

COMMENTS RELATED TO THE PROPOSED ACTION FOR THE SHOSHONE NATIONAL FOREST'S TRAVEL MANAGEMENT PLAN

A. General Comments

1. I do NOT support allowing ATVs/UTVs with 64-inch wheelbases on the forest's existing or proposed motorized trails because:
 - Wider, heavier, larger vehicles will increase the potential damage to trails and trail margins.
 - If a few 64-inch motorized trails are opened, owners of those wider vehicles will soon be agitating for the opening of additional trails in the forest for their use.
 - If the forest doesn't firmly establish the maximum sized vehicle which will be allowed on its motorized trails now, in a few years the next generation of ATVs/UTVs will be even larger, and their owners will demand access to the forest's motorized trails.
 - The argument in favor of 64-inch motorized trails which states that doing so will increase youth rider opportunities is unrealistic. There is a major safety issue if young, unlicensed riders are allowed to drive on the forest's motorized trails. The danger is significantly greater if they are driving larger, more powerful vehicles.
2. I am NOT in favor of the construction of new roads/motorized trails, even in fringe areas, of RARE II Roadless Areas because:
 - Roadless Areas are classified as Roadless Areas because they don't contain roads.
 - If roads/motorized trails are constructed in Roadless Areas, it is highly likely that some users will establish new, unauthorized roads/motorized trails in that area.
 - Even though the 2001 Roadless Area Rule (36CFR Part 294) doesn't specifically prohibit authorized construction of designated motorized trails in Roadless Areas that doesn't mean it would be a good idea to do so. Once the precedent has been established, there will be continual pressure to construct more and more roads/motorized trails in Roadless Areas.
 - The forest should be looking for opportunities to close roads/motorized trails in Roadless Areas instead of expanding their number.
3. Rocky Mountain Power uses ATVs to monitor and maintain its power lines from the Fox Creek Campground westward to the Wyoming/Montana State Line, from the snowmobile bridge across the Clarks Fork River to Lake Creek, from Camp Creek to near Antelope Mountain, etc. The Travel Management Plan does not recognize or authorize such use.
4. There is a dispersed motorized campsite near the point where forest road 165 initially approaches the north bank of Crandall Creek. That campsite is not included in the proposed Travel Management Plan.
5. Dispersed motorized camping is potentially acceptable. However, what is unacceptable is when users incrementally extend an original 300-foot long, motorized camping spur access road further and further and further from the nearby associated, authorized forest road. The Proposed Forest Travel Management Plan should clearly state that dispersed camping spur access roads shall not extend more than 300 feet from the associated, authorized forest road.

6. The Proposed Forest Travel Management Plan should include specific sections describing how the forest will continually, effectively educate the public about the content of the Plan and how the forest will enforce compliance to the Plan.

B. Specific Comments for the Summer Travel Management Plan

1. I support these proposals:
 - NZ-03 However, the new gate location should be in a spot where ATVs can easily turn around without damaging the landscape.
 - NZ-20
 - NZ-26
 - NZ-29
 - NZ-34
 - NZ-36
 - NZ-37
 - NZ-38
 - NZ-39
 - NZ-41
 - NZ-46
 - NZ-49
 - NZ-51
2. I do not support this proposal”
 - NZ-01
3. I strongly recommend permanently closing these forest roads where they extend into RARE II Roadless Areas:
 - Forest road 121.1B in the Little Rock Creek area
 - Forest roads 105.1F and 105.1a in the Beem Gulch area
4. I strongly urge the inclusion of these proposals into the Forest Travel Management Plan:
 - Seasonally close forest road 165 because it crosses a number of wetland areas, and ATV riders have made numerous unauthorized routes (up to seven in one area) through the moist areas in attempts to not get stuck.
 - Permanently close those portions of forest roads 165 and 178.1B at the points where they enter the Clarks Fork of the Yellowstone Wild River Corridor (refer to my comments in my 10/7/15 email to Kristie Salzman and my hand written 6/4/16 hand-written letter (and map) to Rob Robertson). Those road segments do not exist on an official, 1990 forest service map at the time when the Congressional legislation establishing the Clarks Fork of the Yellowstone Wild and Scenic River was enacted. It is my understanding that preexisting roads may continue to be allowed within the boundaries of Wild and Scenic Rivers, but new roads are prohibited.
 - Permanently, or at least seasonally close from 7/1 to 12/31, forest road 1B which extends part way down the steep, western side of Bald Ridge. The road doesn't appear to be needed. Also at the very least, it should have the same seasonal closure as forest road 103.2C to Henry's Mill because the topography and use issues are the same.

C. Specific Comments for the Winter Travel Management Plan

1. The proposed snowmobile season from 11/15 to 5/15 is appropriate only for the area of the Beartooth Plateau at elevations higher than approximately Beartooth Lake. Areas at lower elevations in the Clarks Fork Valley from Fox Creek to the area just east of Camp Creek are typically snow-free and unsuitable for snowmobile use after early to mid-April.
2. The proposed snowmobile season of 11/15 to 5/15 in the area south of Chief Joseph Highway and Bald Ridge is unacceptable because there usually isn't enough snow in that area in the spring, at least, for snowmobiles to operate there.
3. As climate changes, historical dates and areas of adequate snow cover for snowmobile use may significantly contract. Consequently, there should be a specific provision in the Plan which would allow the forest service to close snowmobiling in areas whenever there is inadequate thickness and coverage of snow during the normal snowmobile season.
4. I suggest that the termination point of the ungroomed snowmobile trail "H" be extended down to Beartooth Lake where it can be connected to the groomed trail on U.S. Highway 212. Doing so would provide a loop opportunity.
5. I support the ungroomed trails "B" and "H" north of the Beartooth Highway and the ungroomed trails "C", "D", "E", "F", and "G" south of the Beartooth Highway. However, I do NOT support adding additional ungroomed trails, groomed trails or allowing any other snow machine use in the area encompassing the Wyoming High Lakes Wilderness Study Area. Congressional legislation in 1994 establishing that Study Area prohibited snowmobile use in excess of the amount, location, and type of snowmobile recreation which existed in that area at that time.
6. I support NZ-04W. However, the portion of the trail south of its connection with forest road 118 must be closed to summer motorized use. This is a concern because, for example, even though snowmobile trail U133.2 is closed to summer motorized travel, every summer there is extensive ATV traffic on the trail.

Thank you for the opportunity to comment on the proposed Action for the Shoshone National Forest's Travel Management Plan. Please include my comments in the public record. If you have questions or need additional information, feel free to contact me.

David M. Curtis

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