

CAPITAL TRAIL VEHICLE ASSOCIATION (CTVA)

**P.O. Box 5295
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November 18, 2021

Mark Foster, Environmental Coordinator
Shoshone National Forest
808 Meadow Lane Avenue
Cody, WY 82414
SM.FS.shonfcomment@usda.gov

Re: Comments on Shoshone NF Travel Management Planning Project

Dear Mr. Foster and the Travel Management Planning Team,

We have assembled the following information and issues from our members and other recreationists for the project record. We appreciate the opportunity to provide our comments on dispersed camping in the Shoshone National Forest. We enjoy dispersed camping on our public lands. All multiple-use land managed by the Forest Service including the Shoshone National Forest provides a significant source of these recreational opportunities. Moreover, the pandemic has reconnected visitors to our public lands as a critical way to counter the stresses of ever day life. Most of these visitors are looking for multiple-use activities including dispersed camping. We are passionate about dispersed camping for the following reasons:

Enjoyment and Rewards of Dispersed Camping

- Opportunity for a recreational experience for all types of people.
- Opportunity to strengthen family relationships.
- Opportunity to experience and respect the natural environment.
- Opportunity to participate in healthy and enjoyable outdoor experiences.
- Opportunity to experience a variety of opportunities and challenges.
- Camaraderie and exchange of experiences.
- For the adventure of it.

Acknowledged Responsibilities of Dispersed Campers

- Responsibility to respect and preserve the natural environment. We are practical environmentalists who believe in a reasonable balance between the protection of the natural environment and the human environment.
- Responsibility to respect all visitors.
- Responsibility to use vehicles in a proper manner and in designated places.
- Responsibility to work with land, resource, and recreation managers. We are committed to resolving issues through problem solving and not closures.
- Responsibility to educate the public on the responsible dispersed camping on public lands.

We are a locally supported association whose purpose is to preserve trails for all recreationists through responsible environmental protection and education.

Dispersed camping opportunities supports many different visitor interests. Supporting dispersed camping is the best way to support diversity of uses and multiple-use. This over-arching fact should be adequately addressed in the purpose and need and adequately considered in the analysis and decision. We are representative of the needs of most visitors who recreate on public lands but may not be organized with a collective voice to comment on their needs during the public input process. These independent multiple-use recreationists include visitors who use motorized routes for family outings and camping trips, weekend drives, mountain biking, sightseeing, exploring, picnicking, hiking, ranching, rock climbing, skiing, camping, hunting, RVs, shooting targets, timber harvesting, fishing, viewing wildlife, snowmobiling, accessing patented mining claims, and collecting firewood, natural foods, rocks, etc.

Our position is that the number of existing dispersed camping sites does not adequately meet the needs discussed above. The public would greatly benefit from continued management for multiple-uses including an enhanced system of dispersed camp sites. The pandemic has brought visitors back to our public lands and 98% of them are looking for dispersed camp sites and multiple-use activities. Therefore, we oppose the closure of any dispersed camping opportunities. We strongly support the development of a Pro-Recreation Alternative.

We understand that the Management Team is under pressure from those opposed to dispersed camping opportunities. We have experienced the vast closure of motorized access and dispersed camping opportunities that have gone far beyond reasonable and justifiable decisions because of that influence. We ask the Management Team to review the attached significant issues and work on refinements to the analysis and plan that would adequately address and mitigate these significant issues. We ask the Management Team to use these comments and information as support and justification for more dispersed camping opportunities.

We are looking forward to reviewing to your consideration of these significant issues and your use of them to develop a reasonable Pro-Recreation Alternative for the Shoshone National Forest travel management plan.

Thank you for considering our comments and issues.

Sincerely,

/s/ CTVA Action Committee on behalf of our 240 members and their families and friends
Capital Trail Vehicle Association (CTVA)¹

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¹ CTVA is also a member of Montana Trail Vehicle Riders Association (mtvra.com), Blue Ribbon Coalition (sharetrails.org), and New Mexico Off highway Vehicle Alliance (nmohva.org). Individual memberships in the American Motorcycle Association (ama-cycle.org), Citizens for Balanced Use (citizensforbalanceduse.com), Montana 4X4 Association, Inc. (m4x4a.org), Snowmobile Alliance of Western States (snowmobile-alliance.org), and United Four Wheel Drive Association (ufwda.org)

Significant Issues Associated with Dispersed Camping That Should be Adequately Considered in the Shoshone National Forest Travel Management Plan

- a. The agency should adequately consider that the public prefers dispersed camping spots and that is consistent with the need for social distancing.
- b. The agency should adequately consider that there is an inadequate number of dispersed camping spots in the project area. The preferred alternative should address this significant issue.
- c. The agency should adequately consider that the pandemic and social distancing requirements have significantly increased the public need for more OHV opportunities.
- d. The agency should adequately consider that the pandemic and social distancing requirements have significantly increased the public need for more dispersed camping opportunities.
- e. The agency should adequately consider that abundant dispersed camping sites and motorized trails are essential to keep the public healthy and sane during and after this pandemic.
- f. The agency should adequately consider that dispersed camp sites fill a significant need for retirees, family weekenders, boondockers, and nomads whose lives are fulfilled by these motorized dispersed camping opportunities. All existing dispersed motorized camp sites should be included in the plan as well as new sites to meet the growing need.
- g. The agency should adequately consider that some reasonable visual evidence of public use on multiple use land including dispersed camp sites is acceptable.
- h. The agency should adequately consider that all dispersed camp sites are highly-valued contemporary cultural sites.
- i. The agency should adequately consider that a healthy human environment depends on adequate access to dispersed camping and motorized recreational opportunities.
- j. The agency should adequately consider that the public has been squeezed into too small of an area with too few motorized routes. Every weekend we talk to fellow motorized recreationists and they ask us where they can go to ride trails and camp in dispersed areas.
- k. The agency should adequately consider that agency actions and mining claims are closing much needed dispersed camp spots during a pandemic when the public needs more dispersed camp sites.
- l. The agency should adequately consider that motorized recreation and dispersed camping opportunities should not be closed by the Agency without site-specific data and analysis as required by NEPA guidance.
- m. The agency should adequately develop and consider site-specific data that demonstrates any impact of significance to the natural environment by motorized recreation and dispersed camping when compared to naturally occurring levels of impact and change.
- n. The agency should adequately develop and consider site-specific data that demonstrates that closures of motorized and dispersed camping opportunities produce any significant benefit to the natural environment.
- o. The agency should adequately develop and consider site-specific data that demonstrates significant measurable impacts (compared to naturally occurring) from motorized recreation and dispersed camping.

- p. The agency should adequately consider that the strategy of closing dispersed camping sites using vegetation, resource management, and travel management plans is not aligned at all with the significant public need for these recreation opportunities.
- q. The agency should adequately consider that any significant negative impacts on the natural environment from dispersed camping spots can be mitigated to a reasonable level in most locations. The impact analysis should recognize this fact and pursue this alternative.
- r. The agency should adequately consider that it is extremely difficult to go off-trail with the amount of deadfall in the forest now, therefore, the off-trail issue is no longer significant.
- s. That agency should adequately consider that non-RV campers leave human waste behind and that RV campers dispose of their waste at treatment facilities.
- t. The agency should adequately recognize that self-contained campers have an acceptable and minimal environmental impact and more dispersed camping sites need to be created to serve this popular form of recreation.
- u. The agency should adequately consider why we must drive over 100 miles one-way to find a reasonable diversity of dispersed camping opportunities (quantity and quality) when the agency has multiple-use lands located near population centers.