it will avoid with respect to new road, motorized routes and non-motorized trail building, as surface disturbing activities create the most risk of new infestations. For example, areas suitable for new motorized routes or roads should be located outside of areas that are currently intact and unroaded. And there could be standards that include mandatory monitoring of new routes and/or temporary roads for a certain number of years after the initial construction to ensure invasive plant species are not present or if they are that they are met with treatment.

Page 58: We echo the Wyoming Game and Fish Department's concern that the objective for treating 25-50 acres of cheatgrass per year is not sufficient. The WGFD recommended the Forest Service commit to treating a greater acreage in prioritized areas, especially because successful cheatgrass control requires several years of repeated treatments. We support this approach.

Fire and fuels

Page 62: Although we have no objection to any of the standards listed for fire and fuels, many of these seem more appropriate as guidelines.

Page 63: We generally support the management approach for fire and fuels, particularly the goal of restoring vegetation to naturally occurring conditions over large portions of the Shoshone by reestablishing natural fire regimes. We also support the Forest Service's efforts to coordinate with community wildfire protection plans when the creation of defensible space around existing structures is the focus.

Insects and disease

Page 65: There is debate within the scientific community about the efficacy of thinning and mechanical treatment to reduce susceptibility to insect epidemics. Therefore, the sentence, "Forested stands within management area categories 4, 5, and 8 generally have smaller patch sizes, reduced stand density, and a higher portion of stands in younger age classes, all of which reduce the susceptibility to insect epidemics," should be qualified. We ask the Forest Service to acknowledge these management approaches are far from certain—especially in cases where beetle infestation has reached epidemic proportions. Projects should not be driven by the assumption that treatment will always have a net benefit effect. Some studies have suggested that thinning, especially in currently unroaded (or relatively undisturbed backcountry areas) can do more harm than good and that in order to make an appreciable difference in "reducing susceptibility to insect epidemics" most of the trees on the forest would need to be removed.[7] This would not be a realistic or desirable management action.

As stated above, the Wyoming Outdoor Council is typically not opposed to the Forest Service's more active management of frontcountry, wild-land urban interface areas, and is certainly supportive of intensive management in recreational and administrative areas to ensure public safety. We understand some areas of the forest will be targeted for timber harvest and production, which at a small scale, are valid uses of our multiple use national forests. And we support efforts that aim to strengthen forest resiliency to insects while meeting desired conditions for harvest in these areas. However, we do not support the premise that widespread tree mortality necessitates widespread logging—whether for sawtimber or biomass—and that efforts to "control" insect epidemics warrant treatment or thinning of stands that have yet to be affected by insects.

Commercial livestock grazing

Page 67: Given the statement on page 16 of the plan that watershed conditions on the Shoshone are the most problematic where there has historically been heavy grazing, we urge the Forest Service to include a standard or guideline that seeks to protect riparian areas from future overuse and/or damage from livestock grazing.

Forest products

Page 68: The second sentence in the last paragraph on page 68 needs clarification. It reads, "As a result [of there being no major timber processor in the three-county region] the major economic impact to the region's economy from the harvest of sawtimber on the Shoshone is logging." Is this an adverse or beneficial impact? It would seem to suggest there is a loss of revenue from the absence of a nearby mill; however, the last sentence of that paragraph suggests

[7] Black, S.H., D. Kulakowski, B.R. Noon and D. DellaSala. 2010. *Insects and Roadless Forests: A Scientific Review of Causes, Consequences and Management Alternatives*. National Center for Conservation Science and Policy, Ashland, OR.

the "impact" is indeed revenue, i.e. 90 jobs and $2 million in labor earnings from the three-county region.

Page 69: "Provide a reliable supply of forest products over time that 1) is consistent with achieving desired conditions on the National Forest System lands, and 2) helps maintain or create processing capacity and infrastructure in local communities." We appreciate the qualification that supply will be consistent with overall desired conditions for forest management. There has been pressure by local governments to increase the ASQ on the Shoshone and to have a guaranteed annual supply of timber available for harvest. Because the Shoshone is a multiple use national forest and not a tree farm, it is appropriate that harvest only occur in appropriate areas and with respect for desired conditions, which consider soils, watersheds, wildlife habitat, backcountry values and recreational use.

Page 70: We will be interested in the figures the Forest Service provides within Table 54. Please clarify the exception to the standard that limits clear cuts to 40 acres stating, "Where the area that is cut does not meet the definition of created openings."

Pages 72-3: We support the following guidelines and appreciate the Forest Service's attention to the potential adverse impacts associated with timber harvest and its desire to avoid and/or mitigate these impacts.

"Timber harvest activities should be reviewed by an interdisciplinary team, including the potential environmental, biological, aesthetic, engineering and economic impacts and the activities consistent with desired conditions and objectives."

"Harvesting prescriptions should be selected based on their ability to meet desired conditions and not strictly on their ability to provide the greatest dollar return."

Page 76: We suggest the following sentence, which appears in the management approach section, be incorporated as a standard or guideline. "At a minimum, to ensure adequate restocking of openings created because of completion of final harvest, stocking surveys are conducted at the end of the first and third growing seasons following reforestation treatment."

Page 77: We are interested and generally supportive of stewardship contracts in lieu of traditional timber contracts, particularly when habitat improvement, stream restoration and road decommissioning are significant aspects of the contract.

Special uses

Page 77: Although the data are now six years old, and we would be interested in Mr. Taylor's more recent data, the annual revenue cited is noteworthy. These figures—outfitter guides ($7.8 million), 18 resorts ($6.7 million) and visitor spending ($6.7 million in labor earnings and 424 jobs)—underscore the importance that the Shoshone National Forest's recreational opportunities have on local communities' economies. The Wyoming Outdoor Council will be submitting more detailed economic data in response to the draft EIS, and anticipate these data will show that managing the Shoshone primarily for habitat and human-

powered recreational uses is more beneficial to communities than allowing increased levels of industrial or extractive uses.

Minerals

Page 80: We appreciate the qualification that, "Mineral resources provide commodities for current and future generations *commensurate with the need to protect other resources*." Although mineral extraction is a valid use of national forest lands, we believe that this use is highly undesirable on the Shoshone and that there are few places on the forest where industrial development would not conflict and indeed would adversely impact the unique and important role the forest plays within the Greater Yellowstone Ecosystem. We'd ask the Forest Service to add as a goal that new oil and gas leasing will aim to have the fewest possible conflicts with other resources, or some such statement that reflects that new leasing decisions will be informed by the desire to protect other resources.

Page 81: We ask that the Forest Service incorporate applicable NSO stipulations that appear in other areas of the plan (e.g. riparian areas, RNAs, backcountry non-motorized, etc.) as standards in this section of the plan.

Page 82: We appreciate the recognition of the MOU and strongly support its aim. "In March 2006, the Governor of Wyoming, Under Secretary of Agriculture, and the regional foresters from the Rocky Mountain and Intermountain Regions signed a Memorandum of Understanding on oil and gas leasing in inventoried roadless areas on the Shoshone and Bridger-Teton National Forests. The parties agreed that new parcels for oil and gas leases would not be offered in inventoried roadless areas until new leasing availability decisions are completed."

It is important to note that the social survey the State of Wyoming contracted with Colorado State University to conduct asked residents from the four-county region surrounding the forest whether they supported oil and gas development on the Shoshone. Fewer than 25 percent of survey participants responded affirmatively (Clement and Chang 2008).[8] As evidenced by the results of this survey as well as by the response of citizens to drilling proposals outside of Clark and Dubois in recent years, it is clear the vast majority of local residents (not to mention a national public, of whom tens of thousands weighed in regarding the Scott Well, saying they didn't want to see an oil well drilled on the nation's first and one of its most iconic forests) do not want this use to expand on the forest. Elected officials who support opening all non-wilderness lands on the Shoshone to new oil and gas leasing and development need to justify this position to their constituents.

Paleontological resources

Pages 82-3: We commend the Forest Service for including a distinct section of the revised plan that addresses paleontological resources. We support the stated goals.

Recreation

Page 84: The Shoshone's niche in the forest system is well described in the following desired condition: "The Shoshone is rugged, remote, and wild. It plays a key role in providing locals and travelers an opportunity to connect with nature and experience wildlife. The rich

[8] This is mentioned on page 94 of the Shoshone's January 2012 report, *Analysis of the Management Situation*.

western heritage provides a trail-based infrastructure into and through the backcountry and continues to instill a sense of adventure and freedom." We urge the Forest Service to celebrate and safeguard this aspect of the Shoshone to the greatest extent possible in the upcoming plan, by locating new areas suitable for motorized use in the frontcountry or in already roaded and developed areas.

It appears the data regarding visitor number and expenditures are nearly ten years old. The plan states, "In 2003, it is estimated that about 528,000 people visited the Shoshone (Taylor et al. 2008). Total spending from all visitors to the Shoshone was estimated to be $20.1 million (Taylor et al. 2008)." We assume that visitation and total spending has increased, but it would be helpful to have updated figures. We understand Mr. Taylor may be updating these prior to the release of the draft EIS.

Page 85: We ask the Forest Service to qualify the goal, "Recreation management is responsive to the needs of forest users," by adding "as long as the request does not adversely impact other management goals for an area." We also suggest the word "needs" be replaced with "desires" or "requests." The Forest Service should not only be responsive to recreational users, but also manage for the long-term sustainability of the forest. Some recreational uses may be in demand in a certain area, but the Forest Service may or may not approve of them given other resource concerns.

Page 86: We ask the Forest Service to consider adding to its guideline that motorized use might be restricted not only on cross-country ski trails, but also in certain areas frequented by backcountry skiers on Togwotee Pass.

Heritage Resources

Page 91: We request the Forest Service consider a quarter-mile NSO buffer for oil and gas from areas eligible for or listed on the National Register of Historic Places, including trails and landmarks, as a minimum level of protection and add that depending on the site, and on a case-by-case basis, a viewshed beyond a quarter mile could be required.

Wild and Scenic Rivers

Pages 93-95: We support the thirteen segments the Forest Service has identified as eligible. We'd ask the Forest Service to look closely at the comments that that the organizations American Whitewater and American Rivers will submit and the recommended additions they will request. At minimum, we'd ask the Forest Service to 1) re-evaluate eligibility of the North Fork Popo Agie and Sunlight Creek, for recreation value of regional/national significance; 2) evaluate Crandall and Grinnell Creeks for outstanding recreation value of regional/national significance; 3) add recreation as an ORV for additional segments of the Clark's Fork, and Wiggins Fork and Warm Springs Creek; and 4) include the South Fork of the Shoshone River, the Greybull River, and the Middle Popo Agie River as having a recreational ORV.

Roads and Trails

Page 97: The draft plan states, "The availability and popularity of four-wheel drive and off-highway vehicles have resulted in an increased demand for motorized opportunities on the Shoshone. They make it easier to traverse the land. The demand for this type of motorized

recreation results in the continued presence, and sometimes creation, of unauthorized routes on the ground." We support the authorized use of motorized OHV use on the Shoshone. That said, because of the documented resource damage that results from the frequency with which OHV users stray off-route and the lack of enforcement capability from the Forest Service, we are concerned with the plan's stated goals and objectives to expand this use on the Shoshone.

Pages 98-9: We appreciate the goal that unauthorized, user-created routes will be eliminated, but do not see a quantifiable objective to bolster this goal. Unlike the goal of providing "a variety of summer motorized trail loops" which has the complementary objective of creating "three new, wheeled motorized trail loop opportunities," the elimination of routes has no accompanying objective. We urge the Forest Service to add to its objectives a quantifiable number of miles or number of locations—such as three—where user-created routes will be restored. Preferably, this restoration would be a prerequisite that must be completed before the creation of any new routes.

Page 99: The objective of no more than 1,400 miles of National Forest System roads seems so permissive to render this objective meaningless. With 1,127 miles of system roads on the forest today, and the laudable trend over the past decade that more roads have been decommissioned than created, we question why this objective doesn't set a lower benchmark. Even at an objective of 1,150 miles, the Forest Service would be well within its own trend for roads. 1,127 miles of round is a fairly astounding figure, even on a forest as large as the Shoshone. And this figure is compounded when considering the additional mileage from user-created, unauthorized routes, and temporary roads.

Road construction causes habitat fragmentation, loss of secure habitat, erosion, water quality degradation from sedimentation and the introduction of invasive weeds. Even the construction of temporary roads can cause these problems. In fact, because temporary roads are not required to be constructed to the standard of permanent roads, they can cause even more damage from erosion and sedimentation in the short term. Construction of new road templates, whether permanent or temporary, opens areas to increased motorized traffic, resulting in a higher level of disturbance to wildlife. We urge the Forest Service to consider adding a stated goal or objective (if not a standard) that reflects the no-net increase in roads policy we understood the Shoshone to be following, and to decrease the objective for road mileage.

Suitability of temporary road construction within backcountry areas

Pages 116-9: We ask the Forest Service to prohibit temporary road construction in backcountry areas. Table 95 shows that temporary roads will be allowed in all four backcountry settings: 1) 1.3 Backcountry year-round non-motorized; 2) 3.3A Backcountry year round motorized; 3) 3.3B Backcountry summer non-motorized, winter motorized; and 4) 3.3.C Backcountry summer motorized, winter non-motorized. As explained above, temporary roads are frequently as damaging as permanent roads unless care is taken to adequately reclaim the templates; and in the short-term, these roads can be even more damaging than permanent roads because they are not required to be constructed to meet engineering standards that protect other resources. Particularly in areas 1.3 and 3.3B (where there is no summer motorized travel), keeping these places truly roadless is important to protect habitat and water quality and to prevent the introduction and spread of non-native plant species.

Wilderness—Management Area 1.1

Page 120: The Shoshone is home to incredible wilderness areas that make it possible for people to experience wild country, solitude, and adventure. Contrary to the opinion of a handful of local elected officials and a few vocal members of the public that new wilderness is undesirable, there is significant public support in Wyoming for select wilderness recommendations on the Shoshone.

In 2007 the State of Wyoming contracted with Colorado State University to conduct a social survey of a random sampling of residents in Fremont, Hot Springs, Park and Teton counties. Participants were asked their opinion regarding the possibility that the Forest Service would recommend roadless areas on the Shoshone as new wilderness areas. Although 40 percent of people wanted to see no new wilderness, a higher percentage—46 percent—wanted either some roadless areas to be recommended wilderness (25 percent) or all of the roadless areas on the Shoshone to be recommended wilderness (21 percent) (Clement and Cheng 2008).[9] This social survey was something the state and local government cooperators asked the Forest Service to consider and the taxpayers of Wyoming funded the study. The Forest Service should consider these results seriously when considering potential new wilderness recommendations as well as the national support for protecting our country's heritage landscapes.

The results of the social survey reflect the public's growing recognition that we are in changing times. National forests play a different role than they did even just 50 years ago. Forest Plan revision is an opportunity for the Forest Service to assess and anticipate what will be important in the coming years. Motorized users are not the only constituents that are demanding high quality and diverse recreational experiences. Even though there is a high percentage of wilderness already on the Shoshone, we urge the Forest Service to consider the importance of new recommendations to the national forest system as a whole. Nationwide, every year there are fewer and fewer areas that could even "qualify" as wilderness. And, as is often said about wild country, "They're not making any more of it."

We ask the Forest Service to consider the Franc's Peak and Wood River IRAs—as a combined, recommended wilderness area. The Forest Service's own wilderness inventory in 2008 suggested that these were among the highest-ranking IRAs on the Shoshone. The Wyoming Wilderness Association informed us that Amelia Earhart visited the Wood River area and was so fond of it she began to build a cabin there prior to her tragic, around-the-world flight. Her association with the area, as well as her famed spirit of adventure would make for a captivating designation: the Amelia Earhart Wilderness.

Anti-wilderness proponents often suggest that wilderness "locks up the land" and is bad for local economies. In fact, the opposite is true. The Forest Service should consider the letter more than 100 economists and academics, including three Nobel laureates, sent to President Obama last November urging him to "create jobs and support businesses by investing in our public lands infrastructure and establishing new protected areas such as parks, wilderness, and monuments." This letter and information about the importance of protected public lands to local

[9] The summary of this report is mentioned on page 94 of the Shoshone's January 2012 report, *Analysis of the Management Situation*. 15 percent of people asked about wilderness were "not sure."

economies can be found at http://headwaterseconomics.org/land/reports/economists-president-public-lands/. The communities that are growing and thriving in the Rocky Mountain West and in Wyoming are those with access to public land, open space, recreational opportunities and those that value the scenery and ecosystem services protected public lands provide.

And a notable survey of Wyoming residents just out this week revealed that, 97 percent of people polled agreed with the statement, "Our national parks, forests, monuments, and wildlife areas are an essential part of Wyoming's economy." This is the highest of any of the six western states surveyed. And virtually all (99 percent) say they are essential to "the quality of life" in Wyoming. This entire survey conducted by Colorado College can be found at http://www2.coloradocollege.edu/stateoftherockies/conservation_west_survey/wyomingreport.pdf.

That the Shoshone still has significant wilderness-quality backcountry areas is unique and we ask the Forest Service to celebrate this fact by recommending at least one new area. We support the recommendation of the Wood River/Franc's Peak IRAs—an area we think could comprise the recommended "Amelia Earhart Wilderness." This new wilderness area would safeguard an iconic landscape for future generations and could benefit the economies of Meeteetse and Dubois into the future. Trout Creek IRA and the Dunoir Special Management Unit (as well as the Dunoir's south, west and east additions) also should be considered for recommended wilderness.

Backcountry recreation year-round non-motorized—Management Area 1.3

Page 129: We strongly support the NSO stipulation as a standard for mineral leases within backcountry year-round non-motorized settings. We ask the Forest Service to retain this standard in any alternative it chooses.

As discussed above, we object to temporary road construction in management area 1.3. This allowance is inconsistent with the provisions of the Roadless Area Conservation Rule, which prohibits the construction or reconstruction of classified, unclassified or temporary roads, unless a specific and enumerated circumstance allows for an exception.[10] With or without the rule in place, (since it appears the language of the Roadless Area Conservation Rule informs much of the "management approach" for management area 1.3), we ask the Forest Service not to stray from the rule by allowing temporary road construction. We believe the best management of backcountry, year-round non-motorized areas, will include a prohibition on all types of road construction.

High Lakes Wilderness Study Area—Management Area 1.6A

Page 136: Consistent with the Congressional mandate that snowmobiling be allowed in the High Lakes WSA but only "in the same manner and degree as was occurring prior to the date of the enactment of this Act," we ask the Forest Service to add a standard that ensures the level of allowable snowmobile use will not exceed 1984 levels.

[10] The roadless rule was recently reinstated by the Tenth Circuit Court of Appeals, which reversed the Wyoming District Court's decision and overturned its nationwide injunction. Although a request for rehearing is pending, it is likely the rule will be reinstated.

Dunoir Special Management Unit—Management Area 1.6B

We appreciate the Forest Service clarifying the legislative language regarding restrictions on uses in the Dunoir Special Management Unit. In Table 95 it shows that bicycles and snowmobiles are not suitable uses in the Dunoir. In the past, there has been uncertainty about whether the "vehicle prohibition" included these mechanized and over-the-snow machines. We support this management approach. Moreover, we appreciate that the construction of temporary roads will not be allowed in the Dunoir.

Line Creek Plateau Research Natural Area—Management Area 2.2A

Page 139: We support NSO stipulations as standards application to this RNA.

Proposed Research Natural Areas—Management Area 2.3

We support the Forest Service's recommendation of eight proposed research natural areas and the goals, standards and guidelines the proposed plan outlines for them. We also support the management approaches outlined for the Swamp Lake Botanical Area as well as the recommendation of the two proposed geological areas: Little Popo Agie and Sawtooth Peatbed.

We ask the Forest Service to consider recommending the Little Popo Agie area as a Geologic/Botanical Area, rather than just a Geologic Area. We reference and appreciate the comments submitted by Richard and Beverly Scott that discuss the botanical value of the area and the history of its management. We also share their concerns about damage from overgrazing and request the Forest Service ensure resource protection of this area in the revised plan.

Backcountry motorized areas—Management Areas 3.3A, 3.3B and 3.3C

Pages 149-155: In addition to asking the Forest Service to prohibit temporary road construction in these backcountry areas (as we did above), we also ask the Forest Service to impose standards that would require NSO stipulations for Management Areas 3.3A and 3.3C—the settings that allow motorized recreation in the summer. We appreciate the Forest Service requiring NSO for Management Area 1.3 and 3.3A, where summer motorized recreation is not allowed. We believe that all backcountry areas should be protected from the surface disturbing effects of oil and gas development via NSO stipulations.

And as a general comment, we hope that the draft EIS released this summer will have inventoried roadless areas mapped with acreages from both the RARE II inventory and the Shoshone's 2006 update to the roadless inventory. By that time it is likely the roadless rule case will be decided and the parameters for what may occur in these areas will be clarified. We would also ask for a set of maps that illustrate the portions of each IRA the Forest Service has identified as individual management areas. These management areas were mapped, but there was no overlay of IRAs to show what areas and percentages of IRAs were slated for active management and which were to be managed for their backcountry characteristics. We requested this information and we appreciate the Forest Service sending us maps on CD, however, these maps only showed the location of the various IRAs, not the portions within each that the Forest Service has identified in this draft plan as within various management areas. We also think these maps should be widely available to the public and posted on the Shoshone's website as soon as possible.

Once we have an opportunity to look at the maps (with the roadless area overlay) on an individual IRA basis, we will have more specific feedback about our position with respect to suitability of uses per IRA.

Managed Big Game Crucial Winter Range—Management Area 5.4

Page 171: We support seasonal restrictions on motorized use of travel ways to reduce disturbance to big game populations. We are uncertain why the Forest Service chose to use the term "geophysical operations" in its standard with respect to minerals. Is this an overarching term that encompasses all mineral activity or is it more narrow?

Conclusion

The Wyoming Outdoor Council appreciates the opportunity to review the Shoshone National Forest's proposed revised forest plan. We look forward to participating in the process as it moves forward. Thank you for your consideration of our comments.

Sincerely,

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