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July 27, 2016

WER 11162.02a
U.S. Forest Service
Shoshone National Forest
Travel Management Proposed Action

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

Dear Mr. Robertson:

The staff of the Wyoming Game and Fish Department (WGFD) has reviewed the Shoshone National Forest Travel Management Proposed Action. We offer the following comments for your consideration.

North Zone:

Referring to map NZ-A for Line Creek/Littlerock Creek route, we recommend matching the same closure as the Elks Fork and Rattlesnake Mountain routes (open from 6/1 to 12/31). These dates may help reduce the chance of elk disturbance during the spring and potential movement to private lands, where elk and cattle may come into contact (during the high risk period [2/1 to 5/31] for brucellosis transmission.)

We observed many different open and closure dates for various routes, so where-ever possible standardization of dates may make it easier for the public to remember and stay in compliance

Wind River District

Proposal WR-11: This route is currently an existing trail connecting FR 554 with the Moon Lake ATV trail. The trail has seen some illegal ATV use in the past. The route bisects a fairly sizeable area that currently does not have any designated, motorized routes. This area provides good elk hunting in the fall that would be degraded by developing motorized trail WR-11 thus the WGFD does not support this proposal. Alternatively, the USFS could consider opening FR 961 which is an existing road to a set of radio towers on Windy Mountain. There is currently an existing, illegal ATV trail connecting FR 961 to Salt Barrels Park and the Moon Lake ATV trail. Slight improvement could be made to this illegal trail to provide access to the Salt Barrels Park area while maintaining the roadless characteristics of the area bisected by WR-11.

Proposal WR-20: This spur road is currently connected to FR 531 by an illegal ATV trail. To effectively close the spur, the USFS will also need to eliminate illegal travel off of FR 531.

Proposal WR-26: Travel into Bear Basin on FR 501 by hunters in the fall is very popular. Although the road is quite poor, many hunters are able to travel the route in their trucks and jeeps. Converting this route into a 65" ATV trail precludes motorized access to Bear Basin for hunters unable or unwilling to purchase ATVs. The WGFD does not believe access to a wilderness trailhead should be closed to one class of motorized users but open to others.

Proposals WR-40, WR-43, and WR-27: Due to the number of existing roads and illegal trails in the Long Creek drainages it is already difficult for hunters to avoid motorized traffic. The WGFD believes the creation of WR-27 will further degrade the experience of hunters wishing to hunt on foot and avoid motorized disturbance. Since the route involves new construction, the Department does not support the creation of WR-27. Alternatively, the USFS could consider leaving WR-40 and WR-43 open and connecting them with a small amount of new trail. This would give recreational ATV users an additional travel loop without degrading non-motorized hunting opportunities in the Long Creek drainages.

Washakie Ranger District

Road densities, motorized use, and related impacts on hunting, particularly elk, have long been a recognized issue throughout the West. Numerous research projects have quantified the negative impacts of motorized travel and associated road/trail densities to wildlife and hunting. Links to three comprehensive reviews include:

http://www.fs.fed.us/pnw/lagrande/starkey_na/PDFs_Preprints/ms-04_Rowland.pdf

http://www.backcountryhunters.org/what_effect_do_roads_have_on_elk

<http://wdfw.wa.gov/publications/01491/wdfw01491.pdf>

In addition, the Bighorn National Forest highlights impacts of roads, ATV use, and illegally user created roads and trails to elk security habitats

(<http://www.fs.usda.gov/detailfull/bighorn/recreation/hunting/?cid=stelprdb5167306>). The Department is concerned about the addition of more motorized trails on the Washakie Ranger District, which already has a high density of roads and trails in a fairly small segment of the Shoshone National Forest.

WK-01 (Cony Basin) – This proposed trail (in combination with proposed trail WK-26) would dissect one of the few remaining non-wilderness roadless areas in the Washakie Ranger District. This area provides security habitat for wildlife and remote hunting opportunities for foot or horseback hunters. This is especially important to non-resident hunters desiring remote, non-mechanized hunting experiences but unable or willing to hunt in designated wilderness areas due to outfitter/guide requirements. The Department opposes creation of trails WK-01 and WK-26, and encourages the USFS to retain this roadless area to maintain the undisturbed settings of the

forest (off wilderness) for the protection of wildlife and enjoyment of roadless/non-motorized recreation opportunities, including hunting, fishing, wildlife viewing, etc. The creation of these new motorized trails into a roadless area is not necessary for access to any portion of the Forest. The existing Shoshone Lake and Pete's Lake Roads currently provide access to these features and allow non-motorized use of several square miles of roadless area for hunting, camping, and other recreation. Creation of these trails would also create enforcement problems for current fishing regulations on Shoshone Lake, seasonal travel closures on the Shoshone Lake Road and surrounding area, by creating a "back door" to those features. A long standing agreement for seasonal closure of the Shoshone Lake Road was amended in December 2015 to accommodate a change of the closure gate location from Baldwin Creek to Wyoming State Trust Land at the bottom of the switchbacks to protect wildlife winter ranges and spring habitats, along with protection of the other land resources on State, BLM, Private, and National Forest lands. The Wyoming State Land Board decision on this closure may be found at <http://slf-web.state.wy.us/osli/boardmatters/2015/1215/H-2.pdf> and is also attached to these comments. WGFD believes if proposed trail WK-01 were created, this closure would become very hard to enforce, along with potential for other illegal motorized uses of the area.

WK-19 (Pete's Lake to Shoshone Lake) – The Department supports decommissioning this trail as a motorized trail, but would encourage retention of the trail as a non-motorized trail. This trail is not utilized much by anyone as its condition has deteriorated substantially. Access to Shoshone Lake would be maintained via the existing Shoshone Lake Road and other non-motorized trails. Recreation of the surrounding area would not be diminished by removal of this trail from the system of roads and trails.

WK-26 (Pete's Lake) – See comments for WK-01 above.

WK-27 (Shoshone Lake west shore) – This extension of the Shoshone Lake road along the west shoreline of the lake would result in enhanced dispersal of camping and recreation at Shoshone Lake. Terrain on the west side of the lake should prevent additional illegal road expansion. The Department supports addition of this to the road system.

WK-30 (Pass Creek/Limestone area) – This proposed trail would connect two lightly used 2-track roads/trails not currently on the Forest's road system. These 2-tracks access off-trail camping sites used most often in hunting season and while probably illegally created, there currently is little impact to the surrounding area due to limited use. However, the Department is opposed to connecting these 2-tracks through nearly one mile of undisturbed wildlife habitat. Elk migrate from west of Willow Creek through Pass Creek toward winter ranges that extend from Pass Creek to Freak Mountain, Ed Young Mountain, and Limestone Mountain east into Red Canyon and beyond. Elk parturition habitat is designated in the Pass Creek area, and the area this trail would bisect contains habitat suitable for elk, moose, and mule deer parturition. The added "loop" effect of additional ORV traffic would also create extra disturbance for hunters and wildlife in an area already heavily impacted by ORV users.

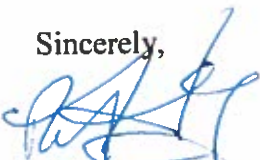
WK-31 (Rock Creek) – This proposed trail would connect lightly used or closed 2-track roads, and cross Rock Creek in an area where access is already quite good for recreation from FS 300 (Louis Lake Road) or FS 368 to the northeast of Rock Creek. The Department is opposed to connecting these 2-tracks through nearly one mile of undisturbed habitat. Elk migrate from west of Willow Creek through Rock Creek toward winter ranges to the east. Again, the added “loop” effect of additional ORV traffic would also create extra disturbance for hunters and wildlife in an area already heavily impacted by ORV users.

WK-06, 07, 32, 33, 34 (Addition of dispersed spurs and campsites to travel system) – These road spurs and dispersed campsites are utilized frequently, pose little additional disturbance to surrounding areas, and provide multiple benefits for recreation of all types. The Department generally supports inclusion of these sites into the travel management system and motor vehicle use map. However, we are concerned about the potential of this setting a precedent of condoning illegal off road use. There are numerous exploitations of “off road or off trail” uses across the Washakie Ranger District, and the Department encourages the Forest to decommission those illegal roads to the greatest extent possible to prevent additional motorized use, while maintaining their utility by non-motorized users.

Map WK-E illustrates a new seasonal restriction on several roads and trails from Fossil Hill southerly through Meyer and Maxon Basins and to Pass Creek cabin sites and Cherry Creek. Since no details were provided regarding the timing and reasoning for this seasonal restriction, it is difficult to prepare informed comments. The Department generally supports the concept of a spring closure which would coincide with closure of the Louis Lake Road (FS 300) for resource protections including big game parturition and wildlife habitat in general. However, we are also concerned about further limiting spring bear hunters and mountain lion hunters with additional travel restrictions. The same would be true for late-fall or early-winter restrictions. We invite the Washakie Ranger District to coordinate with the Department’s Lander personnel to develop appropriate timing and use restrictions which are compatible with wildlife protections that also minimize additional limitations on hunting access to portions of the Forest.

Thank you for the opportunity to comment. If you have any questions or concerns, please contact Rick Huber, Staff Aquatic Biologist, at 307-777-4558.

Sincerely,



 Mary Flanderka
Habitat Protection Supervisor

MF/rh/ns

Rob Robertson
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