

Shoshone National Forest Travel Planning –Environmental Assessment

Sara Domek comments, 11/18/2021

Submitted via email to SM.FS.shonfcomment@usda.gov

Please accept these comments regarding the Shoshone's EA for Travel Planning.

As a long-time resident of Dubois and a hunter, wildlife conservationist and recreational user, I appreciate the opportunity to submit these comments on the Shoshone National Forest (SNF) Travel Management Plan.

From my professional and personal experiences on the SNF, across all districts, this forest and its natural systems are uniquely aligned with a true backcountry forest. It is disappointing and a bit ironic, however that this incredible forest is losing its backcountry character every year as new proposed motorized routes are considered and illegal motorized activity increases (due to lack of enforcement forest-wide). Unfortunately, this TMP and all its alternatives support increased motorized routes and activity across our backcountry forest, especially in the Wind River District (an area that already has substantial motorized opportunities).

Enforcement:

Unauthorized motorized routes are substantially increasing across the SNF, and without adequate enforcement nor funding to close these routes, this is of deep concern. Maintaining and improving existing roads and trails, not adding new ones, should be the top priority of the SNF in this plan. Closing all unauthorized motorized routes for a predetermined timeframe before permitting any new additional motorized routes would be a first step in regaining some control over this issue. The TMP should include specific language that addresses unauthorized motorized use closure and enforcement, with a clear process for implementation including timeline, budget and benchmarks that must be reached. New routes will only add to the problem when motorized users go past open areas that don't have any barriers.

The USFS is unable to maintain the current roads on the SNF. Anyone who takes a ride across Union Pass or up any number of USFS motorized road systems can attest to this, especially when considering the illegal motorized activity stemming from these routes, with little to no agency ability to enforce closures or to inform and keep motorized users on established, legal routes. Washouts, degraded side-road expansion (around significant mudholes or wet areas in particular), and straight-up illegal motorized cross-country spur-roads/paths grow in extensiveness and seriousness every year. The Windy Mountain region just to the southwest of Dubois is a clear example of rampant and increasing illegal off-road motorized activity, with new routes

Travel Management Plan Alternatives

I'm not in support of any of the alternatives since each one proposes significant new route construction and motorized loops without many routes being decommissioned. It's also disappointing to see that the majority of new motorized routes are focused on the Wind River District – an area that already has lots of motorized opportunity.

My specific comments for Alternative 4 include:

- WR-03 up Windy Mountain. Adding access from Windy Mountain WR03 will exacerbate enforcement concerns. This area already has experienced enforcement concerns through indefensible open alpine terrain. The service road to the top of Windy is very steep and with increased traffic, erosion and side-road use would likely occur (similar to what is visible on the Torrey Rim access road). I am very familiar with this area as I have hunted elk, hiked and skied in this region for many years. This provides one of the few areas in elk unit 68 easily accessible from town for hunters who prefer to hunt on foot away from roads. Additionally, the open landscape of this area would create more problems with unauthorized routes as there are no vegetative barriers to keep people on the designated route. Additionally, the proposal is within crucial winter range for bighorn sheep and crosses many of the Dubois mule deer migration route. Finally, this access is redundant and not needed as there are two motorized access routes providing access to FRS524 and MT14 from both the east and west.
- WR-04B above Crooked Creek drainage. This area already has a high road density and illegal motorized abuse all around it since people can travel cross country through the burned timber and road cuts leftover from fighting the 2016 Lava Mountain wildfire.
- Warm Springs Canyon additions. This new approximately 4-mile “large effective loop” would increase traffic to previously inaccessible routes and bisect intact wildlife habitat, unique geologic features including massive rock slides, geysers, a natural bridge and steep remote canyon-cliff habitat. The increased traffic, impacts and illegal motorized use will significantly increase in this currently inaccessible area, and there are no clear enforcement plans about how to address these significant cumulative effects. The agency has not surveyed the unique natural and cultural resources in this area (tie hack plumes, nesting peregrines, moose habitat, bat roosts, etc.).
- WR90. I strongly oppose expanding MT14 (WR90) to 65”. This is a highly contested ATV trail along the Fitzpatrick Wilderness boundary with known resource concerns. Expanding the trail would significantly increase (currently low) OHV traffic through the Benchmark Inventoried Roadless Area and along the Wilderness boundary.
- Seasonal road closures. I support the seasonal date restrictions and recommend they be incorporated to help reduce illegal use during big-game and antler hunting seasons. I recommend that the over-snow travel dates also take into account reducing user and resource conflicts during these activities. During late-season cow elk hunts, snowmobiles should be required to stay to existing roads to reduce having snowmobilers ruin a hunt for someone on foot – something I had personally happen numerous times. For elk area 67, this would mean snowmobiles should be required to stick to routes till Dec 15th for areas that hunters are in (I’m not concerned about up on Togwotee). And for elk area 68, this would be till Nov 30th.
- High Lakes WSA. The SNF fails to address increasing snowmobile use in the High Lakes Wilderness Study Area to comply with the 1984 Wyoming Wilderness Act. I recommend that the forest-wide snowmobile season be limited from December 1 to April 30.
- Beartooth winter use. The Forest should NOT extend the open snowmobile season to June 15. I recommend the agency keeps the pass free for non-motorized recreation (and wildlife) from April 30-June 15.
- Nordic trail motorized closure. I support the proposed closure in the Deception/Pinnacles trail area. While most snowmobilers generally respect this area, and a formal closure still won’t stop the bad actors without enforcement, and official closure will help with grant funding to help groom the area since the state requires a five-year agreement from the land management agency, something the USFS has not been willing to offer without a formal motorized closure. I also recommend that the policy is written clearly to not hamper the use of motorized

equipment for grooming the trails and I hope the USFS can look for ways to support the Nordic trail efforts with their own staff and funding, including trail clearing, signage, and grooming.

- Seasonal over-snow restrictions. I also support having better restrictions on over-snow vehicles in the spring to reduce user and resource conflicts from antler hunters. In certain areas, such as up Horse Creek and East Fork, antler hunters should be required to stick to the roads after a certain date, such as March 1st. I've witnessed resource damage, wildlife disturbance, and have had user conflicts from those driving snowmobiles in areas with bare ground. There should also be better coordination with WGFD lands to address this issue.
- Overall, I am disappointed in the TMP process to-date. The SNF's minimal environmental analysis and a rushed 30-day comment period disregards the importance of meaningful public comment, the complexity and consequence of travel planning, roads, and recreation, and the Shoshone's unique role in the Greater Yellowstone Ecosystem and our National Forest system generally. This process has been underway for years, so it can only be viewed as undermining the public review and comment period by cutting this crucial part of the process short.

Thank you for your work managing our public lands.

Respectfully,
Sara Domek

