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

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Re: Shoshone NF Travel Management Planning Project comments

Shoshone National Forest Management Planning Project representatives,

First, I would like to voice some process objections:

#1 Proposed maps should have an easy corresponding text version that summarizes proposed changes that summarize the gain, deletion, or change of road access summaries or OSV access changes. My eyes are having a difficult time telling the difference between blue roads with a yellow outer highlight from an actual proposed green road. I have a mild form of colorblindness and spelling out the changes in text would have helped. Even those with normal vision would see a blend of the blue/yellow as green if not zoomed in enough on their screen. One had to weed through 60+ of the Environmental Assessment to get to a complex explanation of the impacts and justification for the alternatives proposed. Summaries of what is gained, lost, or changed would have been better. I finally did see some summarized text version on the Forest Service's website, but that should have been available during the 30 day comment period, and not just posted as a document titled "Click here to view the presentation show at the meeting." #2 A virtual meeting is not a good platform for people to see the proposed maps and see the implications. Many people are viewing documents with a phone and it is hard to see what is being proposed. Some older folks may struggle getting into a virtual meeting on a computer. So real in-person meetings would allow attendees to see the maps and understand the changes and the options presented.

Comments to the Travel Management Plan Proposals are as follows:

Subpart B Alternate #3 is a very bad option. Not everyone can afford a 64" and under width vehicle when they are just using their daily driver 4x4. I waited 9 years to be able to buy a UTV and now mine is a couple inches too wide for this proposal. I am very dissatisfied by the Forest Service's Subpart B Alternate #3 proposal. Larger road legal vehicles are not making much impact on trails any more than UTVs to prohibit vehicle use over 64". Subpart B Alternate #3 would unnecessarily restrict travel for road legal vehicles historically used by hunters, anglers, and recreationalists.

On page 26 on the Environmental Assessment dated October 2021, it says the number of unauthorized routes continues to grow as more visitors use the area. So reducing the amount of roads available or restricting the size of vehicles will not help the situation. The Forest Service should have one of the goals listed to provide more road access opportunities than are already in place, instead of prohibiting travel and use. I do like the addressing of Goal RDTR-OBJ-05 to create some new wheeled motorized trail loops. However, that does not mean size restrictions (ie. 64" and under) should be placed on existing routes.

On page 29 on the Environmental Assessment dated October 2021, Class 1 are vehicles that correspond to "snowmobiles" but in the following paragraph a Class 1 vehicle is described as snowmobiles, tracked motorcycles, tracked ATVs, tracked UTVs, and snowcats. The Class 2 vehicles is noted to correspond to "tracked ATV," but later a Class 2 vehicle is listed as tracked 4WD SUVs and tracked 4WD trucks. These definitions do not match since tracked ATVs are mentioned in both Class 1 and 2 OSV categories. How are we supposed to provide comments when we do not know what Class 1 and Class 2 OSV trail definitions are being used on the alternatives in Subpart C? The Forest Service is having the public provide comments to OSV travel when we do not know what Class 1 or Class 2 definitions apply in the maps. Because the comment in the Environment Assessment on alternative 4 generally prohibits tracked ATVs with significant displacement from operating on groomed trails, I feel this option is not good. Therefore, I support the Travel Management Subpart C OSV Alternative 1 Existing Motorized Travel option.

On page 78 on the Environmental Assessment dated October 2021, I do like the acknowledgement of the need to support OSV travel for traditional recreational uses on the Forest including black bear and lion hunting which was one of my concerns before reading through the document.

Page 81 of Environmental Assessment dated October 2021, it says Wyoming Game and Fish was consulted. It makes me wonder if that really occurred. When the proposed seasonal closure dates prohibit hunting activities in already established zones like the Mexican Creek Conservation Easement in the Washakie District, it makes one question this. Wyoming Game and Fish signs at the Mexican Creek Conservation Easement area says public access is allowed September 1 thru December 31. The proposed Subpart B Alt 2, 3, and 4 could possibly shorten hunter access in this easement and halt hunting access from December 1 through December 31 if there is no snow on the ground, which would be a 25% realized reduction of access time. I do not agree with reducing hunter opportunities already established by the Wyoming Game & Fish.

Starting on page 97 of the Environmental Assessment dated October 2021, the difference in road maintenance costs between the four alternatives are insignificant, Alt 1: \$178,580, Alt 2: \$177,840, Alt 3: \$177,632, and Alt 4: \$172,800. Given the relatively little difference in cost savings that may be realized, I think Alternate 1 is best because it does not reduce access or implement seasonal closures. Even a max of a \$6K savings, depending on the plan selected, is not enough to justify moving from the existing Subpart B Alternate Existing Motorized Travel Alternative 1. I did notice that supplemental funding patterns over the FY19, FY20, and FY21 are a better outlook of revenue sources than the many years prior. So maybe those funds can help address Land Management Plan maintenance objectives.

On page 117 of the Environmental Assessment dated October 2021, Subpart C Alternative 3 is the worst option because of closing the most acreage to OSV travel. Absolutely NO to Subpart C Alternative 3.

On pages 272-273 of the Environmental Assessment dated October 2021, it mentioned snowmobile use disturbs and displaces ungulates and wolves. The document says seasonal closures are intended to protect sensitive or management indicator species and other wildlife from disturbance during their winter and reproductive season. The Environmental Assessment and Travel Management Plan instrument should not be providing protections for wolves in areas of the forest classified as predator zones. Some of us want opportunities to hunt wolves in predator zones in the winter months.

On pages 279-280 of the Environmental Assessment dated October 2021, executive order 13443 facilitation of hunting heritage and wildlife conservation is noted. I am glad that hunting heritage is an important consideration in the Travel Management Plan. <https://www.federalregister.gov/documents/2007/08/20/07-4115/facilitation-of-hunting-heritage-and-wildlife-conservation>

On page 323 of the Environmental Assessment dated October 2021, the altered seasonal open dates April 15 to Dec 1 would shift to May 1 to Nov 20 and are not agreeable. The Forest Service should be recognizing that Wyoming Hunting Regulations for these areas are open after the Nov 20 timeframe. Here are examples of Elk Hunting open dates and areas for the 2021 hunting seasons. Elk hunt area 25 has close date of Nov 21, elk hunt area 27 has a close date of Nov 21, elk hunt area 28 has a close date of Nov 21, elk hunt area 69 has close date of Nov 30, elk hunt area 96 has close date of Nov 30, elk hunt area 97 has close date of Nov 30, elk hunt area 98 has close date of Nov 30, etc.. There are many more examples of how the proposed altered seasonal open dates shift would inhibit the legal taking of big game as authorized by Wyoming Game and Fish. At a minimum the proposed Nov 20 seasonal closure date on roads should be changed to allow road access through Dec 1 at a minimum.

In summary, my input is to keep the Subpart B Alternative 1 Existing Motorized Travel plan in place. My input is to keep the Subpart C Alternative 1 Existing Motorized Travel plan in place.

Submitted by,

Matt Ayers

Resident of Lander, WY