



July 26, 2016

Forest Supervisor Joe Alexander
Shoshone National Forest
808 Meadow Lane Avenue
Cody, WY 82414

Dear Joe,

On behalf of the Wyoming Outdoor Council, I appreciate the opportunity to submit scoping comments on the Shoshone National Forest's travel management planning process. Founded in 1967, our mission is to protect Wyoming's environment and quality of life for future generations.

We believe this new travel management planning process will be an opportunity to consider and implement needed changes that will ensure the long-term sustainability of the forest's road and motorized trail system. We share the agency's goal of providing opportunities for motorized users in appropriate locations while safeguarding the wild, backcountry niche the Shoshone occupies in the national forest system.

Accurate baseline information is crucial

An accurate assessment of the current road situation will be essential to the travel management planning process on the Shoshone. This baseline information will be the foundation of a defensible plan that will foster and maintain the public trust. Toward this end, we respectfully ask that you address the following issues.

First, the number of miles of system roads currently in existence on the forest is uncertain. The 2015 forest plan states that there are 1,141 miles of system roads on the Shoshone.¹ The scoping notice for travel management planning states that there are approximately 926 miles of system roads open to the public.² As written, it is not clear whether the 1,141 mile figure includes system roads in existence but "closed to the public," or whether there is simply a discrepancy between the two documents.

Second, the Forest Service's decision not to quantify unauthorized, illegally-created motorized routes gives an inaccurate assessment of existing routes and their

¹ Forest plan at 99.

² Travel Management Scoping at 4.

associated impacts on the ground. We recognize this is no easy task (e.g. new routes could be created at any time, data collection is a moving target, etc.), but a good faith effort to document this baseline information is crucial. Acknowledging these routes and attempting to quantify them in some way—even if approximated and separate from system roads—would better reflect the reality of the situation on the ground. It would also address some of the core concerns of both motorized and non-motorized users. We and our conservation partners believe the decision thus far not to attempt such an inventory is a fixable mistake. Creating a more realistic and accurate inventory would go a long way toward alleviating the current public confusion and frustration with this plan.

Third, there are numerous, well-established, non-system roads on the Shoshone that were not created illegally by users, but instead were likely intended as temporary roads or logging roads.³ On its maps, the Forest Service does not consider these roads “open,” but it has not yet succeeded in closing or decommissioning them. Thus, the roads persist on the ground and their use is commonplace. We understand that travel management planning to date has focused almost exclusively on adding or deleting segments of “open” roads on its Motorized Vehicle Use Map. In response, many have asked the Forest Service to acknowledge the inherent problem in a process reliant on a map that does not accurately reflect the situation on the ground. A MVUM will not be a useful tool—and will garner little public support—if the Forest Service chooses not to address the numerous roads that are “closed” on the map but are in fact open and frequently used on the ground.

A lot of work has already gone into the proposed action, but it is not too late to make these important changes. To ensure the legitimacy of the process, we ask the Forest Service to provide accurate data in order to equip stakeholders (and itself as the decision maker and land manager) with the best available information. In summary, the Forest Service should:

- 1) Clarify and communicate to the public the current number of miles of system roads on the Shoshone;
- 2) Prepare an inventory of user-created routes; and
- 3) Acknowledge and quantify “closed” system roads that are still being used for motorized travel.

This information (i.e. data that reflects the on-the-ground reality) should be incorporated in the Forest Service’s analysis. User-created routes and “closed roads” that are currently being used by motorized vehicles should be added to any inventory of system roads and included in road density analyses for various zones on the Shoshone, water quality analyses and in habitat effectiveness modeling.

³ The Wyoming Wilderness Association—working with other conservation groups and citizen volunteers—spent countless hours and has done an admirable job inventorying many of these roads. We urge the Forest Service to look closely at the data they have collected and submitted.

Meeting the Purpose and Need

One issue we've heard much about from our members and partners is that important aspects of the proposed action do not yet meet the stated "purpose and need" for the project.⁴ The following are two examples of this.

First, we understand that motorized users (especially users who live near the north zone of the Shoshone and who often go to the Bighorn Forest to ride) expressed a desire for loop trails on the north zone. We also know that there are currently no loop trails on the north zone of the forest. In contrast, the south zone has numerous trails and many loops already. We understand the desire of most south zone users is for better signage and enforcement. The proposal then to increase the number of loop trail miles in the south zone fails to meet the desires of either the north zone users (who won't drive to Dubois from Cody to ride) or the south zone users (who don't need or want more trails that the Forest Service is unable to maintain.)

Second, there is significant concern about the proposal to add a new 6-mile route along Line Creek in the north zone (NZ-01). A decision to build this 65-inch wide ATV trail would impose new motorized traffic in quiet ranching and wildlife rich area and would bisect an elk migration route. This route doesn't provide a loop opportunity and because it links to a road, it won't provide "family friendly" riding opportunities for children under the age of 16.

Undoubtedly, the siting of new motorized trails—especially in the north zone where there is such extensive acreage outside wilderness and non-motorized roadless that is managed as primary conservation area habitat for grizzly bears—is a challenge. But it is precisely because the Shoshone is a wild, wildlife-rich, backcountry forest, that the Forest Service should make careful and informed decisions about whether and where to expand motorized use. At the very least, any new proposed motorized routes should wholly meet the Forest Service's stated purpose and need.

Compliance and Enforcement

The proposal would also be improved significantly if the agency were to outline concrete steps to ensure compliance and enforcement. The Forest Service is proposing to demarcate as "closed" some system roads to offset impacts from the authorization of building new routes and connectors. This is a good first step, however, if the situation on the south zone is any indication, closing roads on a map—without taking the necessary steps to obliterate, physically obstruct, adequately sign and consistently enforce closures—does little to ensure motorized use will not occur on these closed roads. The result, as currently written, would likely be a net increase in motorized routes—along with the associated impacts to wildlife, water and air quality and native vegetation.

⁴ We support the more detailed comments that Wyoming Wilderness Association, Greater Yellowstone Coalition and Sierra Club have submitted that provide additional examples.

On a related note, we appreciate the Forest Service assembling a group of diverse stakeholders to address unauthorized motor vehicle use on the Shoshone. We understand the “Compliance Working Group” has made recommendations. We urge the Forest Service to implement these as soon as possible, e.g. establishing physical barriers to “closed” roads and staking adequate “closed” trail signs and sufficient markers (road numbers that correlate to the MVUM) for open roads. These are common sense steps that implement the recently revised forest plan. Because these measures are contemplated in the forest plan, the Forest Service should implement them now—there is no reason to wait until the conclusion of the travel management planning process.

Conclusion

We appreciate the opportunity to provide these brief comments. The wild character of the Shoshone National Forest is an asset and a rarity. It’s what makes the Shoshone a national treasure. In order to safeguard its wild character now and for future generations, we ask the Forest Service to be deliberate and thorough in its travel planning process.

Thank you for your consideration.

Sincerely,



Lisa D. McGee

