



MEETEETSE CONSERVATION DISTRICT

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December 11, 2017

Shoshone National Forest
Attn: Rob Robertson
Washakie District Office
333 East Main Street
Lander, Wyoming 82520

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

Dear Sir:

Thank you for this opportunity to comment on the Shoshone National Forest's Proposed Action for the Travel Management project. We recognize the importance for the public and cooperators to be able to offer comments to help shape the significant travel management decisions being made. Our comments are provided as a result of the proposed action presented by the Shoshone National Forest at the Cooperators Meeting in Thermopolis in November 2017.

Elected by the people of the District at general elections by popular vote, the Meeteetse Conservation District (MCD) is a local government and a governmental subdivision of the state as defined and established by the Wyoming Statutes. The MCD Supervisors are the only locally elected board charged specifically with the responsibility of representing local people of the District on natural resource issues. Wyoming Conservation Districts Law, W.S.11-16-122(b)(xvi), provides that conservation districts may "Develop and implement comprehensive resource use and management plans...". The MCD Land Use Management and Resource Conservation Plan, 2011 (MCD LUP) incorporates the efforts of numerous MCD residents from all walks of life and economic sectors, through time. It embodies the local traditions, values and visions that each of those residents brought to the effort, and is the result of considerable research and thought by each of those participants and the neighbors they represent. It also draws on the successful planning efforts of other conservation districts and counties and attempts to recognize common issues being dealt with by those entities. For purposes of this comment letter, we hereby incorporate by reference the MCD Land Use Management and Resource Conservation Plan, 2011.

Please be cognizant of these important points while continuing.

- Wyoming statutes define Conservation Districts (CDs) as a governmental subdivision of the state.
- CD supervisors are locally elected officials and pursuant to Wyoming law are the only local board charged with the responsibility of representing local people on natural resource issues.
- Wyoming CD law provides that CDs may "Develop and Implement comprehensive resource land use management plans".

- Under provisions of Wyoming law, CDs are to be recognized as “Cooperating Agencies” in the federal land management planning process in regards to NEPA.

Motorized Use is a vital component of Multiple-Use

There is a direct tie between multiple use and the custom and culture of the MCD. Multiple use concepts are integral to its custom and culture. The MCD asserts in its LUP that the exclusive use of a disproportionate share of the public landscape for purposes of limited diversity is generally detrimental to social and economic stability. The people of the MCD are directly and indirectly dependent upon public land and the land’s intrinsic resources for their livelihoods and their quality of life. It follows that the viability and sustainability of the local economy is dependent upon management for multiple use. Multiple use management is the paradigm of both the USDA Forest Service and the USDI Bureau of Land Management. PL 86-517 (16 U.S.C. 528-531), the Multiple-Use and Sustained Yield Act, 1960 authorizes and directs that the national forests to be managed under principles of multiple use and to produce a sustained yield of products and services, and for other purposes.

- The November 2017 Scoping Document addresses that *“Within these corridors, visitors and residents find opportunities for driving for pleasure, viewing scenery and wildlife, camping, picnicking, and hiking. The lands between the back country and travel corridors are transition areas where common opportunities include **motorized access, off-highway vehicle riding, snowmobiling, mountain biking, hiking, dispersed recreation, hunting, fishing, horseback riding and packing, and opportunities for gathering forest products.***

The purpose and need for Travel Management Planning is to be consistent with the Forest Plan and meet the direction of the Regional Forester, which is to: analyze additional motorized opportunities, and to consider routes with resource concerns be changed or considered for conversion to other uses such as motorized or non-motorized trails. The fact is that miles of “system” roads have declined by about 10 percent since 1989, and an average of six miles per year have been decommissioned between the years 1990 and 2010. The Meeteetse Conservation District specifically requests that no existing roads be closed, although a few examples in your proposed action continues the closure of the (Blackjack Draw) Sunshine Flat road 203.2A (Proposal NZ-28), and reduces the length of the Pickett Creek road (Proposal NZ-10). These roads are entirely within the Forest Plan Motorized Use area, and are used often by OHV (Multiple Use) users, especially during hunting season.

In regard to the (Blackjack Draw) Sunshine Flat road 203.2A (Proposal NZ-28) our proposal is that road 203.2A be considered for reopening, or that there be an opportunity to convert the road to a motorized trail at a minimum. MCD is opposed to converting the road from a maintenance level 2 to 1, which would only allow utilizing the road for administrative purposes. Functionally and for practical reasons, moving the road to a maintenance level 1 would only more easily allow for it to be permanently closed and removed from the system in the future. Motorized use opportunities were vastly reduced through the planning process and we should not be further eliminating opportunities, especially existing ones. The MCD supports a seasonal stipulation on the road to protect wildlife winter range and parturition areas which would be consistent with the other roads in the area. According to the MVUM, road 203.2A is shown on the map, but indicates there is a closure for *Safety and Resource Protection*, however, there seems to be a lack of information as to the severity and specificity of the issue, nor is there adequate documentation, administrative records or a case file associated with the order that closed this road. The (Blackjack Draw) Sunshine Flat road offers many opportunities stated in the previous

versions of the draft Scoping Document, as well as provides 3.5 miles of loop opportunities, which again is consistent with the Forest Plan and the review process.

According to the SNF frequently asked questions: *What is the process for designating a trail as motorized (from non-motorized)? Answer: The first step in determining whether a non-motorized trail can be designated as a motorized trail would be to determine that the existing trail exists within a Forest Plan Management Area that allowed for motorized use as defined in the Forest Plan. If the trail exists in a management area that allows motorized use, then the proposed change in the trails designation would be analyzed in the Travel Management, NEPA and authorized in the Record of Decision.* Our proposals are consistent with motorized use provisions in the current Forest Plan Management Plan and Travel Management process.

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'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. 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. 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, and the same goes for looking at existing roads that the Forest Service closed in the past. Motorized recreation use is by far the greatest visitor use on the SNF, and travel management on roads and trails should be prioritized in accordance with other visitor uses to include Wilderness and back country trails. Various partners have expressed interest in helping to provide funding and other stewardship resources such as the Wyoming State Trails Program.

We recognize that there may be proposals to construct new, or re-designate existing trails to motorized use, and we support those proposals. We oppose any and all proposals to close existing roads and trails currently open to motorized use. We support the conversion of maintenance level 1 roads to level 2 roads if the resource concerns cannot be scientifically quantified or there is no current case file that properly documents the closure. When roads or trails are closed by an order due to safety or resource concerns, we assert that there should be an annual review of the road closure and that it should be reopened as soon as the resource or safety concern is no longer a concern, and that funding not be used as a limiting factor in making such determinations. We also request that proper documentation and case files on a road closed due to supervisor's order are kept at the district and supervisor's office. It is our understanding that hundreds of miles of roads have already been closed on the Forest, and we believe there is no need to close more.

We suggest that the SNF fully support and commit the travel management plan to include what remains available for motorized use on the SNF. The Travel Management Rule also provides that existing and future operation and administration funding should not drive travel management. We don't believe funding, or the

lack thereof, should be criteria in developing a travel management plan and hope the SNF does not use it as an excuse to limit motorized use. Motorized recreation users are by far the largest user group utilizing the SNF now and will undoubtedly grow in the future. The MCD, again, encourages you to carefully plan and manage for future use in a positive and transparent way.

We appreciate your consideration of our comments in this process to complete the Proposed Action and look forward to working with Forest Service staff. Please feel free to contact us if you have any questions or need additional information.

Sincerely,

A handwritten signature in blue ink that reads "Steffen C. Cornell". The signature is fluid and cursive, with the first name being more prominent.

Steffen Cornell
District Manager
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