

WYOMING
GAME AND FISH DEPARTMENT

Jim Geringer, Governor



John Talbott, Director

January 30, 1996

WER 8184
Bridger-Teton National Forest
Greys River Ranger District
Scoping Statement
Town of Afton Hill Climb
SIN: 96-002
Lincoln County

WYOMING STATE CLEARINGHOUSE
OFFICE OF FEDERAL LAND POLICY
ATTN: JULIE HAMILTON
HERSCHLER BUILDING., 3W
CHEYENNE, WY 82002

Dear Ms. Hamilton:

The staff of the Wyoming Game and Fish Department has reviewed the scoping statement for the Town of Afton Hill Climb in Lincoln County. We offer the following comments.

The proposed hill climb is in the Northwest 1/4 of Section 29, Township 32N, Range 118W, immediately east of Canyon View Park on the north side of Star Hill. The first 800 feet of the climb course would be on private land. It would then continue up onto the National Forest approximately 2000 feet. This area is designated as crucial winter yearlong range for the Wyoming Range mule deer herd, Afton elk herd and the Sublette moose herd. There are currently about 50 mule deer using the site. The event will likely displace these deer up to one mile from their current home ranges.

The USFS has not implemented a winter travel/recreation plan on crucial big game winter range on land administered by the Greys River Ranger District. The Wyoming Game & Fish Department reviewed a similar hill climb proposal in 1993 and provided comments to acting District Ranger Walt Rogers. Those comments, (letter dated December 7, 1993), are still relevant and should be incorporated into any subsequent environmental document prepared by the Forest Service that pertains to this snowmobile hillclimb. At that time, Mr. Rogers indicated his willingness to address the winter travel plan issue if the WGFD dropped

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opposition to the hillclimb. The WGFD agreed to this proposal. After the event was held, the Forest Service never followed through with the commitment to advance a winter travel plan.

1. RE: DFC 12 and DFC 10 Designation. The area proposed for the hillclimb is designated as DFC 12 and DFC 10 in the Bridger-Teton National Forest Land and Resource Management Plan (LRMP). Designations for adjacent prescription areas are not identified.
 - a) The general theme of areas designated DFC 12 in the LRMP are "managed for high quality wildlife habitat and escape cover, big game hunting opportunities, and dispersed recreation activities" (LRMP, page 241). Further, the Management Emphasis for Management Prescription 12 is focused on "providing such important habitat for big game as winter ranges, feedgrounds, calving areas, and security areas. Management provides for habitat capability and escape cover, and maintained semi-primitive, non-motorized opportunities that emphasize big game opportunities" (LRMP, p 242).
 - b) The theme for areas designated as DFC 10 is "an area managed to allow for some resource development and roads while having no adverse and some beneficial effects on wildlife" (LRMP, page 233). The management emphasis for Management Prescription 10 is "to provide long term and short term habitat to meet the needs of wildlife managed in balance with timber harvest, grazing, and minerals development. All surface-disturbing activities are designed to have no effect or beneficial effects on wildlife..." (LRMP, p 235).

We request the Greys River Ranger District evaluate the hill climb proposal to assure it is consistent with the theme and management emphases of both the DFC 12 and 10 management prescriptions. Our interpretation of the LRMP indicates a snowmobile hill climb on National Forest Systems lands designated DFC 12, 10 and crucial wildlife winter ranges will be in conflict with the management prescription by displacing wildlife into areas unsuitable for winter survival.

2. RE: Management Standards. Two management standards could be violated as a result of the proposed snowmobile hill climb. The first, Habitat Effectiveness Standard (p 124,

LRMP) states "non-motorized and motorized vehicle access will be regulated either seasonally or year-round to protect such important big game habitat components as primary feeding areas, crucial winter ranges, calving/fawning/lambing areas, big game rearing areas, rutting complexes, and big game migration corridors." We believe this standard could be violated because crucial winter ranges will not be protected if the hillclimb is approved.

The second standard, Big Game Winter Range (p 124, LRMP) states "human activity and disturbance in crucial big game winter range will be restricted from November 15-April 30 if big game are present in the area...". The hillclimb, as proposed, will occur in an area vital to big game during winter months.

The Greys River Ranger District should address both issues to ensure the proposal is consistent with management direction in the LRMP. The analysis should describe, in detail, how the proposed action is consistent with the need to manage human activity and disturbance on crucial winter ranges.

3. RE: Mitigation. If the hill climb is approved, appropriate mitigation measures should be identified and required in the environmental assessment and decision document. Specifically, wildlife displacement, and loss of habitat effectiveness should be identified. The EA and decision document should also acknowledge any departure from the Forest Plan, and the Forest Service should determine if this action requires a forest plan amendment.
4. RE: Alternatives. The scoping document does not analyze alternative sites on National Forest System lands, City of Afton property, or private property. In 1994, the hill climb was held on Town of Afton and private property, and in 1995 the hill climb occurred on private property in The Narrows south of Thayne. The Forest Service should provide an analysis of alternative sites where the hill climb could occur.
5. RE: Mule Deer Population Objectives. The Wyoming Range mule deer herd is currently below the population objective of 50,000 deer. A significant portion of the deer that use

the Greys River and Salt Range during summer and fall use the lower portions of the south, west and southwest exposures of the Salt Mountain Range as crucial winter range (including the area of the proposed snowmobile hill climb). Any deer or other big game animals wintering at, or adjacent to, the proposed hill climb site will be displaced into other areas that may not provide adequate security, thermal, or nutritional demands. These effects may be long-lasting if hill climb participants and other individuals continue to snowmobile on these winter range slopes throughout the remainder of the winter. We believe this proposal could have a significant impact to the local deer herd using the site. Loss of winter habitat effectiveness on these ranges compromises our ability to facilitate a population increase to objective.

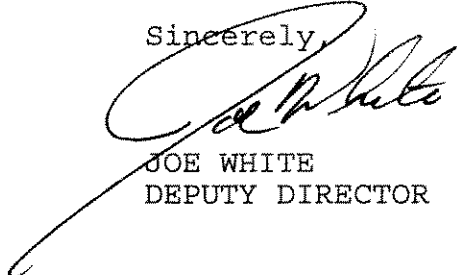
6. RE: Winter Travel Plan. Absence of a viable winter travel plan for the Greys River Ranger District precludes management of motorized recreation on crucial wildlife winter ranges throughout the Greys River and Star Valley area. We recommend that the Greys River Ranger District address this issue by developing a comprehensive document for both motorized and non-motorized winter travel. This will help minimize conflicts in the management and protection of crucial wildlife winter ranges. The document should describe areas and dates where both motorized and non-motorized winter travel are or are not permitted on the Greys River Ranger District. Lack of a winter travel/recreation plan limits the Forest Service's ability to assess the cumulative impacts from this proposal, and may hinder the ability to develop effective mitigation measures. While we are not opposed to the concept of a hill climb or to the community's effort to expand winter recreation opportunities, a plan to minimize resource/user conflicts should be implemented.
7. RE: Cumulative Impacts Analysis. A cumulative impacts analysis should be conducted as required by P.L. 91-190, Sec. 102(2)(c); 40 CFR 1502.1; 40 CFR 1502.16; 40 CFR 1508.7; 40 CFR 1508.8; and other Federal laws, standards, and guidelines outlined in the Bridger-Teton NF LRMP.
8. RE: Travel Management Plan. The proposal should include a winter travel plan for this portion of the Star Valley Front (Swift Creek to Cottonwood Creek) as partial mitigation for the impacts from this event and from the increasing impacts

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associated with human encroachment on crucial wildlife habitat. We recognize the short time frame for the proposed hill climb probably precludes the possibility of including this mitigation measure in the environmental assessment. However, we are very interested in working with the Forest Service, commercial operators, and the various public interests to develop a reasonable solution to the problem that will eventually result in a viable and effective winter recreation and travel plan for the Greys River Ranger District. We are prepared to discuss possible short-term solutions to this problem at the February 6th meeting.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joe White", written over a horizontal line.

JOE WHITE
DEPUTY DIRECTOR

JW:TC:as
cc: Wildlife Division
USFWS