

Mark Foster Environmental Coordinator Shoshone National Forest 808 Meadow Lane Cody, Wyoming 82414

Dear Mark,

These are my comments regarding the Travel Management Plan.

What is special about the Shoshone National Forest is the large expanses of wilderness and roadless areas. This forest should emphasize what is special and unique which includes wildlife, wild places, and roadless areas. This is not the Big Horns or the Black Hills National Forests. The Shoshone should not try to be all things to all users but emphasize what this landscape has to offer. In general, I am not in favor of converting user created routes to NFSR or NFST. Poor signage and lack of on the ground enforcement should not allow motorized use to expand on this forest.

I do not believe creating more routes for motorized travel will increase compliance. On the ground signage, proper barriers, route termination points which are easy to defend, where possible, and adequate Forest Service presence in problem areas, are the best ways to have a manageable motorized recreation program. Forest wide, I do not support expanding motorized recreation into RARE II/Roadless Areas.

Extending dates for OSV has the potential to have negative impacts on wildlife. I would like to see the Beartooth High Lakes protected for its wilderness character and for the rare wildlife species which utilize the area. December 1 to April 30 are more reasonable dates to reduce conflict with wildlife and reduce stress animals when they are the most vulnerable.

The Greybull Ranger District:

Expanding motorized travel on the Greybull District has the potential for resource damage on a district which receives little on the ground presence. The use on this district has increased dramatically in the last decade and staffing has not reflected this increase. Creating new motorized routes in the Cottonwood/Gooseberry area have the potential to increase use and resource damage. Road 218 is extremely steep where it drops down into the Cottonwood drainage. I have ridden horseback down into Cottonwood and have appreciated the quiet solitude of this area. Years ago, there was evidence of motorized intrusion from private property which was never addressed. I can not see increasing activities which cannot be monitored or managed.

Road 202.2C, Gwen Fork of Dick Creek, was closed on the upper end to prevent resource damage and protect wildlife. The Forest spent time and materials to create a defensible barrier. There are other

roads in the area for motorized travel. There was resource damage from multiple tracks created by vehicles in the soft wet riparian meadow.

I strongly support the seasonal closures on this district and through out the Forest. Seasonal closures protect wildlife when they are most vulnerable, provide areas of the forest where nonmotorized recreation can take place, and prevent resource damage to roads during spring thaw. This district and the North Zone need multiple ATV/UTV Rangers to provide the maintenance and handle the numbers of people recreating on the district, especially on the road to Kirwin.

Wind River Ranger District

Since this district has the largest motorized system on the Forest, limited resources should be used to sign, install barriers, and increase on the ground presence. Adding more routes is not going to increase compliance or protect the resource. Adding routes in RARE II/Roadless areas will have significant negative impacts. Adding routes to increase travel in proximity to wilderness boundaries will degrade wilderness. A good example of this is the Road 142 on the Clarks Fork District. The trailhead at the bend in the road overlooks the wilderness. Car horns and other noises associated with a road echo into the wilderness area below. The road proceeded the Wilderness designation but increase use of that road has a serious impact on the wilderness experience today.

Windy Mountain prime example of many areas of this district. Open benches and meadows invite motorized users to head "off road" and once there is a path, others will follow. Years ago, when I worked on the district the philosophy was "only open roads were signed" so if there was no sign, the road or route or track, was not open to motorized travel. How many citations were written for travel on these routes? The MVUM map may be the enforcement tool but, today, how much better is motorized travel being managed and enforced? Increasing motorized travel on the wide-open space of the district is only going to encourage more enforcement issues and more resource damage. There are also the increased conflicts with wildlife due to increased motorized travel. I would suggest a seasonal closure to protect critical winter range. (A good example of route closure in a high open area is Road 207, Phelps Mountain. It is clearly the end of the road, has been in place for years and is respected by the public.)

Warm Springs area with the old tie hack flume, thermal features, rockslides, and other geologic features is a great example of an environment that needs protection. Opening the area to motorized travel increased the risk of damage to cultural features, resource damage, and increase access. Let people ride part way and walk part way to experience this area. What is the cost of new construction on steep slopes and the ongoing cost of maintenance? Wise use of limited maintenance dollars could be spread out across the forest to maintain more stable routs

With state grants, wiser use would be to maintain routes which are lower cost per mile. The routes on the district are not being maintained now nor have they been for many years. Spend state grant money on terminus barriers, adequate signage and well-trained, well-paid ATV/UTV Rangers on the ground. A good Ranger can maintain signs, construct barriers, inform, educate, and enforce travel management rules.

Bear Creek and the East Fork Area use to be the place where no one went. The road into Bear Creek is steep and subject to resource damage. Money could be spent to reroute this road. An extended closure until June 15 would help mitigate damage.

Across the forest I support designating short routes to quality dispersed camping sites.

To sum it up, I have spent many years on the Shoshone National Forest. I many do not travel to all the wild area that I have in the past. I value the wildness and the unique diversity of wildlife this forest has to offer and hope it can be maintained for future generations. I believe there are opportunities for quality motorize recreation, but I do not want to see it at the expense of wildness. There need to be buffers between wilderness and motorized recreation. A new route that sacrifices these areas are unacceptable to me. I would like to see the routes we have improved to prevent resource damage. Better signage, barriers and on the ground presence will provide more quality recreation then extending routes, building loops and opening new areas to motorized travel. Seasonal closures throughout the forest are very beneficial. Extending the OSV season maybe an economic boost for our local communities but may have the long-term affect of reducing spring wildlife viewing which also brings an economic benefit. December 1 to April 30 OSV season makes the most sense. If we can limit recreation on the North Fork of the Wapiti District to protect wildlife, we should be able to protect other areas of the forest from the impact of our use.

I look forward to a successful outcome of Travel Management planning. I understand the effort which has gone into this process. I look forward to seeing a plan the Forest can be proud of and on that will set an example of other forests facing this same task.

Sincerely

Mary Jane Luther

P.S. The Greybull Ranger District is an excellent example of good signage and continual construction and maintenance of barriers to clearly mark closed routes, including user created. Continual maintenance and an on the ground presence are necessary to maintain this standard. A year or two of neglect will result in resource damage and the appearance of unauthorized routes.