

## Appendix A. Attachments

The following attachments are included for your reference in addition to Greater Yellowstone Coalition's group comments submitted on the Shoshone National Forest's Environmental Assessment for the Travel Management Project.

They appear in the following order.

- Attachment 1. Frontier Article, November 11, 2021. Wind River District Plans Presented.
- Attachment 2. TMP Requests, submitted June 11, 2021
- Attachment 3. 2020 Sep\_RE SNF TMP PEA Appendix B\_inquiry\_response\_reply
- Attachment 4. 2021 Oct\_RE SNF TMP EA Appendix B\_inquiry
- Attachment 5. 2021 Oct\_RE SNF TMP EA Appendix B\_response\_reply
- Attachment 6. Winter Recreation Planning Recommendations for Wolverine Conservation.
- Attachment 7. Warm Springs Mountain Correspondence
- Attachment 8. Hocker Objection on LMP p 69
- Attachment 9. MT14 Comments Submitted by the Wyoming Wilderness Association, July 2021
- Attachment 10: MT14 Response from Wind River District Ranger
- Attachment 11: Final Recommendations of the Shoshone National Forest Enforcement and Compliance Working Group

# Dubois Frontier

## WRRD plan details presented last week

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*The virtual meeting Nov. 3 met with mixed reviews; the planning process, even more so.*

By Vic Augustine, Staff Writer, Dubois Frontier, November 11, 2021, Vol. 44 No.45

The Shoshone National Forest Travel Planning Project virtual meeting and conference call took place Wednesday, Nov. 3. There were 56 connections made through the audio/video and telephone links during the peak.

Shoshone Forest Supervisor Lisa Timchak, Wind River District Ranger Jeff von Kienast and environmental coordinator Mark Foster were present during the program to set context and respond to questions and comments.

Glitches in the program technology at times hampered the ability of meeting facilitator and public affairs officer Kristie Salzmann to open the incoming audio/visual links for participants to ask questions and make comments. Some attendees could not see maps which had been presented. The anomalies added an element of frustration to the experience. Some terminated their connections.

After introductory remarks, there was a presentation that summarized what changes are being proposed in Alternative 4 for the Wind River District by Shoshone Forest planners.

It can be found on Shoshone's Travel Planning homepage at [www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd968238.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd968238.pdf).

According to the presentation, there were several forest-wide objectives in the proposed plan. The planners considered public comments from 2020 as well as the input from as many as 23 state, federal and local agencies. They reviewed Travel Analysis Process and Travel Analysis Report documents and seasonal closures revising analysis as necessary.

Out of the development process, the following proposals are recommended for the Wind River District:

WR-86, a proposal to bring onto the system approximately 68 miles of Maintenance Level 1 roads closed to the public and only opened on a project-by-project basis for short periods of time to support projects, such as logging, was dropped. The benefits were deemed too small and the impact too large.

OSV routes in the area of the Pinnacles and Deception Creek would be closed as a result of community-based agreements and the OSV season will be open from Nov.1 to June 15.

All 50-inch trails would be conversed to accommodate vehicles up to 64 inches.

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Road conversions to trails in the Burroughs Loop area would become a combination of trails for all wheeled vehicles and, in some instances, for vehicles only 64 inches or less.

Trail loops are also being proposed. There are several maps in the presentation, the last four of which are project specific. Using the link mentioned above to access those maps is essential to understanding what is being considered.

The Windy Mountain loop trail, WR-03, as an alternate to what was previously called the Bachelor Creek Loop (WR-11). WR-11 was dropped from Alternative 4.

WR-03 proposes making use of an existing service road from NFSR 554 as 64-inch trail to the communication towers on the mountain. The trail would be extended through the Benchmark Roadless II Area by use of a closed administrative road and join Mountain Trail (MT) 14 at Salt Barrels Park. At the juncture in Salt Barrels Park, MT 14, currently rated for 50-inch vehicles, would be rated as a trail for 64-inch vehicles all the way to Moon Lake where it connects to NFSR 531.

WR-08, a branch of WR-03, is a proposal for a 64-inch trail approaching Grandy Reservoir on its eastern end. It follows the path of what may be an old logging road currently used by hikers and horse riders.

Approaching the reservoir from the west, off of NFSR 554, is what is supposed to be a closed administrative forest road. WR-03 would officially open it as an inventoried new road for all motorized wheeled vehicles.

A proposal which will require two construction projects (WR-07 and WR-13) is referred to as the Warm Spring Mountain loop. It would require approximately 4 miles of new construction.

On Warm Spring Mountain, the continuity of NFSR 529 is interrupted because of the relationship of the forest boundary to the edge of Porcupine Subdivision. It is as if a bend or small loop in the road was lost when the subdivision was formed. There is, therefore, no authorized way to access and follow NFSR 529 down to Warm Spring Creek from the mountain.

WR-13 would have two parts. A small part of WR-13 would join together the disconnected ends of NFSR 529 inside the forest boundary.

The second and significantly larger part of WR-13 would create a route on the other side of the Warm Spring Creek from NFSR 528.2D down to the bottom of the canyon to connect with the lower end of NFSR 529. The new trail would be for vehicles 64 inches wide or less.

Back up on Warm Spring Mountain, WR-07 would connect NFSR 263 to NFSR 529.2A. The connection would finish off a large loop from Union Pass across the mountain, down across Warm Spring Creek, back up the other side of the canyon and through a series of turns, connect to NFSR 554 to return to Union Pass.

WR-04B, the No Mans trail proposal, will connect NFSR 732 with a trail to an adjusted MT 11. Both would be for vehicles 64 inches or less.

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There are three small trail segments proposed in the area of Long Creek.

WR-14 would connect NFSR 549 to NFSR 548. It would also connect NFSR 549.1C to NFSR 548.1F.

WR-12 would connect NFSR 548 to NFSR 649. The net effect would be the completion of a cluster of three small loops involving NFSRs 548, 549 and 649.

During the question and answer period of the meeting, conservation advocate Robert Hoskins asked how much "ground truthing" had been done during the EA development. "There is a discrepancy between what you see and what I'm seeing" on the ground, Hoskins said, asserting that what was missing was "granular" analysis.

Von Kienast said the proposals were "general" in nature and acknowledged "we have to do more site specific analysis before we build." Mark Foster added, "We're not proposing to do this immediately, it is not an action document" and that a strong analytical base would be used to move forward on proposals.

Hoskins insisted the EA as a landscape scale process was "long on generalities" and that an Environmental Impact Study (EIS) was needed.

Carly Ideker expressed the concern that the Shoshone was a "horse forest" and "is changing to motorized." She also wanted to know what plans there were to reduce fuels to mitigate the fires caused by increased human presence.

Foster pointed out that 80% of the forest is nonmotorized, but additionally, most of the roads in the Wind River district are the legacy of logging operations in the past.

Von Kienast reported that after the fire ban was lifted in the district this year, there were four fires reported which were found to be abandoned campfires by hunters who were not on vehicles.

"The motorized users were no worse than any other," as it related to human caused fires, he said.

Will Mook observed that there were "very few single track trails" in the system.

"Single track trails would be favoring one user group over the other," Foster said.

Mook replied, "Double track is not as enjoyable for hikers, mountain bikers and motorcycles."

Matt Cuzzocreo felt that an EA was inadequate to the planning task.

When Foster explained that it was the Forest Supervisor who decided that there was "no significant impact" of the plan, and that the EA was appropriate. Cuzzocreo responded, "How can you see no impact when the granular has not been done?"

Dan Neal asked, "Do enforcement resources increase when areas open?"

"We'll ask for enforcement funds from (Wyoming) State Trails (Program) and also seek information from the public," regarding system abuse, von Kienast responded.



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Joan Timchak wanted to know if there were plans for access to the wilderness for hikers and horse riders where there are no vehicles.

She was advised there are no restrictions for those users, they could go where they wanted.

Subsequent to the meeting, Timchak said, while it was true, there were no restrictions for those hiking and on horses, she felt her experience was "less considered." The abundance of downed timber made the absence of horse trails more significant for those who go out on horseback.

Laney Hicks was concerned about the proximity of OSV routes to grizzly bear dens in the area of Togwotee Pass.

"We would have to know where that den was and then I would issue a special closure order," Von Kienast advised.

Subsequent to the meeting, a Nov. 5 conference call with von Kienast, Foster and Shoshone Forest Wildlife Biologist Andy Pils filled in additional information on the question.

Pils advised that pages 220-221 of the EA (tables 98 and 99) reflect interagency research over a 20-year period plotting collared bear denning sites on the Shoshone. Between 2000 and 2020, 84% of the 247 dens located were within areas closed to OSV use and 16% were located in open areas.

He added that because of various terrain and timber characteristics, any given part of the open OSV area would not necessarily mean it would make a desirable route, further reducing the likelihood of disturbance.

The EA pages Pils cited further explain that the risk of disturbance to the grizzly population at large is not considered to be significant.

After Wednesday night's meeting additional contacts have been made.

Sarah Walker, policy coordinator for the Wyoming Wilderness Association, is against more routes in the forest. WWA cannot see adequate maintenance or enforcement on the system currently, she said.

The organization also believes the Forest Service is "ignoring or precluding meaningful public comment. They've been ignoring important comments from 2015-2017." She also said, "Locals know these roads and trails better than anyone and the officials in Cody should be considering local knowledge and concerns before approving proposals they don't know anything about."

She added, "There has been no 'ground truthing' and site surveys to know the impacts or feasibility of proposals."

Connie Wilbert of the Sierra Club Wyoming was one of those who was "extremely frustrated" with the technological limitations of Wednesday's virtual meeting. But beyond the issues of what she felt should have been more "reasonable public access," she is highly concerned that the roads and trails system has

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undergone "rampant abuse" and that there is no justification for adding to a system which cannot be maintained as it is. "It doesn't make sense...use the resources to fix what exists," she insisted.

Wilbert believes there has not been enough on-the-ground analysis. In particular, the Warm Spring Mountain and the Windy Mountain proposals should be dropped.

She finds it inexplicable that an EIS was not chosen for analysis. "No other forest has tried to take this approach," she added.

Kim Wilbert, a dedicated hiker, is dismayed at the increase in motorized use. "We have more than enough roads." The beauty of the Shoshone, he said, is that there is less pressure on the forest, unlike forests in Colorado.

He is concerned that expanding the system with anticipated heavier use in the future will adversely impact the ability of hikers to access the front country for day hiking experiences.

Additionally, he is averse to handing over so much authority in one plan and that the public's loss of control will be significant. About the process, he said, "I don't trust it. Those little meetings are a bad way to treat the public."

Margaret Wells had a different take on the planning process. When the process began in 2015, she, as a representative of the ATV club in Dubois, spent much time working on proposals, some of which have been included in Alternative 4 for the district.

"We are very much gratified to see our work did not fall on deaf ears. It opens up the system, makes it more usable, its good for the community." Wells believes that more loops in general will mean users will be less likely to make their own trails.

"It's trying to make the forest more usable" she said about the plan "I like it".

Jerry Ideker, who uses an ATV, hikes and uses his pickup to get firewood, had no complaints about the plan or the presentation. Though he is concerned about the pressure which is coming in future years, he sees that nothing the plan proposes can be done without more work.

And even though, "I don't want more government," he conceded more enforcement to prevent abuse would be desirable.

Laurie Ideker was dissatisfied with the comment period and disappointed with responses during the virtual meeting. "The Forest Service is not ready at this stage of the game. People weren't able to ask anything or get quality answers. It's way too rushed- it's not fair to all the people who are involved."

Rene Suda wrote a detailed letter during the comment period for the Preliminary EA in July 2020.

Even though his advocacy was in many ways contrary to the resistance of environmental groups regarding the plan, his reaction to the presentation and handling of the EA is very similar.

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"I am opposed and disappointed with Alternative 4," he said emphatically. Suda was particularly angered that the Forest Service lost the email list from the 2020 comment period and that no one on the list was contacted about the EA release on Oct 19.

"It was dysfunctional, illegal and abusive," he insisted.

Even though his suggestions are in the direction of expanding the motorized system broadly, he believes the Forest Service did an inadequate job of ground inspections and that the EA process underserved stakeholders across the board.

"The 30-day response is not long enough. It should at least be 90 days," he said. "Expecting us to collaborate and provide input via email or allow us to comment on a short meeting is completely dysfunctional."

He blames Shoshone Forest leadership for the ills of the process and also believes that input from Wyoming Game and Fish has established false criteria relating to seasonal closures in the forest to protect elk calving grounds, for example. Suda said, "The elk are no longer calving in traditional areas" because of wolf predation.

Suda wants face-to-face meetings with the planners on this forest and the Bridger-Teton to "hammer out" fair policies for everyone, especially motorized users, winter and summer, whom he insists have been unfairly discriminated against.

"I don't care if it takes another five years, no one should be singled out...public lands are for multiple use."

### **Additional Information**

Background information, the Wyoming State Trails Program has been mentioned as a source of support for enforcement enhancement. The organization does more than that. Forrest Kamminga, state trails program manager, was interviewed Monday morning and provided details.

He advised that for every \$15 permit sold, the agent receives \$1 and the other \$14 stays in the program. The state adds another \$18.40 for each sale as a "fuel tax match" based on the fuel use estimate of each permitted vehicle.

The program uses 5-7% of its funds for administrative costs and the rest is available for internal funding of its trails crew, grants for trail rangers (enforcement), and grants for maintenance and construction providing reimbursement for labor and materials. It also participates in the National Environmental Policy Act (NEPA) process.

State Trails will provide matches to Forest Service projects up to 15-30%.

As a gauge on ORV usage in recent years, Kamminga advised there were 3,744 permits sold in Fremont county in 2019. In 2020, the total was 4,104.

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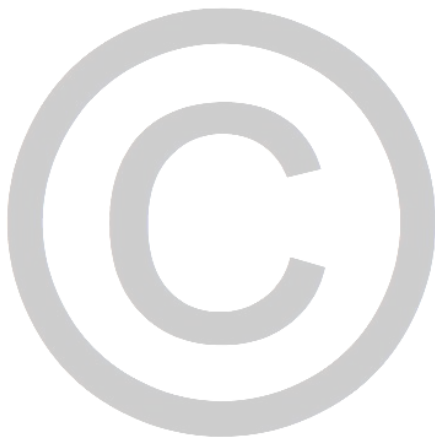
Statewide ORV permit sales in 2019 totaled 54,074. In 2020, the count was 65,271. Figures for 2021 were not yet available.

OSV permits in the winter 2019/2020 totaled 19,964 residential statewide and 22,841 nonresidential. The winter numbers for 2020/2021 were 13,690 residential and 23,967 nonresidential.

There are many other details to Alternative 4 which cannot be covered in this article such as seasonal closures and a close look at OSV use.

There is still time to study the Travel Plan, especially for the WRRD and make comments.

The comment period closes Thursday, Nov. 18.



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Op-Ed

## More time is needed on this

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The virtual meeting on Nov. 3 to present the details of the Wind River Ranger District portion of the Shoshone travel plan was an experience that left behind anger and frustration for more than a few.

As an attendee, I found the audio signal to be jumpy and the picture was freezing often, as audio and visual signals tried to catch up to one another.

It seems the program was not sufficiently vetted in advance.

But those problems just added aggravation to the resentment in some that true dialogue, for the moment, has been lost as an opportunity.

Perhaps it is a casualty of the COVID age, but the virtual format doesn't allow for much follow-up, if any at all.

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I was able to make a contact with planners subsequent to the meeting, but I heard complaints from several others that they received no return calls.

As a researcher, there were several things missing for me. After the release of the EA in October, there was no hard copy to be found in a public place of that document or any supporting material, especially the maps.

Try as I might, scrolling vertically through an enormous load of information and then shifting to maps, enlarging and reducing on my computer screen as needed just could not be done efficiently. And my computer wasn't too happy about it either.

Though I was pleasantly surprised when the presentation on Nov. 3 supplied site specific maps, I found myself wondering why those very good examples were not offered on the first day of the comment period rather than two weeks later. They made a world of difference in comprehension and would have saved a lot of time. I still would have spent hours studying, but the starting point would have been much more beneficial.

I am one of those who thinks the scale of the overall plan is such that too much authority is being sought over too great a period of time. I would like to see the plan broken into phases with time frames and public input along the way. The first phase would be to bring the existing system up to par. I also think 30 days is not enough to feel that comprehension and comment is well served.

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June 10, 2021

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

Submitted electronically to: Lisa Timchak, Mark Foster, Bart Lander

Dear Mr. Foster and Travel Planning team,

Thank you for your interest in making the Shoshone National Forest's (SNF) Travel Plan proposals and documents more accessible to the general public. In recent conversations with multiple organizations who have contributed to this process for several years, there was general consensus that many of us found the preliminary Environmental Assessment (EA) released in 2020 notably more difficult to interpret than previous draft analyses. This is of significant concern to our organizations, as the process should be getting better, not worse. Our group comments on the last draft of the EA (Greater Yellowstone Coalition et al., 2020, Attachment 1) clearly illustrated that we were unable to interpret or comment on many specific proposals due to incorrect, confusing or missing information. We are concerned that if there are not significant improvements, our groups and the general public will once again be hindered from providing meaningful input.

After reviewing the 2016 Proposed Action (PA) and 2017 Revised PA, we were able to identify a number of concrete examples of how past presentations previously facilitated our ability to interpret and meaningfully comment on proposals. We hope these specific examples and the requests below will be valuable in your efforts to provide quality, easily accessible data to the public in the next draft. It is surely a challenge to present such a wide variety of small-scale proposals across a very large forest, but incredibly important to a successful NEPA process and meaningful public engagement.

Below we outline requests for future travel planning documents to include summary statistics, improved maps, and illustrate some of the challenges encountered in interpreting the 2020 preliminary EA. We also provide suggestions for labeling and organizing proposals in a manner that might reduce recurring confusion and errors while facilitating meaningful public engagement going forward. Thank you for your consideration.

#### Request #1: Summary Comparison of Alternatives

As an example of the challenges encountered when reviewing the preliminary EA, we found it difficult to confirm basic critical information about what was being proposed in the preferred alternative, including how many new miles of routes were being proposed on the Wind River Ranger District (WRRD), and whether the three new WRD loop proposals presented in the 2016 PA were included in the preferred alternative of the preliminary EA. Given that several of us are very familiar with the existing route system on the SNF, NEPA documents, and four versions of

previous proposals, we can only imagine how much more difficult it must have been for the interested public to glean what significant changes were being proposed to the existing route system. A narrative or quantitative summary of proposed changes and across alternatives and districts would be especially helpful in this regard.

For example, the breakdown in the 2016 PA summary tables (below) are very helpful, showing forest-wide and district changes to the existing system. These summaries were especially important in understanding the 2016 PA and notably lacking in the preliminary EA. We found the summaries of **motorized loops** and **RARE II additions** and **new construction** especially important and also notably absent in the preliminary EA. Similarly, forest-wide and district summaries of miles of roads decommissioned, miles of trail converted to road, miles of road converted to trail, number of new seasonal restrictions, and miles of new route construction would be very helpful in future drafts.

		North Zone	Washakie	Wind River	Total Miles
<b>Motorized Routes</b>	Existing Roads and Motorized Trails	406	239	322	967
	Proposed Action Additions (26 proposals)	15	12	10	36
	Proposed Action Subtractions (10 proposals)	3	5	4	12
	Proposed Access to Dispersed Campsites	1	3	2	6
	<b>Proposed Action Mileage Added</b>	<b>13</b>	<b>9</b>	<b>9</b>	<b>30</b>
	New Total	419	248	331	997
<b>Seasonal Restrictions</b>	Existing	167	177*	43	387
	<b>Proposed Action Additional Seasonal Restriction (9 proposals)</b>	<b>26</b>	<b>0</b>	<b>35</b>	<b>61</b>
	New Total	193	177	78	448
<b>Motorized Loops</b>					
	Existing	7	83	162	252
	<b>Proposed Action Additional Loops</b>	<b>12</b>	<b>44</b>	<b>51</b>	<b>106</b>
	New Total	18	127	213	358
<b>RARE II (Roadless)</b>					
	Proposed Action Additions (3 proposals)	0.7	6.1	0.4	7.2
	Proposed Action Subtractions (3 proposals)	0.0	4.8	1.5	6.3
	<b>Proposed Addition Motorized trail added</b>	<b>0.7</b>	<b>1.3</b>	<b>-1.1</b>	<b>0.9</b>

Screenshot of portion of 2016 Proposed Action statistics - Excel sheet provided on your website: <https://www.fs.usda.gov/detail/shoshone/landmanagement/?cid=fseprd563810>

Breaking down alternative proposals and summaries by district is important and helpful for two reasons. First, the travel management needs and existing conditions of each district are different, and important to understand the impact or necessity of proposed changes. (These differences are outlined in all of our previous comments: existing route densities, existing motorized loop opportunities, differing enforcement challenges). Second, the general public typically is less interested in total mileage changes across the forest, and more immediately interested in whether routes are being closed or added in their backyard or in their favorite areas of the forest. This type of summary table is much more helpful in determining what exactly is being proposed where.

Since the above summaries and breakdown were presented in past proposals we strongly request your next draft include the same. In addition to information that allows the public to compare differences in proposals across districts, presenting information clearly, accurately, and succinctly so readers can easily compare the preferred alternative to other alternatives and/or to the existing condition is essential.

## Request #2: Improved MAPS

As we struggled to determine what the proposed changes were in the preliminary EA, we found the following advice: “The perhaps most efficient means of identifying changes between the current condition and the Alternative 2 proposed conditions would be to compare the Alt 1 subpt B map with the Alt 2 subpt B map. Tracking where roads on the Alt 2 map of a WR-## (proposal number) designation will help to illustrate where on that district the proposal is occurring.”

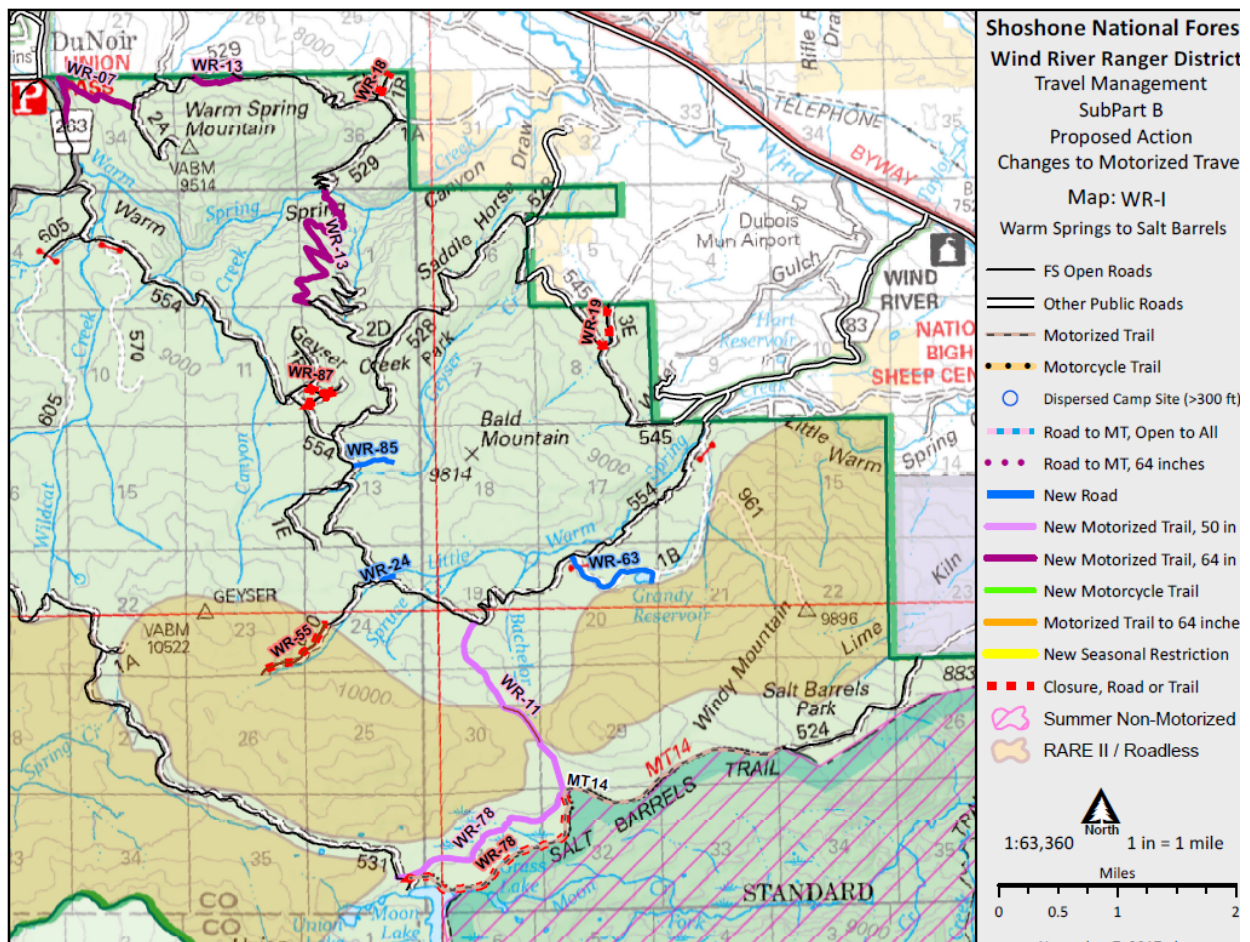
Given the public’s reliance on these maps to interpret proposed changes in different alternatives, the scale and quality of these maps is critical to the public’s ability to interpret and meaningfully comment on proposals. We found that the scale and quality of the maps provided in the preliminary EA failed entirely in this regard.

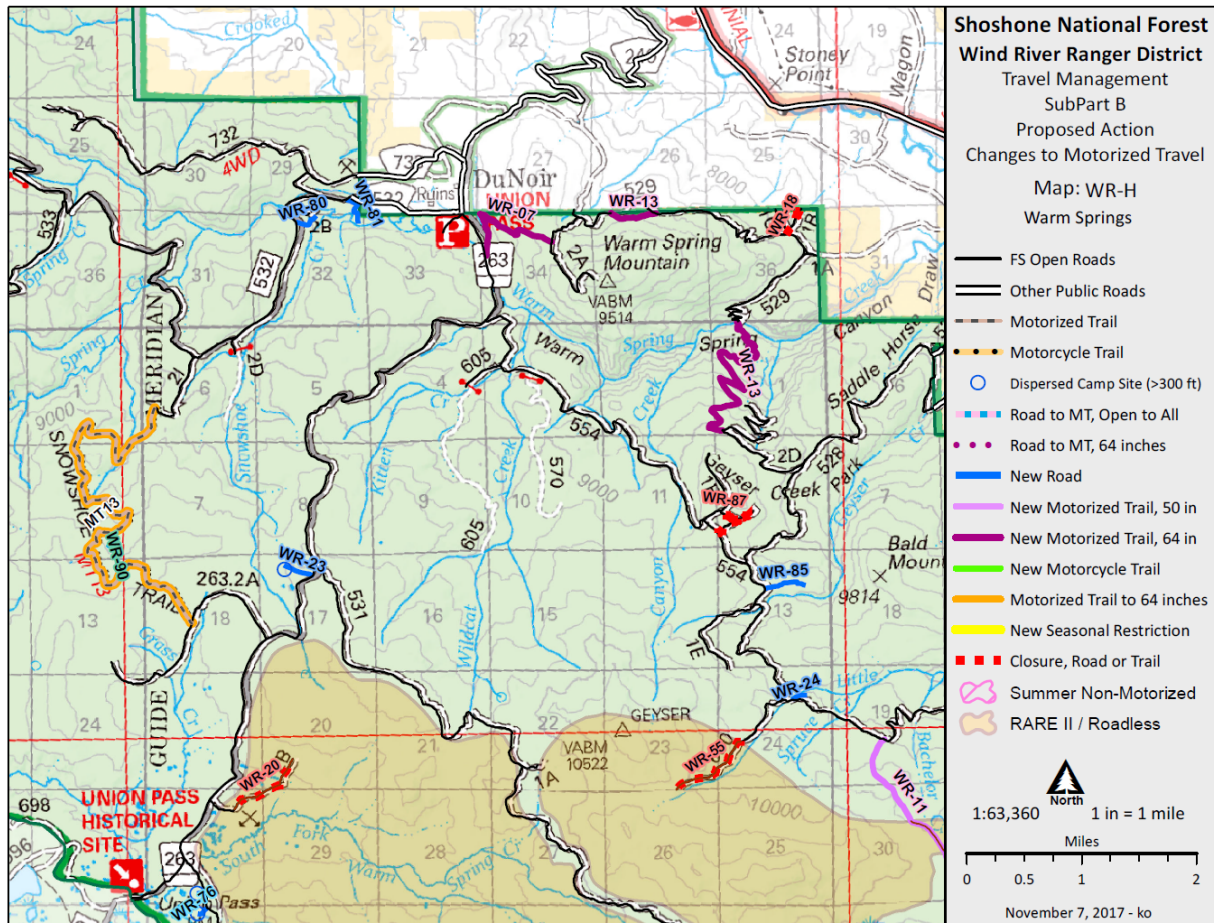
As just one example, to determine proposed changes on the WRRD, we attempted to compare Alt 1, 2 and 3 subpart B Wind River maps from the appendices. The map provided for the entire WRRD was so large that it was literally impossible to effectively compare any one area to another on a computer screen, given the amount of zooming required on each. When printing the three WRRD maps on a home printer - in hopes some differences might appear that would allow us to investigate those proposals in Appendix B - the text for the WRRD maps at the printed scale was too small to read. Looking back at the proposed action maps presented in 2016, there were several notable differences that could help us move forward more effectively:

- Proposed action maps (2016) illustrated proposed changes that differed from the existing system, so that the reader was not required to visually compare Alt 1 maps to Alt 2 maps to identify proposed changes. We request that the FS provide stand alone alternative maps that demonstrate proposed changes in each alternative compared to the existing system.
- Proposals for new trails and roads were denoted differently than existing trail and road width conversions in the PA. We request that this approach be incorporated in the next iteration of the draft plan.
- In the PA, seven different maps for the WRRD were presented instead of one. This scale was much more helpful for interpreting proposed actions on these stand alone maps, even when the reader was not tasked with comparing multiple alternative maps side by side. We request that the FS consider mapping configurations that illustrate proposed changes without requiring side by side comparisons, and that maps be provided at a legible and comprehensible scale compatible with either on screen viewing or home printer capabilities.

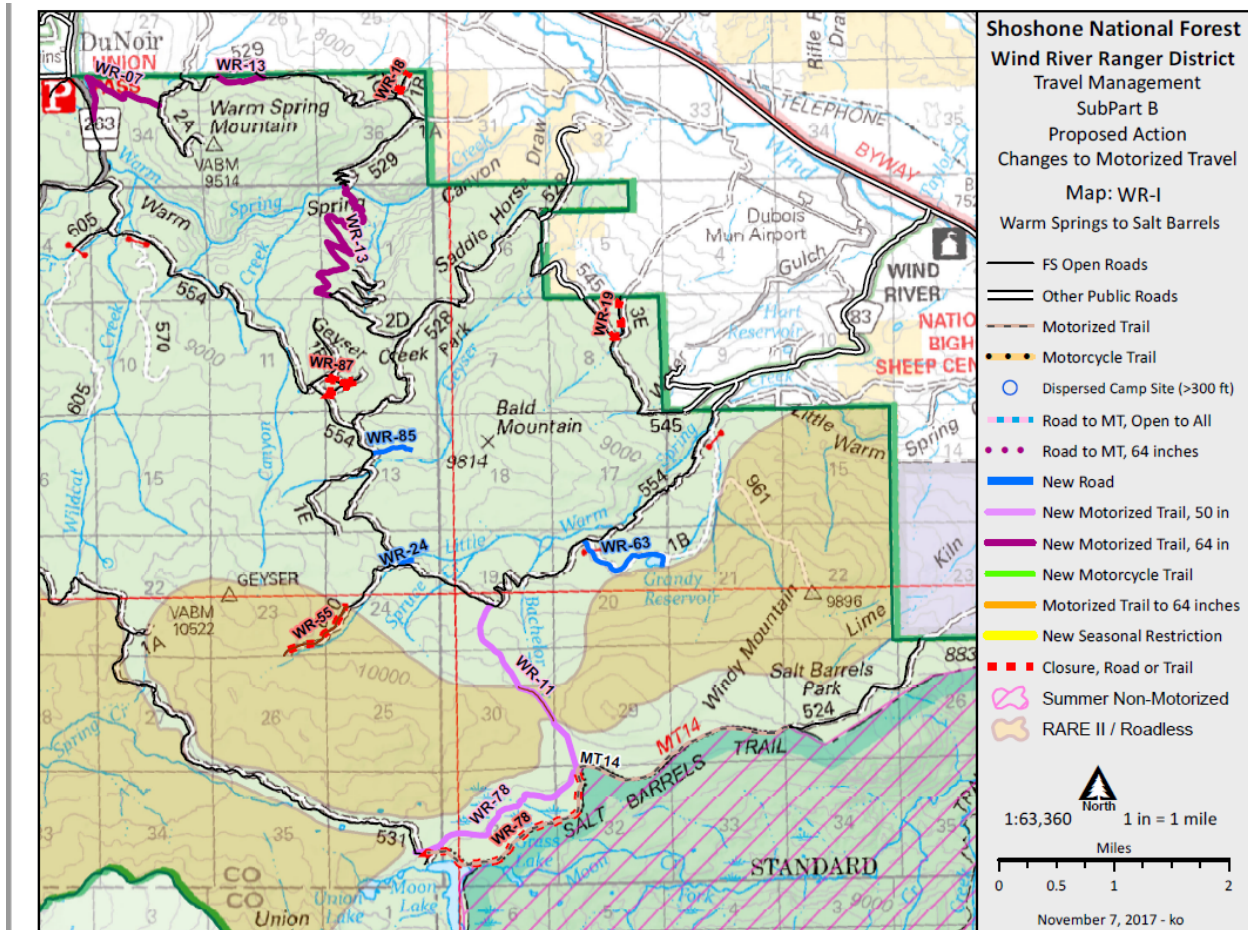


Below are examples of maps from the 2016 proposed action. New motorized trails, roads, seasonal closures and trail conversions are labeled and highlighted on maps. Map segments are at a scale where proposal labels are legible and easily referenced.



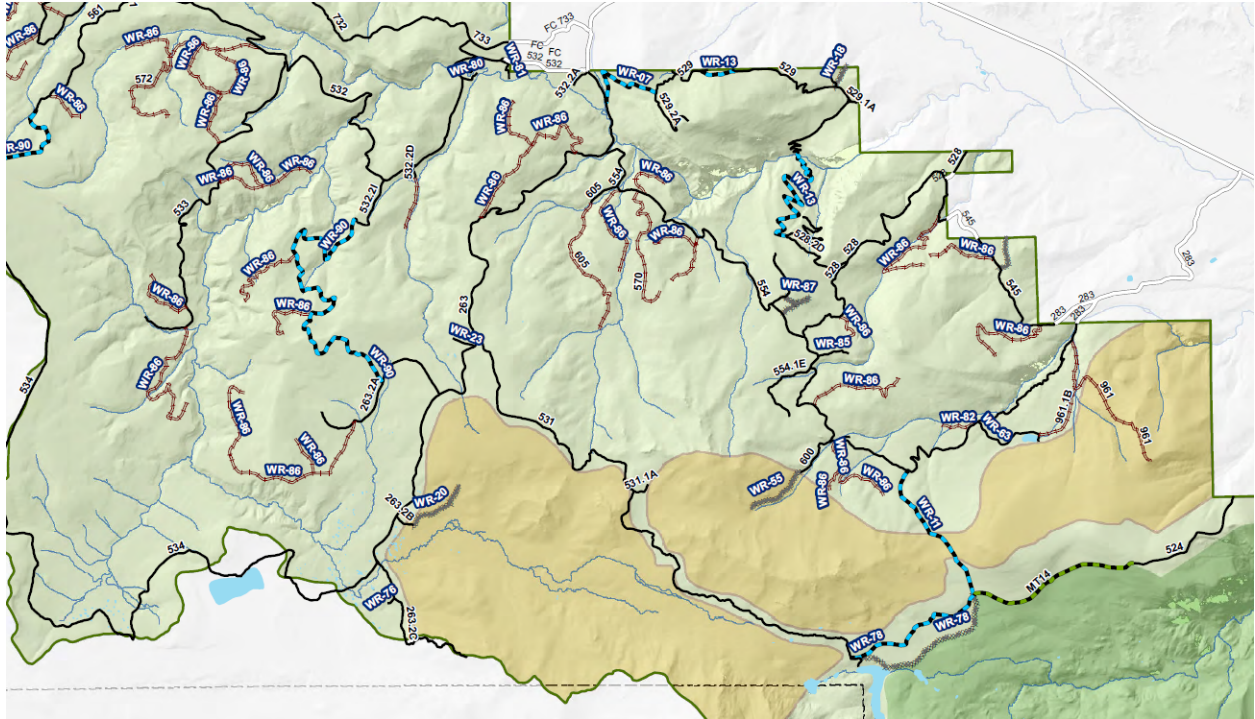




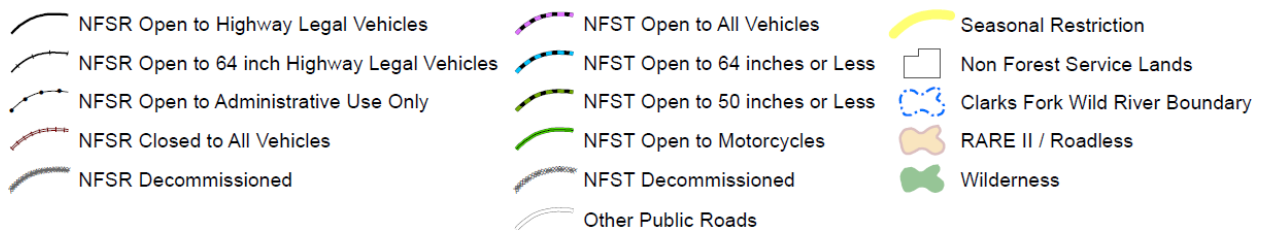


Note: New trail proposals WR7, WR11 and WR13 are clearly denoted in purple as new trails. WR90, a proposal to convert an existing trail to 65", is illustrated differently in orange. This is extremely helpful!

Below is an example of preliminary EA maps of the same area. The reader was required to zoom in 70% in order to read proposal labels in one small corner of the WRRD.



Above: 70% Zoom screenshot into one corner of the Alt B map for the Wind River Ranger District. New trail proposals WR7, WR13, WR11 and WR 78 appear identical to WR90, existing trail converted to 65". This makes it incredibly difficult for the reader to tell what is actually being proposed on the ground in the preferred alternative.



NFSR – National Forest System Road that is defined as a forest road other than a road which has been authorized by a legally documented right-of-way held by a State, county or other local public road authority.

Above: Map key that can be referenced after zooming out 70% and then back in. Note how this legend does not offer the reader any ability to tell how this alternative is different from the existing system.

As one important example, In the preliminary EA map, there is no way to tell if MT14 is a new or existing ATV trail without comparing the same zoomed-in corner of the map to an Alt 1 map at the same scale and corner. The proposals to construct new greater than 65" trails where there is no existing road bed (WR7, WR13, WR11 and WR 78) appear identical to the proposal converting an existing trail to 65" (WR90). These are very different proposals with very different impacts and the concerned public would benefit from any differentiation. We request that the FS review these aspects of the 2016 PA maps and consider a similar approach to allow for more meaningful public interpretation and input. See suggestions below for labeling proposals as another solution to help the reader differentiate proposal types.

### Request #3: Improved Presentation of Proposals and Appendix B

The draft preliminary EA references nearly 100 individual proposals in its maps and associated tables. Many of these proposal numbers and labels were initially generated from a list of ideas generated in pre-pre-scoping in 2015. Only some of these were carried forward for analysis. Since that time, there has been no effort to consolidate, organize or relabel proposals in a way that makes sense to the general public, decision-makers, planners or resource specialists.

We request that the FS recategorize, relabel and regroup the proposals that have been carried forward in this analysis and are now presented in alternatives for public comment. For example, the FS should identify and implement practical possibilities for grouping/labeling proposals to differentiate between proposal types, such as new trail construction (WRNT1), decommissioning (WRD1), route conversion or reclassification, dispersed camping additions, and seasonal closure proposals (WRSC1). This would greatly facilitate readers' ability to interpret proposed changes, especially on associated maps, and may reduce some of the errors, typos and inconsistencies noted between maps, proposal numbers and proposal table descriptions in the draft preliminary EA.

We request that the FS consider options for linking and relabeling related proposals so the public can meaningfully analyze and comment on them. For example, the reader has to reference table descriptions for WR7, WR13 and WR13 to determine that these three proposed segments create a "large effective loop" in Warm Springs Canyon. Since none of these seemingly unrelated individual proposals create a large loop (as described) without the other, it would be helpful to highlight their relationship by linking them for comment and for analysis. The FS could label all three of these sections WRNT1, or WRNT1a,b,and c to allow for tailored descriptions of each separate segment. Similarly, the proposals comprising the new large effective Bachelor Creek loop - WR11 and WR78 - could be relabeled WRNT2a and b.

For each district we request that the FS reorganize proposals in the Appendix B proposal table in a sensible manner and relabel proposals sequentially if possible. This would eliminate proposal numbers that are no longer being analyzed and are likely contributing to errors and confusion. There is no reason one should have to reference WR11 and WR78 to learn about or comment on the large effective loop proposed up Bachelor Creek, or reference WR 27, westernmost WR 29, WR 43,and WR 86 to comment on the Long Creek loop proposal. If for



some reason relabeling existing proposals is not an option, consider other opportunities to improve how proposal types can be grouped in Appendix B in a logical manner. Any effort by the FS at some user-friendliness here would be worthwhile and beneficial to everyone who is attempting in good faith to participate in this process.

We understand that this may sound like added work, but we also know the FS already has its work cut out to review and correct the many errors, typos and inconsistencies noted between maps, proposal numbers and proposal table descriptions in the draft preliminary EA (see below for comment examples). Revisiting proposals and determining a more meaningful and less error prone reference system is likely to help decision-makers and planners as much as it would help the public attempting to interpret and comment on them. Thank you for your consideration, and we look forward to seeing an improved next version of this draft plan.

Sarah Walker, Wyoming Wilderness Association

Connie Wilbert, Sierra Club Wyoming

Jenny DeSarro, Greater Yellowstone Coalition

Example 1. Wind River District Appendix B Proposal Table (page 16, preliminary EA) shows obvious errors referenced in several comments. As just one example, the public was unable to comment on these proposals with misinformation presented in the preliminary EA.

Ranger District	General Location	Proposal Number	Alternative 3 Proposal Type	Alternative 3 Proposal Explanation	Alternative 3 Proposal Rationale
Wind River	Bear Creek	WR-26	Decommission Road	Decommission road to address riparian and wetland issues.	Provides opportunities for youth operators and for looping opportunities throughout the District.
Wind River	Long Creek	WR-27	New NFST open to wheeled vehicles 50 inches wide or less	Add new NFST open to wheeled vehicles 50 inches wide or less to provide loop opportunity.	Current impacts to riparian and wetland areas, moving to lighter vehicles expected to reduce those impacts.
Wind River	Long Creek	WR-27a	Decommission Road	Decommission dead-end road (FSR 548.1D).	Provides a large effective loop, follows existing road template for large portion of route.
Wind River	Long Creek	WR-29	Seasonal Use Restriction	Applies seasonal restrictions to FSR 513, 548, 549, 551, 552 (open 7/1 to 3/30) to address protection for the native road surface during the wet spring months and wildlife requirements. Requires less gating than Alt 2.	With WR-27, no need for this short, dead end route that ends in meadow and would have compliance issues.
Wind River	Brent to Burroughs Creeks	WR-83a	Convert Road to NFST open to all wheeled vehicles	Convert sections of FSR 285, 510, 511, and 512 to NFST open to all wheeled vehicles subject to seasonal closure (open 7/1 to 3/30) (19.11 miles).	Closure dates will provide protection for the native road surface during the wet spring months.
Wind River	Fish Lake	WR-89a	New Road	Build new section of FSR 534 to address riparian issues (0.25 miles).	Provides youth opportunities and looping opportunities.
Wind River	Fish Lake	WR-89b	Decommission Road	Decommission section of FSR 534 to address riparian issues (0.25 miles).	Proposal would address riparian issues associated with current use.

Example 2. Our group comments submitted on the preliminary EA (Attachment 1) includes multiple examples of organizations being unable to comment on proposals presented in the preferred alternative:

*“Once again, we encountered serious disconnects between Appendix B maps and Tables 1 and 3 (more cut and paste haste?) that, when coupled with the difficulty to use the maps and the minimal information provided in the tables, make it nearly impossible for the public to interpret ....and provide meaningful comments.” - (GYC et al. 9/25/2020, Page 39)*

*“WK-27 - Pete Lake to mid NFST01. Information in Table 2 (p. 4) does not match the map for Alternative 2, which proposes decommissioning of WK-27 along the boundary of the Washakie Wilderness Area and reconstruction of a new trail away from the wilderness boundary and which, on the map, is labelled WK-23. WK-23, according to Table 1, is in the vicinity of the Blue Ridge Road but in reality is a district wide proposal to adopt seasonal use restrictions. Table 1 does not contain any entry that describes the permanent closure and decommissioning of the existing trail along the wilderness boundary, whatever number it may be assigned (which is anybody’s guess).” (GYC et al. 9/25/2020, Page 39)*

Example 3: Excerpted comments from Riverton resident, Kim Wilbert. (Attachment 2).

*“Following are my comments on specific Alternative 2 proposals on Washakie (WK) and Wind River (WR) districts. I will preface these specific proposal comments by noting that there were so many errors between Appendix A (Maps) and Appendix B (Tables) that it was impossible to even keep track of them all. In the tables, the proposal type, explanation, and rationale were disconnected and incomprehensible for many proposals. Some roads or trails identified in the tables didn’t exist on the maps. Proposal numbering made no logical sense on the maps, making it nearly impossible to even find the road or trail being described. This is a really shoddy way to treat members of the public who care deeply about their public lands and who are trying in good faith to participate in this public process.”*

....

- *WK-27 Description of WK27 on page four Appendix B does not correlate with the graphic representation of WK27 on the map in Appendix A for Washakie District Subpart B Alt 2. The map shows a four mile section MT01 as decommissioned. The map also shows a road that is not on the 2020 MVUM and is labeled WK23 going from Pete Lake to intersect with MT01 just south of Shoshone Lake. If WK 27 includes decommissioning the section shown on the map and construction of a new NFST I believe there is no existing footprint for most of that new road, which is contrary to the information in the rationale. According to the Alt 2 rationale, WK 23 only refers to seasonal closure on several routes. There is no way for anyone to effectively comment on WK 23 or WK 27 because of conflicting and/or incomplete information on the maps and the table on page 4, Appendix B.*

....

- *WR - 12 Not shown on map, and therefore, without any knowledge of where this “New NFST” is to be located, I have to stand opposed to it. How can any impact analysis be validated if the location proposed road is not charted? Reject this proposal because it doesn’t really exist. Jeez.*

....

- *WR - 14 - Not shown on map.... Please see the comment on WR 12. It is very frustrating to have to comb the maps for stuff that is not there!!*

**Attachment: 2020 Sep\_ RE SNF TMP PEA Appendix B\_inquiry\_response\_reply**

**From:** Jenny DeSarro

**Sent:** Thursday, September 17, 2020 2:32 PM

**To:** Foster, Mark - FS <Mark.Foster@usda.gov>

**Subject:** RE: Shoshone NF Travel Management: Question on Washakie District

Thank you once you have a corrected Appendix B will you notify me?



**Jenny DeSarro** | *Wyoming Conservation Coordinator* | She/Her ([What's this?](#))

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**From:** Foster, Mark - FS <[Mark.Foster@usda.gov](mailto:Mark.Foster@usda.gov)>

**Sent:** Thursday, September 17, 2020 10:27 AM

**To:** Jenny DeSarro <[jdesarro@greateryellowstone.org](mailto:jdesarro@greateryellowstone.org)>

**Cc:** Salzmann, Kristie L -FS <[kristie.l.salzmann@usda.gov](mailto:kristie.l.salzmann@usda.gov)>

**Subject:** RE: Shoshone NF Travel Management: Question on Washakie District

Jenny,

Glad you reached out. Answers to your questions regarding the Pete's Lake proposals are below.

- As explained in the 2017 Travel Analysis Report, that process focused on National Forest System Roads; it did not consider trails including motorized trails.
- The re-route proposed under alternative 2 would be new construction. And as indicated in the preliminary EA, any new construction would be subject to "[n]ecessary regulatory actions includ[ing] acquiring permits and authorizations from responsible local, state, and federal agencies, performing on-site surveys, and applying site-specific mitigation actions to minimize potential impacts."
- The Appendix B table you reference had an issue with the Alternative 3 actions and justifications: the rows were mis-aligned. We have flagged the issue and are working to resolve it. With respect to this particular proposal, under Alternative 2 the existing footprint would be decommissioned, a new route constructed, and that new route would be subject to a new seasonal restriction; under Alternative 3, the existing route would be subject to a new seasonal restriction. (No seasonal restriction applies to the current motorized trail.)

Best,  
Mark





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**From:** Jenny DeSarro <[jdesarro@greateryellowstone.org](mailto:jdesarro@greateryellowstone.org)>

**Sent:** Wednesday, September 16, 2020 9:40 PM

**To:** Foster, Mark - FS <[Mark.Foster@usda.gov](mailto:Mark.Foster@usda.gov)>

**Subject:** RE: Shoshone NF Travel Management: Question on Washakie District

Mark,

Thanks for reaching out. I have heard that the forest is now providing printed copies of materials, which you had told me in early August was not possible. I am glad to hear this shift has occurred.

I have many questions, however I will start with this one. I am finding contrary or unclear information pertaining to this trail between Pete's Lake and Shoshone Lake. Image is Alt 2



I cannot find the original footprint listed in the TAR. I am curious as to how it was rated.

Is the reroute shown above, all new construction or using a stored route? Also, when looking in Appendix B, I am confused by the rationale in alt 2 and alt 3 and they both say new route, but Alt 3 looks to be the same footprint as Alt 1. Will you please clarify?

Thanks, Jenny



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**From:** Foster, Mark - FS <[Mark.Foster@usda.gov](mailto:Mark.Foster@usda.gov)>  
**Sent:** Wednesday, September 9, 2020 1:50 PM  
**To:** Jenny DeSarro <[jdesarro@greateryellowstone.org](mailto:jdesarro@greateryellowstone.org)>  
**Cc:** Salzmann, Kristie L -FS <[kristie.l.salzmann@usda.gov](mailto:kristie.l.salzmann@usda.gov)>  
**Subject:** Shoshone NF Travel Management: Check In

Hi Jenny,  
I am making the rounds with groups and individuals with whom we have had conversations around Travel Management. I wanted to check with you to see if there are any outstanding questions you have, any issues with accessing data or information, or anything else I can do to ensure you and GYC have everything you need to provide us with substantive comments. Please let me know if there is anything I can help with.

Thanks much, and the IDT and I look forward to your input!

Best,  
Mark



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**Attachment: 2021 Oct\_ RE SNF TMP EA Appendix B\_ inquiry**

**From:** Jenny DeSarro

**Sent:** Wednesday, October 27, 2021 7:57 PM

**To:** Mark Foster (mark.foster@usda.gov) <mark.foster@usda.gov>

**Cc:** 'Timchak, Lisa - FS' <lisa.timchak@usda.gov>; Andy Pils <apils@fs.fed.us>; McQuiston, Casey -FS <casey.mcquiston@usda.gov>

**Subject:** TMP EA Seasonal Closure Clarification

**Importance:** High

Dear Mark,

After spending an unfortunate amount of time trying to determine proposed seasonal closure dates from Appendix B and the Alternative 4 Maps for all of the North Zone, it occurs that there is a serious issue around clarity. I suspect it may have to do with the Appendix B table column/row being out of alignment, but I have no way of knowing.

Here are some of the blatant examples:

1. Morrison Jeep Trail:
  - a. Map shows open to highway legal vehicles with a season.
  - b. Table says 120 – 12.83 mile section is “Closed.”
2. Fantan/Sawtooth Lake
  - a. Map shows open to highway legal vehicles with a season.
  - b. Table says all sections of 149 are open “Year-round.”
3. Sulphur Creek – Lee City
  - a. Map shows open to highway legal vehicles with a season.
  - b. Table says 108 is open “Year-round.”
  - c. Table says 101.3I/101.3K/101.D are open “July 15-Nov 30.” **(of these examples I’m inclined to believe this one is correct while the others are not)**

I have MANY more examples of what seems to be incorrect/false/inconsistent information within the **Appendix B Seasonal Open and Close Dates for Motorized Wheeled Vehicle Use on NFS Routes under Alternative 4**. This seems to be a larger problem than expected. There is no other location amid the EA, maps and appendices that clearly articulate intended seasons for Alternative 4, or any alternative.

Seasonal closures are an important tool for wildlife and habitat conservation, something Greater Yellowstone Coalition and its supporters care deeply about. Will you **please** provide the correct proposed open season dates for all routes in Alternative 4 as quickly as possible in order for the public to properly discern and then prepare their comments to submit by the November deadline?

Sincerely,

Jenny DeSarro



**Jenny DeSarro** | *Wyoming Conservation Coordinator* | She/Her ([What's this?](#))  
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**From:** Jenny DeSarro

**Sent:** Wednesday, October 27, 2021 2:40 PM

**To:** McQuiston, Casey -FS <[casey.mcquiston@usda.gov](mailto:casey.mcquiston@usda.gov)>

**Cc:** Mark Foster ([mark.foster@usda.gov](mailto:mark.foster@usda.gov)) <[mark.foster@usda.gov](mailto:mark.foster@usda.gov)>

**Subject:** TMP EA question (Line Creek to Little Rock Creek)

Hello Casey,

Just following up with our conversation yesterday, as I am sure this will need to be clarified in the public meeting scheduled next week, plus I really need to understand this as it has been an area of concern since its spontaneous inception during the public brainstorm as the new construction and/or conversion falls within a known elk winter area. Essentially which sections of the 140 shown on map align with the 140.0 – 140.4 referenced in the Appendix B table? And what the season is for the yellow highlight, as the chart references open May 16-December 31 on an admin road that is only 0.31 miles long which does not seem to align with the map visual that is showing a seasonal closure on more than a .31 mile section and it doesn't appear to be an admin road based on map legend.



Clarks Fork	140	140.0	1.58	NZ-01	NFSR Open to Wheeled Vehicles	2	Year-round	Yes	NFSR Open to All Wheeled Vehicles	NFST	Yes	Admin
Clarks Fork	140	140.1	0.67	NZ-01	NFSR Open to Wheeled Vehicles	2	Year-round	Yes	NFSR Open to All Wheeled Vehicles	NFST	Yes	Admin
Clarks Fork	140	140.2	0.2	-	NFSR Open to Administrative Use Only	2 Admin	Admin	Baseline	NFSR Open to Administrative Use Only	2 Admin	Yes	Year-round
Clarks Fork	140	140.3	1.73	NZ-01	NFSR Open to Administrative Use Only	2 Admin	Admin	Yes	NFSR Open to All Wheeled Vehicles	NFST	Yes	Year-round
Clarks Fork	140	140.4	0.31	-	NFSR Open to Administrative Use Only	2 Admin	Admin	Baseline	NFSR Open to Administrative Use Only	2 Admin	Yes	May 16 to Dec 31
Clarks Fork	142	142.0	2.61	-	NFSR Open to Wheeled Vehicles	2	July 1 to Dec 1	Baseline	NFSR Open to Wheeled Vehicles	2	Yes	Admin

Thank you for trying to help me interpret the SNF TMP EA Map and Appendix B regarding preferred ALT 4 in order to be better able to offer up constructive comments in this short window of time.

Ciao, Jenny



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**Attachment: 2021 Oct\_ RE SNF TMP EA Appendix B\_ response - reply**

**From:** Jenny DeSarro

**Sent:** Thursday, October 28, 2021 11:23 AM

**To:** Foster, Mark - FS <Mark.Foster@usda.gov>

**Cc:** Timchak, Lisa - FS <lisa.timchak@usda.gov>; Salzmänn, Kristie -FS <kristie.l.salzmänn@usda.gov>; McQuiston, Casey -FS <casey.mcquiston@usda.gov>; Andy Pils <apils@fs.fed.us>

**Subject:** RE: Travel Management: TMP EA Seasonal Closure Clarification

Mark,

At a first glance, key areas appear to align and make better sense. I will print out and examine more closely today.

THANK YOU!!!

Jenny



**Jenny DeSarro** | *Wyoming Conservation Coordinator* | *She/Her (What's this?)*

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**From:** Foster, Mark - FS <[Mark.Foster@usda.gov](mailto:Mark.Foster@usda.gov)>

**Sent:** Thursday, October 28, 2021 10:56 AM

**To:** Jenny DeSarro <[jdesarro@greateryellowstone.org](mailto:jdesarro@greateryellowstone.org)>

**Cc:** Timchak, Lisa - FS <[lisa.timchak@usda.gov](mailto:lisa.timchak@usda.gov)>; Salzmänn, Kristie -FS <[kristie.l.salzmänn@usda.gov](mailto:kristie.l.salzmänn@usda.gov)>

**Subject:** Travel Management: TMP EA Seasonal Closure Clarification

Jenny,

Thank you for catching the issue regarding Table 4 in Appendix B and sending us the email last night. We examined the matter and promptly resolved it. We have prepared the attached PDF, which is currently being uploaded to the project website. We are also notifying interested members of the public of the availability of the document, with links provided to corresponding maps found on the project page. The Appendix B correction corresponds to Appendix B Table 1 and the maps we have provided; this response should resolve any ambiguity. Let us know if you have any follow up questions.

Mark



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## Winter Recreation Planning Recommendations for Wolverine Conservation

Backcountry winter recreation is becoming increasingly popular as technological improvements in equipment make it easier for people to master the skills necessary to travel into the backcountry on skis or by snowmachine. This has led to a significant expansion of winter recreation across remote public lands that were previously undisturbed in winter. In light of the recently published study *Wolverines in winter: indirect habitat loss and functional responses to backcountry recreation* (Heinemeyer *et al.* 2019), our organizations have developed management recommendations for the Forest Service and other public lands agencies to employ in order to manage winter recreation to limit deleterious impacts to wolverines.

Under the 2015 Over Snow Vehicle (OSV) Rule,<sup>1</sup> every national forest unit that receives regular snowfall is required to prepare a winter travel management plan designating routes and areas for over-snow vehicle use, and closing those routes and areas that are not designated for use. Winter travel planning also presents an opportunity for the Forest Service to designate routes and areas for non-motorized winter recreation, although the OSV Rule does not require this. Holistic (motorized and non-motorized) travel management planning is encouraged, as all forms of winter recreation have been shown to impact wolverines.

When writing OSV travel management plans, the Forest Service is required to “minimize harassment of wildlife or significant disruption of wildlife habitats”.<sup>2</sup> Furthermore, the Forest Service’s 2012 Forest Planning Rule requires that National Forests integrate sustainable recreation management and protection of environmental resources.<sup>3,4</sup> During Forest Planning, the Forest Service must develop plan components guiding the management of recreation settings, opportunities, infrastructure, and access that are ecologically sustainable and adequately protect wildlife habitat. Plan components and recreation settings should align with winter travel management planning direction to minimize harmful environmental consequences.

As with all Agency decisions, forest plan allocations and winter travel planning should be guided by best available science. As wolverines are a snow-dependent species and thus overlap substantially with areas that provide winter recreation opportunities, winter travel planning is of particular relevance to their conservation. Heinemeyer’s research was intended to inform winter travel management planning and now that the study’s findings have been published, it is important to integrate them into travel planning decision-making.

The following recommendations focus on limiting the spread of the winter recreation footprint in wolverine habitat to preserve existing undisturbed refuges that wolverines depend upon while also preserving winter recreation use on federal public lands in areas where it currently occurs. Limiting the spread of the winter recreation footprint is of particular relevance on national forests

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<sup>1</sup> 36 C.F.R. parts 212 and 261

<sup>2</sup> Exec. Order No. 11,644, 37 Fed. Reg. 2877 (Feb. 8, 1972) § 3(a)

<sup>3</sup> 36 C.F.R. §§ 219.8(a) and 219.9

<sup>4</sup> 36 C.F.R. § 219.10(b)(1)(i)

that lack significant Wilderness or other protected areas where wolverines can find refuge from human disturbance.

These recommendations are intended to inform winter recreation and travel management planning within wolverine habitat. They should be considered as a “toolbox”, containing options for a variety of scenarios, as there is not a one-size-fits-all approach. While these recommendations are primarily designed with the Forest Service in mind, they are equally applicable for other land management agencies. Backcountry winter recreation has occurred on public lands for generations, but as winter recreation use grows, it is important to manage this use with sensitivity to the needs of wildlife, including wolverines.

- **Limit the spread of winter recreation in wolverine habitat.** In high quality wolverine habitat where winter recreation use is already established, buffer established recreation areas with closures to prevent recreation spread. Additionally, areas of moderate-to-high quality wolverine habitat that do not currently see winter recreation activity should be protected with closures or restrictions to provide refuge for wolverines.
- **Manage for low recreation intensity in wolverine habitat where use is currently low.** In addition to limiting the spread of winter recreation, manage areas that currently experience low-moderate winter recreation so use does not increase. This could be achieved by limiting winter parking opportunities or requiring (and limiting) recreation use permits.
- **Establish seasonal (February - April) closures to protect female wolverine habitat during the denning season.**<sup>5</sup> Importantly, closures should extend beyond denning habitat, as females need secure foraging habitat to successfully rear kits. Work with biologists to identify known female wolverine locations and establish closures in areas large enough to secure denning habitat and where foraging needs can be met. While each situation will be different, the closure area should be based on best available science (analysis is currently ongoing on the best recommended area size to support denning and foraging habitat), and should be in consultation with local and regional biologists who can provide insight into foraging challenges and opportunities.
- **Identify opportunities to improve wolverine habitat connectivity** through winter recreation management by reducing disturbance along corridors that connect high-value habitats. These steps could include requiring and limiting recreation use permits, designating recreational use within linear corridors, and closing use during denning season.
- Where demonstrated as necessary to provide access to high-value recreation resources or connectivity between communities, **consider designating some linear winter recreation routes through areas that are otherwise closed.**<sup>6</sup> Where there

---

<sup>5</sup> Heinemeyer et al. 2019: “Female wolverines exhibited stronger avoidance of off-road motorized recreation and experienced higher indirect habitat loss than male wolverines...female wolverines show the strongest functional response to motorized winter recreation.”

<sup>6</sup> Heinemeyer et al. 2019: “Wolverines avoided areas of both motorized and non-motorized winter recreation with off-road recreation eliciting a stronger response than road-based recreation.”

are designated routes through areas that are otherwise closed to protect wolverine habitat, monitor and evaluate whether designated routes are having an adverse impact, and adapt management as necessary.

These recommendations depend upon understanding the extent and location of wolverine habitat on the forest. We have provided wolverine habitat maps<sup>7</sup> developed by WildEarth Guardians using data from Inman 2013, Idaho Department of Fish and Game 2014, Washington Wildlife Habitat Connectivity Working Group 2010, and USGS Gap Analysis 2001. As it is likely that new models will be developed, the Forest Service should always utilize the best available science and consult regional experts<sup>8</sup> when creating habitat and denning models for the region in question. We recommend utilizing studies that integrate snow cover, topography, climate, and anthropogenic factors to inform mapping of wolverine habitat.

By focusing on identifying and protecting areas that provide high quality wolverine habitat that currently experience limited or no recreation use, source habitat for future wolverine populations can be maintained. Identifying population source areas can enable land managers to balance recreation management needs on areas experiencing high use, while decreasing resources spent on managing recreation use within areas of higher protection. Designating source areas also allows for analysis to be conducted that identifies existing or likely dispersal routes between habitat patches. These corridors can then be managed to enable wolverine movements. Heinemeyer et al. identified that wolverines avoid areas with dispersed recreation and had a less adverse response to travel on designated linear routes. It would be beneficial then to reduce disturbances such as dispersed recreation along these corridor routes.

Due to wolverines being a wide-ranging species, coordinating on planning and implementation between forests, and other public land parcels, is crucial. Forests should communicate and work together to consider which areas provide the best suitable habitat and to manage recreation, especially where suitable wolverine habitat spans forest boundaries. We hope that communication across forest boundaries can enable a broader landscape conservation perspective to be implemented that values protecting areas of high quality habitat currently experiencing low recreation use.

Recent publications such as Lukacs et al. 2020 can be used to monitor wolverine occupancy and distribution, and to facilitate the coordination of efforts across state and federal management boundaries to monitor the persistence of wolverines in source habitat areas. Ensuring that land managers have access to best available science for monitoring efforts is becoming increasingly valuable as the climate changes. Although the extent to which spring-time snow depth decreases due to warming temperatures is uncertain, and because running climate prediction models at the scale detailed enough for management decisions is difficult, it is prudent for land managers to take action to preserve high quality wolverine habitat that currently experiences persistent spring snow cover.

---

<sup>7</sup> See Appendix A, maps from “Connecting Wild Places: Core Habitat and Corridors” Prepared by Conservation Geography for WildEarth Guardians. May 2020.

<sup>8</sup> Kim Heinemeyer, Michael A. Sawaya, Mark Hebbelwhite and John R. Squires

In conclusion, we thank land managers for taking the time to read our recommendations.

### Contributors

Hilary Eisen

*Policy Director, Winter Wildlands Alliance. Bozeman, MT.*

Hannah R. Rasker

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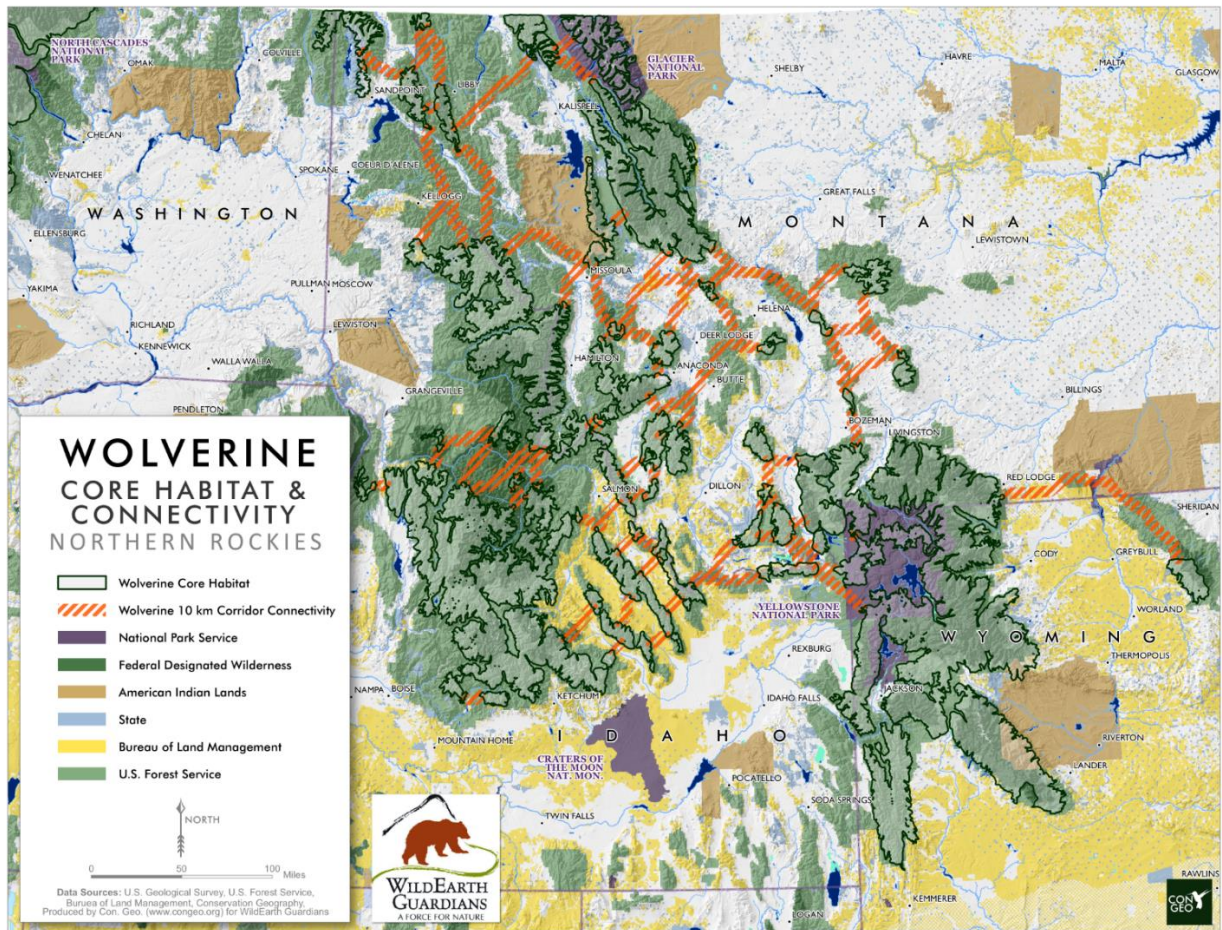
Inman, Robert M., Brent L. Brock, Kristine H. Inman, Shawn S. Sartorius, Bryan C. Aber, Brian Giddings, Steven L. Cain, et al. 2013. "Developing Priorities for Metapopulation Conservation at the Landscape Scale: Wolverines in the Western United States." *Biological Conservation* 166 (October): 276–86. <https://doi.org/10.1016/j.biocon.2013.07.010>.

Lukacs, Paul M., Diane Evans Mack, Robert Inman, Justin A. Gude, Jacob S. Ivan, Robert P. Lanka, Jeffrey C. Lewis, et al. 2020. "Wolverine Occupancy, Spatial Distribution, and Monitoring Design." *The Journal of Wildlife Management* n/a (n/a). <https://doi.org/10.1002/jwmg.21856>.

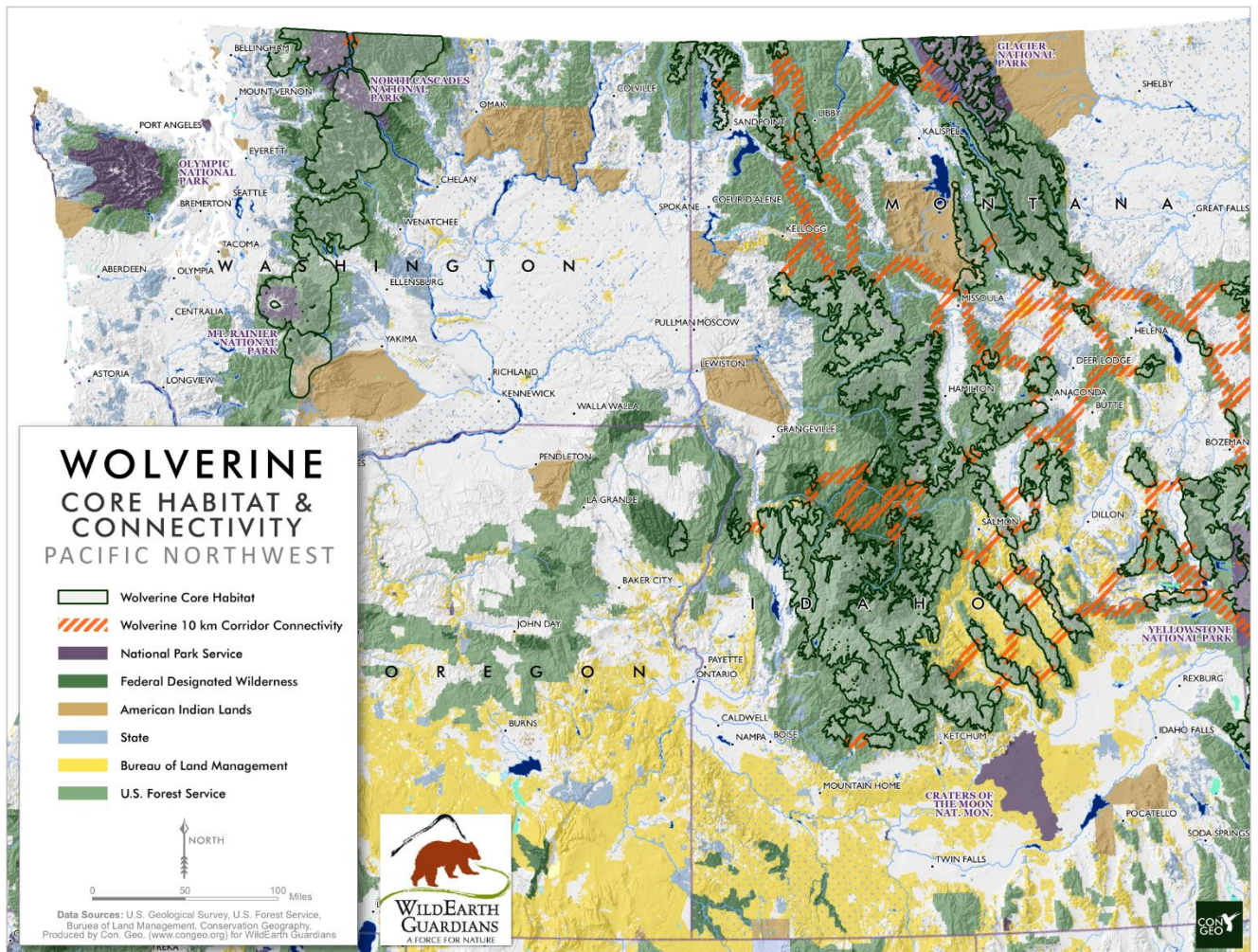
## Appendix A: Wolverine Habitat Maps

From: Connecting Wild Places: Core Habitat and Corridors” Prepared by Conservation Geography for WildEarth Guardians. May 2020.

The following maps depict areas of core habitat across the known breeding range for wolverines in the Northern Rockies and Cascades, respectively. The habitat and corridor delineations depicted on these maps are the results of a westwide analysis completed by Conservation Geography. The analysis integrates best available information on species' distribution with data on anthropogenic impacts and biotic and abiotic environmental factors. All suitable habitat classified as 'occupied' by Inman or patches in close proximity to 'occupied' habitat are represented on the maps as 'general habitat'. Public land road density is shown across the areas of general habitat. Other general habitat areas on lands owned by the Department of Defense or on private or tribal lands are not shown. Potential linkages between core habitat patches are shown as 10 km wide corridors. These are depicted in shades of blue indicative of the relative degree of resistance within the corridor. Darker blue regions have greater resistance than light blue regions and therefore may represent possible 'pinch-points' within a corridor for dispersing individuals. The core habitat patches in the Cascades are separated by narrow highway corridors and thus did not warrant a least cost path analysis given the relatively short dispersal distance between them.









Sarah Walker &lt;swalker@wildwyo.org&gt;

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## Warm Spring Mtn Loop

---

**VonKienast, Jeff- FS** <jeff.vonkienast@usda.gov>

Fri, Nov 12, 2021 at 6:23 PM

To: Robert Hoskins &lt;bryngaer@gmail.com&gt;

Cc: Joan Timchak &lt;jetimchak@gmail.com&gt;, Sarah Walker &lt;swalker@wildwyo.org&gt;, "Timchak, Lisa - FS" &lt;lisa.timchak@usda.gov&gt;, "Foster, Mark - FS" &lt;Mark.Foster@usda.gov&gt;

Hi Robert. With respect to the Warm Springs loop of concern, site-specific review, analysis, and design has not occurred. Our Interdisciplinary Team reviewed and analyzed it at the forest scale. The proposal remains an option that the Forest would like to proceed with provided that during the ensuing site-specific review and analysis, issues of significance are not identified. That process will include public engagement (through appropriate project-specific scoping and comment periods) and compliance with all necessary regulatory processes.

Additionally, it is inevitable that agencies within the government may identify routes differently, or that internal route numbering may change over time. This happened on the forest I was working on previously as well. I can't specifically answer your questions regarding timing of route numbering changes. Because I simply don't have that history here. The current analysis relies on the most recent review of roads, trails, and areas within the Shoshone NF boundaries and relies on the best available science, including aerial photography to review the impacts to the Forest's resources from the proposed action. Again, any new route construction will go through site-specific analysis.



**Jeff von Kienast**  
District Ranger

**Forest Service**

**Shoshone National Forest, Wind River Ranger District**

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**Caring for the land and serving people**



**From:** Robert Hoskins <[bryngaer@gmail.com](mailto:bryngaer@gmail.com)>  
**Sent:** Friday, November 12, 2021 9:27 AM  
**To:** VonKienast, Jeff- FS <[jeff.vonkienast@usda.gov](mailto:jeff.vonkienast@usda.gov)>  
**Cc:** Joan Timchak <[jetimchak@gmail.com](mailto:jetimchak@gmail.com)>; Sarah Walker <[swalker@wildwyo.org](mailto:swalker@wildwyo.org)>  
**Subject:** [External Email]Warm Spring Mtn Loop

[External Email]

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**Phil Hocker (o)**

---

**From:** "Phil Hocker (o)" <phil@hockers.com>  
**To:** <Objections-Chief@fs.fed.us>  
**Cc:** "Brett French @Billings\_Gazette" <BFrench@BillingsGazette.com>; "Connie Wilbert @Sierra Club-Wyo" <connie.wilbert@sierraclub.org>; "Timothy Preso @Earthjustice" <tpreso@earthjustice.org>; "Ann Harvey" <aharvey@wyom.net>; "Andy Wiessner" <wiessner@sopris.net>; "Rocky Barker (ID)" <rbarker@rockybarker.com>; "Mike Koshmrl @JHN&G" <environmental@jhnewsandguide.com>; "Joan Barron @Trib.com" <joan.barron@trib.com>; "Lloyd Dorsey @GYC" <ldorsey@greateryellowstone.org>; "Lisa McGee @WOC" <lisa@wyomingoutdoorcouncil.org>; "Sarah Walker @WyWA" <swalker@wildwyo.org>; "Geoff O'Gara @wyofile" <ogarageoff@gmail.com>; "Steve Thomas @Sierra Club" <steve.thomas@sierraclub.org>; "Joe Alexander, Supervisor, Shoshone NF" <jalexander@fs.fed.us>; "Carrie Christman @Shoshone NF" <cchristman@fs.fed.us>; "Ralph Swain - USFS R-2" <rswain@fs.fed.us>; "Randy Welsh @USFS-WO" <rwelsh@fs.fed.us>; "Bart Koehler" <bart\_koehler@yahoo.com>  
**Sent:** Tuesday, 25 February 2014 10:10 AM  
**Attach:** Shoshone NF Forest Plan Revision -Phil Hocker dEIS Comments with SNF Receipt 26Nov12.pdf  
**Subject:** Objection to the Shoshone Land Management Plan Draft Decision

**TO: Chief Forester Thomas Tidwell**

Forest Service, U. S. Department of Agriculture, Washington, DC  
 via e-mail to: [Objections-Chief@fs.fed.us](mailto:Objections-Chief@fs.fed.us)

**As Reviewing Officer for:**

**Adoption of Land Management Plan Revision, pub. Jan 2014,  
 Shoshone National Forest, Forest Service, USDA**

**Objection to Decision**, submitted 25Feb2014 via electronic e-mail transmission;

This objection is timely according to Notice at 79 F.R. 14, January 22, 2014, pp.3565-66.

RE: Mapping and Management of the DuNoir Special Management Unit  
 and Wyoming High Lakes Wilderness Study Area, Shoshone NF

Dear Chief Tidwell:

Thank you for this opportunity to object to the adoption of the revised Land Management Plan for the Shoshone NF as published in January, 2014. I applaud the Forest Service for completing this revision to the Management Plan for the Shoshone NF. I wish other Units of the System were revising their Management Plans on the schedule anticipated by the National Forest Management Act; I hope the Service will be funded adequately so this vital management need can be filled for the entire System.

I have been involved with Shoshone National Forest planning since the 1970's. I submitted comments in 1985 for the Sierra Club Wyoming Chapter on the then-proposed iteration of the Shoshone NF Management Plan, and pursued the Administrative Appeal of that Plan adoption in 1986 with other conservationists and groups. I worked closely with the Forest Service and the Wyoming Congressional delegation and other members of Congress including the Hon. John Seiberling to negotiate the Wyoming Wilderness Act of 1984. I had a key role in getting the 1987 "Federal Onshore Oil and Gas Reform Act" passed by Congress to give the USFS statutory approval authority, instead of merely advising the BLM, over oil/gas leasing decisions on National Forests. I was Sierra Club Wyoming Chapter Chair 1978-80, Sierra Club National Board Member 1980-86, and Sierra Club Treasurer and CFO 1983-86. I founded and ran Mineral Policy Center with Stewart Udall as Chair of my Board of Directors from 1987-1998. I do not hold office in or speak for the Sierra Club or Mineral Policy Center today.

On 26 November 2012 I submitted formal comments on the current proposed Shoshone Land Management Plan revision. The USFS acknowledged timely receipt of those comments by e-mail. A PDF of those comments including the USFS acknowledgment response is attached to this Objection.

**Failure to obey Congressional direction on special areas:**

My November 2012 comments pointed out the failure of the United States Forest Service to follow Congressional instructions to prepare formal legal descriptions and maps for two Congressionally-protected special areas on the

Shoshone National Forest. I asked that the USFS comply with the law. In the proposed Revisions, Forest Planner Carrie Christman agrees that these requirements of law have not been met.

Congress instructed the USFS to develop a detailed legal description and formally-filed maps--

- 1- For the DuNoir Special Management Unit, "As soon as practicable after this Act takes effect" - which was **October 9, 1972** [Public Law 92-476, October 9, 1972, Sec. 5(c)], and
- 2- For the High Lakes Wilderness Study Area, "As soon as practicable after the enactment of this Act" - which was **October 30, 1984** [Wyoming Wilderness Act of 1984, Public Law 98-550, October 30, 1984, Sec. 202]

According to Shoshone NF Planning Staffer Carrie Christman (e-mail 3-Feb-2014), the response to these violations of law will be: *"We have addressed the mapping of High Lakes WSA and Dunoir SMU with the following objectives in our revised Land Management Plan:*

*By 2019 complete the Forest's portion of the process for establishing a legal description for the High Lakes Wilderness Study Area. (MA1.6A-OBJ-01)*

*By 2019 complete the Forest's portion of the process for establishing a legal description for the Dunoir Special Management Unit. (MA1.6B-OBJ-01) "*  
[italics added by me]

Thus the revised Plan sets objectives to "complete the Forest's portion of the process" -- still not to fully comply with the law -- in **2019, forty-seven years late** for the DuNoir SMU and **thirty-five years late** for the High Lakes WSA. It reflects badly on the United States Forest Service's professionalism and obedience of law, that after this long-standing failure has been pointed out the Shoshone National Forest still plans to stall this duty for another five years.

#### **Objection:**

I object to making it a "Plan" to continue to ignore the mapping obligations set by laws passed by Congress. As Chief Forester, I ask you to direct the Shoshone NF to modify its Management Plan revision to call for immediate completion of the legal descriptions and formal maps for the DuNoir and High Lakes areas. The mapping process should include full disclosure of the legal basis for proposed precise boundaries, and full opportunities for public examination and comment on boundary proposals before final lines are adopted and recorded according to law. When the Forest Service waits for decades to comply with mapping directions, the process must be an open public discourse rather than a confidential internal clerical process.

My November 2012 Comments raised other concerns regarding the Plan. Those comments are attached and I request that all concerns therein be treated as Objections. However, this letter is focused on the special areas mapping problem.

#### **Obligation to Accept Objections from other groups:**

Other Wyoming and National conservation groups tell me they share the concern over the mapping failure. If those groups did not list the failure to do this mapping specifically in their formal EIS comments, that is largely because the Forest Service did not properly disclose the problem. Since the USFS does not accurately describe "the affected environment" and honestly expose the proposed action (to disobey statute for five more years on top of forty-two and thirty years' tardiness), I believe the Forest Service should in good faith accept that this issue is significant and should accept objections if other groups choose to express objection at this time. As the Federal Register Notice acknowledges, if an "objection concerns an issue that arose after the opportunities for formal comment," the Forest Service is obliged to consider the fresh objection. [F.R. Notice, "How to File an Objection," listed item (7)]

#### **Duties of the Chief Forester -- "Missing Maps" across the FS System:**

Chief Tidwell, detailed maps and legal descriptions have been required by scores of Acts of Congress for National Forest areas -- including designated Wilderness Areas, Wilderness Study Areas, and some "Special Management Units" like the DuNoir in Wyoming. USFS staff inform me that many of these maps and legal descriptions have never been completed. Many of the statutes require that "Each such map and legal description shall be on file and available for public inspection in the Office of the Chief of the Forest Service, Department of Agriculture." [example, Wyoming Wilderness Act of 1984, Public Law 98-550, October 30, 1984, Sec. 202]

With the gracious cooperation of your staff, I have personally visited "the Office of the Chief of the Forest Service...." Despite the clear text of the laws, many of the required maps and legal descriptions are simply not there.

I am told that efforts are underway to clean up this backlog, but they are far from complete. No new Forest Land Management Plan should be accepted that proposes to delay completion for five more years. Furthermore, while "GIS" and "digital" processes can be extremely useful and efficient, the intent of Congress as expressed in statute is that the boundaries of these areas be "available for public inspection" in a form that does not require computers or special software, "in the Office of the Chief." This

places a special honor on your Office, and a special responsibility. I hope you will ensure that this honor and responsibility are fulfilled very soon. Adding a digital alternative is useful, but the physical maps and descriptions must remain available as directed by law.


This information is needed for proper management by the Service. Examples are multiplying across the System of District-level management decisions taken where the boundaries of Congressionally-protected areas have never been precisely delineated. Errors are being made, however inadvertently. The cure is to get these long-overdue mapping projects complete now.

**Conclusion:**

Many of these points have been raised with FS staff on Forests, at R-2 and R-4, and at WO since March 2012. This January 2014 proposed Shoshone NF Land Management Plan suggests that the Service still does not regard these plain violations of the law as important. I hope you will instruct the Service to follow the instructions of Congress and complete these legal-description and mapping instructions very promptly, both through the Shoshone decision and System-wide.

Thank you for your consideration and attention. If I can assist your staff with completing this chore, please call on me. Please keep me informed of your response to this Objection, and of all further steps on the Shoshone NF Land Management Plan Revision decision.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Phil Hocker", with a long horizontal line extending to the right.

Phil Hocker  
[electronic signature attached to this e-mail]

-----  
Philip M. Hocker  
ConServCo / Conservation Service Company, LLC  
20 West Chapman Street  
Alexandria, Virginia 22301  
tel: 703.683.4990  
cell / text: 307.480.0200 -sic  
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**Phil Hocker (o)**

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**From:** "FS-objections-chief" <objections-chief@fs.fed.us>  
**To:** "Phil Hocker (o)" <phil@hockers.com>  
**Sent:** Tuesday, 25 February 2014 10:19 AM  
**Subject:** Your email was received by the objections-chief mailbox.  
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<p>Note: this one-page USFS e-mail acknowledgment of receipt of Objection was received as shown in the header, by automatic response to filing of three-page Objection by Philip Hocker on 25Feb2014.</p>
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**Wyoming Wilderness Association**  
PO Box 6588 (Mailing)  
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Sheridan, WY 82801  
307.672.2751

July 21, 2021

Submitted electronically to Jeff VonKienast, Mark Foster, Lisa Timchak

Re: MT14 Trail Improvements and Travel Planning

Dear SNF Travel Planning Team,

Please consider our significant concerns around the scheduled MT14 ATV trail improvements made public just last week. (July 12, read in

<https://county10.com/headsup-scheduled-work-on-motorized-trail-to-impact-moon-lake-area/>)

Jeff, thank you for getting back to me and the discussion regarding these concerns yesterday. Mark and Lisa, I wanted to include you in this conversation as it strongly pertains to travel planning. Please include these comments in your travel management plan records.

As discussed with Ranger von Kienast, maintenance and improvement on your existing route system is commendable and generally not in conflict with ongoing travel planning efforts. There are several reasons why the unexpected and recently announced blasting project for MT14 has alarmed many individuals and partners heavily invested in the Shoshone's travel planning process:

- The proposed Bachelor Creek loop - a proposal requiring significant new route construction to create a "large effective loop" utilizing MT14 - has been one of the most contentious and opposed proposals since the beginning of travel planning. (WR 11, WR 78, and other iterations, proposed as early as 2015 and recently included in the 2020 draft preferred alternative.)
- The fate of MT14 itself is presently debated through multiple travel plan proposals. Proposals to close this trail have been submitted by the public during travel planning and should be included in future draft alternatives.
- Requests for the history and record of decision for this ATV trail bordering the Fitzpatrick Wilderness have been repeatedly submitted and gone unanswered during official travel planning comment periods. This requested information should have been provided to the inquiring public before approving blasting improvements without analysis or public involvement.
- The many comments submitted against the new Bachelor Creek loop additions have noted a currently low level of use on the existing MT14 trail, and questioned how increasing traffic along this trail will impact the environment. Making trail improvements to this trail at this time irreversibly alters the parameters, context and impacts of the current proposed travel plan alternatives. (Submitted requests for analysis for the MT14/Bachelor Creek loop proposals include impacts on the adjacent designated Fitzpatrick Wilderness, wilderness potential of the inventoried roadless area, and existing non-motorized recreation opportunities in this area. See Attached, WWA2016, page 37).

Prioritizing significant financial and physical improvements on a trail whose fate is actively debated during travel planning appears pre-decisional and signals that the SNF is not seriously considering public input in its travel planning decisions. As an organization heavily invested in the travel planning since its inception, WWA opposes this project at this time. On behalf of our concerned local members and conservation partners, we strongly encourage the SNF to postpone improvements on MT14 until the travel planning process concludes.

We appreciate the SNF's initiative and desire to utilize State Trails resources to improve the existing system and MVUM compliance, but counter that these resources be used on any of the other Wind River District's roads or trails desperately in need of improvement. If the resource concerns on MT14 are so great as to make this trail project the urgent priority at this time, the SNF is well within its right to issue a temporary closure on MT14 until travel planning determines its outcome. By postponing this project until the travel planning process concludes, the Forest has an opportunity to maintain critical public trust by 1) eliminating the pre-decisional actions on a controversial route; and 2) displaying good financial stewardship in the case that the travel planning eliminates the need for these improvements entirely.

After speaking with Ranger von Kienast, it is unclear whether postponing this project is even possible within the recently announced timeline. This in itself is unfortunate. If the SNF had reached out to the many individuals and organizations that have commented on MT14 and opposed the Bachelor Creek loop since 2015, there could have been appropriate discussion about the implications of this project and plausible alternatives. Even outside of travel planning and timing concerns, the decision to approve a blasting project on an ATV trail delineating the boundary of the Fitzpatrick Wilderness during Stage 1 fire restrictions reasonably warranted careful consideration, analysis and outreach to stakeholders, partners and the public.

Finally and most urgently, WWA again officially requests documentation on the history and record of decision on MT14's designation as an ATV trail. Routine maintenance of existing designated trails may not require NEPA, but since information on the timing and rationale for designating MT14 has been questioned and unanswered throughout travel planning, we again request this history and documentation be provided before trail improvements commence.

Thank you for your consideration of these concerns and your commitment to the integrity of the travel planning process.

Respectfully,



Sarah Walker  
Policy Coordinator  
[Wyoming Wilderness Association](http://WyomingWildernessAssociation.org)  
swalker@wildwyo.org  
307.672.2751



Sarah Walker &lt;swalker@wildwyo.org&gt;

---

## Suspension of blasting operations on MT-14

---

**VonKienast, Jeff- FS** <jeff.vonkienast@usda.gov>

Fri, Jul 30, 2021 at 10:45 AM

To: Sarah Walker &lt;swalker@wildwyo.org&gt;

Cc: "dan\_smitherman@twos.org" &lt;dan\_smitherman@twos.org&gt;, "jdesarro@greateryellowstone.org" &lt;jdesarro@greateryellowstone.org&gt;, "metaylor@wyoming.org" &lt;metaylor@wyoming.org&gt;, "Timchak, Lisa - FS" &lt;lisa.timchak@usda.gov&gt;, "Foster, Mark - FS" &lt;Mark.Foster@usda.gov&gt;

Sarah,

You have requested clarification on how MT-14 was designated a motorized trail on the Forest and how that designation complied with the minimization criteria requirements for trails. We have and are continuing to conduct an exhaustive search to identify relevant information. The best historical record we have been able to find is a motorized vehicle map dating to 1981 (see attached zip folder, Image1 & Image2). The map indicates NFSR 524 running next to the border of the Fitzpatrick Wilderness (to the South), until that road eventually transitions to a motorized trail (Image4 & Image5). The dashed line versus the two parallel lines depict the motorized trail versus the road (Image3 & Image5).

Our best guess, at this point, is that the entire route to Moon Lake (covering NFSR 524 and MT-14) was a historical access route, potentially used for logging and timber operations and for public recreational use. We also found a 1971 map with a "trail" designated on it, but it does not specify whether it was motorized or not on the legend. That is likely because the Fitzpatrick Wilderness was not designated until October 1976. We are fairly certain that the Fitzpatrick boundary along the motorized trail that is now designated as MT-14 was defined there specifically because of the motorized use. After the designation of the Fitzpatrick Wilderness, we are guessing that the Forest Service re-designated a portion of the route as a motorized trail. We are still looking for records that reflect this potential designation, but we can probably pinpoint that event to sometime between 1976 (the time when the Fitzpatrick Wilderness was designated) and 1981 (when this map was published).

What we can say, unequivocally, is that the trail has been on the system and used for at least the last 40 years. Additionally, since the Forest has never before gone through travel management (as dictated by the 2005 travel management rule and corresponding regulations), the MT-14 route has not been subject to any minimization criteria requirement. Finally, the route remains consistent with management for motorized use outside the wilderness boundary, given the direction under the Wyoming Wilderness Act prohibiting any buffer around these designated areas.

I hope the attached photos of the 1981 map provide you with some of the information you need. Again, we will continue to search our records to provide a more comprehensive picture of the route, though other local, regional, and national priorities may take precedence, specifically the current wildfire situation across the country.



**Jeff von Kienast**  
District Ranger

**Forest Service**

**Shoshone National Forest, Wind River Ranger District**



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**From:** Sarah Walker <[swalker@wildwyo.org](mailto:swalker@wildwyo.org)>  
**Sent:** Wednesday, July 28, 2021 8:24 AM  
**To:** VonKienast, Jeff- FS <[jeff.vonkienast@usda.gov](mailto:jeff.vonkienast@usda.gov)>  
**Cc:** dan\_smitherman@tw.s.org; jdesarro@greateryellowstone.org; metaylor@wyoming.org; Timchak, Lisa - FS <[lisa.timchak@usda.gov](mailto:lisa.timchak@usda.gov)>; Foster, Mark - FS <[Mark.Foster@usda.gov](mailto:Mark.Foster@usda.gov)>  
**Subject:** Re: Suspension of blasting operations on MT-14

Jeff,

[Quoted text hidden]

[Quoted text hidden]

[Quoted text hidden]



**MT-14.zip**  
14528K

# **Shoshone National Forest**

## **Compliance Working Group Recommendations**

**11/18/2016**

### **Introduction:**

The travel management process is the Shoshone National Forest's first step in implementation of the recently revised Land Management Plan. During the forest plan revision, and as the Forest began the travel management process last summer, multiple members of the public brought forward concerns about compliance and enforcement of the current motorized system. As such, the Forest leadership decided to hold a two-day workshop on education and compliance to explore what other forests have done to address these issues; as well as to seek input from the public regarding improving accountability and compliance on the Shoshone's motorized system. Over 20 individuals representing a variety of interests attended this workshop and laid the groundwork for a follow-up working group. In an effort to move these ideas forward, Forest Supervisor Joe Alexander decided to initiate a working group to find new tools to improve compliance. The ideas compiled by the workgroup will be considered for inclusion in the post travel management plan implementation plan; and where feasible, the ideas may be implemented prior to completion of that travel management process by the Shoshone National Forest. In addition, the tools generated may also be utilized for mitigation measures or as design features in alternatives for the Environmental Analysis.

The working group was organized under a charter developed by Forest Supervisor Joe Alexander (see Appendix B). The working group Charter introduction, objective and participants were stated as follows:

*The Shoshone National Forest has formed a working group to improve the accountability of its existing motorized road and trail systems. In addition, the Forest would like to create a system that is more user-friendly and appealing to the motorized user resulting in an enhanced recreational experience for all user groups.*

**Objective:** Identify ways to encourage and improve compliance on our motorized system of roads, trails, and areas through a variety of methods and techniques.

**Participants:** WY Game and Fish, WY State Trails Program, Sierra Club, Northwest Off Highway Vehicle Alliance, County commissioners from Fremont, Park, and Hot Springs County, Meeteetse Conservation District, Greater Yellowstone Coalition, Wyoming Wilderness Association, OHV clubs representatives from Lander and Riverton, BLM, Backcountry Horseman, Backcountry Hunters and Anglers, other interested publics, Shoshone National Forest (Rick Metzger, Ron Ostrom, Doug Johnson, Mike Franchini).

The working group met in Thermopolis on March 25, 2016. Following the directive of the charter, selected a Chair, Jerald “Jay” Jochim, and initiated work. Four additional meetings followed over the course of the summer, and those discussions resulted in the set of recommendations in this document.

To organize our recommendations, the Working Group chose the categories of the 4 E’s: Engineering (also known as, Infrastructure), Education, Enforcement and Evaluation.

## **Engineering (Infrastructure):**

The working group determined that travel system signage, road and trail condition, and the ability to monitor the travel system are essential components to a well-functioning Forest travel system. These components, combined, are grouped under our infrastructure recommendations. Well-designed and maintained infrastructure is absolutely necessary so that the public can use and enjoy the forest travel system, while at the same time comply with forest travel rules and regulations. We agreed that the vast majority of motorized recreational users have the desire to do what is right and follow the rules; however, without the proper types of infrastructure, their ability to do so is hindered. Inadequate infrastructure makes it difficult to prosecute intentional violators. Improvements in infrastructure would reflect Shoshone’s commitment to encouraging compliance on the designated system routes.

### **TRAIL SIGNAGE:**

1. Signs should be consistent
  - a. Within Shoshone National Forest (north and south zones)
  - b. Regionally among neighboring forests, especially where routes cross jurisdictions where possible.
  - c. Between the signs on the ground and the maps (virtual and paper MVUM).
2. Messaging should be simple to understand and precise
  - a. If there is a closure or seasonal restriction, have a short explanation of WHY (Chapter 6A; page 370 or 6A-4, 6A-5)<sup>1</sup>
  - b. Use more symbols and less words
  - c. Continue the use the American Flag on the signs.
3. Types of Signs
  - a. Permanent “You Are Here” maps at key locations would help inform the user about what opportunities lay ahead (5.6 Locator Map Signs)<sup>1</sup>. Seek further recommendations from motorized user groups, focusing specifically on high-traffic and/or areas of non-compliance.
    - i. Examples on the Wind River District, may include: Upper Warm Springs Subdivision, Lower Bachelor Creek Trailhead, the Upper 454 Wildcat Loop entrance above the subdivision, Horse Creek, Long Creek, and the Moon Lake Trailhead.

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<sup>1</sup> *Sign and Poster Guidelines for the Forest Service*, full citation is in Appendix A.

- b. Include mileage (3E.9 Reference Location Signs)<sup>1</sup>, allowable use (recreation symbol) and confidence markers (3E.6B Directional Arrow Auxiliary Signs and 5.8 Reassurance Markers)<sup>1</sup> along open routes. “Open signs” are less likely to be vandalized and require less upkeep than “closed” signs. Mileage, waypoint, and confidence markers can be small, effective with encouraging compliance, while also avoiding a sense of sign pollution.
  - c. Consider “loop symbol” signage and popular names to promote existing loops, like *Wild Cat Loop*.
  - d. Signs for Non-System Routes
    - i. Barricades need to be placed at their most effective location.
    - ii. Physical barriers- buck and rail fence, boulders or logs- are superior to carsonite signs and should be implemented when possible.
    - iii. Obliteration and barricades should be done in a manner as to not preclude other uses, with special attention to winter OSV use.
    - iv. The Forest should prioritize unauthorized routes for decommissioning, especially those roads not needed for FS maintenance or future use.
    - v. Barricades and closure notices should strive to be permanent and visible, while being conscious of other allowable users to have appropriate access.
  - e. Use the “Trail Restriction” sign with symbols, dates, and explanations (6A.1, pg. 367 and 6A.3, pp 369-372)<sup>1</sup> in areas that can be accessed by snowmobile in winter, yet not by wheeled vehicles or vice versa.
4. Placement of Signs
- a. Intersections should have markers with route numbers on all system routes proceeding from intersection.
  - b. Place informational signs, seasonal closures and route markers where they are visible year-round and on permanent infrastructure when possible; i.e. gate posts, fence posts and rails, trees. See examples in photos below.
  - c. Install confidence markers at junctions with unauthorized routes or dead-end/dispersed camping spurs directing use onto authorized, legal route.
  - d. Distance/Mileage markers on:
    - i. Spur/dead-end
    - ii. Dispersed camping
    - iii. Point of interest

#### **ROAD AND TRAIL MAINTENANCE:**

Frequently, unauthorized use occurs because there has been a neglected maintenance item on a road or trail; i.e. *Mud holes, washouts, downfall trees, etc.*

1. Use “temporary closure” signage with explanation for these types of issues on routes that have a high traffic demand.
2. Ensure that the repair/maintenance is scheduled as a priority.

3. Evaluate and consider minor alterations to route to avoid continued habitat damage or repair/maintenance issues in future.
  - a. End route before problem area.
  - b. Move route away from problem area if it avoids created other potential problems.
  - c. Install bridge to avoid riparian/water quality damage.
  - d. Add barriers that keep traffic on designated route.
4. Develop an adaptive management plan that can aggressively address the maintenance issues on the Shoshone.
5. Expand and improve partnerships with the State and public entities to provide funding and man power to help with maintenance; as well as, improve user satisfaction by addressing user needs.
6. Implement a reporting system so the public may report maintenance issues to the appropriate district office. Add a phone number to the motorized kiosks for this purpose.

#### **KIOSKS:**

1. Kiosks should be consistent across the forest.
  - a. Large informational kiosks are important for heavily used trailheads, parking and staging areas. Most of these structures are currently in place on the Forest. These large kiosks should contain information important to all types of users likely to be using that area; i.e. *leave-no-trace, bear information, map graphics, fire guidelines, food storage, etc.*
  - b. Small informational kiosks (4'X4' panel) should supplement large kiosks at major parking areas and other appropriate locations to target specific user groups (10B.4.3 VIS Content, pg. 545-548)<sup>1</sup>:
    - i. A motorized use kiosk should contain:
      - An image of motorized recreation at the top "header" to draw attention
      - The pertinent rules of operation and registration including violation fines
      - A map of the immediate area as well as maps available to take
      - A brief overview of the travel restrictions applicable to local area; i.e. *Seasonal closures, temporary closures, vehicle types*
2. Create list of recommended locations for small and large kiosks in cooperation with user groups.

#### **Education:**

The working group feels strongly that, education is an integral part of compliance and is tied directly to the infrastructure and enforcement sections. The following recommendations cover a wide array of educational ideas and opportunities that can individually improve compliance, but will be more effective as a complete package.

#### **SIMPLIFY MESSAGE:**

We recommend that all travel system messaging be 'short and sweet'. Use icons and info graphics as much as possible, especially on system signage and at trailhead kiosks.

### **DIGITAL MEDIA COMMUNICATION:**

1. WEBSITE. The Shoshone website ought to add a link to a designated page for motorized recreation. Some of the items needed on this page may include:
  - a. Highlight the seasonal and temporary motorized route closures.
  - b. Post the relevant travel management requirements.
  - c. Utilize Facebook for announcements and/or travel updates.
  - d. Make downloadable PDF maps showing travel system available, as well as simple basic travel rules.
  - e. Feature a link to Wyoming State Trails' recreational motorized use maps and information website.
  - f. Include a comment area for the public to report issues or alert the Forest to such things as maintenance needs, MVUM issues, violations and the Forest can utilize it to send targeted messages out. Set up so messages can be immediately directed to the correct personnel.
2. FACEBOOK. Post announcements, such as seasonal openings and closures, maintenance issues, and/or travel updates. Utilize Facebook in conjunction with the Website.
3. EMAIL SERVER. Explore adding an email "listserver" sign-up and a "hotline" from the website so that the public can alert the Shoshone Forest to such things as maintenance needs, violations and the Forest can utilize it to send targeted messages out.

### **MAPS:**

1. Map Improvements.
  - a. Better use of infographics to highlight important topics, including key or legend.
  - b. Include photos of invasive species to help the public identify and report them.
  - c. Use a QR code so that the public can scan the map into their phone or other device.
  - d. Display numbers for major intersections that correspond to on-the-ground signs to help orient the public.
  - e. Have the maps available in a PDF format
  - f. Break up blocks of text (white space) so that when they are downloaded there is not long strings of text.
2. Map Distribution. A related issue with maps was their distribution. Namely, how best to get them out to the public. Some ideas for where to have the MVUM available included:
  - a. At Game and Fish checkpoints
  - b. Retailers, gas stations, other known 'hot spots' in town
  - c. Trail Host gives out
  - d. Partner w/groups to distribute
  - e. At kiosks
  - f. Every OHV sticker sold in Park, Fremont, and Hot Springs counties comes w/an appropriate map – FS and State, printed or scan the QR code
3. We recommend the FS engage with user groups, via the website or FB, to improve maps during the annual review.

### **TRAIL HOST PROGRAM:**

We encourage that the Forest Service work with Wyoming State Trails and user groups to implement a Trail Host Program. The program would focus on high use areas and periods.

**TRAILER:**

We encourage pursuing the use of an education trailer for the purpose of having a very visible location to spread the messages of compliance. Consider borrowing or sharing trailer with another Forest or organization like Tread Lightly, or State Trails.

- Known gathering spots in small towns during key seasons
- Fairs
- Outdoor expos
- Target youth by visiting schools or working with local youth groups like Boy Scouts or Boys and Girls Club of America

**INTERNAL TRAINING AND DEVELOPMENT:**

We encourage Forest Service provide applicable personnel additional training and development to increase the level of understanding with respect to:

1. Management Guidelines for OHV Recreation (see Appendix A)
  - a. Sustainable attainable motorized use methods
  - b. Maintenance and development
  - c. The value of the “fun factor” for a trail system
2. Travel regulations
3. Public relations skills
4. A constantly increasing demand for motorized recreation.

**MVUM AND TRAVEL PLANNING OUTREACH:**

Prioritize educational outreach on the importance of the MVUM in identifying the designated route system.

1. We encourage the FS to continue addressing the existing unauthorized routes to validate the accuracy of the MVUM.
2. One efficient method to do this would be to produce an informational flyer to be posted at trailhead kiosks, on driver windshields, and on newly constructed barriers. Pamphlet or official notice could read:

*“The Shoshone National Forest is committed to enforcing compliance to its designated route system identified by the official Motor Vehicle Use Map. (Insert Picture of MVUM). Motorized users should expect increased education and enforcement efforts as part of the designated route Compliance Initiative. Changes to the designated route system are currently being considered under the current Travel Management Planning process. Contact any Shoshone National Forest office or visit <http://www.fs.usda.gov/shoshone/> to get involved and stay informed.”*

3. Issue statewide Press release with above message.

## **Enforcement:**

Effective enforcement of travel rules is an essential component of the travel system on the Shoshone National Forest. Before effective enforcement can be possible, there must be maps available and good signage on the forest routes, allowing the travel system user to readily know when they are in compliance with travel rules. Good signage and maps is also essential for successful prosecutions. There should also be effective educational efforts ongoing to help the system users be aware of forest travel rules.

### **INCREASE FOREST SERVICE PRESENCE:**

We recommend the Forest maximize the number of Forest Service personnel out on the travel system interacting with forest users, especially during high use and system abuse periods, e.g. holiday periods, hunting season and shed antler collection periods. The intent of increased FS presence is to have greater visibility and educational impact, regardless of the employee's capacity to cite violations.

### **PROSECUTION AND PENALTY:**

1. The working group recommends that the Forest Supervisor's office participate actively with the magistrates, federal attorneys, whoever convenes every time period to review penalties and push for larger fines, with graduated stiffer penalties for repeat offenders. Work with judges to increase awareness of the seriousness of these offenses, both in terms of resource damage and the threat to access by the law-abiding public.
2. Make sure successful prosecutions are publicized in local media, sportsman's publications (Wyoming Wildlife), and made known to area OHV organizations.

### **VOLUNTEER REPORTING**

1. Use the previously recommended website section or develop a reporting system similar to the poaching hotline so the public can report motorized violations and effectively participate in protecting motorized access. Even if public reporting of violations does not result in prosecutions, the mere existence of such a system will be a deterrent to some potential violators.
2. Work with current efforts (Backcountry Hunters & Anglers) to extend the effort to get the public to help report violations.

## **Evaluation:**

Pivotal to our recommendations is the need for an Implementation Action Plan that outlines how the Shoshone Forest plans to sign and maintain the authorized system routes, Recommend that the SNF use the White Forest Action Plan as a model

### **SYSTEMATIC MONITORING:**

1. Distribute the annual Law Enforcement Report to forest management for use as a management tool to direct resources as necessary. Recommended motorized-related CFRs to include:
  - a. the number of tickets and warnings issued in each district
  - b. incident reports



- c. number of successful prosecutions
- 2. On a yearly basis review and consider information concerning potential errors in the MVUM.
- 3. Develop a database of signs, barriers, and unauthorized routes that can be used as a guide to track violation hot spots as well as sign replacement information.
  - a. A photo point data set should be used to track areas of high use/violation.
    - i. Wyoming Wilderness Association has already begun this work (Refer to Appendix A).
  - b. Consider providing tough books for appropriate field staff to enter monitoring data while in the field, decreasing time needed to be in office and optimizing field time.
- 4. An Evaluation plan needs to be developed in conjunction with the databases, to address ongoing compliance issues.
  - a. Evaluate
    - i. Plan Effectiveness
    - ii. Resource Protection
- 5. Utilize volunteer user groups to help with monitoring.

## **Options Beyond 4E's:**

This section includes action items that were discussed by the committee, yet would be more appropriate for folks outside of the Forest to initiate, such as OHV Clubs, individual motorized recreational users or a subset of the working group. In some cases, there would be a need for cooperation and partnership with the Forest.

### **LEGISLATION:**

- 1. Consider seeking a willing legislative sponsor to work toward future state legislative action to enable certified youth to use a greater portion of the FS travel system. The program could be modeled after the State of Oregon's certification program which allows an unlicensed operator to travel on enrolled roads (see Appendix A).
- 2. Consider seeking a legislative sponsor to enact a law that enables Game and Fish to enforce ATV regulations during hunting and/or antler gathering. Tie in fines or loss of privileges as penalty.

### **IMPLEMENT A YOUTH PROGRAM:**

Partner with the Forest to test and possibly establish at Junior ATV Ranger Internship. (See Oregon BLM's example in Appendix A) Work to engage and enable one or two local *youth* in the effort, especially in Dubois since there is no longer an ATV club. Explore opportunities to work with the local Boys and Girls Club or Dubois Area Recreation and Trails or others for the developing the internship.

## **Prioritization:**

Please refer to the Survey Monkey results prepared by our facilitator and attached to this document.

## **Respectfully Submitted by SNF Motorized Compliance Working Group:**

### Co-Chairs

Jerald “Jay” Jochim – Wyoming Outdoorsmen

Rick Metzger – Shoshone National Forest

### Members

Larry Allen – Fremont County Commissioners

Jenny DeSarro – Greater Yellowstone Coalition

Gary Fischer – Fremont County ATV Association

Loren Grosskopf – Park County Commissioners

Dick Inberg – Backcountry Horsemen

Steve Jones – Meeteetse Conservation District

Bart Kroger – Wyoming Game and Fish Department

John Lumley – Hot Springs County Commissioners

Josh Milek – Wyoming State Trails

Jared Oakleaf – Bureau of Land Management

Barry Reiswig – Backcountry Hunters & Anglers

Dustin Rosecrance – Northwest Wyoming OHV Alliance

Sarah Walker – Wyoming Wilderness Association

Kim Wilbert – Sierra Club, Wyoming Chapter

Tim Wooley – Wyoming Game and Fish Department

Margaret Wells – Dubois ATV

## Appendix A: References

*Motorized Travel Monitoring on the Shoshone National Forest.* Wyoming Wilderness Association. Spring 2016. (Print Copy Included, Online: <http://www.wildwyo.org/snf-travel-management-plan> )

*Sign and Poster Guidelines for the Forest Service.* USDA. Engineering Staff, Washington, D.C. EM7100-15; Revised October 2013. ([http://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprd3810021.pdf](http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3810021.pdf))

Chapter 5 Trail Signing

Chapter 6 Travel Management Signing

Chapter 10B Visitor Information Signing

Oregon BLM's ATV Operator Program:

<http://www.blm.gov/or/districts/medford/recreation/timbermountain/atv-requirements.php>

Management Guidelines for OHV Recreation:

<http://www.nohvcc.org/materials/ManageGuide.aspx>

<http://www.rideatvoregon.org/>

<p><b>FROM ANOTHER STATE?</b> Info about riding in Oregon if you're from another state or country. <a href="#">Read More ►</a></p> <p><b>MORE INFORMATION</b> Oregon's ATV trails, rider permits, training and more. <a href="#">ATV Oregon.gov ►</a></p> <p><b>FAQ</b> View frequently asked questions. <a href="#">Read More ►</a></p> <p><b>CONTACT US</b> Need more information or have questions? <b>1.877.7SAFELY</b> <b>1.877.772.3359</b> <a href="#">Send Email ►</a></p>	<p><b>— Welcome To RideATVoregon —</b></p> <p>Effective January 1, 2014, all operators of quads and three-wheel ATVs (Class I ATVs) and off-road motorcycles (Class III ATVs) must have an ATV Safety Education card when operating on lands open to public use. In order to make training as convenient as possible, the Oregon Parks and Recreation Department now offers this free safety education program and certification online on this website.</p> <p><b>SAFETY TRAINING EXEMPTION:</b> Safety training isn't mandatory for riders using an ATV or off-road motorcycle for farming, agriculture, forestry, nursery, Christmas tree growing operations or when riding on private land.</p> <p><b>— How To Get Your FREE Online Card —</b></p> <ol style="list-style-type: none"> <li>1. Take the online course and pass the test on this website. 1-2 hours.</li> <li>2. You will receive a plastic card in the mail. You may print a 30-day temporary card on your home printer.</li> <li>3. Carry the card when you are riding.</li> </ol> <p><b>NOTE:</b> Youth under age 16 have the additional requirement to get hands-on training. At the completion of this online course, youth can print a 6 month Certificate of Completion to practice riding, which gives them plenty of time to find a training course. <a href="#">Click Here</a> for more information.</p> <p><b>— Mandatory Training Ages —</b></p> <p>All riders must have an ATV Safety Education Card. There is no minimum age to take the online course, though some children may have a difficult time with the course material. We strongly encourage parents to go through the course materials and test with their child/children. One parent may sign up with up to 4 kids under a family account and all will be issued cards upon passing the test. Adults supervising youth must also have the card.</p> <p><b>— No Internet? —</b></p> <p>If someone does not have access to the internet or for some other reason is physically unable to take the on-line course, please have them call our ATV hotline toll free at 877-772-3359 (877-7SAFELY) for an equivalency course application.</p> <p><b>— Did You Lose Your Card? —</b></p> <p><a href="#">Click here to order a replacement card</a> and find out more information about replacement cards or call the ATV hotline (above).</p> <p><b>— Frequently Asked Questions —</b></p> <p><a href="#">Click here for a list of frequently asked questions</a> about the Oregon Online ATV Safety Education Course.</p> <p><b>— Other Rider Requirements In Oregon —</b></p> <p><a href="#">Click here to go to our main All-Terrain Vehicle web site, <u>www.oregonOHV.org</u></a> where you can find out everything you need to know about what you need to ride and where.</p>
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## Appendix B: Travel Management Compliance Working Group Charter

### Shoshone National Forest Travel Management Working Group Charter

*The Shoshone National Forest has formed a working group to improve the accountability of its existing motorized road and trail systems. In addition, the Forest would like to create a system that is more user friendly and appealing to the motorized user resulting in an enhanced recreational experience for all user groups.*

**Objective:** Identify ways to encourage and improve compliance on our motorized system of roads, trails, and areas through a variety of methods and techniques.

**Goals:**

1. Infrastructure - The group needs to develop a list of signs, barriers, kiosks, trailheads, etc. and the criteria for when and where the appropriate use is. I want to enhance compliance while making the motorized road and trail systems more user friendly for the motorized community on the Shoshone National Forest.
2. Education - You will need to work on the education and information program for the Forest's motorized road and trail system. Your efforts should be focused on simplifying messaging, ensuring consistency with adjacent jurisdictions, developing an innovative communication strategy, and exploring potential revenue streams for this work in the future.
3. Enforcement - Enforcement is not the main piece of a motorized road and trail system but it is a critical component of a successful motorized road and trail system. I am asking that you identify ways to encourage and improve compliance on our motorized system of roads, trails, and areas through a variety of methods and techniques.

**Participants:**

WY Game and Fish, WY State Trails Program, Sierra Club, Northwest Off Highway Vehicle Alliance, County commissioners from Fremont, Park, and Hot Springs County, Meeteetse Conservation District, Greater Yellowstone Coalition, Wyoming Wilderness Association, OHV clubs representatives from Lander and Riverton, BLM, Backcountry Horseman, Backcountry Hunters and Anglers, other interested publics, Shoshone National Forest (Rick Metzger, Ron Ostrom, Doug Johnson, Mike Franchini).

**Facilitation, Logistics, and Convening Meetings:** The Forest Service will provide a facilitator for the meeting to maintain consistency. The Forest Service will also find and secure meeting venues, convene the meetings through emails and phone calls, and provide a note taker for the meetings.

**When:** The first meeting will be held on Friday March 25, 2016 from 10:00 a.m. to 3:00 p.m. at Bighorn Federal Bank in Thermopolis, WY. I will let the group decide when and where to meet for meetings always taking into account the effects of travel time and distance on participation.

**Working Group Chair:**

I would like to see someone other than a Forest Service representative become the chairperson of the group. I would like to have the chairperson selected the first meeting so that the group can define structure first and focus on substance in the following meetings.

**Public Engagement:**

Travel Management on the Shoshone National Forest has been driven by the public thus far and needs to be that way into the future. I am aware that the general public that has been coming to our meetings and providing proposals, input, and ideas are not all part of this group. However, my expectation is that this group will find creative and innovative ways to keep the general public in the communities of Cody, Meeteetse, Dubois, Lander, Riverton, and some of the other surrounding communities expressing interest in this project up to date and involved in what this group is doing. This is a key component to the success of our travel management process on the Shoshone National Forest.

**Timeline:**

The group will begin their work on March 25, 2016 and complete this portion of work by September 30, 2016. I would like to be briefed at least 3-4 times during the process by the Working Group Chairperson.

**Decision Making Process:** The group will elect a chair and should utilize the chair to make decisions how they see fit. The pursuit of consensus is noble but not always achievable so the chair may need to make occasional decisions where there are opposing viewpoints. The group should discuss this up front and agree to how you will handle decision making.

**\*Agenda, Meeting Minutes, Notes, Handouts and Presentations,** can be found here:

<http://www.fs.usda.gov/detail/shoshone/home/?cid=fseprd495241>