



Meeteetse Conservation District

Scan

December 1, 2015

Joe Alexander
Forest Supervisor, Shoshone National Forest

Subject: Comments on Shoshone National Forest Travel Management Plan

Dear Joe:

The following observations and comments are provided as a result of the Shoshone National Forest (SNF) - Forest Service travel management presentation and workshop given to Meeteetse area residents on October 14th at the Meeteetse Conservation District office. According to the presenters, comments concerning travel management are due by December 1, 2015. We chose not to address individual proposals, as those are apparently still in progress or have been tabled by the Forest Service. Instead, our comments will focus on the overall process as we see it.

In reviewing the Forest Service Rule (36 CFR 212, 251, 261, and 295) and the Travel Management "Questions and Answers" posted on the SNF website, there appears to be clear direction and intent for the USFS to "provide for motorized use opportunities" on areas open to motorized use. According to the rule, "the designations must be consistent with the applicable land management plan. If a responsible official proposes a designation that would be inconsistent with the LMP, a proposed amendment to the plan must be included with the proposed designation so that the designation decision will conform to the land management plan".

With the foregoing in mind, we offer the following comments:

1. At the workshop, it was stated that the Forest Supervisor had no intent in doing a "Forest Plan Amendment". Yet the process presented and some of the proposals could entail a plan amendment in accordance with the National Environmental Policy Act. We understand the travel management proposals should drive the process and to include a Forest Plan amendment if necessary. Forest Plans provide direction, not law, and should be open to adjustments in management areas, either minor or major. If that is not the case, then please advise us differently.
2. We were told at the workshop that some proposals were "tabled by the Forest Service" because they were outside the goals or scope of the Travel Management Planning process. What travel management proposals were tabled and why?

We believe the upcoming NEPA decision-making process should retain and address them as to why they are being eliminated and are outside the scope of the travel management planning, in accordance with NEPA. The MCD believes that the Forest Service decision to filter out, in advance, "some proposals" could be considered as arbitrary and capricious. We believe the process should be open and transparent to eliminate any conflict of interest or bias by the Forest Service. Perhaps the best way to resolve inappropriate proposals is for the SNF to discuss them with the proponent and have the proponent voluntarily withdraw them from consideration.

3. We noted that some of the maps (proposals) posted on the walls at the workshop proposed the closing of roads in areas open for motorized use under the new Forest Plan. We have concerns because that would be closing existing roads in motorized areas. The MCD is concerned that the SNF may accept proposed road closures in areas open to motorized use by the Forest Plan.

The Rule makes it clear that existing trails in motorized areas can be upgraded to motorized use to include trails over 50 inches. The SNF staff touched on that in their presentation, but our concern is it lacks emphasis in presentations and on the website. We believe and encourage the SNF to present maps showing all trails (not just roads), in the areas open to motorized use so the public can offer up proposals that would re-designate those trails as motorized. We recommend that in the future, the SNF present and emphasize all the motorized use opportunities available to the public - not just areas with existing roads. That includes trails that can be designated as motorized in accordance with the rule and that new construction is possible in motorized areas.

The same issue applies to trails in the Grizzly Bear Primary Conservation Area (PCA). Even though there appears to be little opportunity to make changes in the PCA, we recommend the SNF present those maps for public viewing so opportunities for any changes can be addressed by the public. The impression left at the workshop is that PCA travel areas are "off limits" and the "no net gain" rule applies. Within the PCA, there may still be room for travel management improvement.

Another issue that came up at the meeting was how the Forest Service was going to treat "off road use". We believe that the travel management process should include the ability of forest users to have a 100-yard zone of travel off any road or trail for camping, day use or retrieval of firewood and game. There are hundreds of pull-offs along State, county and National Forest roads. These are customarily used by all classes of forest users, i.e. fishermen, hunters, campers and day users.

There is a need to provide off road travel to harvest wood, retrieve harvested game, or other activities. Apparently, it is not a travel management issue in your process, but the Rule addresses it as off road travel. Is it an issue to be addressed in the Forest travel management process and if so, why isn't it addressed in the workshops and on the website?

At the meeting, travel management enforcement came up. The Rule 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. There was a hint in the presentation, and also expressed on the web site, that the SNF goal is to "develop a travel management plan that is enforceable" and "sustainable". 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 user groups have expressed interest in helping to provide funding and other resources.

In doing research for our comments, MCD personnel made some phone calls to the Gallatin National Forest (GNF). We learned that the GNF has opened roads, opened trails, and even constructed new trails to connect existing motorized uses into viable loop trails as a result of the travel management plan. We believe loop trails provide opportunities for destination ORV users and that they contribute to local economies. We support the construction and maintenance of loop trails throughout Park County to help in diversifying recreation uses, including mountain biking.

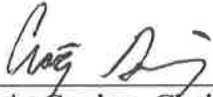
We thank the SNF for presenting the travel management workshops. However, we believe the presentations, and the website, have "framed the process" to restrict or limit the opportunities available to the public. We would hope the SNF will be forthright and give the OHV users, and others, all the tools (maps, encouragement, and direction) necessary to not only maintain, but grow, the recreation opportunities on the Forest.

We oppose any and all proposals to close existing roads and trails open to motorized use. 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. In fact, some of those road closures in motorized areas should be looked at again as part of the travel management planning process. We disagree with creating "*de facto*" wilderness or roadless areas by management actions in areas where motorized use is allowed by the Forest plan.

We also recognize that there may be proposals to construct new, or re-designate existing trails to motorized use. However, the MCD is concerned that the average person has to figure out where the opportunities lie, (i.e. showing maps emphasizing only existing roads open to travel is misleading). We strongly encourage the SNF to commit to "enhancing" and growing the travel management program as promised by giving the public all the information and tools to make their proposals in areas open to motorized use and then consider all of them in the NEPA process.

According to the Park County Commissioners: "85% of the SNF is roadless. This results in a 95% use density concentrated in the 15% of road-accessible forest areas, with only 5% accessing roadless regions". We suggest that the SNF fully support and commit the travel management plan to include what remains available for motorized use on the SNF. 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.

Sincerely yours,



Craig Geving, Chairman
Meeteetse Conservation District Board of Supervisors

Cc: Park County Commissioners; Northwest Wyoming OHV Alliance; Cody Chamber of Commerce; Powell Chamber of Commerce; Senators Barrasso, Enzi, and Congresswoman Lummis; Travel Recreation Wildlife and Culture Committee, Wyoming Legislature; Wyoming Trails; Governor's office – Jeremiah Rieman; Town of Meeteetse