Shoshone National Forest Travel Management Planners

Shoshone National Forest

808 Meadow Lane Avenue

Cody, WY 82414

Glenn A. Nielson

[PII]

September 4, 2020

Dear Shoshone National Forest Staff,

I’d like to begin my comments on the travel management planning and the environmental assessment by asking a question, “What is the goal of this project and are there problems that justify significant changes?” I do not believe we have a significant problem that requires material changes and I further believe that regulatory changes always have unanticipated consequences. For this purpose, I support the ‘no change alternative.’ I do support some of the increased uses proposed in Alternative 2 although I feel dates and unnecessary additional restrictions are added at various levels that come at greater costs to public use than the few new trails noted such as the Ghost Creek trail from the Painter Store near my family property. I worry we may be making changes so as to ‘be doing something’ rather than spending our tax supported Forest Service staff energies managing the public use we already have in trail maintenance and similar efforts that have dropped well below acceptable levels!

I am 36 years old and was born and raised in Park County WY—I’ve spent a realistic 40-45 weekends a year in the Shoshone Forest. I’m a landowner bordering the Forest. I submit that we have a very healthy shared land use. I personally snowmobile, ride ATVs, ride horses, hike, fish and hunt almost every location of the Shoshone Forest (I should note I run cattle on private agricultural land in this area also) and have strong opinions that further reductions and/or restrictions of public use are not appropriate nor are some that already exist…many of our trails could benefit from an additional 2-4 week use per season but blanket rules have created unjustified dates.

Regarding the High Lakes Wilderness Study area and the alternatives that would further eliminate over the snow use, I strongly oppose those alternatives. I have not seen a material negative impact from over the snow use snowmobiles or snow bikes nor seen such documented in any type of scientific study—I read lots about usage levels (which have not changed much as noted in the winter vehicle counts) but found no science demonstrating negative impacts of any specified use quantities. I further see no need for a 12-inch snow limitation and do not find good data for season dates which will inevitably allow for creep and tightening of those restrictions. I’ll acknowledge the SNOTEL data but again feel a date is not needed—if you paid over $18,000 for a new snowmobile like I did last year you are not going to drive it over inadequate snow and some common sense is quite helpful in these situations! Dates and snow depth detail will also lead to debate over interpretation with environmental groups which is unnecessary. In regard to winter use, I would suggest that Cody and the forest are highly dependent on tourism and winter use in the High Lakes area. It is key to our local economy as one of our only winter tourist attractions.

I’d like to also specifically address the camp creek and reef creek drainage winter use. There are 3-4 private properties adjacent to this location. For nearly two decades I have monitored the use as I enter and exit our private family cabin property. I’ve enjoyed taking children on a snowmobile or horse ride to picnic and snowshoe in this area. I have personal knowledge that there have not been more than 4-5 different landowners with over the snow use during these winters and I have been the only primary user with a few trips a winter. I have seen no negative impact on wildlife or habitat and I thus request that this area remain open for such use. I’d further ask that you as staff provide me with any data or proof of negative impacts resultant from my and neighbors’ use which is the only use even able to access these locations. Respecting wildlife winter use in the area I argue (and have written personal records as proof) that there has not been a single bull elk on Camp or Reef Creek wintering ridges for the last 15 years when I once enjoyed seeing dozens as a youth—I picked up the last single bull wintering in that area as a winter-kill after it was killed by wolves in the early 2000s. I properly reported and tagged it with Game and Fish game warden Craig Sax. This unfortunate change is a wildlife tragedy resultant of other government agency decisions which have effectuated a devastating 50-90% reduction in elk populations throughout the Greater Yellowstone Ecosystem.

As a local use sportsman, I’d like to request data on another specific location with the plan and that is the seasonal closures to ‘Phelps Mtn Rd’ proposed within the South Fork/Greybull area in alternative 2. I apologize for such specificity but due to my personal knowledge and use of the area (along with my knowledge the Forest Service allows forest, university and other researchers to use that access point in winter months I would like to raise question to the data or science behind this decision. Again, the nature of the location and winter conditions alone dramatically limit winter month use yet a few responsible and avid sportsman as myself use this access. It has allowed me to bring children and introduce them to winter wonders within the forest. I would like to be presented with wildlife data showing some detrimental impacts of human presence or use of Phelps Mtn Road. I’ll admit I have a full time job, 6 kids, and a cattle ranch to manage such that I have not read every word of the hundreds of pages of this travel management plan and associated documents but from what I have studied I do not believe there is good science demonstrating negative impacts of human use or presence. In fact, it would be my argument that the wildlife counts in that area merely demonstrate that ‘the existing usage’ is NOT having a detrimental impact on said wildlife populations or they would not frequent the area. The same could be argued for various other locations and I simply selected this specific location as an example to reinforce my comments.

In closing I appreciate the Forest Service allowing public comment—I well realize that is the culture of many government organizations yet I question if in fact such public comment is truly playing a role in many decisions. I wonder if these comments will have any impact or if I will receive any response which I welcome. We are fortunate to have the Shoshone Forest and it is my hope that shared public use will continue to be promoted. I appreciate the consideration of these few comments, and it is my sincerest hope that they are indeed taken into consideration.

Most Sincerely,

Glenn A. Nielson