



## WYOMING GAME AND FISH DEPARTMENT

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December 8, 2017

WER 11162.02b  
U.S. Forest Service  
Shoshone National Forest  
Travel Management Revised Proposed Action

Rob Robertson  
Washakie District Office  
333 East Main Street  
Lander, WY 82520

Dear Mr. Robertson:

The staff of the Wyoming Game and Fish Department (Department) has reviewed the Shoshone National Forest Travel Management Revised Proposed Action. We offer the following comments for your consideration.

### **North Zone:**

Under Appendix A, Table 1A, Sight-specific changes of the proposed action, NZ-43 Phelps Mountain, it states the proposed change is to “move gate below Forest Boundary on State land”. This statement is confusing since you do not state where you plan to move the gate. The Department assumes it will be moved to the Forest boundary on Phelps Mountain Road. We do not have any issues with this move, and also support the new proposed road open dates of 7/1-12/31.

Under Appendix A, Table 2A, Seasonal Restriction Date Adjustments, the Department has always been under the assumption that the Pickett Creek Road (FS209) has had seasonal open dates of 5/1-1/31, since these are the dates the lower gate (just above the Pitchfork Ranch headquarters) is unlocked and locked respectively. You have the current open dates in Table 2A as 5/1-12/31. The proposed new open dates of 5/1-1/31 will likely not change anything since this has previously been when the road has been open for vehicle use. The Department still supports the current road open dates of 5/1-1/31.

### **Wind River District:**

Proposal WR-11: This route is currently an existing trail connecting FR 554 with the Moon Lake ATV trail. The trail has seen some illegal ATV use in the past. The route bisects a fairly sizeable area that currently does not have any designated, motorized routes. This area can provide fairly

good elk hunting in the fall. There is high potential to degrade elk hunt quality by developing motorized trail WR-11. Thus the Department does not support this proposal. Alternatively, the USFS could consider opening FR 961, which is an existing road to a set of radio towers on Windy Mountain. There is currently an existing, illegal ATV trail connecting FR 961 to Salt Barrels Park and the Moon Lake ATV trail. Slight improvement could be made to this illegal trail to provide access to the Salt Barrels Park area while maintaining the roadless characteristics of the area bisected by WR-11.

Proposal WR-20: This spur road is currently connected to FR 531 by an illegal ATV trail. To effectively close the spur, the USFS will also need to eliminate illegal travel off of FR 531.

Proposal WR-26: Travel into Bear Basin on FR 501 by hunters in the fall is popular. Although the road conditions are poor, many hunters are able to travel the route in their trucks and jeeps. Converting this route into a 65" ATV trail precludes motorized access to Bear Basin for hunters unable or unwilling to purchase ATVs. The Department does not believe access to a wilderness trailhead should be closed to one class of motorized users but open to others.

Proposals WR-40, WR-43, and WR-27: Due to the number of existing roads and illegal trails in the Long Creek drainages, it is already difficult for hunters to avoid motorized traffic. The Department believes the creation of WR-27 will further degrade the experience of hunters wishing to hunt on foot and avoid motorized disturbance. Since the route involves new construction, the Department does not support the creation of WR-27. Alternatively, the USFS could consider leaving WR-40 and WR-43 open and connecting them with a small amount of new trail. This would give recreational ATV users an additional travel loop without degrading non-motorized hunting opportunities in the Long Creek drainages.

Proposals WR-26 and WR 83: The Department does not agree with converting these existing motorized routes to OHV trails thus requiring passenger vehicles/trucks to display an OHV sticker simply for the point of revenue generation as stated on page 2. These routes should be left with their current designations.

Proposal WR-85: These routes all appear to be short, dead-end routes. The travel management draft includes several proposals to close other short, dead-end routes. It seems counter-productive to close down certain short, dead-end routes only to open others.

**Washakie Ranger District:**

The following comments were provided in July 2016 toward proposed travel management changes. A few modifications may exist to fit proposed actions under the current planning session. We would also like to express our appreciation to the Washakie Ranger District for removing some of the proposals from the 2016 planning session [WK-01 (Cony Basin) and WK-

31 (Rock Creek)] that could have resulted in onerous situations for wildlife and related recreation, particularly big game hunting.

Proposal WK-26: This proposed motorized trail would dissect one of the few remaining non-wilderness roadless areas in the Washakie Ranger District. This area provides security habitat for wildlife and remote hunting opportunities for foot or horseback hunters, especially important to non-residents who desire remote, non-mechanized hunting experiences, but are unable or unwilling to hunt in designated wilderness areas due to outfitter/guide requirements. The Department opposes creation of trail WK-26, and further encourages the Shoshone National Forest to retain this roadless area to maintain the undisturbed settings of the forest (off wilderness) for the protection of wildlife and the enjoyment of roadless/non-motorized recreation opportunities, including hunting, fishing, wildlife viewing, etc. The creation of these new motorized trails into a roadless area is not necessary for access to any portion of the Forest.

Proposal WK-27: The existing road/trail between Pete's Lake and Shoshone Lake currently receives minimal, if any, use due to maintenance issues. The proposed action to re-align the road/trail away from wetlands and the Popo Agie Wilderness boundary is commendable, but we also ask the Shoshone National Forest whether re-opening this route is necessary. The following comment provided in July 2016 regarding what, at that time, was called WK-19 (Pete's Lake to Shoshone Lake) still stands – *"The Department supports decommissioning this trail as a motorized trail, but would encourage retention of the trail as a non-motorized trail. This trail is not utilized much by anyone as its condition has deteriorated substantially. Access to Shoshone Lake would be maintained via the existing Shoshone Lake Road and other non-motorized trails. Recreation of the surrounding area would not be diminished by removal of this trail from the system of roads and trails."* Re-routing of this road/trail would essentially reopen access to Shoshone Lake and remote non-wilderness, roadless area that currently provides many hunters the opportunities described above under our comments for WK-26. Realignment of this road/trail could also create enforcement problems for current fishing regulations on Shoshone Lake, and seasonal travel closures on the Shoshone Lake Road and surrounding areas, by creating a "back door" to those features. A long standing agreement for seasonal closure of the Shoshone Lake Road was amended in December 2015 to accommodate a change of the closure gate location from Baldwin Creek to Wyoming State Trust Land at the bottom of the switchbacks to protect wildlife winter ranges and spring habitats, along with protection of the other land resources on State, BLM, Private, and National Forest lands. The Wyoming State Land Board decision on this closure may be found at <http://slf-web.state.wy.us/osli/boardmatters/2015/1215/H-2.pdf>. The Department believes if proposed trail WK-01 were created, this closure would become very difficult to enforce, along with potential for other illegal motorized uses of the area.

Proposal WK-30 (Pass Creek/Limestone area): This proposed trail would connect two lightly used 2-track roads/trails not currently on the Forest's road system. These 2-tracks access off-trail camping sites used most often in hunting season and while probably illegally created, there currently is little impact to the surrounding area due to limited use. However, the Department

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remains opposed to connecting these 2-tracks through nearly one mile of undisturbed wildlife habitat. Elk migrate from west of Willow Creek through Pass Creek toward winter ranges, which extend from Pass Creek to Freak Mountain, Ed Young Mountain, and Limestone Mountain east into Red Canyon and beyond. Elk parturition habitat is designated in the Pass Creek area, and the area this trail would bisect contains habitat suitable for elk, moose, and mule deer parturition. The added “loop” effect of additional ORV traffic would also create extra disturbance for hunters and wildlife in an area already crowded with ORV access.

Proposals WK-06, 07, 32, 33, 34 (Addition of dispersed spurs and campsites to travel system): These road spurs and dispersed campsites are utilized frequently, pose little additional disturbance to surrounding areas, and provide multiple benefits for recreation of all types. The Department generally supports inclusion of these sites into the travel management system and motor vehicle use map. However, we are concerned about the potential of this setting a precedent of condoning illegal off road use. There are numerous exploitations of “off road or off trail” uses across the Washakie Ranger District, and the Department encourages the Forest to decommission those illegal roads to the greatest extent possible to prevent additional motorized use, while maintaining their utility by non-motorized users.

Proposal WK-35: The Department is unclear as to the intent or need of this proposed action to open 1.57 miles of roads. We assume these roads are similar to those in the comment for Proposals WK-06, 07, 32, 33, 34, and if so, we would have the same concerns.

The subject of road densities, motorized use, and related impacts on elk hunting is important enough to be included in a discussion on the Bighorn National Forest website at the following link. <http://www.fs.usda.gov/detailfull/bighorn/recreation/hunting/?cid=stelprdb5167306>

Additionally, there have been multiple works of research reporting the negative impacts of motorized travel and associated road/trail densities to wildlife and hunting. Links to some of those research papers and comprehensive reviews are listed below.

[http://www.fs.fed.us/pnw/lagrande/starkey\\_na/PDFs\\_Preprints/ms-04\\_Rowland.pdf](http://www.fs.fed.us/pnw/lagrande/starkey_na/PDFs_Preprints/ms-04_Rowland.pdf)

[http://www.backcountryhunters.org/what\\_effect\\_do\\_roads\\_have\\_on\\_elk](http://www.backcountryhunters.org/what_effect_do_roads_have_on_elk)

<http://wdfw.wa.gov/publications/01491/wdfw01491.pdf>

We believe these publications and the notice on the Bighorn National Forest website lend additional credence to our concerns about the addition of more motorized trails on the Washakie Ranger District, which already has a high density of roads and trails in a fairly small segment of the Shoshone National Forest.

Maps WK-A, WK-B, WK-C, WK-D, and WK-E, along with the Washakie Ranger District Winter Travel Management map illustrate new seasonal restrictions to roads/trails and big game winter range habitats. The Department generally supports the concept of a seasonal closure which would coincide with closure of the Louis Lake Road (FS 300) for resource protections,

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including but not exclusive to big game parturition, wildlife habitats in general, road & trail conditions, etc. However, we are also concerned about further limiting spring bear hunters and mountain lion hunters with additional motorized travel restrictions. The same would be true for late-fall or early-winter restrictions. In addition, we are becoming increasingly concerned about tracked vehicle use off of designated routes, often in areas where snow is not deep enough to safely operate traditional snowmobiles and during the late-winter/early-spring when ground conditions are not frozen in many areas. This activity has increased, primarily from antler collectors, but other operators are increasing their recreational uses as well. Although this is often an enforcement issue, this is an area where additional educational campaigns may be prudent to distinguish off trail uses by these vehicles. We invite the Washakie Ranger District to coordinate with Lander personnel to develop appropriate timing and use restrictions which are compatible with wildlife protections, but minimize additional limitations on hunting access to portions of the forest.

Thank you for the opportunity to comment. If you have any questions or concerns please contact Rick Huber, Staff Aquatic Biologist, at 307-777-4558.

Sincerely,



Angi Bruce  
Habitat Protection Supervisor

AB/rh/ml

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