

## **Comments on Shoshone National Forest Travel Management Proposed Action: Anticipated Effects & Meeting the Stated Purpose and Need**

The Shoshone National Forest Travel Management Scoping Document (May 2016) describes the proposed actions including adding and removing roads and trails for motorized travel. The Forest Service is requesting public comments specifically on the anticipated effects of the proposal, whether the proposal is meeting the stated Purpose and Need, environmental concerns, and alternate options for meeting the Purpose and Need.

The Scoping Document proposes both adding and closing a list of specific routes to achieve roughly no net increase or decrease in designated motorized travel route mileage. However, the plan to widen certain trails to accommodate currently wider off-road vehicles essentially encourages more motorized travel by providing for more types of vehicles, a certain percentage of which will not follow most or any use rules. Providing new motorized travel routes into the forest will require rule changes, more rules enforcement, more maintenance, and more reclamation while causing new erosion, vegetation damage/loss, and stress to resident wildlife and non-motorized visitors.

The Scoping Document acknowledges the current need for and “Purpose” of improved enforcement of existing motorized vehicle route rules yet proposes to add access to more types of vehicles without addressing how enforcement of existing and new rules will be improved or implemented. It is unclear to me how widening and/or designating certain routes will “improve compliance,” one of the stated “Purposes.” I infer from this that adding currently unauthorized “non-system” routes to the designated system (i.e. opening currently illegal routes for legal use) is considered one means of improving compliance.

Widening certain routes to accommodate certain off-road vehicles currently being used by a small percentage still excludes the majority of persons owning/operating only vehicles manufactured for standard on-road or highway use. If trails are going to be widened, it would be more inclusive to widen them to standard on-road vehicle, or even logging vehicle width. This also might prevent the need, expense, and disturbance to widen routes yet again when the next generation of ever-larger off-road vehicles is manufactured, or to provide immediate access for potential future logging.

Logging companies pay the Forest Service/Dept. Agriculture for the right and privilege to build roads to enable lumber production and associated disturbance in exchange for the benefit to the local and national economy, i.e. logging provides jobs, building materials, and tax revenue. Logging companies also must post a bond to assure reclamation of logged areas following completion of logging. The logging companies then conduct and manage the logging operations under the Plan of Operations agreed to with the Forest Service. Many former logging roads are used for recreation once logging is finished, adding a secondary benefit to the road disturbance.

I found no discussion of the **cost** of adding, closing, and widening certain recreational motorized routes. What economic “purpose” or benefit do recreational motorized vehicle trails provide, apart from supporting off-road vehicle manufacturing and sales? Who will pay for the cost of new and wider motorized recreational roads? Will recreational motorized vehicle operators perform and pay for the authorized road and trail upgrades, as would a logging company or other commercial user? Will this be funded by user fees, taxpayers, or other? Will user fees be collected through sale of OHV permits, or will the cost be distributed amongst all forest users, whether or not they operate motorized vehicles, through entrance fees or federal taxes? Does the current revenue from user fees/permits cover the current building, maintenance, and reclamation costs? If user fees are essential to paying for these roads, is non-permitted use a significant compliance issue (revenue loss) for the Forest Service?

If not already done, one means of improving compliance with motorized travel rules might be to encourage off-road vehicle dealers and riding clubs in communities nearest to the Forest to provide their customers and members with printed Forest Service use information and rules and initial education for new riders. This would be similar to how sporting goods (hunting and fishing) retailers frequently provide State publications on rules and regulations for hunting and fishing access and licensing.