



Comments sent via email to SM.FS.shonfcomment@usda.gov

November 18, 2021

Mark Foster
Environmental Coordinator
Shoshone National Forest
808 Meadow Lane Avenue
Cody, WY 82414

Re: Comments on the Shoshone National Forest's Environmental Assessment for Travel Management Planning

Mr. Foster,

Please accept the following general and location-specific comments on behalf of Trout Unlimited (TU) regarding the Shoshone National Forest's Environmental Assessment for Travel Management Planning (TMP). The Shoshone National Forest (SNF) is important to TU's mission of protecting native and wild trout and it provides our members, Wyoming residents, and all Americans with valuable recreation, fish and wildlife, economic, and cultural experiences and opportunities. There are also few issues as critical to the conservation of our fish and wildlife, their habitats, and maintaining our outdoor traditions as travel management on our public lands. As such, TU has participated in the SNF's Forest Planning and TMP processes, submitting comments in 2012, 2014, 2016, 2017, 2020, and participating in public meetings for many years. TU's past comments on the TMP are attached, as is a TU brochure on its work with the USFS.

Trout Unlimited is a non-profit national conservation organization that has more than 300,000 members and supporters nationwide dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Since 1959, TU's dedicated staff and volunteers have worked on initiatives and projects to protect sensitive ecological systems necessary to support robust native and wild trout populations in the United States. We recognize the high value of public lands and the role public lands play in providing habitat to coldwater fisheries, drinking water and wildlife habitat.

Our analysis of the Environmental Assessment (EA) was done with the understanding that the "principal goals of travel management planning are to:

- Reduce the development of unauthorized roads and trails and the associated impacts to water resources and aquatic ecosystems, wildlife, and user conflicts
- Identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands”¹

Yellowstone Cutthroat trout (YCT) are the native fish species of primary concern for TU in the SNF. The map in Figure 1 shows SNF Ranger Districts relative to YCT habitat and trout streams classified as top-tier by the WGFD, as well as locations of fisheries restoration projects completed by TU. Existing SNF trails and roads are shown as dark gray lines.²

Native cutthroat trout once were found widely across Wyoming watersheds, but they have been systematically extirpated from their historical range. All four cutthroat trout species native to Wyoming (Yellowstone, Colorado River, Bonneville, and Snake River cutthroat trout) are listed on the Wyoming Game and Fish Department's (WGFD) Wyoming Species of Greatest Conservation Need,³ as well as the Bureau of Land Management (BLM) Wyoming Sensitive Species List.⁴ The BLM's Wyoming Sensitive Species list notes that the Yellowstone Cutthroat Trout has been petitioned for Federal listing in the past. Understandably, the SNF EA for the TMP lists the YCT as a Special Status Species, as well as a Management Indicator Species.⁵ The average lifespan of YCT is estimated to be 6-12 years, but the oldest documented cutthroat trout in Yellowstone National Park was 16 years old.⁶ Some YCT will remain in tributaries for their entire lives, while others will spawn in tributaries but migrate to larger water to grow, feed, and mature. Cutthroat trout spawn in spring after the water temperature rises to above 41 degrees Fahrenheit, but when water temperatures exceed ~62 degrees Fahrenheit cutthroat trout begin to experience stress and lower capacity to recover from stressors. Of watersheds that can and do still support native trout across Wyoming, Montana, Colorado, Utah, New Mexico, Nevada and Idaho 73% of these watersheds are within or are composed of public lands, thus our keen interest in actively participating in Forest planning and travel management planning processes.

In Wyoming, TU has over 1,600 members and 13 state chapters who enjoy the many resources and recreational opportunities the SNF offers. Three of our chapters are based on the border of the SNF and directly benefit from the local opportunities the SNF provides. These are the Popo Agie Anglers (Lander), East Yellowstone Chapter (Cody), and Adiposse (Cody). We also partner with other organizations who share our values and love of the outdoors, such as the Dubois Anglers and Wildlife Group. TU volunteer leaders, members, and staff have contributed countless hours on this Forest over the years working on restoration projects, trail

¹ USDA-USFS. 2015. Land Management Plan 2015 Revision Shoshone National Forest. p 102-103

² These data were downloaded on Aug 4, 2020 from the USFS/SNF website:

<https://www.fs.usda.gov/main/shoshone/landmanagement/gis>

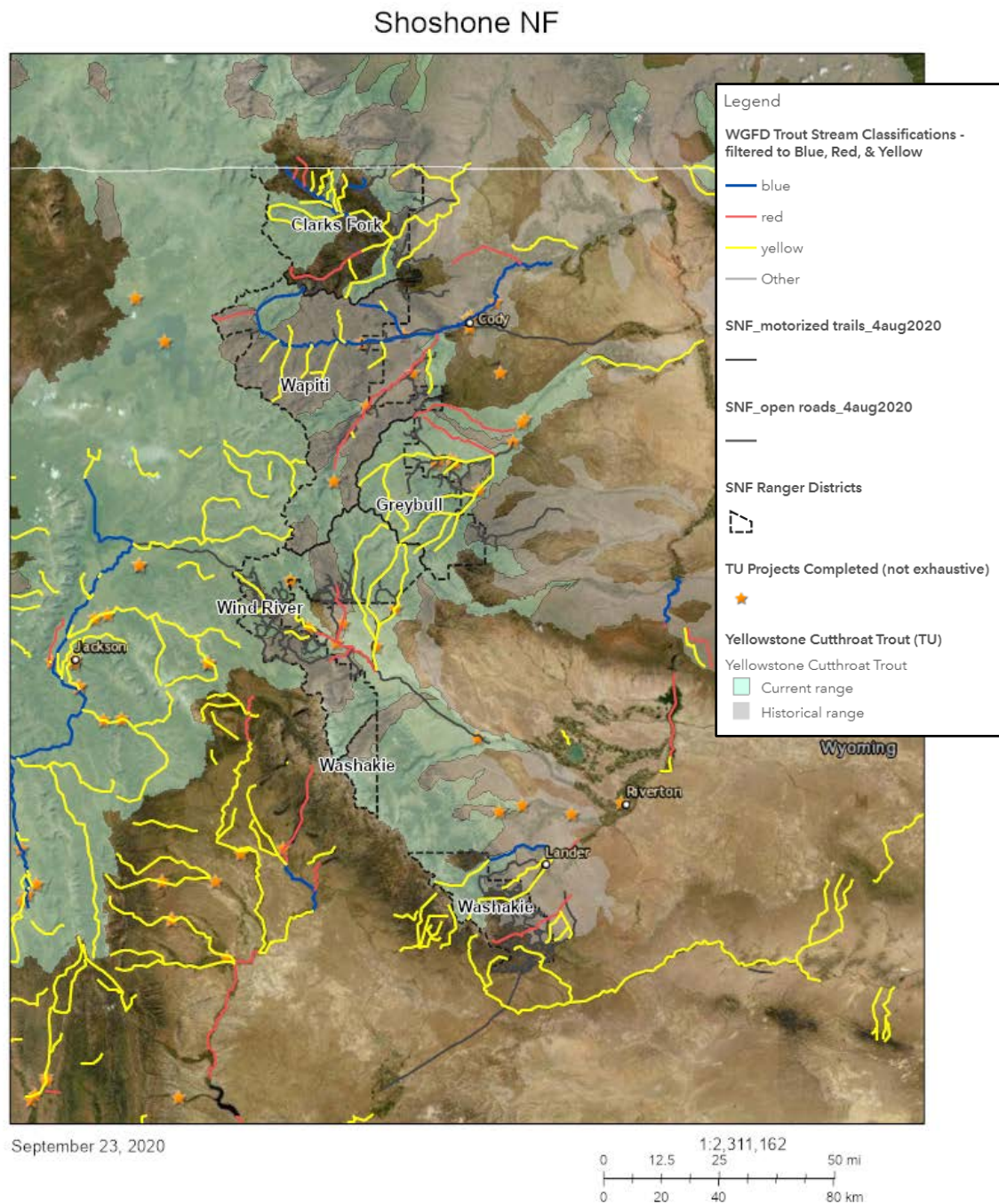
³ WGFD. 2017. <https://wgfd.wyo.gov/WGFD/media/content/PDF/Habitat/SWAP/SGCN-Introduction.pdf>

⁴ DOI-BLM. 2010. <https://www.blm.gov/policy/im-wy-2010-027>

⁵ USDA-USFS. 2020. Preliminary Environmental Assessment ... p.

⁶ DOI-National Park Service. Yellowstone Trout Facts. Yellowstone Science – Vol 25 Issue 1: Native Fish Conservation. <https://www.nps.gov/articles/ys-25-1-yellowstone-trout-facts.htm>

maintenance, and teaching youth and families the value of our watersheds and remaining native trout fisheries.



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community

Liz Rose
Wyoming Game and Fish Department, State of Wyoming | Esri, HERE, Garmin | Earthstar Geographics

GENERAL COMMENTS

1. Comments on the alternatives

- **TU does not support the preferred Alternative 4.** Alternative 4 fails to address the concerns raised during the preliminary EA comment period, and concerns raised throughout this NEPA process. Furthermore, Alternative 4 is not fiscally sustainable, nor will it reduce adverse impacts to resources, which are stated needs of this travel management project.
- **TU would support Alternative 3, with exceptions,** out of all the alternatives proposed in the 2021 EA (please see the "Alternative 3 Exceptions/Comments" section below). Alternative 3 does the best job of (1) protecting Forest resources via seasonal closures, (2) keeping route densities below 1 mi/sq mi in most non-Wilderness portions of the SNF, (3) providing for the minimum route network necessary by keeping the total route miles about the same as it is today, (4) adding dispersed campsites and recreation site access, and (5) increasing motorized recreation opportunities across the Forest (including 14 more miles of loop riding opportunity).
- **Significant backcountry safety issues will result from adding (or converting) 160+ miles of trails that will permit use by all wheeled vehicles under Alternative 4.** Even allowing for so many 64" trails under Alternative 3 means you're mixing dirt bikes, ATVs, and UTVs together, with riders of all experience levels, which presents greater risk to riders and Forest users. 50" trails that accommodate ATVs can be important for providing hunting and fishing access, but adding full-size vehicles into the mix is likely to degrade trails faster, increase user conflicts, increase safety hazards, and result in more erosion, more motorized vehicles on the Forest, and more resource damage. Furthermore, from personal experience, encountering full-sized vehicles that take up the whole trail when you're on a dirt bike or smaller OHV and having to stop or weave around them really carefully makes that trail so much less fun and much less safe (especially for riders who are not experts, like myself).
- **Under Alternative 3, we expect that after 160 miles roads currently open only to highway-legal vehicles are converted to trails open to a variety of wheeled off-road vehicles, trail funding from the State Trails Program will be used to improve those trails' condition.** SNF staff explained during 2021 public meetings that they expect route conditions to be improved significantly by converting them from Forest roads to Forest trails, since the Forest will be able to use funding from the Wyoming State Trails Program for maintenance and improvements. Because many of these existing roads have degraded significantly over the last decade or more, our members will appreciate improvements to routes that can be used to access fishing and hiking areas. By converting Forest roads to trails, many more vehicles will be allowed to use these routes however, so it's critical that the SNF and WY State Trails Program to work together as

soon as possible to improve key, and heavily-traveled routes.

- **TU supports seasonal restrictions on wheeled routes**, especially where they overlap with or are within watersheds with crucial and/or sensitive fish and wildlife habitat. Thank you for adding seasonal restrictions to so many routes in all three action alternatives.
 - As is, seasonal restrictions apply to 27% (300.8 miles) of all Forest roads on the SNF. (There are currently only 36 miles of trails open to public wheeled vehicle use, and section 2.4.1.1.1 does not explicitly state that any of those trail miles have seasonal restrictions.)
 - Under Alternative 3, 57% of wheeled routes would be reserved for seasonal use, which would help reduce adverse impacts to Forest resources, aquatic ecosystems, and the environment.
- **The route density target should be capped at 1 linear route mile per square mile of Forest.** Limiting route density can improve landscape resiliency, limit erosion, and prevent wildlife from abandoning parts of the Forest completely, particularly big game animals that are important to wildlife watchers and hunters. As is, under the 'no action' alternative, the Wind River and Washakie Ranger Districts have average route densities for all habitats combined of 0.81 and 1.1 miles per square mile, respectively (sec. 3.9.3.2.1). Under Alternatives 2 and 4, the Wind River Ranger District route density would increase to 1.1 and 1.2 miles per square mile (respectively; section 3.9.3.3.1), which we strongly oppose.
- **Public engagement in 2020 and in 2021 was unsatisfactory.** In both 2020 and 2021 all three public meetings (for each year) were held back-to-back during the same week, all during hunting season when many Wyoming citizens are off the grid, and no other public meetings were scheduled. In 2021, members of the public were not all able to speak during virtual meetings due to technical issues and SNF's meeting settings. During some of those meetings (the third meeting of 2021 for example) the chat function on the Microsoft Teams meeting was turned off so members of the public who were unable to speak up, also could not chat questions to SNF staff. In other meetings, questions in the chat were ignored by SNF staff during the public discussions/Q&A. The more highly-attended meetings were also concluded before all attendees could ask all of their questions. While the SNF provided attendees with two SNF staff members' email addresses and contact information and encouraged people to follow up with them on additional questions, that does not satisfy the need to have *public* discussions in which members of the public learn from one another and learn through others' questions.
- **The alternatives are not presented to members of the public in a way that facilitates understanding and analysis, and there are still inconsistencies in the data.** There are differences between different tables in the EA, between appendix B and the GIS data, and between different sections of the EA that make it difficult to determine what the

correct values are. For example, Table 9 values differ from those in Tables 38-47. Regarding Alternative 2, Table 16's total for <50" wide trails is 7.18 miles, while in Table 19 the total for <50" wide trails says 17.9 miles. When the Forest issued a correction to Appendix B (the Appendix B Addendum), it was unclear whether the KMZ files were also updated, or if the KMZ files provided by the SNF had (and/or still have) errors in them.

In 2020 TU and many other people asked the SNF to make the data more accessible to the public. The KMZ/GIS layers provided in 2021 were organized very nicely (even better than in 2020, which is a very much appreciated improvement!), however these data are still too difficult for members of the public to analyze and overlay on other spatial data they care about, unless they happen to use GIS in their daily lives. Other National Forests have found ways to provide interactive, accessible map data to the public via ArcGIS apps, and the SNF should endeavor to do the same. For example, **the Grand Mesa, Uncompahgre, and Gunnison National Forests provided the story maps linked below to help the public understand their Forest Plan alternatives:**

<https://usfs.maps.arcgis.com/apps/PublicGallery/index.html?appid=350dd64b1c1c46fbaa1fb89909363463>

- **Over-snow vehicle (OSV) travel should be permitted when snow depth is 12" or greater** in order to protect wetland vegetation, riparian vegetation, prevent streambank collapse, and reduce the risk of increased erosion and sedimentation in watersheds that support wild and native trout.
- **An OSV season closure date of June 15th is surprisingly late.** If the SNF does not wish to set a measurable, science-based trigger for closures to OSV when snowpack is low, setting an earlier OSV closure date in the spring would help prevent damage to plants that stabilize watersheds, riparian vegetation, and stream banks.

2. The SNF should conduct and EIS for the TMP

- **Precedent-setting process designed by the SNF should be analyzed in an EIS.** Mr. Foster, during our phone call on October 25, 2021, mentioned that this is a 'new way' of managing the travel management process. If this approach of proposing un-surveyed routes then implementing the Forest-selected alternative via a combination of Categorical Exclusions and future, local, meetings or working groups facilitated by district rangers is indeed a new way of conducting the Travel Management Process, then this precedent-setting action needs to be analyzed more thoroughly and clarified in an EIS.
- **We encourage the Forest to conduct an Environmental Impact Study (EIS)** because the changes in route use patterns and intensity, and the changes in maintenance requirements that would result from the provided alternatives are significant, yet are not sufficiently analyzed or discussed in this EA. By converting so many roads to trails and changing width-restrictions we certainly expect to see increased user conflict;

increased visitation (and thus impacts) to areas that were previously only accessible to a limited subset of motor vehicles; and significant changes in maintenance requirements and responsibilities. The public's ability to analyze or anticipate the outcomes from these major changes is very limited because based on the EA alone there is an incredible amount of uncertainty as to what route-specific issues already exist; how the plan would be implemented; how the State Trails Program would contribute to SNF objectives; and how this "plan" would impact our natural resources. Site-specific analysis and clear implementation plans are needed in light of this major action and the significant changes being proposed by the SNF.

- You (Mr. Foster) have stated on multiple occasions that SNF staff have 'had a hard time identifying impacts' yet you've also stated that technical staff haven't actually surveyed proposed new routes yet. If expert staff have not yet looked for anticipated impacts, it does seem unlikely that they would find them. Signing off on a plan that proposes new routes for which site-specific analysis and surveying have not yet been done is irresponsible. Doing adequate due diligence by ground-truthing proposed route development or changes would surely eliminate some of the proposed routes, and inform many of the other route decisions. An EIS with route-specific discussion of conflict concerns, resource issues, and proposed mitigation strategies is needed if the SNF wishes to provide the level of detail needed for the public to meaningfully participate in this NEPA process.

In our view, the EA lacks a satisfactory:

- Range of alternatives (since Alternative 4 is so similar to alternative 2, and all three action alternatives do very similar things)
- Discussion of known, route-specific issues on Forest roads and trails. Without a discussion of current conditions by the SNF specific to the routes in question, the public lacks the information necessary to provide informed feedback on the proposal, and thereby lacks meaningful opportunity to participate in this NEPA process.
- Discussion of user conflict and plans for minimizing and mitigating user conflict in each ranger district.
- Discussion of how much funding the Forest expects or needs from the State Trails Program to meet the Forest's maintenance responsibility and/or construct new routes.
- Plan for enhanced public education and public outreach to try to maximize voluntary compliance and thus minimize resource damage. Who with the Forest Service has the capacity to do this? How can organizations partner with you? Has this worked well in any other similar Forests?

- Explanation of the Forest's plans for implementing their record of decision, and standards for making decisions derived from this TMP in the future.
- Plan for increased enforcement capacity to patrol the increased route mileage and prevent further illegal route development and resource damage.
- Detailed plan for reducing 'the development of unauthorized roads and trails and the associated impacts' (Forest Plan principal goal for TMP)
- Strategy for monitoring impacts that will result from implementation of the TMP and for monitoring the effectiveness (or shortcomings) of mitigation actions chosen from the options listed in Appendix C for each route
- Analysis of erosion and sedimentation that will occur when poorly maintained roads currently open only to highway-legal vehicles are converted to trails and opened to all motor vehicles immediately, thereby increasing visitation and usage while the Forest tries to catch up on its \$25+ million maintenance backlog.

3. Comments on implementation of a decision

- **We ask that Forest include clear, specific plans for and discussion of implementation of this plan, even if that is in the final Record of Decision or Finding of No Significant Impact (FONSI).** So that the public understands what the outcomes of this travel management process will be, please include the following in the implementation discussion:
 - Plans for adding effective signage. How you know what kind of signage is considered most effective.
 - Strategies for effectively communicating changes and closure orders
 - Strategies for improving public education and outreach (more on this below)
 - Potential for increased law enforcement (if there is the potential for expanding law enforcement capacity on the SNF)
 - Defined, science-based triggers for future closures of motorized routes and OSV areas to prevent damage to forest resources and harm to fish and wildlife
 - Specific opportunities and/or requests for additional input, funding, or help from other groups, since you (Mr. Foster) have said repeatedly the Forest intends to partner with outside groups to improve Forest conditions and address existing and future issues
 - How the public can be involved in future collaboratives, working groups, or public meetings regarding future travel management decisions or actions on the SNF. How can they expect to find out about future meetings? How can they get involved?
 - Will expenses associated with participation be compensated for any participants?

- Will professional facilitators be hired to facilitate these meetings and processes?
- **There is a need for the SNF to strategically expand its communication efforts and increase public outreach.** With an increasing number of out-of-state visitors flocking to Wyoming to enjoy outdoor recreational opportunities on public land,^{7, 8} it is imperative that the SNF cultivates a culture of stewardship among local and visiting public land users and that land managers make it *easy* for public land users to do the right thing, thereby preventing significant resource damage. Make signs clear, make maps clear, make expectations clear, and have enough law enforcement capacity to ensure that the Forest and SNF's routes are not degraded.

4. Other general aquatic habitat concerns

- **Proper culverts and fish passage are important considerations in any route building or route improvement work.** Where roads and trails cross streams that host native and wild trout, particularly streams that are used for spawning, we ask that you commit to constructing fish and aquatic species passage structures to ensure aquatic systems' and fish populations' long-term health.

Trout Unlimited works year-round on fish passage, water diversion efficiency, watershed restoration, culvert replacement, and design projects, and coordinates volunteers for help with on-the-ground project work. TU staff in Wyoming has worked closely with the SNF and its neighboring Forests on aquatic restoration and improvement projects and would appreciate the opportunity to continue to partner with the SNF. Please see the attached "TU USFS Project Brochure 2019" for examples of projects we've worked on with other Forests as well as projects we've worked on with the SNF.

For future aquatic restoration projects, please contact Cory Toye, Wyoming Water and Habitat Director for the Western Water and Habitat Program of Trout Unlimited, at Cory.Toye@TU.org or (307) 856-4993.

- **Dispersed camping can significantly impact aquatic habitat.** To prevent damage to wetlands, riparian areas, and other sensitive habitat, we ask that language be added to the Dispersed Camping section of the Motor Use Vehicle Maps to ensure that camping limitations are made abundantly clear to Forest land users. With an increasing number of out-of-state visitors flocking to Wyoming to enjoy outdoor recreational opportunities on public land,^{9,10} it is imperative that land managers make it easy for public land users to do the right thing, thus preventing resource damage.

⁷ <https://buckrail.com/crowds-flock-to-wyo-public-lands-during-covid-summer/>

⁸ <https://www.parkrecord.com/news/writers-on-the-range-covid-19-and-recreation-too-many-people/>

⁹ <https://buckrail.com/crowds-flock-to-wyo-public-lands-during-covid-summer/>

¹⁰ <https://www.parkrecord.com/news/writers-on-the-range-covid-19-and-recreation-too-many-people/>

The motor vehicle use maps (MVUM) in effect at this time note in the Dispersed Camping section on Side 2 of the maps that: "Motor vehicle use off designated roads for the purpose of dispersed camping is permitted for up to 300 feet from the centerline of the road, allowing the same vehicles the road allows and the same season as the road is open and resource damage does not occur. This applies to all roads on this map with the exception of those listed below."

Additional language is needed to clarify that:

- "Campsites should be at least 200 feet from trails, lakes, or wet meadows, and 100 feet from streams or creeks."¹¹
- "In sensitive areas dispersed camping/game retrieval may either be prohibited along USFS roads or trails, or limited to only one side of a road or trail (see map legend)."
- "Additional restrictions may apply." This is in order to account for specific restrictions or permissions in various Management Areas, defined in the SNF Forest Plan.

5. Enforcement and voluntary compliance

- **Enforcement and voluntary compliance both need to increase to protect Forest resources.** Under all of the action alternatives presented, new routes and newly-reclassified routes will entice riders of all skill levels, on varying types of wheeled vehicles to visit the SNF for the first time and/or to explore routes they've never been on before. During public zoom meetings in 2020 and 2021 SNF personnel stated that "(the SNF does) not foresee any additional Law Enforcement Officers being assigned to the SNF" (August 11, 2020).

Under the status quo (Alternative 1) there are areas like the Shoshone Lake area where off-road travel on unauthorized, illegal 'routes' is a documented and ongoing problem (see TU comments from revised scoping, 2017). Increasing route mileage without increasing enforcement, monitoring, mitigation efforts, or public outreach will result in increased resource damage and user conflict.

The Bighorn National Forest has experienced serious problems with dispersed camping and user conflicts as a result of its catering to ORV users and long-term campers. In response to these widespread issues, the Big Horn Mountain Coalition formed to begin to address the issues of resource damage, user conflict, and the need for increased enforcement. The Big Horn Mountain Coalition sent out surveys, held public meetings, and documented their findings. Even the Governor's office was briefed on the issues. According to their 2016 report, "Workshop participants described many instances of underage children operating ATVs, ATVs operating off designated trails, and mud-

¹¹ SNF Forest Plan, under Guidelines for recreation; dispersed recreation, citing REC-GUIDE-02

bogging ATVs causing damage. Increased enforcement was recommended to address these issues. Survey respondents expressed similar concerns regarding ATV use and increased enforcement.”¹² **It would be wise for the SNF to *prevent* this kind of overuse, rather than have to spend valuable time and resources responding to overuse and Forest resource damage in the future.**

We asked in 2020, and we ask again that the SNF provide the public with a plan and timeline for conducting public outreach pertaining to TMP implementation and user education in the future, and it should be modeled after initiatives in similar settings that have documented success. It is very important that local and regional stakeholder groups develop messaging and culture that will encourage not just voluntary compliance amongst their members but also stewardship of our shared land and resources, and it's important for that work to begin as soon as possible, ideally right now.

6. Fiscal Sustainability

- **The motorized route network needs to be fiscally sustainable.** Adding to the \$25+ million maintenance backlog by creating 40+ new routes under the SNF's preferred Alternative 4, while facilitating significant increases in motorized route use is not fiscally responsible. EA section 3.2.3.1.1 explains that the SNF's operational funding continues to decline. Supplemental funding (from the Great American Outdoors Act, grants, or other funding applied for by the Forest) is helpful to the SNF, but it's not guaranteed even year-over-year therefore it should not be used to justify expanding a route network that will be a part of the landscape, and a financial liability, for generations to come.

It's important to all Forest users and to local communities that the Forest ensure 'a safe and efficient travel system'¹³ using the financial and personnel resources allocated to the SNF. TU members travel Forest Service routes in SUVs, trucks, OHVs, on bikes, and by foot, and their safety is of utmost importance. The EA section 3.2.3.1 paints a dire picture of the Forest's financial circumstances and maintenance backlog, demonstrating that creating new routes and adding to the total Forest wheeled mileage should not be the top priority at this time.

USFS budgets have declined over the past decade and this trend is expected to continue according to the EA, while the Wyoming state budget proposed by Governor Gordon is considered to be very 'lean,' with state agency budgets remaining flat "compared to the previous budget."¹⁴ For these reasons TU does not believe that allowing for a net gain in

¹² <http://www.bighornmountains.org/wp-content/uploads/2016/02/BHMC-Dispersed-Camping-FINAL.pdf>

¹³ Preliminary Environmental Assessment for the Shoshone National Forest Travel Management Plan, p 12.

¹⁴ Hall, J. 2021. Gordon unveils proposed \$2.3 billion budget. *Laramie Boomerang*.
https://www.wyomingnews.com/laramieboomerang/news/gordon-unveils-proposed-2-3-billion-budget/article_4aa9b826-42eb-564c-bda3-a481eb3f93a7.html

motorized routes while relying on the State Trails Program for an unspecified level of financial support is unreasonable and unsustainable. The State Trails Program's reliance on opportunities "to apply for grants to address maintenance and other issues" means that maintenance and project work will not necessarily be consistently feasible. The uncertainty in funding availability for route building, rehabilitation, and maintenance is a problem, and the focus at this time should be on identifying and committing to the minimum road system needed for safe and efficient travel, and the minimum road system that can be responsibly administered and effectively utilized in a way that protects National Forest System lands and resources.

Having a fiscally sustainable motorized route system is very important to TU so that routes can receive the maintenance necessary to facilitate safe travel, and so that other work on the Forest, like habitat improvement projects, can continue. Estimates for trail building can range from \$15,000 per mile to \$80,000 per mile, and even just *rebuilding* damaged trails in Wyoming can cost nearly \$37,000.¹⁵ While the SNF's maintenance costs appear to be lower for many of its routes (according to the EA), the total financial impact is significant when there's an expectation and obligation to maintain over 900 miles of wheeled routes, and when the numbers of visitors is increasing.

Maintaining existing routes and reducing the development of unauthorized roads and trails and the associated impacts to water resources and aquatic ecosystems, wildlife, and user conflicts is most important to TU, and is a principal goal of the SNF as stated in the 2015 Forest Plan. These should be the top-priority concerns considered in the Alternatives analysis.

¹⁵ Thuermer, A. 2018. Going for a hike? It may soon cost you. *WyoFile*. <https://www.wyofile.com/going-for-a-hike-it-may-soon-cost-you/>

ALTERNATIVE 3 EXCEPTIONS

If the Forest Supervisor elects not to engage in an EIS, we support Alternative 3, with exceptions (consistent with our comments on the 2020 preliminary EA):

- Wapiti Ranger District NZ 42 and NZ 45a
 - The management of this under Alternatives 2 and 4 would be preferable to TU, as Alternatives 2 and 4 make NZ 42 near Corral Creek seasonal, which is preferable, and they do not add a new trail (NZ 45a) across Corral Creek (in contrast to Alternative 3 which proposes a new trail, NZ 45a). NZ 45a should not be built, as it's important to protect that tributary to the Shoshone River and big game crucial range.
- Greybull Ranger District NZ 12
 - TU supports Alternative 1 for NZ 12 due to concerns for riparian condition and potential impacts from increased use that would result from increased route length. NZ 12 is in a Yellowstone cutthroat trout watershed and TU has done restoration work nearby downstream on Wood River.
- Greybull Ranger District NZ 15 and NZ 15a
 - TU supports Alternative 1 for NZ 15, as the proposals under Alternatives 2, 3, and 4 would add NZ 15 which looks unnecessary, and the NZ-15a route proposed under Alternative 4 is through a Yellowstone cutthroat trout watershed
- Wind River Ranger District Proposal WR 25
 - TU supports Alternative 4 for WR 25 because it makes this route seasonal, which is preferable to reduce risk of erosion and sedimentation into Horse Creek, a red-ribbon trout stream.
- Wind River Ranger District Proposal WR 87
 - This is in the mapped Wind River Wetlands (mapped by WGFD) and current cutthroat trout habitat, therefore TU supports the decommissioning of WR 87 under Alternatives 2 and 4.
- Wind River Ranger District Proposal WR 16
 - TU supports decommissioning this route under Alternatives 2 and 4, as the existing road seems redundant.
- Wind River Ranger District Proposals WR 55
 - TU would support the decommissioning of WR 55 under Alternatives 2 and 4 since that route currently extends into an inventoried roadless area.
- Washakie Ranger District Proposal WK 40
 - TU would support making this trail open to all wheeled vehicles under Alternatives 2 and 4. This area provides access to many types of outdoor recreation opportunities (including fishing) so facilitating access for people who don't have ATVs, side-by-sides, or dirt bikes is preferable, especially on the road between Freak Mountains and Limestone Mountains. Most importantly, please improve and maintain this road to a higher standard, per TU members' request, to ensure safe travel for the public.

LOCATION-SPECIFIC COMMENTS FROM 2020 PRELIMINARY EA

Ranger districts listed from north to south

A more in-depth discussion of each area can be found in attached 2016 TU comment letter.

Clarks Fork Ranger District

- Line Creek/Littlerock Creek Proposals NZ 01, NZ 30

- The seasonal closure of NZ30 is very important, as it overlaps with current cutthroat trout watersheds as well as elk crucial range. For that reason, TU supports the seasonal closure proposed in both Alternatives 2 and 3.
- If a new trail (NZ 01) is built to connect NZ 30 (Littlerock Creek area) to the loop in the Line Creek area, as proposed in Alternative 2, we recommend the SNF constructs a bridge crossing Bennett Creek similar to the one currently on Littlerock Creek. This will help remediate some of the secondary erosion issues that are possible from the crossing of Bennett Creek without a bridge.

- Upper Sunlight Proposal NZ 23

- The seasonal restrictions (NFSR open July16-Sept 30) proposed in Alternative 3 are acceptable to TU.
- TU also supports the decommissioning of the upper portion of NFSR 108, as proposed in Alternative 3, and the conversion of the end of the remaining road to admin only.
- The streams in this area (Galena Creek, Copper Creek, Sulphur Creek, and Gas Creek) are important for providing clean water to the downstream Red Ribbon Sunlight Creek trout stream.
- We recommend management prescriptions for this area to remediate the riparian conditions.
- This an area where increased enforcement efforts and close working contact with local OHV groups would be beneficial to discourage illegal trail development.

- Morrison Jeep Trail Proposal NZ 03

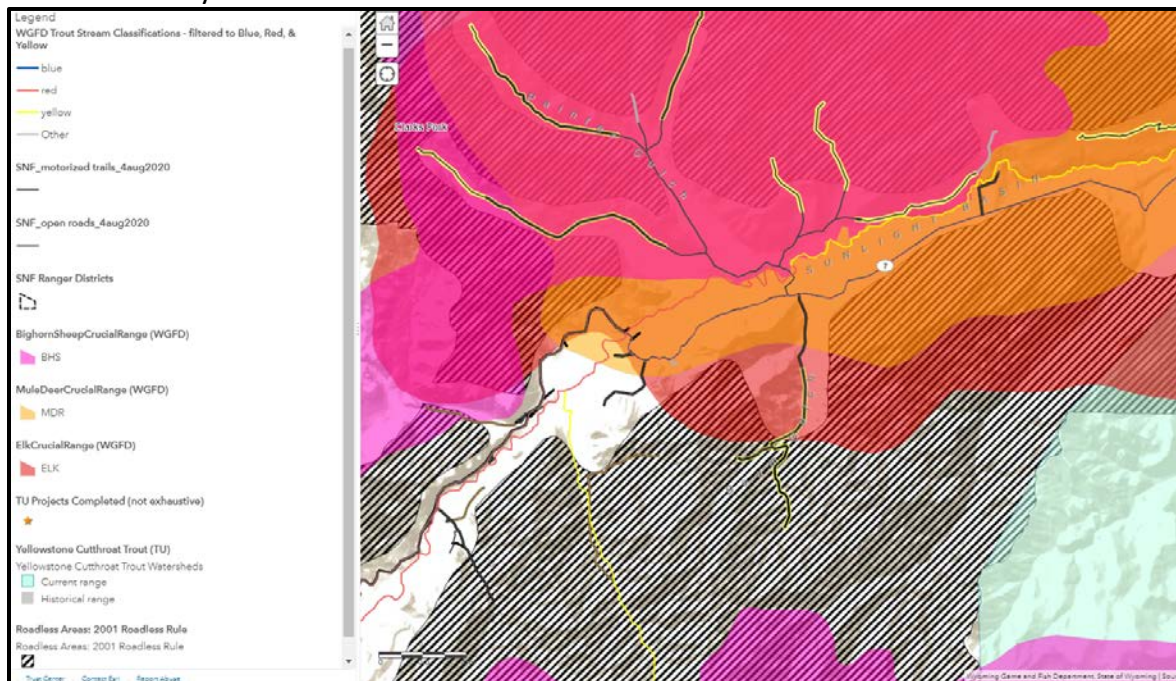
- TU members report that they used to be able to travel this road via Jeep or 4x4 truck, but due to increased use by ATVs and side-by-sides in the past ten years or so, this road is no longer usable by full-sized vehicles like it was not so long ago. Encouraging more year-round OHV travel should not be done unless the Forest commits to improving then maintaining this road.
- The Morrison Jeep trail coincides with crucial mule deer, elk, and bighorn sheep crucial range (mapped by WGFD) and it's next to the Wild and Scenic Clarks Fork River, thus increased use in this corridor could pose a threat to fish and wildlife.
- TU recommends the SNF provide prescriptive management actions to address long-term impacts to this section of the Wild and Scenic River.
- There is not any information detail about this proposal in the EA and the maps suggest that Alternatives 1, 2, and 3 are the exact same for this route and for

these changes. This is very confusing, hence disagreement among the public about what this proposed change will actually do. The public is unable to determine if significant impacts will occur from these proposals if there is no information on what the proposed changes would do.

- Due to lack of information, we can not definitively support any action alternative, thus we support Alternative 1

- **Beem Gulch/Dry Fork Pat O'Hara Proposals NZ 19 and NZ 41**

- TU supports the seasonal road closures proposed in Alternative 3.
- Parts of both Beem Gulch spur roads and the end of USFR 102.10 cross into non-motorized areas, which is not ideal. In TU's 2016 comment we proposed that the roads be closed to motorized use at the Sulphur Creek Inventoried Roadless Area (IRA) boundary and the Pat O'Hara IRA boundary. We are disappointed this is not an option under either action alternative.
- We recommend increased monitoring of the impacts these roads have on Sunlight Creek downstream. Downstream of the confluence of Beam Gulch and Sunlight Creek, Sunlight Creek is downgraded from a Red Ribbon trout fishery upstream, to a Yellow Ribbon trout fishery. You can see in the map below that Sunlight Creek is red above the confluence with Beem Gulch, and it maintains its yellow classification until it flows into the Clarks Fork River.



Wapiti Ranger District

- **Elk Fork & Sweetwater Proposal NZ 07**

- There is not enough information to determine support for an alternative. In fact, there is contradicting information regarding Alternative 2.

- The GIS data provided with the EA contradicts the prepared maps provided with the EA. The maps show that under Alternative 2 NZ07 would be a seasonal road going north from Highway 14. The GIS file says Alt 2 proposes a NSFR open to 64" highway legal vehicles when I select that section on my GIS map.
- Sweetwater Creek provides excellent spawning gravel and is a good incubation area for trout. Both the Sweetwater Creek and the North Fork of the Shoshone River are very popular fisheries with the public. The North Fork of the Shoshone River is a Blue Ribbon fishery and fishing is valuable to residents and nonresidents alike. This stretch of the Shoshone River has been identified as a critical stream corridor by WGFD. Much of that is due to the high level of siltation and erosion issues, experienced by the drainages off Clearwater, Sweetwater and Horse Creek
- The road should be fixed and proposals for creating a long-term crossing and long-term mitigation measures should be included in the SNF management prescriptions. The SNF should consider this watershed a high priority for trying to resolve the significant, existing issues.
- If Alternative 2 were to provide seasonal access for highway legal vehicles up to the point where it's decommissioned, and if there were a plan in place to improve this road and this river system in the long term, that would be preferable to us.

Greybull Ranger District

- Gwinn Fork Proposal NZ 12

- TU worked hard to prevent increased motorized use into the Wood River and Franc's Peak IRAs during the SNF plan revision process. We were pleased and appreciative that our objections were listened to and resolved appropriately, leaving motorized access out of these two valuable IRAs.
- We are concerned with the proposal to open up the currently closed section of road in an area that has riparian condition issues as is, therefore TU supports Alternative 1 for NZ 12

- Dick Creek Proposal NZ 28

- Seasonal access on Blackjack-Dick Creek NZ 28 under Alternative 1 is supported by TU as it provides a valuable loop alternative and dispersed recreation.

- Corral Creek Proposal NZ 42

- TU supports Alternative 2, converting the existing road to a seasonal road, but not creating new trail across Corral Creek as proposed under Alternative 3.
- This route is within elk and mule deer crucial range and is in between bighorn sheep crucial range so the less disturbance in their crucial habitat, the better.
- Corral Creek drains into the South Fork of the Shoshone River which is a Red Ribbon trout stream. The new trail proposed under Alternative 3 would cross Corral Creek less than 3 miles upstream from the Shoshone River. If Alternative 3

were selected for this route, TU requests that a stream crossing be carefully and thoughtfully constructed to limit sedimentation and damage to this drainage.

- **Twin Lakes/Grass Creek Proposal NZ 15**
 - TU supports Alternative 1 for NZ 15, as the proposals under Alternatives 2 and 3 add unneeded additional route mileage.
 - Converting the closed road to an open road under both Alternatives 2 and 3 seems unnecessary because there is already a road open to all vehicles right next to it. It would create a very tiny loop.

Wind River Ranger District

- **Bear Basin/East Fork Proposals WR 26 and WR 71**
 - This area is in a current Yellowstone Cutthroat trout watershed.
 - TU supports Alternative 3 proposals for WR 26 and 71.
 - Bear Creek contains conservation populations of YCT and is identified by TU as a potential Area of Concern for fisheries, riparian conditions and watershed impacts due to erosion. East Fork and Castle Rock Creek also contain conservation populations of YCT in addition to other trout species (WGFD 2011). Strong connectivity is provided in this drainage and should not be hampered. Bear Basin is also recognized for its prime elk hunting opportunities. Resource damage is most likely to occur based on timing of snowfall and big game hunting seasons.
 - If Alternative 2 were selected instead Alternative 3 and an increase in use by ≤ 64 " vehicles required increased maintenance and enforcement, we hope the Forest is prepared to adequately provide for this proposed change in this sensitive watershed. Water diversions and fish-sensitive stream culverts should be constructed to keep the route in better shape and to keep vehicles out of the streambed. In that case we encourage partnerships among ORV users, the SNF, WGFD, and conservation organizations to develop a strong conservation and restoration plan for this section of Bear Creek in order to repair and minimize further damage.
- **Bear Basin/East Fork Proposals WR 67, WR 68, and WR 86**
 - This area is in a current Yellowstone Cutthroat trout watershed, so if seasonal restrictions prevent increased sedimentation into streams, that would be positive for fisheries.
 - There is no difference in the Alternatives proposed for WR 67 and 68 that I can tell from the EA and provided maps. As such, we support the seasonal closures under all of the alternatives.
 - It is confusing that WR 86 is only shown on Alternative 2. If this is an illegal route that is not officially open or closed currently, its fate should be determined

during this process. TU supports closure of WR 86 under Alternative 2.

- **Bear Basin/East Fork Proposals WR 69 and 70**
 - This area is in a current Yellowstone Cutthroat trout watershed, so if seasonal restrictions prevent increased sedimentation into streams, that would be positive for fisheries.
 - This area is also very near to elk crucial range, so we appreciate the seasonal restrictions from Dec. 17 to May 14.
 - Much of the area is spring fed with wet meadows and rolling mountains. Heavy illegal off- road use is evident, especially during the fall hunting season.
 - The SNF should address enforcement and monitoring actions in this area.
- **Brent and Burroughs Creeks Proposal WR 25**
 - In this case, Alt 2 would be preferable as it would make this a seasonal road. Under Alt 3 this road would be open year-round which is unacceptable because seasonal closure is needed to prevent further meadow and road deterioration.
 - Horse Creek is a Red Ribbon Stream containing populations of YCT, rainbow trout, brown trout, and brook trout. We recognize this area's value for recreation of all kinds, so we recommend the Forest implement an informative sign kiosk or several smaller signs along road and stream crossings to provide the public with information on the importance and sensitive nature of these streams, riparian areas, and big game habitat.
- **Long Creek Proposals WR 27, WR 43, WR 86, and westernmost WR 29**
 - The West Fork Long Creek, Middle Fork Long Creek and Long Creek contain conservation populations of YCT. These streams are important spawning areas for YCT, providing clean and clear water from their headwater sources. OHV road impacts and sediment runoff can damage these spawning areas, threatening trout population stability. Maintaining these streams as conservation population areas remains a priority and considerable restoration work is needed on some of these streams due to the increased hybridization of YCT with other trout species.
 - TU supports the closure and conversion to admin only of the WR 43 and 86 routes under Alternative 2.
 - Adding connector segments (WR 27 and westernmost WR 29) to create a large, continuous loop in this area for motorized vehicles ≤50" may help discourage illegal route development elsewhere and may disperse traffic somewhat more efficiently. This would provide the motorized community with easy-to-access ORV loops, and if proper care is taken to minimize sedimentation into Long Creeks and the Wind River corridor, we could support the new segments added for WR 27 and 29 under Alternative 2. This is only if the Forest has sufficient funds to justify adding any additional route miles.
- **Long Creek Proposal easternmost segment of WR 29**

- TU supports the seasonal closure of WR 29 under Alternative 3 because the eastern part is within the mapped Wind River Wetlands (mapped by WGFD) and this coincides with current Yellowstone Cutthroat trout habitat.
 - This easternmost segment of WR 29 should have been given its own route number. It's confusing that in Alternatives 2 and 3 there are important differences where WR 29 route miles are proposed to be added or restricted.
- **Long Creek Proposal WR 16**
 - TU supports decommissioning this route under Alternative 2.
 - This road seems redundant, so decommissioning this road helps to establish a minimum route network.
- **Proposal WR 87**
 - This is in the mapped Wind River Wetlands (mapped by WGFD) and current cutthroat trout habitat, therefore TU supports the decommissioning of WR 87 under Alternative 2.
- **Pelham Lake Area Proposal WR 90**
 - Maintaining access for motorized vehicles ≤50" under Alternative 3 is preferable in order to reduce impacts to riparian areas that WR 90 crosses which have been identified as in poor condition.
 - Increasing the route width without a plan for amending existing, documented riparian issues and without a plan to ensure mitigation, monitoring, and compliance would likely lead to greater problems in the future, and at a considerable cost.
- **Warm Spring Mountain Proposal WR 07 and WR 13**
 - TU supports Alternative 3 proposals for WR 07 and WR 13.
 - While a new loop would benefit the ORV community, the new trail proposed in Alternative 2 crosses current cutthroat trout watersheds, goes through crucial mule deer range, and the loop crosses into crucial elk range as well. If these new routes were developed under Alternative 2, seasonal restrictions might help to protect big game species and trout-bearing watersheds.
 - Warm Springs Creek, Wildcat Creek and Kitten Creek riparian areas have been identified as in poor functioning condition. Route management in this area should focus on preventing erosion, especially since Warm Springs Creek was identified as eligible for Wild and Scenic designation in the Final SNF Plan.
- **Wind Mountain/Union Pass Proposals WR 11, WR 55, and WR 78**
 - TU supports the proposals for WR 11 and WR 78 under Alternative 3. There are other established ways to access Moon Lake, Union Lake and the Fitzpatrick Wilderness, so a new route seems unnecessary and like it would result in significant, unnecessary environmental impacts.

- TU would support the decommissioning of WR 55 under Alternative 2 since it extends into an inventoried roadless area.
- Road management at the stream crossings on Wildcat Road 554 should be increased to prevent erosion.
- Since this popular ORV use area receives considerable traffic, heightened enforcement must be prioritized in the SNF's TMP.

Washakie Ranger District

- **Shoshone Lake/Cyclone Pass/Pete's Lake Proposals WK 23, 27, and 40**
 - We support the proposed action under Alternative 3 for WK 23, 27, and 40 in the Shoshone Lake/Pete's Lake area that adds seasonal restrictions and limits routes to ≤50" vehicles.
 - This Shoshone Lake/Pete's Lake route/area was not analyzed in the TAR.
 - The existing boardwalks around Cyclone Pass were built to keep vehicles above and out of the wetlands appeared to be effective to TU staff in 2017.
 - When possible, TU recommends improving existing routes instead of creating new routes. We often find decommissioning old routes and rehabbing those areas can be difficult and hard to establish and maintain a defensible closure, which is why we support the Alternative 3 proposal for this area.
 - TU recommends constructing a bridge over the outlet of Pete's Lake to protect the integrity and pristine nature of this stream crossing and to prevent further resource impacts i.e. increased sedimentation in to the Middle Popo Agie River from motorized travel through the outlet and associated wet areas.
- **Freak Mountains/Young Mountain Proposal WK 40**
 - Alternatives 1 or 2 are preferable to TU because this area is important to many kinds of outdoor recreationalists, including anglers, so this should remain open to all vehicles.
 - TU members have reported that the existing USFR 352 is not passable around the Freak Mountains and Young Mountain area even though it should be doable in a 4x4 vehicle, so it is understood. Improving and maintaining WK40 and allowing access for all vehicles should be top priority.
 - Minimizing sediment runoff into Pass Creek, which flows into the Red Ribbon Little Popo Agie River, should be a top priority to protect this valuable fishery.
- **Limestone Mountain Proposal WK 30**
 - WK 30 seems unnecessary, and like it could increase sediment runoff into Pass Creek, therefore TU supports either alternative 1 or 3.
 - WK 30 and Pass Creek are within historical cutthroat trout habitat.
 - Rock Creek to the south of WK 30 is classified by WGFD as a yellow-ribbon trout stream so minimizing sediment.

In closing

TU appreciates the SNF's efforts to increase seasonal closures and to decommission and/or put into storage redundant routes. TU encourages the Forest Service to continue to its good work on upgrading undersized culverts, replacing culverts that prohibit fish passage, and removing natural and man-made barriers to fish passage on fish-bearing streams. We hope that you will continue to give TU the opportunity to work with you on projects in the future where our input and partnership may be helpful.

Providing different kinds of public land users with a variety of recreational opportunities is important, and we recognize and appreciate that you are trying to balance and accommodate the interests of many. Considering the forecasted budgets for the SNF and Wyoming state agencies and programs, we ask that the SNF concentrate on committing to maintaining and improving the routes already in existence, not on creating 40+ miles of new routes as is proposed in Alternative 4. Adding fewer miles of new routes and doing so in select, strategic areas will mean more funding available for addressing the existing maintenance burden and backlog, conducting impactful community and public outreach, continuing habitat improvement work, and ensuring public safety on SNF routes.

Under the status quo, visitation to Wyoming public lands is increasing and is taking its toll on popular recreation areas and consuming land management resources. If the SNF decides to increase total route mileage while converting 160+ miles from roads for highway vehicles only to trails for any and all wheeled vehicles as is proposed under Alternative 4, there will be a significant uptick in visitation and vehicle traffic likely to cause changes in erosion and sediment transport to streams and wetlands across the Forest, and more dispersed camping. These impacts can pose serious risks to trout populations, since trout require clean water and particular gravel size distributions to reproduce successfully. According to the EA ~55% of SNF visitors were from out of state in 2019, and in 2020 and 2021 there were even more out-of-state visitors to Wyoming than in years past. This trend is not expected to change, and studies have shown that the Covid 19 pandemic fundamentally changed the ways that people recreate outdoors, and their expectations for public land managers.¹⁶ More research surely is emerging, and it should be utilized in the SNF's near-term planning decisions. Americans who bought camping gear, campers, and OHVs during the pandemic to recreate outdoors are likely to use these things for years to come. The TMP should include detailed strategies for mitigating impacts to routes and resources in the face of increasing visitation, visitation by people who are not particularly public lands-savvy, and detailed strategies for reducing the risk of serious user conflict, environmental degradation, and safety issues across the Forest. **For these reasons, we suggest conducting an EIS.**

¹⁶ https://lnt.org/wp-content/uploads/2020/04/COVID_OR_phase-II_final.pdf

TU and its members would love for the SNF to be able to continue to provide access to high-quality outdoor recreation activities for generations to come, while providing vital habitat for native Yellowstone Cutthroat Trout and other wild trout. We want to ensure that Wyoming residents and outdoor enthusiasts will be able to venture into a wild, well-maintained, and well-respected SNF for generations to come. We believe that vision can be achieved by being fiscally prudent today, carefully managing what routes the SNF already has, and working closely with community members and organizations to increase levels of voluntary compliance and stewardship for our shared public lands.

Thank you very much for being available for questions during this comment period. TU appreciates the opportunity to participate in the travel management planning process and we thank you for considering our comments. We hope they are useful to you and your team. If you have any questions, please do not hesitate to contact me at the contact information below.

Sincerely,

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