



September 28th, 2020

Shoshone National Forest
Attn: Shoshone NF TMP EA
808 Meadow Lane Avenue
Cody, WY 82414

Submitted via email to SM.FS.shonfcomment@usda.gov.

RE: Access Fund Comments on Shoshone NF TMP Environmental Assessment

Dear Shoshone National Forest Travel Management Staff,

The Access Fund appreciates this opportunity to provide comments on the USFS's environmental assessment for the Shoshone NF Travel Management Plan (TMP). The Shoshone holds world-class, year-round climbing resources valued by locals and visitors alike. We look forward to collaborating with the USFS on management strategies that protect both the integrity of the land and continued climbing opportunities.

The Access Fund

The Access Fund is a national advocacy organization whose mission keeps climbing areas open and conserves the climbing environment. A 501c(3) nonprofit and accredited land trust representing millions of climbers nationwide in all forms of climbing—rock climbing, ice climbing, mountaineering, and bouldering—the Access Fund is a US climbing advocacy organization with over 20,000 members and over 123 local affiliates. Access Fund provides climbing management expertise, stewardship, project specific funding, and educational outreach. Access Fund holds a Memorandum of Understanding with the U.S. Forest Service.¹ For more information about the Access Fund, visit www.accessfund.org.

Comments

Our comments will largely echo those of the Central Wyoming Climbers Alliance. We support their efforts to protect sustainable climbing access in the region and coordinate with the local

¹<https://d1w9vyym276tvm.cloudfront.net/assets/AF-FS-MOU-2020.pdf?mtime=20200711232710&focal=none>

outdoor recreation community and federal agencies on long term management strategies, including a Climbing Management Plan for the Shoshone NF.

Access Fund supports Alternative 2 with some modifications. We would like to see FR 326 designated as a non-width-restricted motorized trail open to all vehicles from the Young Mountain intersection out to the parking area of Wolf Point/Little Po. We would also ask that seasonal restrictions be based upon conditions rather than strict, hard closures. The potential exists for year-round recreation beyond the Pass Creek gate, allowing OSV travel when snow cover and ground conditions are amenable. It is also possible that during drier years, conditions may be appropriate for motorized travel out to Wolf Point (right fork, FR 326) and down to the stream crossing of the Little Po (left fork, FR 352) in March, April, and May, and we encourage ongoing conversations about how these zones can be made more accessible to a variety of user groups during the spring. The Little Po region is an unparalleled outdoor treasure for climbers, anglers, hunters, and motorized recreationists alike, and efforts should be made to broaden its access window, especially into the prime spring months when conditions allow.

We also support the Central Wyoming Climbers' opposition to Alternative 3 as presented within the proposed TMP. Reclassifying many roads to width-restricted motorized trails limits access to a significant portion of the Shoshone to those with OHVs. This would impede access to many desirable climbing areas in the Lander region, as well as access points for other user groups (hikers, mountain bikers, etc.) to non-motorized trails. Most climbers do not own OHVs and would be unable to access some of the area's climbing gems such as Wolf Point. If taken as presented, Alternative 3 heavily favors specialized/off-road motorized recreation and eliminates access for the many types of non-motorized recreation along most of the Lander Front and its side canyons.

Justice, Equity, Diversity, and Inclusion (JEDI)

Access Fund urges the Shoshone NF to work with the local community to advance inclusive and equitable access to the forest and its recreational opportunities. It is well documented that people of color often use outdoors spaces at lower rates than their white peers. In addition, people from other marginalized communities, such as the LGBTQ and differently abled communities, can face additional challenges to getting out on public lands. As an outstanding natural area with extensive recreational opportunities, the Shoshone NF should be accessible to people from a true diversity of backgrounds. Access Fund has staff dedicated to JEDI issues, and is more than willing to offer our time and resources to assist the USFS in applying JEDI principles to their work in northern and central Wyoming.

Access Fund Assistance

The climbing community and the Access Fund are ready, willing, and able to help planners identify and improve the climbing related infrastructure, trail system, roads, and other management needs the Shoshone NF may require to provide for the climbing opportunities found in the area. In addition, some aspects of this planning initiative may qualify for Access Fund Climbing Preservation Grant Program or assistance from our Conservation Team which

helps maintain^{2,3} climbing areas throughout the United States by assessing climbing area conservation needs, working with locals to address those needs, and providing training on planning and stewardship best practices to keep those areas healthy.

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Thank you for your consideration of these comments on the Shoshone NF's travel management plan environmental assessment. Access Fund has the experience, local contacts, and resources to help planners craft management strategies that encourage climbing while sustaining the health and integrity of the landscape and the recreation experience. Access Fund looks forward to continuing to work with the Shoshone NF. Please keep us informed as the planning process proceeds. Feel free to contact us via telephone at (303) 552-2843 or via email (katie@accessfund.org and taimur@accessfund.org) to discuss this matter further.

Sincerely,



Katie Goodwin - Access Fund, Policy Analyst



Taimur Ahmad - Access Fund, Policy Associate

Cc:

Chris Winter-Access Fund, Executive Director

Erik Murdock-Access Fund, Policy Director

² <https://www.accessfund.org/take-action/apply-for-funding/apply-for-a-climbing-conservation-grant>

³ <https://www.accessfund.org/pages/conservation-team>