

Dear Shoshone National Forest Travel Team,

Please consider the comments I am submitting below regarding the recently released Environmental Assessment for the Shoshone National Forest Travel Management Plan/Process/Project.

I am a lifelong resident of Fremont County Wyoming, and have used and enjoyed the SNF my entire life. I recently saw an old picture dated 1953 of a family picnic at Fiddlers Lake, with me as a toddler. I truly believe local people have a unique and valuable long term perspective on management issues on our public lands including the SNF. Many of us have deep understanding, knowledge and love for our local national forest. Yet, I do not feel like many folks like me have been allowed an effective voice in the creation of a new travel plan/project for our forest. So, again, I ask for your consideration of my ideas and problems I identify with the current proposal as presented in the Travel Management Project Environmental Assessment.

I will direct my comments toward preferred Alternative 4 first proposed in this October 2021 EA.

WK-21 I support the common sense seasonal closures.

WK-32 through WK-35 Adding many road spurs as in proposals WK32-35 to well used dispersed campsites makes sense, but those extensions should not allow driving 100 yds either side as presently the case for many FRs.

WK 27 I do not support WK 27 because 3.5 miles of brand new trail in a pristine location would be very difficult, expensive, and have tremendous ecosystem impacts.

WK 30 I do not support WK 30 because it is another new road in a presently unroaded area that is unneeded and will have adverse impacts. It only creates a tiny 'loop opportunity' in a portion of the Forest with a plethora of roads already.

WR-03 I do not support WR-03 for all the reasons stated in 2016, which were sufficient then to have that proposal screened out. The logic of forwarding WR-03 in lieu of WR-11 escapes me, as they both are horrible ideas creating public roads or trails where they should not be for all the reasons I have stated regarding WR 11 in earlier comments. Neither WR-03 nor WR-11 proposal should have made it past the first screen and public review, because they both cross large effective areas of IRA, as well as all the other reasons stated in "reasons for dropping", Table 1, Appendix B 2021 EA

WR-04 sounds very sketchy. Table 1, Appendix B. Don't you all think adding "user created" routes encourage new route pioneering? It doesn't make sense to me to reward people who create highly damaging new routes on our National

Forest lands by then incorporating their route into the system. The description in the EA makes it apparent that this illegal road or trail has significant environmental impact. This proposal should be dropped from the travel plan/project.

WR-07 In the fall of 2014, then WR District Ranger Metzger led what I believe was the first public outing hosted by the SNF to explain and initiate the TMP/P (I'm confused by the nomenclature - is this a plan or a project?). The very first stop on that tour was at the SNF boundary on the Union Pass Road. Ranger Metzger pointed out the "illegal tracks" on the open slopes of the west end of Warm Springs Mountain as an example of egregious resource damaging off-system travel by motorized forest users. Now, seven years later, it is unacceptable to bring essentially this same route into the forest travel system. Again, simply memorializing illegal roads by bringing them into the travel system encourages future forest resource damaging route pioneering. It gives those who drive vehicles off system the message that is how to create new routes on Forest lands. I further object to this new construction because it only goes to FS 529, which should not be designated at all on the 2021 MVUM because there is no access to 529, which originates on private lands without public right-of-way. Instead, **as I proposed in the first round of requests for proposals from the public**, FS 529 should be closed in its entirety. Incidentally, my FS 529 closure proposal was never acknowledged in the second round of scoping, nor subsequent references to proposals as this process has progressed over the past six years.

WR-11 I know WR-11 was dropped from Alternative 4, but given the unexplained revival of WR-03, I feel obliged to reiterate my total opposition to this onerous proposal. I walked the Bachelor Creek trail into the Moon Lake Creek twice during the summer of 2021 and that on-the-ground analysis further damned this proposal. Most of the old roadbed that ascends Bachelor Creek is right up the drainage, or in other places, the creek has abandoned the natural streambed, and instead runs down the old road creating erosion and watershed damage. Bachelor Creek is a horrible place to try to build a road. It bi-sects a large inventoried roadless area, would add disturbance to secure wildlife habitat and creates user conflict by adding motorized travel to the only non-motorized trail into the Jakey's Fork backcountry.

WR-13 I oppose WR-13 because the crossing of Warm Springs Creek and the portion of new construction on the south side of Warm Springs Canyon would be beyond "complex" (Ranger VanKienast's description). This very steep canyon wall where proposed new construction would be required is a crazy place to build a new road or motor trail. The old roadbed with a few switchbacks shown on the south side of the canyon on old USGS quadrangles is not where the proposal shows the new route location. There are archaeological ruins, identified hydrology and severe erosion interactions (Table 1, Appendix B). Again, this route involves following off-system user created motoring routes, and should be

opposed for that reason alone. Like WR-07, WR-13 only goes to FR529, which should not be part of the travel system because there is no public right-of-way to FR 529, and as such, FR 529 should not be part of the current travel system. How can there be routes on any public lands travel system that are only accessible to a few private landowners? This question was posed in my follow-up email after the WR district online meeting of Nov 3, but so far I have heard no response. For all these reasons, WR-13v should not be included in this project or plan or whatever.

WR-25 I support this modest seasonal closure for resource and wildlife protection.

WR-26 Alternative 3 action should be the preferred proposal for this road. It should be decommissioned because of the tremendous resource damage that it causes. This old jeep trail, with all its ruts and erosion is not fixable and should just be closed. Historical access should not have priority over forest resource protection. Just because a horrible scar on the land has been there for a long time does not mean it should be perpetuated. It is an easy walk or horse ride down the last two miles into Bear Basin and that is the way this otherwise pristine area should be accessed.

WR-29 - I support this modest seasonal closure for resource and wildlife protection.

WR-32 - I oppose this new road. Please see my comments on WR-04, 07,13 for why incorporating user created (illegal) routes into the system is bad policy.

WR-54 - It is hard to believe an on site analysis of this highly eroded and braided road yielded the conclusion that the reason to drop it from consideration for closure or conversion to MT status is because "road surface did not warrant converting to a trail." Table 1, Appendix B. There are many braided and severely eroded segments of this old road, but the section as the trail ascends the south-facing slope above Telephone Draw is beyond severe. You can stand in old eroded ruts and be over chest deep! And that level of damage extends several hundred yards. Hundreds of cubic yards of soil and rock have washed down that hill, into Telephone Draw, and then into Wiggins Fork. Of course, paralleling that incredible gouge are new routes up the hill, waiting for a thunderstorm to create more erosion impacts. I can't see how the FS concludes this constitutes a "suitable road surface." This road is another example of lack of site-specific field analysis by the FS team.

WR-66 - WR-76 Adding many road spurs as in proposals WR-66 through WR 76 and other WR proposals to well used dispersed campsites makes sense, *but those extensions should not allow driving 100 yds either side as presently the case for many FRs.*

The Deception Creek/Pinnacles winter motorized closure I support this proposal as many local non-motor recreation enthusiasts, myself included, have long appreciated this area. I would also be enthusiastic about other areas of winter-motorized closures to provide more wide spread opportunities for non-motorized winter recreation. The local demand for this type of recreation is high. One only has to look at the membership level of the Lander Nordic Association to recognize the level of non-motorized winter recreational interest in Fremont County. The fact that there are presently no winter-motorized closures on the entire forest glaringly points to the need for more such areas. Deception Creek is a start that should be complemented with other designated areas for this unmet recreation need.

There are other proposals that are confusing to interpret exactly what is proposed and what is included in the preferred alternative. For instance WK 19 (using Table 1, appendix B for reference) is only included in Alt. 2, and by inference not in the preferred alt 4. Yet the table says "no" in the *Dropped* column. Note, WK-19 proposes to close MT01 in its entirety and convert it to a non-motorized trail. But WK-27 relies on WK-19 to close and presumably decommission a portion of MT01. None of this confusing combination of portions of proposals is explained in the EA or elsewhere. Personal email with Mark Foster revealed to me that the intent was to incorporate a portion of WK-19, totally ignoring the intent of the original proposal (a proposal I made in 2016, as well as another similar proposal to close MT02 because of resource damage). My proposal to close MT02 was never even acknowledged, and while WK 19 was forwarded, it is never explained in the EA description of proposals, nor does it appear on the map showing changes proposed in alt 4. I am attempting to describe this one example of confusing, contradictory and nonsensical proposals in the EA. I have followed this process closely for the past six years and that knowledge is the only way I can guess what is most likely meant by these proposal descriptions. I don't see how anybody could possibly understand what is being proposed in Alt 4 based only on the EA documents and the online presentation of one hour for each district, with no effective Q&A afterwards for most participants.

Thank you for considering my input on the Shoshone Travel Plan/Project (which is it?)

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