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Comments: [External Email]Shoshone NF Travel Management Planning Project -- Evans

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Dear Shoshone NF Travel Management Planning Project Team,

Thank you for the opportunity to respond to the Shoshone NF Travel Plan Proposals. We are year-round Dubois residents, almost daily visitors to the Shoshone NF, and own an OHV. Although we own and use an OHV, we oppose any OHV roads/trails added to the system. Thus, we don't find any of the action alternative proposals particularly appealing. While there are parts of the Alternative 4 proposal that we applaud, we will focus our comments on our objections (and some observations). We present our objections and observations in three categories: 1) General Objections, 2) Observations of the Process, and finally 3) Objections to Alternative 4.

1) General Objections

In general, none of the action alternatives provide any substantive environmental benefit. It appears the primary goal of the Travel Plan is to provide more motorized recreation opportunities to an area that has more than sufficient OHV roads and trails already.

During the virtual public meeting of November 3rd, we were informed that new road/trail development essentially has to go on the Wind River District because the other districts lands are locked up in Wilderness and other non-developable designations. This seems a specious justification. We would argue the opposite: given the relative paucity of non-developable designations on the Wind River District, we should strive to maintain those areas that remain essentially undeveloped. The Wind River District should not be a throw-away zone to fulfill a seemingly obsolete objective of adding more OHV trails for the entire Forest to satisfy a quota.

In the early 2000's, then USDA FS Chief Dale Bosworth identified Four Threats to the Health of the Nation's Forests and Grasslands as: (1) fire and fuels, (2) invasive species, (3) loss of open space, and (4) unmanaged recreation (OHV use). These threats have only increased since Chief Bosworth's tenure. The list of threats is still prominent on the web pages of the USDA Forest Service, Washington Office.

While we understand there are financial benefits that OHV recreation provides, OHVs and OHV roads/trails are threats to forest ecosystem health. OHV roads and trails fragment habitat, they are susceptible to erosion (increasing runoff and threatening fisheries), are expensive to maintain, and they're vectors for unauthorized off-

road OHV use. OHVs disturb wildlife, spread invasive weeds, and increase the risk of human-caused wildland fire (which could negate any financial benefits they provide). Thus, they increase three of the four biggest threats identified by the Forest Service WO. It strikes us as the highest of incongruities that the WO vigorously proclaims the threats of unmanaged recreation while the Shoshone NF indirectly proposes more opportunities for unmanaged recreation.

In the meantime, the climate is changing, increasing the pressure on almost all of our natural ecosystems -- we should be implementing plans that reduce pressure on our lands, not increasing them. We would support a proposal that reduced the amount of roads/trails, while increasing funding for maintenance and enforcement. The current proposals however, only add additional pressures and threats to ecosystem health by increasing the areas that OHVs can reach.

2) Observations of the Process

We are new to the Forest Service planning, public involvement, and revision process. So our observations about the process may be simplistic and naive. However, maybe they're not. These observations are in no particular order:

- * The process seems remarkably circuitous, overly complicated, and difficult to follow from the outside

- * For example, the framework for the Travel Management Plan seems to be from the 2015 Land Management Plan (LMP). Putting it there seems to take responsibility away from the Travel Management planners (or is that the intent?).

- * The LMP sets the objective that "At least three new, wheeled motorized trail loop opportunities are available. (RDTR-OBJ05)". That seems a totally arbitrary and capricious objective--and terribly misguided. However, that seems to be the one objective in the LMP that the Travel Management planners seem to hold irrefutable.

- * On the other hand the LMP also sets the goal: "Resource impacts from use of unauthorized motorized routes are eliminated, along with the unauthorized route. (RDTR-GOAL-09) -- that goal doesn't seem as important or desirable to the Forest.

- * During the November 3rd virtual public meeting it became apparent that much of the EA planning was done without much or any ground visitation. It was suggested during that meeting that once the EA is approved, the proposed development sites would then be thoroughly investigated on the ground before implementation. We fear there is little room to retreat from these poorly investigated ideas that have been put forth. It's human nature to try to engineer a solution to save an ill-conceived idea when the best solution is to simply abandon the idea. Especially since there are no alternative locations for development without opening this entire process again.

We realize the general objections and process observations described above are likely non-actionable for the current Travel Management Plan efforts. We chose to include them for several reasons. First, we wanted to present our overall perspective so that particular objections to the new roads/trails presented in Alternative 4 have context. Second, we hope that some of our arguments will resonate with you. Even if they don't change what you feel is needed in this effort, perhaps they will have some effect in future works you conduct within the Forest Service. And finally, we present the process observations to you since you're on the inside--and change is easier from that position.

3) Objections to Alternative 4

As we mentioned previously, there are parts of Alternative 4 that we applaud. For example, we greatly appreciate the proposed official designation of Deception Creek as a non-OSV area. We also appreciate the seasonal closures proposed (however, seasonal closures are under-utilized in this proposal). On the other hand, there is unfortunately much that we object to. We will limit our objections to three issues: 1) enforcement, 2) WR03, and 3) the Grandy connector (961.1B..1).

Enforcement remains a huge problem. The enforcement plan we heard during the November 3rd virtual meeting was: 1) more signage, 2) a couple of additional state enforcement officers (for how long?), and 3) hope that people will obey the plan. This seems woefully inadequate and makes it safe to assume that unmanaged recreation will largely remain unchecked. The vast majority of OHV riders are good people and will constrain themselves to the designated routes. However, a very small percentage will break the laws and will do significant and irreversible damage. More roads without significant long-term increases in enforcement mean more illegal activity.

We live in the Upper Little Warm Springs subdivision with a clear view to the two entry points of the Wildcat Loop. We've witnessed a tremendous increase in OHV traffic through the subdivision in the last few years but have never observed FS personnel patrolling or enforcing in this area. While this is admittedly empirical evidence, it supports the conclusion that there's insufficient personnel to effectively enforce the current system of roads and trails. Additional miles of roads/trails, especially through open expansive terrain, will only heighten the enforcement deficit--as well as the maintenance deficit.

We're opposed to all of the significant new road and trail development proposed in Alternative 4. In particular, any new routes, additions or expansion to MT14 or the Benchmark Roadless Area (Windy Mountain, Bachelor Creek, and Grandy Reservoir, as well as widening MT14). All of those proposals would impact popular existing non-motorized recreation, impact the character of the Inventoried Roadless Area, stress wildlife, damage vegetation, and significantly increase OHV traffic and enforcement concerns.

We're very opposed to opening 961 and developing WR03. The proposed route opening the Range cell tower service road (961) and a new road (WR03) to Salt Barrels Park is problematic for several reasons including:

- * The current road is too steep with terrible erosion and gullying problems.
- * The required road improvements and new road development would have significant impacts to this relatively pristine alpine meadow environment.
- * The vast majority of the route is through the above mentioned alpine meadow, presenting an invitation to those inclined to pursue off-trail illegal joy-riding (we've personally seen the damage from illegal off-road riding in this meadow on numerous occasions--even as the service road is closed to the public--and had confrontations with dirt bikers far from designated routes).
- * The area is a crucial winter and summer range. During my hikes in this area, we've witnessed large elk herds,

deer, pronghorn, coyotes, fox, grizzly and black bears, and more. (We have photo documentation of grizzlies in this area that we can provide).

* This is a popular hiking and horseback riding area for the community--largely incompatible with the noise and disruption from OHVs.

* There is already access to the Salt Barrels Park area via FS 524 (through 3-Spears Ranch) and two motorized access points to MT14. This road is not needed!

* It would needlessly bisect an inventoried roadless area.

* This will increase OHV traffic through the ULWS subdivision increasing traffic, noise, dust, and wear on neighborhood roads.

Finally, we're opposed to the additional road on the backside of Grandy Reservoir road (961.1B.1, 0.77 miles) proposed in Alternative 4. The proposed route is adjacent to, and crosses at least twice, a sensitive riparian area and serves no purpose. There is currently a small trail through this area that is popular with hikers and horseback riders that would essentially be lost if OHV use is permitted.

The Shoshone NF is magnificent in so many ways--as well as being an integral part of the Greater Yellowstone Ecosystem. More roads and trails diminish the magnificence of this Forest, it's role in the GYE, and it's legacy for the future. There are more-than-sufficient existing trails within the Wind River District to satisfy the needs of OHV users for a lifetime of riding. Please consider NOT adding any additional OHV roads/trails -- and further, consider decommissioning trails that are difficult or costly to maintain and patrol.

"Deeply felt concerns about the impact of their newly assumed liberty, I suspect, will probably not arise until something they cared for is damaged or destroyed by someone else." Vic Augustine-staff writer in the November 4th, 2021 issue of the Dubois Frontier writing about the Shoshone Travel Plan.

Thank you for considering the comments, observations, and suggestions that we respectfully submit.

Sincerely,

Don and Julie Evans

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