



July 26, 2016

Rob Robertson  
SNF Washakie District Office  
333 E. Main St.  
Lander, WY 82520

Re: Shoshone National Forest Travel Management #48573

Cc: Joe Alexander, Olga Troxel, Sue Stresser, Steve Schacht, Rick Metzger

Submitted electronically to: [travel\\_management\\_comments@fs.fed.us](mailto:travel_management_comments@fs.fed.us)  
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Dear Mr. Robertson,

On behalf of nearly 1000 members in Wyoming and more than 2.3 million members and supporters of Sierra Club nationwide, thank you for the opportunity to comment on the Proposed Action for the Shoshone National Forest's (SNF's) travel management plan. Since 1892, Sierra Club has worked to help people enjoy, explore and protect the planet. Many Sierra Club members, both those who live in Wyoming as well as others from across the country, are inspired by and treasure the beauty, remoteness and undeveloped nature of the SNF, and we have a strong interest in fully participating in the travel management planning process.

As Supervisor Joe Alexander explicitly acknowledged in the recently updated forest plan, the Shoshone's greatest value, increasingly unique in the national forest system, lies in the fact that it remains an undeveloped, backcountry forest. We need the peace, the stillness, the solitude, the chance to see a grizzly bear, and the personal challenges that the Shoshone gives us, and as these opportunities decrease to the vanishing point on many other public lands, the few places like the Shoshone National Forest where they still exist become ever more precious and necessary to protect. We have an obligation to protect this most special place – for the flora and fauna that depend on its wild nature, and for future generations so they also will be able to experience the awe and wonder that we are so fortunate to enjoy today in the Shoshone.

## **PURPOSE AND NEED**

### ***Illegal Motorized Use***

Sierra Club was deeply involved in the SNF's Forest Plan revision process throughout the entire 10-year process, which concluded in 2015 with the adoption of an updated plan. During that process, we became increasingly concerned about problems with illegal motorized use on the forest, and the failure of the Service to effectively deal with its existing motorized system. In 2013, Sierra Club launched a citizens' effort to document illegal motorized use, through which we gained considerable on-the-ground information about where illegal use is most common. We attended numerous Forest Service meetings and field trips, and shared our concern about illegal motorized use with SNF staff.

We appreciate that, in response to our often-expressed concerns about illegal motorized use, Supervisor Joe Alexander held a motorized use compliance summit in February 2016, which led to the formation of a working group in March. We participated in the summit, designated a representative to serve on the working group, and have participated in every meeting. At the compliance summit, we were heartened to hear Supervisor Alexander explicitly state that the SNF would not add new motorized roads or trails to the existing system until the Service has gained effective control of illegal use and can deal with resource damage that is occurring from illegal use, improperly placed legal roads, and inability to adequately maintain the current system. Unfortunately, that resolve is not expressed at all in the Purpose and Need statement or in the Proposed Action for the travel plan.

Sierra Club strongly believes the SNF travel plan must include specific proposals to improve compliance with motorized travel regulations, and effectively stop illegal use on the SNF, before authorizing any new roads or motorized trails. The Forest Service acknowledges the public's concern "about resource damage occurring on system roads and trails, as well as unauthorized use on closed roads/trails and user created routes" (SNF Travel Management Scoping Document, May 2016, p. 6). The statement of Purpose and Need states "The overall objective of the proposed action is to provide a manageable system of designated public motor vehicle access routes and areas within the Shoshone National Forest..." While the Forest Service acknowledges deficiencies in management of the current travel system, there are no proposed actions in the specific proposals that address these needs. SNF staff have said these issues will be taken care of in the implementation stage of travel management, but given that the forest already has travel rules that are being disregarded by the motoring public and that misuse, resource abuse, and illegal activities are currently overtly being ignored by the Forest Service, our skepticism seems warranted. The new travel plan must include more than just another map – it must provide clear guidance as to how that paper plan will be reflected by the actual forest motorized travel system on the ground.

Sierra Club formally submitted the following proposal to address these compliance needs to the Washakie District, the Wind River District, and the North Zone (Clarks Fork, Greybull, and Wapiti Districts) in September 2015:

*Shoshone National Forest Travel Management Plan Proposal  
September 23, 2015*

*Forest Planners:*

*We would like the following guidelines to be included in all proposals to the SNF Travel Management Plan currently being formulated:*

- 1. The Forest Service must identify all non-system roads, clearly mark them on the ground as closed, and take necessary action to stop use.*
- 2. The Forest Service must identify (with field signage), and take effective action to close all user-created tracks and trails.*
- 3. The Forest Service must identify and clearly mark in the field all system roads and trails. System roads should be signed at regular intervals along such routes.*
- 4. The Travel Plan must identify resources to maintain route signage and closures across the forest.*

*Without effective efforts being implemented to allow a typical forest user to know which roads are open or closed, our group cannot accept the opening of any new motorized routes on the Shoshone National Forest.*

*Connie Wilbert  
Sierra Club Wyoming Chapter*

*Bonnie Rice  
Sierra Club Greater Yellowstone Ecoregion Campaign*

According to the SNF travel management web pages, our proposal was not included in the Proposed Action because it has been "addressed with the compliance working group". We see no evidence that this is the case. To date, the working group has produced nothing that addresses our fundamental issue, and we again formally request that these simple guidelines be included as a foundation for the proposed action and any alternatives that are developed. If the working group does produce something useful, an outcome that is by no means assured, it will complement and support the commitment of the SNF (as publicly stated by Supervisor Alexander) to effectively deal with the problem of illegal use before considering any additions to the motorized system. Our take-home from six days of compliance meetings can be distilled down to the recommendations we made in the above proposal. As of July 2016, we have seen no new signage or any effective actions taken to close illegal routes on the forest. Our volunteers have continued to monitor the system, and the dozens of legal routes without signage, and dozens more illegal routes without signage or barriers, persist unchanged. We therefore again formally request that

the Proposed Actions and all draft alternatives elucidate the need to have appropriate signage and barriers to allow/require the motoring public to stay on the legal system.

### ***Public Input***

Sierra Club asks SNF officials to carefully review the public comments that were submitted during the recent Forest Plan revision process, and to revise incorrect conclusions that directly affect the Purpose and Need for the Proposed Action. The scoping document improperly implies that a large number of public comments supported expansion of motorized recreational opportunities on the forest, while barely mentioning public concerns about resource damage and illegal motorized use.

"During the recent Forest Plan revision process comments were received from **many users** expressing a desire for the expansion of motorized recreation opportunities, especially loop opportunities, for summer motorized recreation. The availability and popularity of four-wheel drive and off-highway vehicles have resulted in an increased demand for motorized opportunities on the SNF. In response to public comments the 2015 Forest Plan provides direction for the SNF to develop at least three summer motorized loop opportunities during the life of the plan (Forest Plan, RDTR-OBJ-05:Forest Plan, pg. 104). In addition to concerns raised about a desire for additional motorized recreation, during the forest plan revision process the public also raised concerns about resource damage occurring on system roads and trails, as well as unauthorized use on closed roads/trails and user-created routes." (Scoping Document May 2016, p. 6. Emphasis added)

In fact, of the 749 individually written public comments on the draft Forest Plan, 76% opposed more motorized development on the forest, and that percentage remained at 75% when looking only at comments submitted by Wyoming residents (see Attachment A: Public Comment Analysis). We question the validity of the conclusion that the public is clamoring for more motorized routes on the Shoshone. Apparently, one motorized advocate has about four times more influence than one forest user who thinks the Forest has an adequate system of roads and motorized access. Individual Wyoming citizens clearly expressed far more concern about poor maintenance, illegal use, and resource damage than about the need for more motorized routes.

Since the travel planning process started in 2015, the ability of SNF staff to accurately identify the Purpose and Need for travel planning has been limited by the agency's own actions. By emphasizing the objective of three new loop opportunities, and refusing to solicit or accept public input in an unbiased manner on an array of issues related to motorized use on the SNF, Shoshone staff precluded a great deal of meaningful public comment ahead of the proposed action.

Throughout an entire year of pre-scoping meetings, the public was only allowed to comment on proposed additions or deletions to the existing legal motorized system. The SNF did not provide any meaningful, up-to-date information describing the existing system to inform public comment, discouraged comments related to unauthorized routes or enforcement concerns, and completely missed an opportunity to identify system-wide needs like dispersed camping, illegal roads and trails, or areas of inadequate maintenance. On top of that, the SNF accepted proposals for additions and closures during the exact same time frame as accepting comments on those same proposals, had confusing and different processes and timetables for public participation between different districts, didn't post proposals on the web site in a timely manner, and generally made it extremely difficult for citizens to participate.

In fact, it is misleading and incorrect to suggest that the 2015 Forest Plan directed the SNF to develop at least three summer motorized loop opportunities. The 2015 Forest Plan included an objective (RDTR-OBJ-05, 2015 SNF Plan, p. 101) for three new summer motorized loop trails, which falls far short of a directive or required outcome. If analysis does not support the need for additional motorized access, the Forest Service would not be required to achieve this objective. The SNF's overemphasis on adding new motorized loops completely skewed public participation in the pre-scoping period, leading to an incorrect expression of Purpose and Need for the project.

### ***Travel Analysis Report***

To comply with the 2005 Travel Management Rule, the SNF must identify unneeded roads to prioritize for decommissioning and identify the minimum road system needed for safe and efficient travel and for the protection, management, and use of national forest lands. The identified Purpose and Needs statement misrepresents the Shoshone's duty to evaluate the existing designated road system and use a science-based analysis to determine a minimum road system that is sustainable both ecologically and economically.

Sierra Club has been requesting that the SNF conduct an inventory and analysis of motorized roads and trails on the forest for several years. We asked for this information during the forest plan revision process. We requested identification of all system and non-system roads, and illegal roads and trails, in the formal proposal we submitted during pre-scoping (referenced above). We asked for analysis of motorized use on the forest, including road density information, at the 2016 compliance summit. We repeatedly were told that the SNF did not have this information, did not have the resources to gather it, and generally our requests for information were rebuffed.

In addition to being required by the 2005 Travel Management Rule, we staunchly maintain that rational decisions about future travel planning cannot be made without first knowing what exists on the ground. We were interested to note, at the

2016 compliance summit, that presentations by staff from the Black Hills and White River National Forests both emphasized the necessity of having a current inventory of on-the-ground motorized use as the first step in successful travel management planning.

Given the SNF's repeated assertion that it did not have a current travel system analysis, it came as quite a surprise to receive (from a third party, not directly from the SNF) on July 14, 2016 a copy of the SNF's Travel Analysis Report, which was signed by Supervisor Joe Alexander and three other SNF officials on September 22, 2015. That report, apparently done in secret and never released to the public, is attached to our comments (Attachment B). According to the Travel Analysis Report, the outcome "is a set of science-based recommendations for the forest transportation system to meet current and future management objectives." The analysis includes the required defined minimum road system, which identifies 256 miles of roads currently in the legal system that will likely **not be needed** for future use on the SNF.

This information should have been released before the Proposed Action was developed, and should have informed the Purpose and Need for the Proposed Action. The information also should have been given to the public as critical background data. As of July 25, 2016, two days before the end of the public comment period on the scoping process, the report has not been made available to the public. It is not on the SNF website, nor has its existence been shared with citizens or organizations on the SNF TMP email list. There is no evidence that the SNF themselves used the information in this scientifically-based reference document to inform the development of scoping Purpose and Need or the Proposed Action.

According to the Travel Analysis Report, the primary objective of the analysis is "to provide the Shoshone National Forest leadership with an appropriate level of information to manage and maintain a road system that is safe and responsive to public and agency needs, **affordable and efficiently managed, environmentally sound, and in balance with available funding.**" (Travel Analysis Report, p. 4, bold added) A further objective is to "inform a forest travel management plan for the Shoshone National Forest" (ibid, p. 4).

To say the least, we were surprised and puzzled by the discovery of this secret Travel Analysis Report. Why was the analysis not shared with the public and made available to help the public knowledgeably participate in the pre-scoping and scoping processes? Why was the analysis based on 30-year-old information from the 1986 Forest Plan, Environmental Impact Statement (EIS), and Record of Decision (ibid, p. 5), instead of the 2015 Forest Plan and supporting analyses? Why wasn't the information in the report used by SNF staff to inform the development of the Purpose and Need for scoping or the Proposed Action?

Given the stated objectives of the analysis to provide information so forest officials can manage and maintain a road system that is affordable and in balance with

available funding, and to inform the development of the travel management plan, we request that the SNF:

1. Update the Travel Analysis Report to incorporate the most current available information from the 2015 Forest Plan, EIS, and final decision.
2. Incorporate information from the updated Travel Analysis Report into the Purpose and Need and Proposed Action for travel management.
3. Explain to the general public why the Travel Analysis Report was not made available to the public during the pre-scoping or initial scoping period.

### ***Minimization Criteria***

The failure of the Proposed Action for this travel plan to follow, or even acknowledge, Executive Orders 11644 and 11989, which provide the foundation for all travel management planning, and the 2005 Travel Management Rule, is troubling, to say the least. These executive orders, issued in response to increasing resource damage caused by off-road vehicle (ORV) use and conflicts between non-motorized users and ORV users, require federal land management agencies to manage ORV use to protect other resources and recreational uses. The executive orders require that, when designating areas or trails available for ORV use (including over-snow vehicles (OSVs)), the agencies must locate them to:

1. Minimize damage to soil, watersheds, vegetation, and other resources of the public lands;
2. minimize harassment of wildlife or significant disruption of wildlife habitats; and
3. minimize conflicts between ORV use and other existing or proposed recreational uses of the same or neighboring public lands.

The 2005 Travel Management Rule codified the executive order “minimization criteria” and the Shoshone must adhere to these criteria when making ORV designation decisions. To address the minimization criteria the Forest Service’s methodology should, at minimum:

- Incorporate site-specific data
- Provide opportunities for public participation early in the planning process
- Consider the best available scientific information
- Account for projected climate change impacts, including reduced and less reliable snowpack, and increased vulnerability of wildlife and resources to ORV and OSV impacts
- Consider site-specific and larger-scale impacts
- Apply best management practices
- Account for available resources for monitoring and enforcement
- Consider whether to designate areas or trails by “class of vehicle” and “time of year”

The SNF must follow the required minimization criteria and above minimum

methodologies when defining the Proposed Action and evaluating draft alternatives. Winter Wildlands Alliance has submitted extensive comments and documentation related to minimization criteria, which apply equally to winter and summer motorized use. We support the comments submitted by Winter Wildlands Alliance and hereby include them by reference with our comments.

### ***Continental Divide National Scenic Trail***

Motor vehicle use along the Continental Divide National Scenic Trail (CDNST) travel route and within the CDNST Management Area must be managed to provide for the protection of the nature and purposes of this national scenic trail. The proposed action must be modified to be consistent with the National Trails System Act. Previous designations of travel routes for motor vehicle use along the CDNST and associated Management Area should be reconsidered as allowed by 36 CFR 212.54, since some of those designations were not in compliance with the National Trails System Act, specifically with section 7(c), allowance of motor vehicle use, and 36 CFR 212.55(b), minimizing conflict requirements. NSTrails has submitted extensive comments and documentation related to CDNST management. We support the comments submitted by NSTrails and hereby include them by reference with our comments.

Based on the serious, systemic deficiencies identified above in the May 2016 scoping document, Sierra Club formally requests that Supervisor Alexander direct his staff to revisit the SNF Travel Management scoping document and revise the Purpose and Need and Proposed Action in response to Travel Analysis Report recommendations and in accord with required minimization criteria. The Travel Analysis Report first should be updated to incorporate the most current available information from the 2015 Forest Plan, EIS, and final decision. We urge Supervisor Alexander either to conduct supplemental scoping, or to withdraw the current deficient scoping document and replace it with a new scoping document that corrects the deficiencies of the May 2016 effort.

### **PROPOSED ACTIONS**

Underlying our comments on specific proposed actions, and as previously stated in this document and in every possible previous opportunity for public comment, Sierra Club strongly believes the SNF travel plan must include a concrete, detailed plan to effectively stop illegal use on the SNF and prevent new illegal use, and identify how the resources necessary to accomplish this task will be secured, **before any new roads or motorized trails are allowed, forest-wide**. In addition, we note that preserving natural values in inventoried roadless areas, important wildlife habitats, and easily-accessible areas for non-motorized recreational activities



(hiking, horseback riding, foot and horseback hunting, wildlife watching, etc.) must be a tight screen for any additional motorized roads or trails.

Our members have spent hundreds of hours the past three years walking, riding, and driving on the existing SNF motorized route system. This effort, as well as our members combined several lifetimes of experience using the SNF road system, has provided us with a good on-the-ground knowledge of many of the specific proposals put forward in the Scoping Document. Following are our comments on those proposals.

### ***Wind River District***

The Wind River District presently has the most roads, and by a substantial margin, the most large loop routes, of any area on the SNF. Our citizen-led illegal motorized use project as well as similar work of the Wyoming Wilderness Association clearly shows that the Wind River District also suffers the most illegal motorized use on the entire forest. Although it makes no rational sense to add even more loop routes to the Wind River District, the proposals in the scoping document would create the largest increase in loop routes in the already loop-rich Wind River District. With 64% of all the loop drives on the SNF, the Wind River District has ample loop opportunities today. We find no credible rationale for adding a single additional route on the Wind River District to meet a perceived need for loops somewhere else: more loops on the Wind River District will not solve a lack of loops elsewhere.

We also challenge the oft-expressed opinion that adding more motorized trails, be they loops or not, will lead to fewer illegal, user-created routes. Our on-the-ground monitoring strongly suggests exactly the opposite to be true: the more motorized routes there are, the more opportunity exists to bail off in open areas and create more and more illegal routes. We challenge the SNF to provide actual evidence that increasing motorized miles leads to a decrease in illegal use. We are not aware of any such research results.

#### **WR-07 – Warm Springs Mountain**

We strongly oppose WR-07. When our members attended the travel system field trip in the fall of 2014, led by Wind River District Ranger Metzger, our first stop was at the forest boundary on the Union Pass/Warm Springs road. The illegal user-created trail brazenly going straight up the slope of Warm Springs Mountain was the first example of illegal motorized use we saw on the Wind River District that day. A carsonite wand indicated no motorized travel, but the degree of use made an ugly scar straight up the open slope of the mountain – literally the very first thing the forest visitor sees when entering the forest on the very popular Union Pass road. The illegal road is a visual affront to campers, picnickers, and fishermen using this long popular area. Ranger Metzger highlighted it as the first example of the day of the egregious nature of illegal motorized use on the SNF.

Our members have been visiting this area for many decades, and this illegal road and the erosion it has caused was not there until relatively recently (last ~20 years). We stand strongly against incorporating this route into the system. The scoping document lists the rationale for changing this route as “provides large effective loop”. In reality, it does not create a loop; it merely connects two roads coming onto the forest from private lands that go to the top of Warm Springs Mountain. These private roads do not provide public access, and both spur roads should be closed where they enter the forest, as the Forest Service has no business maintaining roads that have no public access.

This illegal, user created route goes straight up the fall line of the slope, leading to erosion and braiding. Adopting illegally created routes into the legal system is the antithesis of an honest attempt to encourage compliance with the legal motorized system. It merely legitimizes and encourages illegal behavior.

It is not possible to meet minimization criterion #1, to minimize damage to soil, watersheds, vegetation, and other resources of the public lands, with this proposed trail. This proposed action does not address the recommendations found in the Travel Analysis Report.

#### WR-11 – Bachelor Creek

We strongly oppose WR-11. The Bachelor Creek trail has for many decades served hikers, horsemen and hunters as an access to the Fitzpatrick Wilderness at Moon Lake. Opening this foot and horse trail forces those users to face the danger and unpleasantness of hiking or horse riding those four miles with the prospect of trying to get through the inevitable mud holes created by motorized use, as well as meeting ATVs traveling at much higher speeds. Furthermore, the Moon Lake jeep trail (FR #531) already provides a popular ATV route to Moon Lake. The last six miles of FR #531 is presently used almost exclusively by ATVs, and as such, provides very poor hiking or horse riding opportunity. Any hiker or horseman on that route will encounter deep ruts, mud, deep dust, and fast moving ATVs.

Given the popularity of the Moon Lake entry into the Fitzpatrick Wilderness, we find it incumbent on the Forest Service to continue to provide all those hikers and horsemen a safe, quiet, enjoyable access. The historic Bachelor Creek trail has long met that need.

Our opposition to WR-11 is furthered by the fact that adding a motorized route through this presently roadless area will bisect secure wildlife habitat. It will substantially limit hunting opportunity in this area and diminish the wildlife value of this rich area.

WR-11 would create another motorized route crossing through indefensible high mountain meadows. With over 330 miles of routes to maintain, provide signage for, and prevent off trail, illegal abuse from those roads, the last thing the Wind River District needs is another out-of-sight, out-of-mind route to take care of. Current

conditions on the Wind River District would indicate that the present system requires far more maintenance, signage and enforcement resources than are available. The SNF must not add more miles of loops and motorized trails to a system already overburdened to the breaking point with deferred maintenance and unresolved compliance needs. The Travel Analysis Report explicitly recommends fewer miles on the SNF, not more.

Furthermore, it is not possible to meet minimization criteria #2 or #3, to minimize harassment of wildlife or significant disruption of wildlife habitats, or to minimize conflicts between OHV use and other existing or proposed recreational uses of the same or neighboring public lands, with this proposed trail, which also does not address the recommendations found in the Travel Analysis Report, which suggest that fewer roads are needed on the SNF.

#### WR-13 – Warm Springs Mountain and Canyon

We oppose WR-13, a proposal that is split into two different sections.

The proposed new route included in WR-13, in S 35 T 42N R 108W, consists of several short sections of current routes in this area that are not publicly accessible from routes on the current legal motorized system. Interestingly, the 2016 Wyoming State Trails map does not even acknowledge these fragmentary routes that are only accessible from private lands in S 26 and S 27 T 42N R 108W. We concur with the State's interpretation, given that the public can't legally access these roads. The proposed new section of WR-13 will not accomplish an on-forest connection, for two reasons. First, the road it connects to crosses north out of the Forest at another segment east of WR 13, into S 26 and S 25 T 42N R 108W. And second, without WR-07, there is still no effective access from other public roads or motorized trails.

The second section of WR-13 is a combination of unauthorized, illegal roads crossing the historically and culturally rich area of Warm Springs Canyon. The proposal shows new construction would be necessary on the steep ridge above Bear Creek, which would cause unnecessary and destructive impacts including erosion on this steep slope.

Adopting illegally created routes into the system is the antithesis of an honest attempt to encourage compliance with the legal motorized system. It merely legitimizes and encourages illegal behavior.

It is not possible to meet minimization criterion #1, to minimize damage to soil, watersheds, vegetation, and other resources of the public lands, with this proposed trail. Neither component of this proposed action addresses the recommendations found in the Travel Analysis Report.

#### WR-02w and WR-03w - Falls/Deception Creek and Pinnacles ski trails

We support both of these proposals. These very popular ski/snowshoe trails are an extremely modest proposal to set aside a few acres for non-motorized use in the winter. Whereas there are over a half million acres on the Shoshone available for winter motorized use, the 1,354 acres of non-motorized restriction in these combined proposals is a whopping  $\frac{1}{4}$  of one percentile of the total acres available for winter motorized on the Forest. And these two areas are not the type of terrain in high demand for snowmobiling. As with all other proposals, we suggest the travel plan include specific on-forest signage and public education that will be required to make this proposal a success.

Adoption of WR-02w and WR-03w certainly would reduce conflicts in these two tiny areas between OSVs, cross country skiers and snowshoers, and so would meet minimization criterion #3. It is unaffected by the recommendations in the Travel Analysis Report.

#### ***Washakie District***

Sierra Club's illegal motorized project explored much of the forest summer motorized system on the Washakie District. We found a number of supposedly closed roads, not identified as part of the current legal motorized system on the motor vehicle use map, that have no signage and therefore get regular use. We also found several miles of user-created roads being illegally used, especially during hunting season. We found minimal signs throughout the district, with many routes not marked either open or closed. Clearly, the road and trail system on the Washakie lacks consistent, clear signage and any on-the-ground way for the public to understand when a route is closed, and this alone is the cause of much of the misuse.

#### WK-01

We strongly oppose this new motorized route. This traditional, long-existing horse, hiking, and stock trail goes through large open parks in Cony Basin that will be riddled with illegal use off this route if it is constructed. No amount of carsonite signs, boulders, or stumps will keep vehicles on this route through these beautiful, wide-open parks. If this becomes a motorized route, a great elk and deer hunting area will be permanently ruined. This proposal would create a motorized route across the heads of at least eight little drainages, all with clear springs, all at an elevation between ten thousand feet and timberline. In other words, this terrain is the summertime sweet spot for elk, deer, bears, and countless other wildlife species. A summer motorized route through this rich habitat would disrupt wildlife over several square miles – at least a half-mile to either side of the route. It would be a terrible and destructive place for a motorized route, traversing the top of every little drainage coming off the northeast aspect of Mount Arter, which collectively create the headwaters of Lander's Baldwin Creek.

It clearly is not possible to meet minimization criteria #1, #2 or #3, to minimize damage to soil, watersheds, vegetation, and other resources of the public lands, to minimize harassment of wildlife or significant disruption of wildlife habitats, or to minimize conflicts between OHV use and other existing or proposed recreational uses of the same or neighboring public lands, with this proposal. Furthermore, as with every other new road or motorized trail, WK-01 does not even acknowledge, much less respond to, the recommendations found in the Travel Analysis Report.

#### WK-19

We support this closure proposal. MT-01 should have never been part of the system. This route lies along the Popo Agie Wilderness boundary for about four miles. Given that the Popo Agie Wilderness is the southeast portion of one of the largest expanses of Wilderness in the lower 48, this iconic area must not have an alpine-zone motorized route right on the border. There is one section along MT-01 where the oft-used Wind River Peak approach route, the Deep Creek Trail, skirts near the Popo Agie Wilderness boundary, coming to within about one-quarter mile of MT-01. The world-class wilderness experience sought by thousands of people from around the planet who come to experience the true wild (that which the SNF is known for) must not be jeopardized with loud, smelly machines that are the very antithesis of the quiet wilderness experience, cruising the edge of Hudson Meadows.

Adopting this closure clearly achieves minimization criteria #1, #2 and #3, by minimizing damage to soil, watersheds, vegetation, and other resources of the public lands, minimizing harassment of wildlife or significant disruption of wildlife habitats, and minimizing conflicts between ORV use and other **existing** or proposed recreational uses of the same or **neighboring** public lands. This closure is in accord with the recommendations for a smaller motorized travel system on the SNF found in the Travel Analysis Report.

#### WK-26

There are presently two motorized access routes to Pete's Lake, one too many in our estimation, as described in WK-XX, below. Creating a third route would be not only redundant, it would be extremely harmful to wildlife as it would close the open side of a nice square mile of wildlife habitat. FR 356 and FR 369 already form a 'C' around this area, and WK-26 would close the open west side of that 'C', seriously diminishing wildlife habitat values and wildlife use of this mixed-forest area.

It is not possible to meet minimization criteria #2, to minimize harassment of wildlife or significant disruption of wildlife habitats, with this proposal. Adding totally redundant routes such as WK-26 also clearly runs counter to the recommendations in the Travel Analysis Report, which explicitly recommends fewer miles on the SNF, not more.

#### WK-XX

We strongly recommend the closure of MT-02. Our members hiked this route earlier this spring, and discovered numerous problems. First, we noted no clear

signage to let a conscientious user know what is or isn't a legal route, or what a designated "trail" is, much less that it was MT-02, as shown on the motor vehicle use map. We talked to a bicyclist on the Fairfield Road, and he wasn't even sure if the route was open to bicycles! See Photo 1, below.



Photo 1: Cryptic signs at the intersection of MT 02 and FR#369 at McMahon Park. No explanation of vehicle limitations, what the sign with the arrow means, or what a "trail" is. These likely are not even Forest Service signs, but instead Wyoming State Trails signs. This would justifiably confuse even the most conscientious motorized user!

The aquatic crossing of McMahon Park on this route is a complete travesty and totally unacceptable. See photos 2 and 3, below. There is absolutely no excuse for



the extreme damage being done by motorized abuse of this otherwise beautiful lake-like meadow, and it simply must be stopped. An alternate motorized route, FR 351 and FR 369, traverses the dry top end of McMahon Park, providing motorized access on into Pete's Lake. We ask for the immediate closure of MT-02, and effective enforcement immediately to halt this outrageous abuse.



Photo 2: McMahon Park, MT02. June 21, 2016. These are full-sized vehicle ruts, probably from fall 2015, going into about three feet of water in the creek. Apparently the vehicle must have been pulled out, as the tracks did not go through this 'crossing'. Under current regulations, there are supposed to be no full-sized vehicles on this trail, but there are no signs explaining that at either end of MT02.



Photo 3: MT 02 entering McMahon Park from the east. The route continues at least one hundred meters through this lake-like meadow, in two or more feet of water. This photo was taken June 21, 2016, and there were fresh ATV and motorcycle tracks entering and exiting the meadow.

Rather obviously, implementing the closure of MT-02 would achieve minimization criteria #1 and #2, by minimizing damage to soil, watersheds, vegetation, and other resources of the public lands, and minimizing harassment of wildlife or significant disruption of wildlife habitats. It also would support the recommendations in the Travel Analysis Report for a smaller motorized travel system.

#### WK-30

We oppose this new route, which would bisect an excellent piece of wildlife habitat, and would minimize the forest's ability to keep Wyoming wildlife abundant, healthy, free-ranging, and comfortable. The addition of this route would create only a tiny loop, and actually may just detract from a larger existing loop. We certainly don't support the creation of loop short-cuts, and cannot see any serious rationale for this addition. It appears totally counter to the just discovered Travel Analysis Report,



which explicitly recommends fewer miles on the SNF, and it would not minimize damage to soil, water, or vegetation, or harassment of wildlife, or disruption of wildlife habitat. Quite the opposite, in fact.

#### WK-31

We oppose this new route across Rock Creek, which would be extremely rocky and rough, and would create a very small loop at best. Again, we see no rationale for creating more motorized impacts in an area that already is well served by the current routes, with plenty of riding opportunities for motorized users. And yet again, pointing to the Travel Analysis Report, this new route would be counter to the recommendation for a smaller motorized travel system, and would not meet any minimization criteria.

### ***North Zone: Clarks Fork, Greybull River, and Wapiti Districts***

#### NZ-01 - Line Creek

Sierra Club opposes the proposed new motorized routes in this area, because of unacceptable impacts to wildlife. This narrow, one to two mile wide undeveloped corridor of the forest is constrained by development across the forest boundary to the east and the steep Beartooth Front to the west. It provides an important movement corridor for elk, mountain goats, bighorn sheep, and deer, and is occupied grizzly bear habitat. Several thousand elk winter on Bald Ridge nearby, and disperse through the corridor in spring, summer, and fall.

If NZ-01 is allowed in this narrow corridor, wildlife connectivity between Bald Ridge and Red Lodge areas will be lost, with increasing motorized recreational use disrupting or completely preventing movement between seasonal habitats.

It clearly would not be possible to meet minimization criteria, particularly criterion #2, to minimize harassment of wildlife or significant disruption of wildlife habitats, with this proposal. The new roads and trails also are not supported by the recommendations in the Travel Analysis Report.

#### NZ-07 - Sweetwater Creek

We support this closure, but recommend closing the road at the North Fork Bridge. There is no strong reason to maintain the road up to the first low water crossing, and very good reasons to permanently close it at the bridge. The route is highly erosive, washes out regularly, and the Forest Service has wasted significant resources repeatedly rebuilding in past years. The Sweetwater drainage wasn't included in the grizzly bear Primary Conservation Area (PCA) solely because of the old lodge that has since burned down. Now, with the lodge is gone and the motoring public accustomed to having the road closed due to washouts, is the perfect time to permanently close the road and incorporate the full drainage into the PCA. This deciduous riparian valley is extremely valuable ecologically and biologically, which far outweighs its value as a short, run up and down motorized route.

This closure meets minimization criteria, particularly criterion #2, to minimize harassment of wildlife or significant disruption of wildlife habitats, and would help move toward the recommendations in the Travel Analysis Report for a smaller system of motorized routes forest-wide.

#### NZ-08 - Elk Fork Creek road

We continue to support this closure that was proposed during pre-scoping, and request that it be further analyzed, given the opportunity it clearly offers to protect valuable ecological resources and prevent resource damage. This valley has the same biological and ecological values as Sweetwater Creek: its deciduous riparian vegetation is biologically diverse, and provides important wildlife habitat. Current motorized use causes substantial resource damage: trucks driving through wet meadows (as they do every year) seriously tear up the riparian areas, and the Forest Service does not seem able or willing to prevent this abuse. The large developed campground near the highway would be a logical place to terminate the road.

This closure meets minimization criteria, particularly criterion #2, to minimize harassment of wildlife or significant disruption of wildlife habitats, and would help move toward the recommendations in the Travel Analysis Report for a smaller system of motorized routes forest-wide.

#### NZ-15 - Grass Creek

We were unable to find a map showing this modified proposal on the SNF website, and so are not able to knowledgeably comment on it. Inferring from the minimal descriptive information provided, we would note that constructing a new road so close to existing roads, simply to create a relatively tiny loop, is of questionable value, and probably would only serve to lessen other values of the area. Because of the lack of meaningful information provided to the public, we request that this proposal be dropped from consideration.

#### NZ-20 - Line Creek (northernmost segment)

We support closure of the one segment identified in this proposal, and continue to argue that the second, parallel route also should be closed, leaving only one of the current three closely parallel routes open, for the same reasons described above for NZ - 01.

Closing two of the three parallel routes would meet minimization criterion #2, to minimize harassment of wildlife or significant disruption of wildlife habitats, and would help move toward the recommended smaller system of motorized routes.

#### NZ-23 - Sulphur Creek

We support the closure of the Sulphur Creek Road at the private land boundary. Closing this road below the private property would alleviate conflict with hikers and would protect the high elevation terrain above the private property where OHVs currently are illegally rambling around wherever they please, pushing higher and higher. This closure would minimize conflicts between OHV use and other

recreational users, and would minimize damage to soil, vegetation, and other resources, meeting minimization criterion #1 and #3. It also would help move toward the recommendations for a smaller motorized system.

### Forest-wide Proposals

#### SHO-02w

We have long supported the idea of calendar date winter motorized definitions as proposed in SHO-02w. Setting an OSV use season is a management action recommended in the Forest Service's own Best Management Practices: "Specify season of use to be at times when the snowpack is expected to be of suitable depth conditions." (USFS 2012. *National Best Management Practices for Water Quality Management on National Forest System Lands. Volume 1: National Core BMP Technical Guide*. Rec. 7 – Over-Snow Vehicle Use.) Having set dates for the winter season will help the Shoshone to better enforce the travel plan. However, because the proposed action does not explain how "high" versus "low" elevation areas were determined, we would appreciate more clarification on this point.

In addition to the date restrictions, we ask that minimum snow depth requirements for snowmobiling be added, and we recommend requiring 18 inches of uncompacted snow before allowing OSV use within an area to help to minimize impacts from soil compaction, wetland and alpine habitat damage, and damage to vegetation and subnivean habitats. The best available science shows that minimum snow depths should be at least 18 inches for cross-country travel and 12 inches for travel on groomed trails or roads (*Snowmobile Best Management Practices for Forest Service Travel Planning: A Comprehensive Literature Review and Recommendations*. Available at <http://winterwildlands.org/wp-content/uploads/2015/06/BMP-Final.pdf>).

Establishing minimum snow depths before OSV use is allowed has worked on other western national forests (i.e., Tongass and Chugach), and there is no reason this approach, coupled with seasonal dates for use, should not be just as successful on the Shoshone. The Forest Service's Best Management Practices for water quality management call for forests to institute minimum snow depths, stating that forests should: "Specify the minimum snow depth for each type or class of over-snow vehicle to protect underlying resources as part of any restrictions or prohibitions on over-snow use." (USFS 2012. *National Best Management Practices for Water Quality Management on National Forest System Lands. Volume 1: National Core BMP Technical Guide*. Rec. 7 –Over-Snow Vehicle Use.)

The five other forests in the nation that are currently writing winter travel plans – the Lassen, Tahoe, Eldorado, Stanislaus, and Plumas - have all proposed minimum snow depths. The language in these proposed actions is the same for each forest: "To implement a forest-wide snow depth requirement for OSV use that would provide for public safety and natural and cultural resource protection by allowing

OSV use in designated areas when there is a minimum of 12 inches of snow covering the landscape.” (See USFS Region 5 Travel Planning webpage: <http://www.fs.usda.gov/detail/r5/recreation/travelmanagement/?cid=stelprdb5397043>)

It seems obvious that to a minimum snow depth is necessary to achieve minimization criteria #1, minimizing damage to soil, watersheds, vegetation, and other resources of the public lands. Damage to soils and vegetation by snowmobiles run over snowpack that is too thin is common in the fall and spring in some heavy use areas, and is totally preventable with a minimum snow depth requirement of at least 18 inches.

#### SHO-XXX

We again request that the Forest Service include a proposal that spells out specific practices, procedures and standards to ensure that any future travel plan map will correlate closely to the way the system is used on the ground. Minimal signing expectations, a plan to create effective barriers, an education and enforcement plan, and identification of agency resources necessary to accomplish these tasks absolutely must be a key component of a new travel plan, if the SNF has any expectation that a new plan will be any more effective in curbing abuses and illegal use that is the norm on the forest today.

### **ENVIRONMENTAL ANALYSIS**

After the Purpose and Need and Proposed Actions have been updated to be in accord with legal requirements, the environmental analysis and development of draft alternatives must include the following.

**Cumulative Impact Analysis:** impacts resulting from the addition of incremental impact of the proposed action to other past, present, and reasonably foreseeable future actions must be fully evaluated. This must include climate change impacts of climate change including wildlife disease, insect infestations, changes in wild fire regimes, and the cumulative impacts of these changes on the SNF's budget. The environmental analysis must also consider the entire existing forest road and motorized trail system, including illegal routes, and evaluate the cumulative impacts of any additions to damage to natural resources that is already occurring or expected to occur from the existing system

**Enforcement:** the SNF must fully evaluate how changes to the motorized system will affect its ability to enforce the entire system and prevent illegal use, and its ability to properly maintain the entire system.

**Financial Sustainability:** the SNF must evaluate the maintenance costs of all proposed actions and each alternative, and must include a fiscal analysis of the

estimated cost for implementing each alternative that includes necessary staffing to stop illegal use and properly maintain the system.

**Effects on Forest Values:** the environmental analysis must evaluate the impacts of the entire motorized system, and the cumulative impacts of any proposed additions to that system, on the full range of other forest values, including (but not limited to) wildlife, roadless character of the SNF, cultural and historical values, and other recreational uses of the forest.

Thank you for considering our comments. We appreciate the opportunity to share our concerns about the apparent deficiencies in the current Proposed Action for the Shoshone National Forest's (SNF's) travel management plan, and we look forward to seeing a revised scoping document in the near future. Please do not hesitate to contact us if you have any questions about our concerns, or would like more information.

Sincerely,

A handwritten signature in black ink, appearing to read "K Wilbert".

Kim Wilbert  
Board Chair  
Sierra Club Wyoming Chapter  
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A handwritten signature in blue ink, appearing to read "Bonnie Rice".

Bonnie Rice  
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