



December 11, 2017

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

Re: Shoshone National Forest Travel Management #48573

Cc: Sue Stresser, SNF Acting Supervisor; Wapiti, Clarks Fork, & Greybull Districts
Ranger
Steve Schacht, Washakie District Ranger
Rick Metzger, Wind River District Ranger
Rob Robertson, SNF NEPA Coordinator
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Dear Mr. Robertson,

On behalf of more than 1,250 members in Wyoming and more than 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) 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 you know, the Sierra Club submitted extensive comments to the Proposed Action in July 2016. We are including our revised version of those comments in our response to the revised Proposed Action, and adding new responses to the revised version. We are restating many of our previous comments because we have not seen a response to some of them in the new revised Scoping Document. We also are aware that the Shoshone National Forest will have a new Forest Supervisor in place in early 2018, and we want to make sure the new supervisor has our full comments in one package.

As former SNF 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 human 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 Forest 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 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 fully 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 only minimally expressed in the Purpose and Need statement or in the Proposed Action for the travel plan.

Sierra Club strongly urges the SNF to include in the travel management plan 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, November 2017, 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 currently are being overtly 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/Northern Rockies 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". While the compliance group did produce a set of recommendations, and we have noticed during ongoing field monitoring improved signage in some areas of the forest, we still believe these needs should be explicitly addressed in the Proposed Action. 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

The new revised scoping document still has not addressed the following comments. It seems that forest officials think that simply repeating the phrase "The Shoshone will retain its character as a back country forest" (SNF travel management scoping document, November 2017, p 8), will protect the wildlife, resource, and recreational values that are indeed the unique values of the Shoshone. Forest officials continue to give more weight to (or place higher value on) requests for more motorized access, winter and summer than to the desires and opinions of the vast majority of people who commented on the forest plan.

Why are traditional forest users such as hikers, horsemen or family campers so ignored in deference to motorized trail riding when determining changes to the forest transportation system? All forest users depend on reliable and sufficient roads to access the areas they hold near and dear, but the activities of non-motorized recreational uses are highly impacted and even precluded by recreational motorized use. Why have the values cherished by non-motorized users consistently been ranked as less legitimate or valuable than the desires of the motoring public who wish to expand opportunities to ride around just for the sake of riding motorized vehicles on Forest lands?

Sierra Club thus again 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 November 2017, p. 6. Bolding emphasis added)

In fact, as we previously pointed out, 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; previously submitted with 2016 scoping comments). 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 the recent effort to incorporate Subpart A of the 2005 Travel Management Rule, there was no effective opportunity for the public to comment or participate. Three public meetings were held, but neither the maps nor the actual Travel Analysis Report were ever made available to the public. There were links on the website all summer that would not open. That problem was never fixed during the open comment period, even though we brought the issue of non-function links to the attention of Forest officials and requested that it be corrected. The so-called "informal comment period, which ended August 31, 2017" (SNF TMP scoping

document, November 2017, p.6) was so informal that it was not publicized on the SNF website or in local newspapers. Neither we nor the general public had any chance to weigh in on the new Travel Analysis Report, or to use that new information to inform our comments on this proposed action.

In fact, it is fundamentally 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

Please refer to our comments submitted in July of 2016 regarding the lack of compliance with the 2005 Travel Management Rule requiring that a Travel Analysis Report (TAR) inform the travel management planning process. We understand that the need to address Subpart A of the Travel Management Rule caused forest officials to pull the original Proposed Action back and redo the Travel Analysis Process.

While the hiatus and redo have now produced a new TAR, no explanation has been provided about differences between the two documents. We remain mystified as to why the original TAR, signed by four SNF officials on September 22, 2015 (2015 TAR attached to our 2016 scoping comments) was not utilized. Two of the original signers also signed the new TAR, dated 19 months later, April 27, 2017. Additional similarity in authors between the two reports is reflected in the lists of Interdisciplinary Team Members, on page 5 of each report, which are almost identical. Our confusion and concern is compounded by the fact that the two reports, created less than two years apart and by the same forest service scientists lead to quite different conclusions. While both documents state that "The outcome of the TAR is a set of science-based recommendations for the forest transportation system to meet current and future management objectives" (TAR 2015, p3 and Tar 2017, p3), the **2015 TAR identified 256 miles of System Roads likely not needed** for future use (TAR, September 2015, p3) while the **2017 TAR finds 52 miles of roads not needed** (TAR, April 2017, p3). How can the same scientists, using the same analytic metrics, come to such different conclusions about the same road system with only 19 months separating the two analyses? We would like a full explanation of this inconsistency in conclusions between the two reports.

Yet another problem with the most recent effort to include subpart A into the SNF TMP is that the public was not given access to either the first or second TAR throughout the "informal" comment period, and only within the past 45 days or so have those materials been available. Because of the complexity of dissecting the

analysis of about 1200 miles of roads, we have not yet been able to gain any understanding of how or why the recommendations changed so much. Are there significant mistakes, or was the original or second analysis done incorrectly, or is there some other explanation? We believe the Forest Service, in the interest of transparency, owes the interested public a full and clear explanation, and again, we formally request clarification as to how these two reports can come to such different results

Minimization Criteria

We ask officials preparing the draft plan and alternatives to refer to our comments regarding minimization standards from the forest scoping period (July 2016). We appreciate the inclusion in the second scoping document of the description of Subpart B from the 2005 Travel Rule. We encourage the Forest Service to fully implement all portions of paragraphs two and three (SNF TMP Scoping Document, p7) in the new travel plan.

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.

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 summary of proposed changes (SNF TMP Scoping Document, November 2017, Table 1, p.11) indicates that the proposed actions would leave the Wind River District with 214 miles (65%) of the total proposed 329 miles of loop routes on the entire Shoshone National Forest. Our 2016 comments seem not to have been heard at all. Again we ask: what is the logic of adding more roads to the forest district that already has the most roads? We understand there is pressure from motorized users on the northern districts for more access, but it is clearly obvious that adding more roads in the Wind River District will not increase recreational opportunities for motorized users on the Wapiti, Clarks Fork, and Greybull Districts. At the same time, adding all these new proposed routes on the Wind River District will permanently reduce recreational opportunities for non-motorized users on this district. We request a formal analysis of current and proposed road densities by district, and a clear explanation of the rationale behind the proposed new motorized road and trail distribution, by district, specifically in relationship to what users are requesting.

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 effort to monitor illegal motorized use, as well as similar work done by 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. If all the other loop opportunities in the 2017 Proposed Action were implemented in other districts, and the Wind River District gained zero, the Wind River would still have well over half of all the loops on the forest.

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. Again, we request a clear explanation of whatever logic the SNF officials used to propose 214 miles of additional loop routes on the Wind River District.

We also continue to 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 request that the SNF provide actual evidence that increasing motorized miles leads to a decrease in illegal use. We are not aware of any such research results, and look forward to learning what factual information the SNF officials are using to justify this belief.

WR-07 – Warm Springs Mountain

We oppose WR-07. The rationale stated in the proposed action “provides legal access to an area currently without it” is incorrect. Hikers, foot hunters, birders, photographers, and many other users have for many years walked or ridden stock into this area. The Wind River district already has 162 miles of motorized loops, and we have seen no evidence of need for more in this area of the forest.

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. Given the popularity of the Moon Lake entry into the Fitzpatrick Wilderness, it is incumbent on the Forest Service to continue to provide all those hikers and horsemen with safe, quiet, and enjoyable access. While the historic Bachelor Creek trail has long met that need, if it becomes part of the motorized trail system, that loss must be mitigated by the construction of a new horse and foot trail and trailhead for non-motorized users. While we support WR 20 and WR 55, and while closing those two routes (both in Inventoried Roadless Areas) does offset the new miles of road in IRA from WR-11, they do not provide for the loss of foot and horse trail access to the Fitzpatrick Wilderness.

WR-13 – Warm Springs Mountain and Canyon

We oppose WR-13. The rationale stated in the proposed action “provides legal access to an area currently without it” is incorrect. Hikers, foot hunters, birders, and many other users have for many years walked or ridden stock into this area. The Wind River district already has 162 miles of loops, and we have seen no evidence need for more in this area of the forest was expressed in the forest plan process.

WR-25

We support commonsense seasonal closures to prevent road, resource and wildlife damage.

WR-78

We support moving this route as proposed, to curtail damage presently being caused by motorized use crossing the boggy area, and to move the route away from the Fitzpatrick Wilderness boundary, which will reduce impacts on the wilderness

character of the area and reduce the likelihood of illegal motorized incursions into the wilderness area.

WR-83

Opening full sized vehicle routes to unlicensed drivers seems like an idea fraught with potential legal problems. What about people who have lost legal driving privileges because of DUIs, physical or mental impairments, etc.? Would a person lawfully driving a pickup who has an accident involving a child or other unlicensed driver on an ATV face liability? Who would have the responsibility for patrolling for appropriate and safe use on these routes, investigating accidents, etc.? If Wyoming State Trails collects licensing fees, would they be legally responsible to manage use? There is a trailhead into the Dunoir via Sixmile off this route. Backcountry users who have no interest whatsoever in motorized recreation would be required to buy an OHV permit to access that trailhead, which is unfair and possibly open to legal challenge.

WR-85

These roads must be separated to allow effective analysis and commenting on them.

- We strongly oppose the segment in the Double Cabin area. It has a rough creek crossing, adding resource damage. The road doesn't go anywhere, and dead ends up on a little bench 400 vertical feet above Wiggins Fork. It does not provide good fishing access. It clearly is a good candidate for a low benefit/high risk classification, and should be closed. What is the specific justification for this road?
- We offer similar objections for the inclusion of the short spur off FR 554 out over Geyser Creek. In what sense is this a necessary or useful road?
- We have no concern with adding the road off the Brooks Lake Road
- Try as we might, we can't seem to locate the other proposed addition mentioned in WR-85. Again, this clearly demonstrates why these proposals must be separated and clearly identified, to allow for meaningful public participation. Phrases such as "district wide" are not specific enough for the public to be able to locate and effectively comment.

WR – XX

We suggest the closure of the portion of MT 14 east of its junction with WR-11, if WR-11 is added to the motorized trail system. If WR-11 is opened to ATV use, the approximately two miles of MT 14 going over to Salt Barrels Park should be closed because it does not connect to a publicly accessible road, it is right on the wilderness boundary the whole two miles, and it is very difficult to prevent illegal, off-trail travel on the eastern portion where there are indefensible open slopes up the south side of Windy Mountain.

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 easily accessible 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 one quarter 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. Adoption of WR-02w and WR-03w certainly would reduce conflicts in these two tiny areas between snowmobilers, cross country skiers and snowshoers, and so would meet minimization criterion #3. As with all other proposals, we recommend that the travel plan include specific on-forest signage and public education, so that this proposed change can be a success.

Washakie District

While working on our SNF travel monitoring project, our volunteers did see improvements in the trail and road markers on the Washakie District, in the summers of 2016 and 2017. Problems we noted in our earlier comments on the Fairfield Hill roads were addressed in 2016, and we noted other improvements in signage in 2017. We also still found illegal, user created or non-system roads that have yet to be marked or barricaded, especially in the Limestone Mountain/Young Mountain area.

WK-01

We cannot reconcile the statement “Modified WK-01 so that it displayed a more realistic location on the ground” (SNF TMP Scoping Document, November 2017, p 2), with either the lack of mention of WK-01 in Table A4, or with the absence of any representation of a new location on Map WK-A in the Nov. 2017 scoping document. We strongly opposed WK-01 as it was proposed in 2016, and given the lack of any specific details in the 2017 Proposed Action that would allow us to evaluate the claimed location modifications, we have no choice but to continue to oppose this new motorized route, for the same reasons we articulated in 2016.

The current traditional horse, hiking, and stock trail through large open parks in Cony Basin has been used and enjoyed for many decades by the non-motoring public. If a new motorized route is constructed through this area, it will be impossible to prevent a proliferation of illegal use. No amount of carsonite signs, boulders, or stumps will keep vehicles on a designated road or trail 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 coming off the northeast aspect of Mount Arter, which collectively create the headwaters of Lander’s Baldwin Creek. At an elevation between ten thousand feet and timberline, 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 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.

WK-06

We find the rationale “hard to close” (SNF TMP Scoping Document, November 2017, p7) to be an insufficient reason to establish a road on the forest system. Closure difficulty doesn’t meet the minimization criteria from the 2005 Travel Management Rule. Furthermore, rewarding illegal behavior by simply transforming a user-created, illegal route into a legal one will only encourage future additional bad behavior.

WK-07

Where is it? It is not depicted on Map WK-E. Regardless of where it is, we find the rationale “hard to close” to be an insufficient reason to establish a road on the forest system. Furthermore (assuming that this is another illegal, user-created route), we offer the same objection against rewarding illegal behavior by simply making it legal.

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 states, 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, which is 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 remaining open side of a square mile of great 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 i d effective enforcement



Photo 2: McMahon Park, MT02, from fall 2015, going in. The vehicle has 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 bisects 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 shortcuts, and cannot see any serious rationale for this addition. Contrary to 205 Travel Rule minimization criteria, it would not minimize damage to soil, water, or vegetation, or harassment of wildlife, or disruption of wildlife habitat. Quite the opposite, in fact.

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

NZ-01 - Line Creek

Sierra Club continues to oppose the proposed new motorized trail 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 to the south, 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.

NZ-07 - Sweetwater Creek

We strongly oppose the conversion of NA-07 to a motorized trail. This existing road should be permanently closed to all motorized use at the North Fork Bridge. The route is highly erosive, washes out regularly, and the Forest Service has wasted significant taxpayer money repeatedly rebuilding in past years. Converting the existing road to a motorized trail for vehicles up to 64 inches wide will not diminish the erosion problems, and in fact may exacerbate them, causing even more resource damage including erosion, water quality degradation, and harm to both terrestrial and aquatic wildlife habitat.

The Sweetwater drainage wasn't included in the grizzly bear Primary Conservation Area (PCA) solely because of the old lodge that subsequently burned down. Now, with the lodge 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, values that far outweigh its value as a short, run up and down motorized route.

Full closure to motorized use would meet 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-47 - Elk Fork Creek road

We continue to support closure of NZ-47, the forest service road that goes about two and a half miles up Elk Fork Creek. Closure would protect valuable ecological resources and prevent significant 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) 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 offers a logical place to terminate the road, with adequate parking for hikers and horseback riders.

This closure would meet minimization criteria, particularly #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

Finally seeing a map of the proposed NZ-15 in the revised Proposed Action confirmed our suspicion that this short route parallels MR213, creating a tiny motorized loop of dubious value that would lessen other values of the area including wildlife habitat and, potentially, water quality as it crosses the tops of two headwater drainages of Gooseberry Creek.. For these reasons, we oppose the construction of this new road as unnecessary for any practical purpose, and inconsistent with the recommendation in the Travel Analysis Report for a smaller road system on the forest.

NZ-20 and NZ 51 - Line Creek

We support the closure of NZ-20 and NZ-51 on map NZ-A, and (as stated previously), urge abandonment of the proposed NZ-01.

Closure of these routes, coupled with not constructing NZ01, 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-29 - Upper Sunlight

We support the closure of this route at the top of the ridge before Silver Tip Basin. We would note that the scoping document is extremely confusing with inconsistent numbering for this route: on page 3, #13, and again in table A1 on page 17 (in the description for NZ-46 - Sulphur Creek), this proposed action is referred to as NZ-26. However, on map NZ-G, and in table A1, p16, it is identified as NZ-29. These inconsistencies present additional hurdles to meaningful public participation.

NZ-46 - Sulphur Creek

We support the closure of the Sulphur Creek Road below 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.

In addition to the date restrictions, we also request that minimum snow depth requirements for snowmobiling be incorporated, 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 a specified 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

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 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.

Effects on special concern, rare, threatened, and endangered species: the environmental analysis must include evaluation of impacts of any new motorized use on all wildlife species, but particularly those that are rare, including (but not limited to) grizzly bears, lynx, wolverine, fisher, small mammals, avian species, and aquatic species. Particularly related to grizzly bears, analysis of impacts of additional motorized use must include summaries of existing and proposed miles of motorized roads and trails within the grizzly bear demographic monitoring area, broken out by district, as well as impacts of increased motorized access (summer and winter) on grizzly bear denning and spring emergence activity. The environmental analysis must also include a comprehensive analysis of the impacts of a changing climate on grizzly bear denning and spring emergence, overlaid with the impact of more summer and winter motorized use.

Thank you for considering our comments. We appreciate the opportunity to share our concerns about the current Proposed Action for the SNF's Travel Management Plan, and we look forward to seeing a draft plan with appropriate alternatives that address and incorporate our concerns. Please do not hesitate to contact us if you have any questions about our concerns, or would like more information.

Sincerely,



Kim Wilbert
Board Chair
Sierra Club Wyoming Chapter
[REDACTED]



Bonnie Rice
Senior Campaign Representative
Sierra Club, Our Wild America Campaign
[REDACTED]