



## *Meeteetse Conservation District*

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July 25, 2016

Rob Robertson  
333 East Main Street  
Lander, Wyoming 82520

**RE: Comments on proposed action, SNF Travel Management Plan (scoping)**

Dear Rob:

Our comments are provided as a result of the proposed action alternative presented by the SNF at the Cooperators Meeting in Thermopolis on March 18, 2016 and follow up to our MCD comment letter on the same subject, dated December 1, 2015. We have also referenced the Park County BOC comment letter.

Based on the proposed action alternative presented, it is evident that the SNF has not and is not about to taken a serious approach to “provide for motorized use opportunities” on areas authorized for motorized use in the revised Forest Plan. Considering all the roads closed in the past 20 years and considering the minor changes made to the current travel management program, it is evident that the SNF has no intention to plan for and manage for not only existing use but anticipated future motorized use on the Forest. Those were the goals set forth by the SNF and you have already missed your own mark. We are especially disappointed in your disregard for Cooperating Agency comments which shows disrespect for those entities that represent the people at the local government level. The following comments are for your consideration.

Both the MCD and the Park County BOS specifically requested that no existing roads be closed, but as just one example your proposed action closes parts of the Sweetwater road. The Forest Supervisor, at the March 3 Cooperator’s meeting tried to explain why road maintenance costs were the reason behind closing the upper portion of the Sweetwater road. This road is entirely within a Forest Plan Motorized use area, and is used often by OHV users, especially during hunting season. The Supervisor also touched on grizzly bear issues. Why wasn’t there consideration to leave a trail open for OHV use on the existing road bed above the washout? This would mitigate the road maintenance issue and still allow access for low impact vehicles. As for any grizzly bear issues that were brought up, we expect you to fully quantify those issues with bear incidents tied directly to motorized use in this specific area of the drainage. We believe you can’t justify it and your ultimate goal in the Sweetwater is to satisfy environmentalists’ comments to close the road and to create even more de-facto non-motorized use and de-facto grizzly bear PCA areas on the Forest. Never mind the Forest Plan and Cooperating agency comments and suggestions. This lack of common sense and disregard for Cooperating Agencies’ comments just in the Sweetwater example alone leads us to believe that you have applied the same negative and prejudicial attitude towards OHVs throughout your proposed action process and that you will continue to pledge your non-multiple use allegiance to supporters of additional (de-facto) Wilderness. In short, for the MCD the Sweetwater example alone has created a lack of trust and respect for the travel management planning process. It has

validated our concern in our December 1 Cooperating Agency comment letter that the process has been “framed to limit or restrict motorized access” to the Forest in areas open to motorized use.

Common sense seems to no longer prevail in Forest management. It appears that there is clear intent to formulate mitigating measures that are not quantifiable or are just plain impractical. The suggestion to “measure snow” throughout the Wind River Drainage as a means to regulate the snowmobiling season is not only unrealistic but probably cannot be supported by “resource damage” claims. Again this is just another way for the SNF to use a potentially meaningless metric to arbitrarily create and justify a micro-management and labor intensive jobs program to limit access to National Forest or to limit all resource uses for that matter. Is this what we are to expect in future multiple uses of the SNF?

The same applies to seasonal closures. If the issue is road damage, then roads can be opened early to low impact (OHV, ATV) vehicles and still allow access without damage. Also, weather conditions dictate road and trail use. Setting specific dates for travel is nothing more than applying a conservative approach to increasing and restricting access to the National Forest. There should be line officer discretion for opening roads for ATV use if that use would not cause resource damage. Taking away adaptive management options and setting non-flexible seasonal closures is just another way to preclude motorized use where it could be appropriate. To repeat our concern, if you choose to set permanent dates for road closures, then you should be prepared to quantify those impacts and their significance in your EIS.

Another concern is the Forest Supervisor’s continued emphasis on “maintaining the backcountry character of the SNF”. It appears that the Forest Supervisor has been given special authority and discretion to override the Forest Plan direction. Then, justified or not, the ultimate say for restricting motorized use lies with the Forest Supervisor and his right to waive his magic “maintaining our backcountry character” wand over his kingdom and making it so. We believe this special authority (self-imposed or not) overrides the peoples’ say in the final Forest Plan. We brought this “continued filtering process” up in our earlier letter. In short, it appears that you will continue to filter and restrict motorized use beyond what the Forest Plan allows for and to the point that micro management of the resource, justified or not, will prevail. In short, the public was misled in the Forest Planning process and it now appears that Forest Direction can be overridden by executive orders.

The SNF has maintained in their workshops that trails 50” or less could be constructed in Roadless areas. Yet only a few such trails are in the proposed action alternative. The same goes for relooking at existing roads that you closed in the past. These level one roads offer opportunities, with limited resource issues. The Grass Creek area is a good example that should be considered in the proposed action alternative. Again the public was led to believe something that was never going to be considered. Also, we strongly support the creation of a 4.75 mile motorized loop trail from the Brown Creek (201.1D) area over to the West Gooseberry Creek area (217.1A) *(see yellow in Map A)*.

Your proposed action shows you have added 36 miles and closed 12, then goes on to spin this as an additional 106 miles using loops. In our opinion, if you add 36 miles and close 12, then you have only 24 miles added to the system. . Trails mileage remains the same regardless if it is a loop or not. Another point, new roads you claim on adding like Gwinn Fork, are not new roads, but old roads you closed in the past. You can’t make a silk purse from a sow’s ear.

We believe the proposed action falls short of the users need. To make a relative analysis to “need”, we would ask you to provide us with maps, data and analysis for all trails and roads proposed for motorized use by the

public. We then will be able to determine the extent and scope of your proposed action and if it even satisfies your own goals, let alone the public's needs.

In summary, we believe your proposed action missed not only your own goals, but it ignored the Forest Plan motorized use allocation and direction. We believe your restrictive and limited approach to motorized use is based on personal bias and an insincere fear of resource damage and effects to wildlife. We believe this is speculative and cannot be justified or quantified.

But our greatest concern is that you continue to ignore the will of the people, their local elected representatives' comments and your duty to provide a service to those folks and the communities in Park County. We sincerely hope that there will be changes to the proposed action alternative to better reflect Forest Plan direction and the desires of local government and their communities. If those comments are not taken in earnest and included in a new proposed alternative, then it is evident there is a disregard for the Cooperating Agency status and process. We also hope that the travel management process is not reflective or representative of how the revised Forest Plan will be implemented for other multiple uses in the future. We strongly support the multiple use concept but all indications are that it is being undermined at the local level.

Sincerely yours,



George T. Renner, Chairman  
Board of Directors  
Meeteetse Conservation District

CC: Wyoming Delegation, Regional Forester/ Region 2 in Denver, Governor of Wyoming, WACD, Shoshone Cooperating Agency Coalition, Town of Meeteetse, NW Wyoming OHV Alliance, Cody Chamber of Commerce

Map A.

MCD Proposed Motorized Trail (50'')

