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Comments: Shoshone NF Travel Management Planning Project

Shoshone National Forest Travel Management Planning Team Shoshone National Forest 808 Meadow Lane Avenue Cody, Wyoming 82414 Dear SNF Planning Team I am a snowmobiler and ORV/ATV rider who frequently rides on the Shoshone National Forest. My comments on your preliminary management plan include the following: I generally support parts of Alternative 2 but think that it is overreaching in some areas and doesn't include near enough opportunity for those who need and want motorized travel on the very limited amount of lands that are available for motorized recreation. ORV/ ATV TRAIL / ROAD CONSIDERATIONS INDIAN POINT TO DUTCH OVEN SPRINGS (FSRD 554 - FSRD 285.4A) * Trail already constructed utilizing specs from SNF. * Cost to build is already done with Cooperation from Local ATV Club/SNF * The SNF restrictions from Non-Motorized is defunk as Motorized travel exists to the north, east, west and south of the area. * Fails to meet Scenic and Wilds as there is an airstrip at the bottom of the hill. There is Deeded land at the bottom of the hill with roads, and there is also a Utility Line in the Area. * Wyoming Game and Fish opens the area on the 15th of May. * The SNF has no restriction on the roads to the North of the trail. * 1 Water crossing is on a gravel bed that has no steep banks and poses no erosion issues. * Rogue use to the trail was never an issue during all the years it was open * Creates a huge economic boost to the local economy for the looping opportunities it creates. NO MANS TRAIL (FSRD 732 - MT11) * Trail is already in place and currently being used. * Provides a great looping opportunity. * Mirrors the snowmobile system making maintenance an easier task COW CAMP (FSRD 533 - FSRD534) * Trail is already in place and currently being used. * Provides a great looping opportunity. * Mirrors the snowmobile system making maintenance an easier task WINDY MTN TRAIL (FSRD554 - TOWN) * Trail is already in place and currently being used. * No Water Crossings * Provides a great looping opportunity. * Utility Company Uses it for Access to their equipment * Provides access from Town. FIRE TOWER (FSRD 263 - FSRD 528.2D) * Trail is already in place and currently being used. * Provides a great looping opportunity. * Utilizes land locked SNF roads * Provides Fishing and Hunting Opportunities * Water Crossing is Rock based * Follows existing Roads past and present * Trail offers Historical Tour of Towns History. CLINT CREEK (FSRD 540-MT15) * Utilizes existing roads and old routes * Overlays existing Snowmobile Route minimizing maintenance * Great Looping Opportunity * Elk calving ground is poor excuse as elk calving ground exist everywhere now. GAME WARDEN TRAIL (FSRD 538 - FSRD 537) * Overlays existing Snowmobile Route minimizing maintenance * Great looping Opportunity * State Trails has been Utilizing ORV's to maintain trail for years for the snowmobile side. * Utilizes existing Roads on both the SNF and BT * Grizzly Bear Issue is debunk as Grizzlies are everywhere throughout the entire Absaroka and Wind River Ranges. Impact to Grizzlies from ORV travel shouldn't even be a talking point. BACHELOR CREEK TRAIL (MT14 TO FSRD 283) * The precedent for this trail Makes the route from Indian Point to Dutch Oven Springs even more desirable. This trail actually runs through a RARE area, and has multiple spring crossing, and the trail is prone to serious erosion issue. If you are willing to accept this for a trail when it really offers very little other than a very uncomfortable ride then you should be willing to accept any of these proposed. SALT BARRELS PARK TO MOON LAKE (MT14) In Alternative II it is proposed that a 50" restriction be maintained on the Salt Barrels Park to Moon Lake (MT14). There is no justification to the proposal as it has been being used for 64" wide use for the many years already. It has been said by some in SNF they are appalled that this trail even exists due to some of the low muddy areas within the route; however they are easy fixes with the help from the State Trails Program. MOCCASSIN BASIN ROAD TO BARBERS POINT (FSRD 537-515) * This route mirrors the snowmobile trails (XA) utilizing one maintenance program for both * It can be done by utilizing and old road already there * Provides a great looping opportunity keeping orv/atv off the highway alleviating the safety issues. * An Existing Utility Easement can be also utilized for the trail. * The Utility easement alone makes this area an area than can be developed outside of the Grizzly Habitat Inclusion UPPER BRENT CREEK ROADS Right now there is a season closure on Brent Creek Road (511) which has been in place for a number of years and a special order by previous local ranger. It was said that

this was put in place for Elk Calving Grounds. * Elk Calving Grounds Designation holds no water as Elk are calving everywhere now due to Bears and Wolves influence. * This road is a south facing slope that burns off of snow long before most others. * It is a lower elevation, and a good road with good compaction and very little rutting, especially the lower 2/3rds. * The Game and Fish opens all of their areas which are as big of calving grounds as there is in this country all on the 16th of May, there is no precedence for this being closed. SALT CREEK (FSRD 263.2A - FSRD533) * Utilizes existing roads and old routes * Overlays existing Snowmobile Route minimizing maintenance * Great Looping Opportunity SPUR ROADS * All spur roads need to be inventoried at this time and kept open for all the resources that they provide like hunting, fishing, hiking, sight seeing, and especially Firewood Collection. If the SNF only new the reasons for a lot of these roads they would understand the value of them. If the SNF spent as much time closing these roads and pound brown stakes in the ground as they did fixing the road there would be such a backlog of work and problems that we do. WIDTH RESTRICITONS In Alternative II it is proposed that a 50" restriction be maintained on the Salt Barrels Park to Moon Lake (MT14). ALL 50" width restrictions need to be eliminated as they are out of touch with current market trends and technology. The Forest Service equipment will be in fact breaking their own law and designation as not only does the Wyoming State Trails equipment and the Forest Service's ORV fail to meet the 50" wide criteria. In the very least, there is minimal impact to the resource in either case with both 50" and or 64" equipment and all trails should be marked to a 64" capacity. This also makes it much clearer to the user and does not segregate users. SINGLE USE TRAILS * All trails for ATV/UTV should be proposed as Multiple Use trails for everyone horses, backpacking, hunting, biking, fishing, atv'ing, motorcycles etc[hellip]the segregation needs to stop. ROAD MAINTENANCE * Road grading needs to be done in the spring when road are damp. By spring this means late June or July. Blading like was done this year in late August is pointless. The road is bone dry, the dust just flies, there is no compaction, fines are lost, and it's a complete waste of time and money. Not to mention the operator is unqualified and leaves boulders all over the road surface. He fails to fill in pot holes that become lakes again every spring and never crowns the roads surface. * Mountains of Gravel have been sitting in certain areas not being used. DECOMMISSIONING ROADS There are some cases of two roads that serve the same purpose without question; however this ideal of Decommission road needs some serious consideration. There are many spur roads that serve as valuable access to hunting spots, caves, fishing and especially FIRE WOOD CUTTING and the like. They have been in existence for a very long time. Allowing people to spread out especially in times like hunting seasons is invaluable opportunities for the users. Decommissioning of roads if absolutely necessary should be an action that is paid for by the SNF and not out of the "States Trails" funds whatsoever. This is solely the responsibility of the SNF and needs to be done with extreme caution. We have seen routes decommissioned by both the SNF and the Bridger Teton National Forest and in almost every case the decommissioning creates 3 new routes to the same exact destination or dead end. Not to mention The 1866 Mining Law provision - RS (revised statute) 2477 - states simply that "The right-of-way for the construction of highways over public lands, not reserved for public uses, is hereby granted. "And those precedents are being set daily on the legality of the repeal on a state by state case. The BLM has already set the president in Wyoming that makes the repeal defunk and that all old routes for mining, timber, off-road vehicle and livestock remain open for development or motorized recreation. YOUTH * Every single opportunity needs to be taken advantage of to allow our youth ride these trails and roads. It is a family affair and there is nothing in the world more important than a family being able to recreate together. SEASONAL CLOSURE RESTRICTIONS The proposed specific actions outlined in the Alternative II do not fully address or mitigate relative issues. They are also overreaching for no apparent reason. I will use the seasonal closure in the Upper Burroughs Creek road system as an example. The Alternative II says that this area is proposed to open July 1st. Dates of July 1st are simply an overreach and an abuse of power. Right now there is a season closure on Brent Creek Road (511) which has been in place for a number of years and a special order by previous local ranger. It was said that this was put in place for Elk Calving Grounds. This road is a south facing slope that burns off of snow long before most others. It is a lower elevation, and a good road with good compaction and very little rutting, especially the lower 2/3rds. First off Elk calves are mostly all born by the end of May or the first part of June and have since become very mobile with their mothers. In most cases they follow the snow to the higher elevations long before then to avoid the bugs. Even the Wyoming Game and Fish opens all of their lands at the very latest on May 15th. Most all of their lands encompass elk calving grounds these days. Seasonal closures

need to be reasonable and logical especially in regards to that of ORV/ATV travel as we all know that the light weight characteristics of these machines do not cause rutting or excessive wear or damage to trails and or roads. One last comment about elk calving grounds or grounds for any animals birthing the forest service needs to recognize with the influx of Grizzly Bear population and the overwhelming presence of wolves on wintering habitat, birthing grounds for all animals in the Upper Wind River valley has changed significantly. Birth grounds are not the same and exist across the entire valley now. Deer and Elk alike are birthing very close to town and if this is the case does your closures need to happen across every single area? If it does than why does the Game and Fish open the gate to all their lands on the 15th of May here in this valley and on the 1st of May on the Bridger Teton? I believe that there may be some cases for seasonal closures to help manage the resource but they need to be consistent across the board to avoid confusion. They also need to be reasonable and rational and not overreaching. OSV CONSIDERATIONS I OPPOSED TO FULL-SIZED VEHICLES (TRUCKS AND SUVs) EQUIPPED WITH TRACKS USING OSV TRAILS. Full-sized vehicles equipped with tracks (your proposed new OSV Category 2) are too heavy and too wide to be used on designated snowmobile trails across the Shoshone National Forest. These vehicles can cause trail rutting/damage and create safety issues since many snowmobile trails are far too narrow for two-way traffic that would include these extremely wide tracked vehicles. They simply do not belong on any groomed or ungroomed snowmobile trails on the SNF because of weight and width issues. Exceptions to our opposition to allowing full-sized tracked vehicle operation on the SNF would include tracked conversion vehicles operating with permission under a special use permit issued by the Forest (Brooks Lake Lodge vans, utility company vehicles, etc.). Otherwise, the use of these large tracked vehicles on the SNF should be limited to only designated roads which are not part of the State's groomed and ungroomed snowmobile trails system. I SUPPORT - KEEPING THE ENTIRE HIGH LAKES WILDERNESS STUDY AREA OPEN TO SNOWMOBILING. The WSSA supports Alternative 2 on this topic since it would keep the entire High Lakes WSA 100% open to continued OSV use. This is consistent not only with Congressional intent but is also supported by your EA analysis - which clearly shows that use patterns have not changed significantly since the 1970s. Since the area's potential wilderness character has not been harmed by snowmobile use since the WSA's establishment, OSV use must be allowed to continue. WE ARE OPPOSED TO CLOSING THE NORTHERN AND EASTERN PORTIONS OF HIGH LAKES AS IS PROPOSED BY ALTERNATIVE 3. Snowmobilers have had to fight off attacks from environmental and no motorized groups who continually try to close this area to our use. They already have 80% of the Forest for their exclusive nonmotorized use, plus they keep wanting to close more of the already very limited area open to OSVs and snowmobiling. Congress was very clear in its intent that this entire area is to remain open for continued snowmobile use - until such time that either use changes significantly to the point that the area's character is threatened, or until Congress itself determines differently. And we know that our Wyoming Congressional Delegation continues to strongly support continued snowmobiling access within the entire HLWSA - so the entire area should remain open under your final travel plan. I SUPPORT - OPENING THE DUNIOR SPECIAL MANAGEMENT AREA BACK TO ITS PREVIOUS USES The Dunior is not Wilderness nor does it meet the criteria. There was a town in the Dundee Meadows, there are Model T Ford Trucks in the woods, and there are sites of homes everywhere in the valley. It needs to be reopened immediately to OSV and management returned to previous designations. OSV SEASON DATES - I SUPPORT DATES OF OCTOBER 1ST - JUNE 30TH The proposed dates of November 1 through May 31 for the North Zone (Beartooths) and Wind River (Dubois) District - and December 1 through May 31 for the Washakie (Lander) District - are very realistic since there is always adequate snow for snowmobiling in these areas during these times. However, these are the absolute minimum OSV season dates we are prepared to accept - and we will fight any efforts by conservation and nonmotorized groups to shorten these proposed season dates. Our support for Alternative 2's proposed open and close dates is conditional since we have a lot of members who feel these proposed season dates are too short - so they are quite upset. The vast majority of our membership has ridden snowmobiles, on adequate snow, much earlier than November 1 as well as much later than May 31; not everywhere on the Forest, but certainly routinely in many high elevation areas in more years than not. There very definitely are years when October snow storms prevent hunters from accessing their backcountry hunting areas or camps since deep snow causes roads to become inaccessible by wheeled vehicles. Consequently, extending the opening date for OSV use on adequate snow to somewhere between October 1 or no later than October 15 is what we request - so that hunters have a fair chance to access their

hunting areas and so that desired wildlife harvest targets have a reasonable chance to be met in years with early, deep snow. Additionally, at season's end, there are a lot of dedicated snowmobilers who regularly continue to ride their snowmobiles until somewhere between June 15th and June 30th - in high elevation areas where adequate snow remains. It has been their tradition for decades and they don't want their riding access restricted due to arbitrary dates on the calendar that really have nothing to do with when there typically is still more than adequate snow in many high-country areas. SNOTEL data shows there are many places on the SNF where snowfall is absolutely sufficient to be able to add 15 to 30 days to both the front-end and back-end of your final OSV season dates - so we request that you revise Alternative 2 accordingly. It is also our position that - if there is sufficient snow depth in areas of the Forest zoned available for OSV use - snowmobilers and other OSV users should be given priority / continue to be able to access it versus having our very limited motorized use zones closed on an early, random date - particularly if the reasoning to end OSV use early is to 'provide exclusive use of that snow by non-motorized recreationists.' Those individuals and groups already have exclusive use of over 2 million acres of the SNF that we are entirely shut out of - while we openly share our 20% of the Forest with them versus ever having exclusive use of it. Consequently, it would be inherently wrong to reward them for being unwilling to abide by the same multiple-use principles we operate under every day of the year (all motorized trails on the SNF are ALWAYS open to multiple use by non-motorized recreationists - regardless of whether it is winter, spring, summer or fall). I SUPPORT OSV OPERATION ON SNOW-COVERED ROADS OUTSIDE THE DESIGNATED OSV SEASON DATES. We request that OSV use be allowed on designated wheeled routes (open roads and trails), when they are snowcovered, outside whatever the final OSV operating dates end up being in the final Travel Plan decision. This will help keep public access open to roads and trails on the SNF during shoulder seasons when snow is too deep for travel by wheeled trucks, ATVs and UTVs. CROSS-COUNTRY SKI AREAS CLOSURE TO OSVS We accept closure of the Falls/Deception and Pinnacles cross-country ski trail areas since there has been an informal 'closure' agreement between area snowmobilers and skiers for years. I OPPOSED TO THE PROPOSED 12-INCH MINIMUM SNOW DEPTH FOR OSV USE OR TRAIL GROOMING. The 2015 OSV travel rule (Subpart C) lists only two potential criteria for the designation of OSV use on USFS lands: Class of Vehicle and Time of Year. It does not require that any numerical minimum depth be set, only that there be "adequate" snow depth for OSV use. Since snow depth can be extremely variable depending on natural metamorphoses in the snowpack, wind, and other wide ranging weather conditions, this rule would be impossible to enforce and would also create an unwelcome tool for groups trying to shut snowmobiling down when snow is actually quite adequate for OSV operation across the majority of the Forest's landscape. With the wind scour we have in Wyoming, there routinely will be bare ground in one spot when just beyond that particular spot there can be one, two, three or more feet of snow. There are also features like a 'snow shadow' where tree limbs prevent snow from reaching the ground - creating bare spots along the trail that may rarely have twelve inches of snow while the remainder of the trail will have tons of snow. And roads or trails along southfacing slopes are notorious for holding less snow due to sunshine causing snow to shrink quicker than snow on more shaded areas. There are countless other examples as to how snow depth will vary greatly from point to point to point - making it virtually impossible to have consistently deep snow pack even in the dead of winter. So, you're setting a 12-inch minimum snow depth standard will absolutely, unnecessarily prevent trail grooming as well as OSV use across the forest if it is applied and enforced to the letter of the law - which environmental groups and other anti-motorized groups will absolutely insist you do. I SUPPORT ADDING THE UNGROOMED GHOST CREEK TRAIL TO PAINTER'S STORE IN THE BEARTOOTH. I ALSO SUPPORT ADDING THE UNGROOMED TRAILS IN THE SUBLETTE PASS AREA NEAR TOGWOTTEE PASS TO YOUR MAPPED TRAIL SYSTEM SINCE THEY'VE ACTUALLY EXISTED AND BEEN SIGN ON THE GROUND FOR DECADES. I OPPOSE ANY CARVING OUT OF SPECIAL USE LANDS on any of the lands that are not designated Wilderness for special interest groups. Skiers have the opportunity to utilize all the land we do and all the land that snowmobiler's don't. They also take advantage of our groomed trails without paying a dime and the sledding community never says a word.

Sincerely,

Ronald Shaw

9/24/2020

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