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First name: Mark

Last name: Hinschberger

Organization:

Title:

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

[External Email]

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Shoshone National Forest Environmental Coordinator

808 Meadow Lane Avenue, Cody, Wyoming 82414,

Dear Mark Foster,

Thank you for the opportunity to comment on the proposed SNF Travel Plan. I have been participating the Travel Management Plan since its beginning and before that as a former Wildlife Biologist on the Wind River and Washakie Ranger Districts working on travel management.

I found the virtual meeting for the Wind River District wrought with so many problems that it essentially was just a waste of time for most people involved.

A working group was formed at the February 2016 Travel Management Education and Compliance Workshop to improve the accountability of the Shoshone National Forest's existing motorized road and trail system. They formed a charter, recruited members, had a series of meetings, and generated a list of recommendations that were presented to the Forest Supervisor. To date, I have seen little to show for that effort in the way of compliance with the existing roads and trails. ORV use and abuse is still on the rise and no obvious sign of increase enforcement, signing, road and motorized trail maintenance. Not sure why you want to increase the amount of motorized trails, especially in areas that provide for more maintenance issues and illegal travel off more routes (give them a mile and they take more miles). I realize that funding is an issue to complete the needed backlog of existing road and motorized trail maintenance, signing, barricades gates, etc. So, I know, lets add a bunch more we can't afford!

I also understand the difference between and EA and EIS. This EA is as large as many EIS documents. However, this EA does not include the site specific analysis of proposed new travel routes, much like the Forest Plan EIS, which was not a site specific project implementation document. So a decision will be made but the analysis of the site specific analysis or "ground truthing" for proposed new travel routes, be they motorized trails or roads, will come later? This seems more like an EIS document and is very backward for EA.

I realize that the no action (alternative 1) is not going to be chosen. There is too much time, energy, public comment, and costs already expended to say "never mind".

The Wind River District has the most miles of motorized routes, both roads and trails, than any District on the

Forest. This is a product of having the most relatively gentle front country terrain of all the Districts on the Forest. We have plenty of existing roads and motorized trails to provide for the users that travel on the Wind River District.

I support the over the snow proposed action for the Wind River District, including the designation of the Falls/ Deception and Pinnacles x-country ski areas as a snowmobile free zone. However, I am not sure why we need to have snowmobiling go into June! I worked hard with Becky Aus to get the areas on eastern edge of the District adjacent to the Wyoming Game and Fish Commission lands with seasonal closures to human presence closed to motorized travel from December 16 thru May 15 for wintering wildlife, especially elk. Please maintain this by making this closure by Forest Supervisor Order a permanent designation for whatever alternative is chosen.

How many loop motorized trails do they need in on the Wind River District? Are we being overachievers in the first iteration of the new Forest Plan (At least three new, wheeled motorized trail loop opportunities are available. (RDTR-OBJ-05)? I believe this is a forest-wide objective and the proposals submitted in the first round of travel management planning included 19 loops just on the Wind River Ranger District. Granted many of these new loop proposals and the existing loops utilize both segments of motorized trails and segments of the forest systems roads to complete a loop. If we are concerned about the lack of just motorized trail loops for the ORV users, then too bad! That train left the station when forest system roads were enrolled as part of the ORV trail system.

As much as I am in favor of supporting a loop trail from the Town of Dubois near the rodeo grounds thru the Wyoming Game and Fish Commission Lands to Salt Barrel Park, Moon Lake, and back thru the Upper Little Warm Spring Subdivision on private subdivision and County roads, I am not in favor of rewarding illegal behavior by making user created routes now legitimate motorized trails (it sets a bad precedent now and for future travel management planning). So I don't want to see the WR-03 proposal go forward. I am not sure how you would keep the users on just the designated route in that wide-open meadow west of and below Windy Mountain. The closed road to Windy Mountain electronic facilities also currently provides a non-motorized access for horseback riders that park adjacent to the FSR 554 just inside the forest boundary or ride from the adjacent Upper Little Warm Springs Subdivision. For those of us that cherish the solitude from others beyond the motorized areas, especially during the fall and late season elk hunting seasons, this area begins to provide that right behind it gate. If we reduce these closed areas by opening them up to motorized access during this travel management planning process, then those of us who like this kind of non-motorized experience in the "front country" will be crowded into fewer and fewer of them; thus defeating their attraction and function.

There currently exists a loop motorized trail from town to back to town via the Warm Spring/ Soda Springs county road thru the Upper Little Warm Spring Subdivision, FSR 554 (Wildcat road), FSR 263 (Union Pass road), FSR 531 (Moon Lake road), MT14, FSR 524 (Salt Barrels Park road) and then thru Wyoming Game and Fish Commission lands in the Whiskey Basin WHMA. I realize that it is a very long route.

Regardless of whether the Forest goes forward with WR-03 to have a shorter loop on Forest, traveling east on MT 14, WR-90 and FSR 524 accesses the Wyoming Game and Fish Commission lands in the Whiskey Mountain WHMA from Salt Barrels Park onto Sheep Ridge. Because part of the proposal involves motorized travel on the Whiskey Basin WHMA managed by the Wyoming Game and Fish Department for winter range and it has seasonal restrictions on motorized travel on their road to the forest boundary and FSR 524 from December 1 thru May 15, a seasonal closure should be applied to these segments of these proposed loops for 64" or less motorized vehicles. Granted, most of the higher elevation portions of these proposed loops will not be passable most years until after May 15th so the possibility of accessing these seasonally closed areas on the Game and Fish Habitat Unit from the backside would be low most years, but there are always those dry, low snow years

when that could occur and it could occur more often if WR-03 is implemented. The Little Warm Springs, Windy Mountain, Grandy Reservoir, and Batchelor Creek areas are used by elk as calving areas and from a maintenance and sedimentation stand point those routes in this area could stand to have time to dry out before motorized use occurs, so I would propose a seasonal closure on these roads and routes (FSR 545, FSR 528, FSR 529, and FSR 554) that would comprise these loop systems from April 1 thru May 15th. This would prevent access to the segments of these proposed loops until after the Whiskey Basin Wildlife Habitat Management Area opens. And much of the beginning (and lower, native surface portions) of both FSR 554 and FSR 545 could benefit from not being open to travel during this wetter time period (much like the rationale for the seasonal closures in Long Creek and Burroughs Creek).

In addition, because the over snow vehicle proposal in Alternative 4 shows the MT14 and FSR 524 as open to snowmobile use November 15 thru June 15, this area should be closed to snowmobile use from December 1 thru May 31st to correspond to the closure on adjacent Wyoming Game and Fish Commission lands.

For the same reasons above for WR-03, I am not in favor the 961.1B proposal. That trail has been used by hikers and horseback riders to Grandy Reservoir and is very narrow. In order to have vehicles that are up to 64" is width go both directions on this trail will require a large amount of widening of this trail. This area is also an elk calving area. However the road (961.1B WR-63) into Grandy Reservoir from FSR 554 has never been gated in the 29 years that I have lived here. There had been the old sign with the red slash over a jeep on a tree at the entrance to this road, but that disappeared after the last timber sale was logged along the road into Grandy. It has been driven on for access to the reservoir control structure on the reservoir dam by the special use permittee, by contractors for timber harvest, a by nearly everyone else that has seen that road from FSR 554. There is not much that can be damaged by driving on this road, it is very rocky in most portions of the road to the reservoir. I would suggest that it be classified as an open road on the MVUM and added to the ORV Map as an enrolled road, but only to the reservoir and not beyond. Beyond the reservoir and dam is a wet meadow before one gets to the narrow trail.

For roads with the WR-83 and WR-25 designations (512, 512.1B, 510, 510.1D, 510.1E and 692), I agree with this proposal to convert this series of roads to a seasonal closure to motorized vehicles, however it should include snowmobiles. The time frame that this seasonal closure is in effect should also match the seasonal closure that currently exists on the FSR 511 (Brent Creek Road) (April 1st thru June 30th). However, as it is proposed currently in alternative 4, a person could legally drive on FSR 510, 512 and 512.1B between June 1st and June 30th and access FSR 511 (Brent Creek Road) on the back side of the closed gate during the seasonal closure on that road, which is April 1st thru June 30th and has been for a long time. A seasonal closure that matches the Brent Creek Road seasonal closure would also provide more time for the snowdrifts to melt, the mud holes to get smaller, and muddy road to get drier. It would also benefit grizzly bear in these spring use areas and elk during the spring calving period to improve spring time elk secure habitat (SPLC-GUIDE-09). This proposal will require gates with rationale signing in effective spots on FSR 510 (Burroughs Creek loop road) somewhere in the vicinity of the Horse Creek Guard Station and also its junction with FSR 504 (Parque Creek road).

There appears to be a discrepancy between the alternative 4 map and the Appendix B Addendum list of seasonal closures in the Long Creek area and what is mapped with highlighted yellow roads and trails. Forest

Service Roads 552.1H; 552, WR-29; and 548.1D, WR-29 are listed as having seasonal closures from April 1st thru May 31st, but the map does not have those routes highlighted in yellow. I assume or would hope that they would match the roads and trails seasonal closure in the West Fork of Long Creek area. I like the idea of establishing a seasonal closure on these routes (WR-29 and WR-43). Implementing the Forest Plan for species of local concern, such as elk by placing emphasis on maintaining secure habitat within current ranges while trying to improve conditions in areas with low or very low secure habitat is important in this area of the Long Creek drainage. This can be partially accomplished by using seasonal closures where necessary in parturition areas to lower open road densities, limit disturbance from motorized use, and provide increased secure habitat during the spring. (Apply seasonal restrictions as needed on motorized use of travel ways to reduce disturbance in sensitive big game areas, such as birthing areas and winter range. (SPLC-GUIDE-09)). I would suggest and request that the seasonal closure dates mirror the time frame used on FSR 513 near its junction with FSR 552.1H to the Wolf Creek Trailhead (April 1st thru June 30th).

Lastly, I am not in favor of legitimizing a pioneered, unauthorized ORV motorized trail by proposing WR13 ORV trail from FSR 528-2D on the south steep slope of Warm Springs Canyon to FSR 529 that comes down from Warm Springs Mountain on the north side of that canyon. This again establishes a bad precedent, especially for future travel management planning (let's drive where we want and we will get the Forest Service to add these routes in the future). This section of WR13 will require significant costs to make it passable to vehicles up to 63 inches.

Every effort should be made to keep the Shoshone the wild place it is in the Greater Yellowstone Ecosystem and this Travel Management Plan is an opportunity for the forest to create a legacy of minimizing roads, protecting wildlife, watersheds while providing plenty of motorized access and considering non- ORV users in the front country.

Thanks for reading and considering my input,

Mark Hirschberger

[PII]