



Comments sent via email to: travel_management_comments@fs.fed.us

December 1, 2017

Shoshone National Forest
Rob Robertson
Washakie District Office
333 East Main Street
Lander, WY 82520

RE: Scoping Comments to the Shoshone National Forest's Revised Proposed Action for the Travel Management Plan Environmental Impact Statement

Mr. Robertson,

Please accept the following additional comments on behalf of Trout Unlimited (TU) to the Shoshone National Forest's Revised Proposed Action for the Travel Management Plan Environmental Impact Statement (EIS). Trout Unlimited offers these comments based on our collective interests and use of the Shoshone National Forest (SNF), and knowing what an important national, regional and local role this Forest plays in its recreation, fish and wildlife, economic and cultural contributions.

Trout Unlimited is a private non-profit national conservation organization that has more than 300,000 members nationwide dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Since 1959, TU has dedicated staff and volunteers working toward the protection of sensitive ecological systems necessary to support robust native and wild trout populations in their respective ranges. We recognize the high value of intact public lands and the role public lands play in providing habitat to coldwater fisheries, drinking water and wildlife habitat. In Wyoming, TU has approximately 1,700 members and 12 state chapters whose members actively participate and enjoy the many resources the SNF offers.

General Comments about the Plan

Trout Unlimited understands the importance of addressing the myriad of issues associated with public use of our national forests and we appreciate the SNF's plan to manage the use of motorized vehicles on our public lands. Trout Unlimited works with partners to find a balance between quality motorized recreation and healthy fish and wildlife resources. As discussed, the purpose and need for the Shoshone National Forest's Travel Management process is defined as:

1. Provide a system of designated public motor vehicle access routes and areas within the Shoshone National Forest.
2. Identify resource concerns or enforcement issues.
3. Identify additional motorized opportunities; look at opportunities for "loops".
4. Improve compliance with the existing road and trail system.
5. Designate roads, trails, and areas for winter motorized travel – display on Over Snow Vehicle Use Map.

Resource Concerns and Enforcement Issues

These comments are specific to the Washakie Ranger District after visiting these areas in August 2017. Significant unauthorized motorized use was detected around Shoshone Lake. The backcountry experience sought by horseback riders and motorized users alike is lessened by trashed campsites and unauthorized "off trail" use. Currently, the technical difficulty of terrain and remoteness of the area has most likely kept it as pristine as it still is. Increasing access to the area will need to be countered with increased law enforcement and defensible route closures.

For example, after viewing OHVs and jeeps drive through a stream and a lake on [YouTube](#), my curiosity was piqued to identify the area this is occurring in the Wind Rivers. To protect the fisheries and aquatic resource values of Shoshone Lake and Shoshone Creek, TU recommends closing the route in Pictures 1-3 to unauthorized off-road vehicle use found on the north end of Shoshone Lake.



Pictures 1. Outlet of Shoshone Lake with motorized trail through Shoshone Creek and across old granitic dam.



Picture 2. Looking southwest across Shoshone Lake and an entry/exit point for motorized use into the lake.



Picture 3. North end of Shoshone Lake and a view of the area accessed by unauthorized motorized use through the lake and outlet to Shoshone Creek.

Upstream of Shoshone Lake, the proximity of the motorized trail to the stream is of concern, but appears hard to relocate due to the surrounding terrain (Picture 4). When possible, TU recommends improving existing routes instead of creating new routes. We often find decommissioning old routes and rehabbing those areas can be difficult and hard to establish and maintain a defensible closure.



Picture 4. Looking south into Shoshone Basin along Shoshone Creek.

At the south end of Shoshone Lake, the one campsite we walked in to from the trail looked like this (Pictures 5-8) with considerable resource damage and unauthorized motorized use.



Picture 5. Campsite on the south end of Shoshone Lake.



Picture 6. Old grills and debris left behind.



Picture 7. Empty beer cans and more trash.



Picture 8. Box of nails in the bushes.

To decrease the probability of bears associating the area with a food/beverage reward therefore increasing the likelihood of human-bear conflicts, we emptied the six pack stashed in the bushes.



Picture 9. Emptying warm beer to protect the bears.



Picture 10. Unauthorized motorized use in the wet meadow along the southeast shore of Shoshone Lake.

TU recommends constructing a bridge over the outlet of Pete's Lake to protect the integrity and pristine nature of this stream crossing and to prevent further resource impacts i.e. increased sedimentation in to the Middle Popo Agie River from motorized travel through the outlet and associated wet areas.



Picture 11. Pete's Lake at the outlet and proposed sight to re-route WK-19 and build WK-27.

Forest-wide Concerns

Expanding more trails to 64" seems unnecessary and may increase the likelihood of backcountry safety issues, especially since the reason provided is to increase opportunities for children to drive on these routes. Many of the routes are technical and difficult and require a level of expertise beyond that of most children. Increasing the width of routes chips away at the resiliency of the natural resource and increases the likelihood of increased use by all types of motorized user groups, which are seemingly in more and more conflict. For example, only 2.0 miles of single-track motorized trail exists in the entire forest system as compared to 90 miles of 50" and 64" motorized trails. In many cases, mountain bikes and two-wheeled dirt bikes have more in common when comparing experiences based on safety of sharing trails with jeeps, UTV's and OHV's. Many of the routes are remote in nature and would require an experienced backcountry rescue in the event of an emergency.



Picture 12. UTV with four broken axles on Cyclone Pass.

TU appreciates the SNF's efforts to increase seasonal closures and to close and rehab unnecessary routes. TU encourages the Forest Service to continue to work closely with grazing leasee's and minimize impacts to riparian areas forest-wide. Cleaning cattle guards, to increase their effectiveness, should be a priority for all to decrease the likelihood of a motorized user becoming severely injured on an authorized motorized route.



Picture 13. Make-shift cattle barrier across a motorized route.

We look forward to continued dialogue with the SNF as the Travel Management process moves ahead. Should you have any questions with respect to our recommendations or our recommendations submitted July 2016 for this scoping process, please feel free to contact us.

Sincerely,

A handwritten signature in cursive script that reads "Tasha Sorensen".

Tasha Sorensen
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