



Comments sent via email to: travel_management_comments@fs.fed.us

July 27, 2016

Shoshone National Forest
Rob Robertson
Washakie District Office
333 East Main Street
Lander, WY 82520

RE: Scoping Comments to the Shoshone National Forest's Proposed Action for the Travel Management Plan Environmental Impact Statement

Mr. Robertson,

Please accept the following comments on behalf of Trout Unlimited (TU) to the Shoshone National Forest's Proposed Action for the Travel Management Plan Environmental Impact Statement (EIS). Trout Unlimited offers these comments based on our collective interests and use of the Shoshone National Forest (SNF), and knowing what an important national, regional and local role this Forest plays in its recreation, fish and wildlife, economic and cultural contributions.

Trout Unlimited is a private non-profit national conservation organization that has more than 150,000 members nationwide dedicated to conserving, protecting and restoring North America's coldwater fisheries and their watersheds. Since 1959, TU has dedicated staff and volunteers working toward the protection of sensitive ecological systems necessary to support robust native and wild trout populations in their respective ranges. We recognize the high value of public lands and the role public lands play in providing habitat to coldwater fisheries, drinking water and wildlife habitat.

In Wyoming, TU has approximately 1,700 members and 11 state chapters whose members actively participate and enjoy the many resources the SNF offers. Two of our chapters (the Popo Agie Anglers and the East Yellowstone Chapters) are located in Lander and Cody and directly benefit from the wonderful attributes of the SNF. In addition to our staff members, our volunteer members have contributed countless hours on this Forest, working on river and stream restoration projects, trail maintenance and teaching youth and families the value of our watersheds. There are few places of more importance for fishing and hunting and general recreation for our membership than the SNF. There are also few issues as critical to the conservation of our wildlife, their habitats, and maintaining our outdoor traditions as travel planning on our public lands. Thus, we offer our scoping comments as a continued and concerned participant in the overall SNF planning process.

General Comments about the Plan

Trout Unlimited understands the importance of addressing the myriad of issues associated with public use of the national forests and we appreciate the SNF's plan to manage the use of motorized vehicles on our public lands. Trout Unlimited works with partners to find a balance between quality motorized recreation and healthy fish and wildlife resources. We clearly understand the significant concerns and issues identified in the Shoshone National Forest Final Forest Plan (FEIS) and Record of Decision (ROD May 2015). As discussed in the FEIS, several defining issues have surfaced since the original 1980's motorized use designation on the SNF:

- Resource damage and wildlife considerations
- Conflicts between motorized and non-motorized users
- Unauthorized use on closed roads and trails
- Quality of recreational experience

As an organization with members who both fish and hunt, we are impacted by all four of the stated issues. Motorized vehicles can degrade streams and aquatic habitats while displacing deer, elk, moose and other wildlife species, reducing the effectiveness of their habitats. Excessive motorized routes can reduce the quality of an outdoor experience, particularly in the backcountry areas so iconic of the SNF. Finally, illegal and irresponsible off-road vehicle (ORV)¹ use can ruin a stalk on big game, diminish secure habitat areas, cause new resource damage issues, and create a poor reputation for responsible OHV use.

Trout Unlimited is a vital member in a partnership called Sportsmen Ride Right (SRR) which is (www.tu.org/connect/groups/sportsmen-ride-right) an educational effort to promote ethics among the motorized sportsmen and sportswomen community. We believe that most sportsmen and women ride their ORVs responsibly and stay on authorized trails and roads. The SRR effort supports those individuals to be representative of the responsible use of ORVs and helps rein in those who create illegal and unauthorized trails and cross-country motorized travel on our public lands. Our members are users of motorized vehicles on public lands to access quality fishing and hunting opportunities and recognize the privilege of ORV use on our public lands. As such, we recognize that there are places where motorized vehicles are simply not appropriate and places where riding could and should be encouraged by land management agencies.

We value the unique aspects of the SNF, from its northern more primitive zone near the towns of Cody and Meeteetsee, to the southern end of the forest where more heavy ORV use occurs. The northern portion of the forest, comprised of the Clarks Fork, Wapiti and Greybull ranger districts, have long held the reputation as a "horse forest" where big wilderness experiences using pack stock are traditional, long-standing uses that should remain unimpeded. This type of forest use in this portion of the forest is unique among many of the western states and thus expansion of motorized use should be carefully considered and the cost of expanding such use weighed judiciously.

We also recognize forest managers are balancing many uses on an ever-increasingly popular piece of land. Expansion in the types of motorized vehicles and their use on forests across the country has increased markedly in the last decade. Working with partners, state and federal agencies, conservation organizations

¹ For purposes of our discussion, unless particularly referenced, off-road vehicle use will collectively be referred to as ORV. We do recognize that to a motorized user, OHV, ORV, ATV, and UTV all have different meanings.

and local businesses will need to find a balance between quality motorized recreation and healthy fish and wildlife resources.

Trout Unlimited commends you for moving forward with a designated route system for motorized vehicles and we applaud your efforts to bring surety and balanced management to our public lands. We believe strongly that a designated motorized route system that eliminates motorized cross-country travel is essential to public lands management. Designated routes for motorized vehicles not only protects habitat for fish and wildlife, they also prevent user conflict and give public land users options to choose their experience.

Fisheries and Aquatic Concerns

Of particular interest to TU, as it relates to motorized vehicle use on the Shoshone, are areas where highly erodible soils threaten spawning habitats, aquatic invertebrates and populations of wild and native fish. The highly erodible soils that led to significant fish kills on the South Fork of the SNF several years ago are not unique to that particular drainage of the forest; indeed much of the forest has the same unstable soils (Absaroka volcanic) from the southern end of the Absarokas north to the Montana line. Washouts are common and part of the geologic nature of the area. We are concerned that expansion of motorized use or conversion of single-track motorized trails into trails accommodating 50-inch wide or greater vehicles in these areas could be contributors for further impacts to streams and rivers and we urge the Forest to evaluate any increased motorized access in some of the more fish-sensitive streams.

Drainages in the Wood, Greybull, North Fork Shoshone, South Fork Shoshone, Crandall Creek and Clarks Fork in the North Zone of the forest are of high concern to TU. These streams and rivers are vital native trout fisheries harboring significant populations of Yellowstone cutthroat trout (YCT) in addition to providing and supporting a crucial recreation economy to local communities. Many of these streams contain blue ribbon and red ribbon recreational fisheries for rainbow and brown trout. Local businesses depend on the long-term health of these fisheries for their economic success. Expansion of roads or construction of new roads for motorized use in these areas should be carefully considered and include plans for reducing any type of erosion potential that could harm long-term fisheries in this area.

The Shoshone River and the Wind/Bighorn River drainages have historically supported large interconnected core populations of YCT. However, today many of these populations have been cut off from their historic habitat and no longer support a migratory life history. The Wind, Greybull and Shoshone rivers drain the headwaters of the Wind/Bighorn River and support pure populations (genetically unaltered with less than 1% introgression) of YCT ("*Developing a Diverse Conservation Portfolio for Yellowstone Cutthroat Trout*" Trout Unlimited, 2011). Many of these populations have extents of only a few miles and do not meet persistence criteria; in other words, they remain vulnerable.

The SNF (through its regional office) is signatory to the *Conservation Agreement for Yellowstone Cutthroat Trout*.² This Conservation Agreement (Agreement) was developed to expedite implementation of conservation measures for YCT as a collaborative and cooperative effort among resource agencies. Threats that warrant YCT listing as a special status species by state and federal agencies and which could lead to listing under the Endangered Species Act (ESA) of 1973 will be eliminated or reduced through

² Range-wide YCT Conservation Team. 2009. Conservation Agreement for Yellowstone cutthroat trout (*Oncorhynchus clarkii bouvieri*) in the States of Idaho, Montana, Nevada, Utah and Wyoming. Montana Fish, Wildlife and Parks. 2010.

implementation of this Agreement. The goal of this Agreement is to ensure the persistence of the YCT subspecies within its historic range, manage to preserve genetic integrity and provide adequate numbers and populations to provide for protections.

Updates to the 2007 Range-wide Status Assessment³ are underway and will include updates to previously identified opportunities for population restoration and expansion opportunities. Habitat conditions are part of the variables considered and specifically address habitat quality of stream and river segments. We encourage the Forest to evaluate any new road and trail construction for motorized travel where YCT populations exist. Effects to fisheries, containing both native and wild trout, including streams with conservation populations of YCT, should be avoided and minimized.

The majority of YCT currently occupied habitat in Wyoming is located on Forest Service lands and includes 2,124 miles (2006) including wilderness. The SNF contains the majority of YCT habitat. The 2007 Status Assessment indicated that a significant number of conservation populations of YCT (40%--over all five states) had no specific conservation management actions implemented to improve conditions for the populations. Management of impacts from roads was included in the parameters identified. We encourage the SNF to provide a current assessment on the impacts roads and trails are having on those streams containing YCT populations and where ORV use appears to be impacting these streams, the Forest should include specific management guidelines to improve stream conditions.

Finally, most YCT populations are managed as “conservation populations” with additional management emphasis being placed on conservation or preservation as the primary management focus. They are also considered game fish by WGFD as well as other federal agencies that have management authority of this subspecies. Thus, secondary emphasis is placed on recreational public use which does have economic importance, as previously mentioned. We urge the Forest to keep this in mind during the plan development process.

Specific Comments for Summer Travel Management

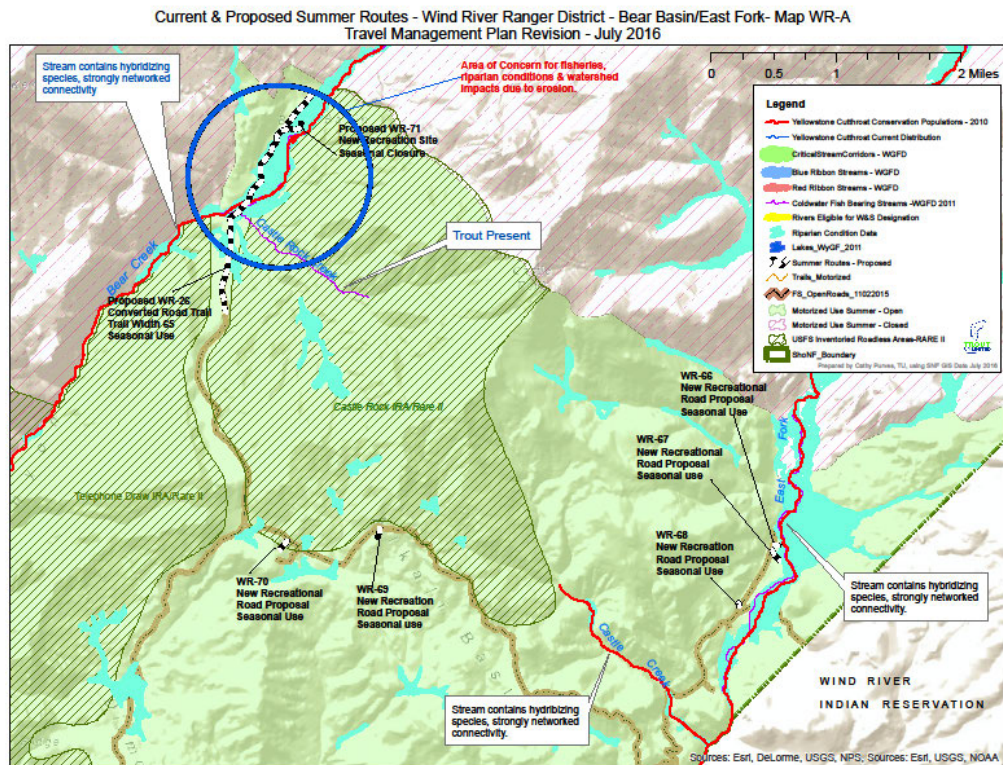
1. Wind River Ranger District:

- **Bear Basin/East Fork: *Proposals WR-26/WR-71 and Proposal WR-66 to 68 (map)***

Bear Creek contains conservation populations of YCT and is identified by TU as a potential Area of Concern for fisheries, riparian conditions and watershed impacts due to erosion. East Fork and Castle Rock Creek also contain conservation populations of YCT in addition to other trout species (WGFD 2011). Strong connectivity is provided in this drainage and should not be hampered. Bear Basin is also recognized for its prime elk hunting opportunities. Resource damage is most likely to occur based on timing of snowfall and big game hunting seasons.

We believe moving to lighter vehicles (allowing 65-inch wide vehicles) in this area will not sufficiently reduce the impacts to fisheries, riparian and wetland areas, since the act of opening it up to larger vehicles will not limit continued use by other smaller OHVs. Thus, it is difficult for us to imagine how the current resource damages will be minimized. In addition, this area is hard to enforce unauthorized use, regardless

³ Range-wide Status Assessment for Yellowstone Cutthroat Trout (*Oncorhynchus clarkii bouvieri*): 2006. March 2007.



of vehicle type, and is often a symptom of high value dispersed campsites in these semi-remote forests. **Recommendation:** The Scoping Document states (Table 7: Rationale for Change) that creating a motorized trail for 65-inch wide vehicles will potentially reduce current impacts to the riparian and wetland areas. Trout Unlimited would like the Forest to provide information that supports this statement. Should the Forest consider the construction of water diversions and fish sensitive stream culverts to keep the road in better shape and vehicles out of the streambed, TU supports this. However, such an increase in road development consequently requires an increase in maintenance and enforcement and we hope the Forest is prepared to adequately provide for this proposed change. We encourage partnerships among ORV users, the SNF, Wyoming Game and Fish Department (WGFD), and conservation organizations to develop a strong conservation and restoration plan for this section of Bear Creek in order to repair and minimize further damage.

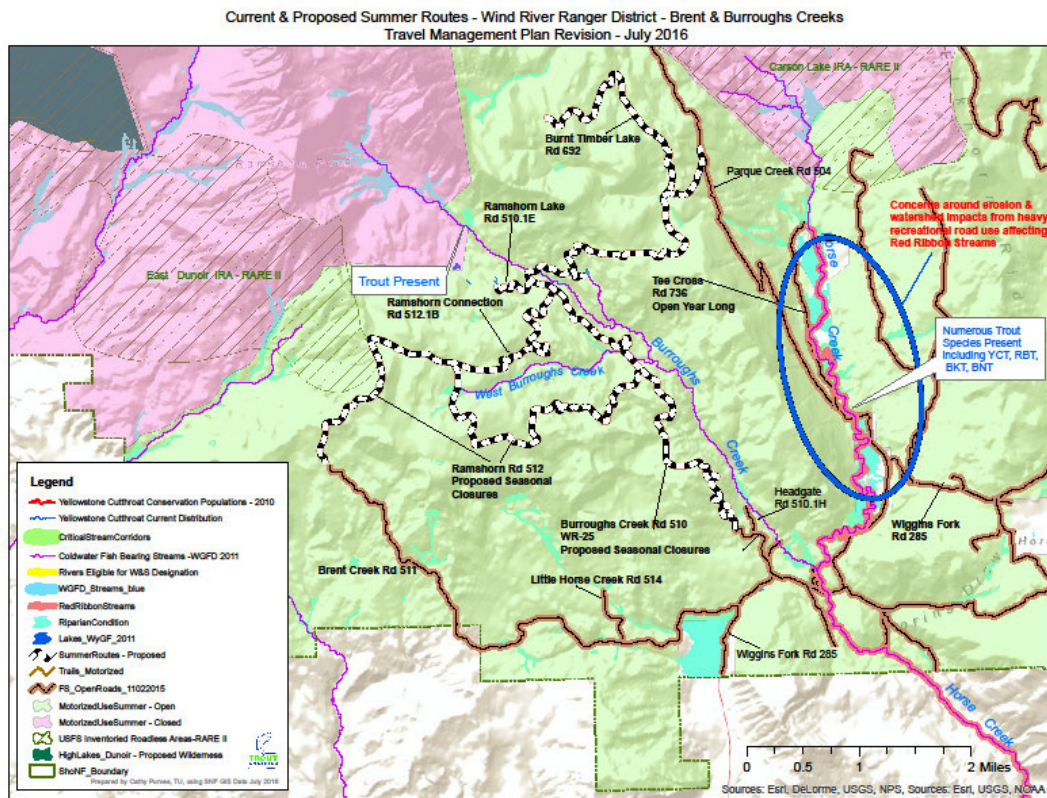
- **Bear Basin/East Fork: *Proposal WR 69 to 70 (map above)***

Trout Unlimited is concerned about the impacts on the character of the two Rare II or inventoried roadless areas (IRAs) that the wider road and potentially increased traffic will have, especially with the addition of new camp sites. Castle Rock IRA and Telephone Draw IRA are nestled against these proposed dispersed camping sites. Much of the area is spring fed with wet meadows and rolling mountains. Heavy illegal off-road use is evident, especially during the fall hunting season. **Recommendation:** The SNF should address enforcement and monitoring actions that will be implemented should these proposed changes occur.

- **Brent and Burroughs Creeks: *Proposal WR-25 (map)***

Trout Unlimited supports the seasonal closure proposal in order to prevent further meadow and road deterioration.

Horse Creek is a Red Ribbon Stream containing populations of YCT, rainbow trout, brown trout and brook trout. Tee Cross Road 736 is open year-round and may be contributing to concerns around erosion and watershed impacts from heavy recreational road use affecting this stream.

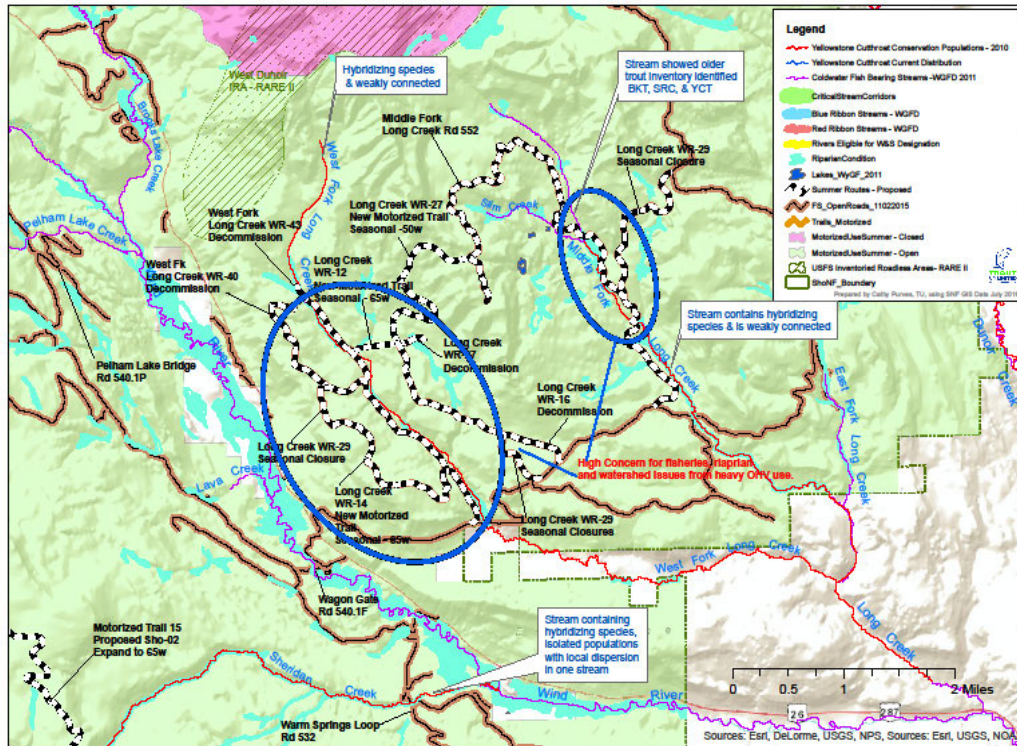


Recommendation: We recognize its value for recreation of all kinds and recommend the Forest implement an informative sign kiosk or several smaller signs along road and stream crossings to provide the public with information on the importance of these streams, riparian areas, and big game habitat.

▪ Long Creek: Proposals WR-12, WR-14, WR-16, WR-27, WR-27a, WR-29, WR-40, WR-43 (map)

This popular fishing, hunting and general recreation area is located conveniently off Highway 26-287, thus making access very easy. We support the proposed closure changes as it will provide needed protection for an overly “loved” area. Creating a large loop for motorized vehicles will help disperse traffic somewhat more efficiently as well as provide more ORV opportunity. As viewed on the map, West Fork Long Creek, Middle Fork Long Creek and Long Creek contain conservation populations of YCT. These streams are important spawning areas for YCT, providing clean and clear water from their headwater sources. OHV road impacts can damage these spawning areas, eventually affecting trout populations. Maintaining these streams as conservation population areas remains a priority and considerable restoration work is needed on some of these streams due to the increased hybridization of YCT with other trout species.

Current & Proposed Summer Routes - Wind River Ranger District - Long Creek
Travel Management Plan Revision - July 2016



Recommendation: Opportunities exist in this drainage for restoration proposals in the spirit and management recommendations of the YCT Agreement. There is increasing concern for riparian and watershed impacts from heavy, concentrated recreational road use in this area, thus we believe the identified road closures are necessary for the health of this native fish and its habitat stability.

- **Pelham Lake MT10 – Proposal SHO-02**

The current Motorized Trail (MT) off Moccasin Basin Rd 537 crosses riparian areas that have been identified as Functioning at Risk or in Poor Functioning Condition by several agencies. Increasing this MT width to 65-inches will allow more access to the area by vehicles and the health of these riparian area crossing may be of concern, especially during the wet season. While we recognize this opportunity to provide for the larger vehicle access, we do have concerns about the status of the current riparian conditions. Without addressing these problems caused in part from current ORV use, increasing the route width without consideration toward amending these riparian issues appears to only lead to greater problems in the future, and at a considerable cost. **Recommendation:** The SNF should address (in the EIS) how the forest will handle increasing road maintenance, monitoring and enforcement.

- **Warm Spring Mountain – Proposals WR-07 and WR-13**

This popular ORV road will benefit with the addition of a loop system. However, TU would like to address the fact that Warm Springs Creek, Wildcat Creek and Kitten Creek riparian areas have been identified as Functioning at Risk and in Poor Functioning Condition. **Recommendation:** Road management actions should be increased to prevent erosion, especially since Warm Springs Creek is an identified river eligible for Wild and Scenic designation in the Final SNF Plan.

- Wind Mountain/Union Pass: **Proposals WR-11, WR-20, WR-55, WR-75, WR-76**

The decommissioning and closure of WR-20 Union Pass spur and WR-55, the Spruce Creek Road, is supported by TU due to these roads occurring inside two IRAs (Warm Spring Creek and Bench Mark IRAs). Closure of these two roads should help some of the unstable riparian conditions identified by SNF and WGFD biologists. Both Spruce Creek and Little Warm Springs Creek riparian corridors are identified as Functioning at Risk and in Poor Functioning Condition. **Recommendation:** Road management at the stream crossings on Wildcat Road 554 should be increased to prevent erosion. Since this popular ORV use area receives considerable traffic, heightened enforcement must be considered in the SNF's planning objectives.

2. Clarks Fork Ranger District

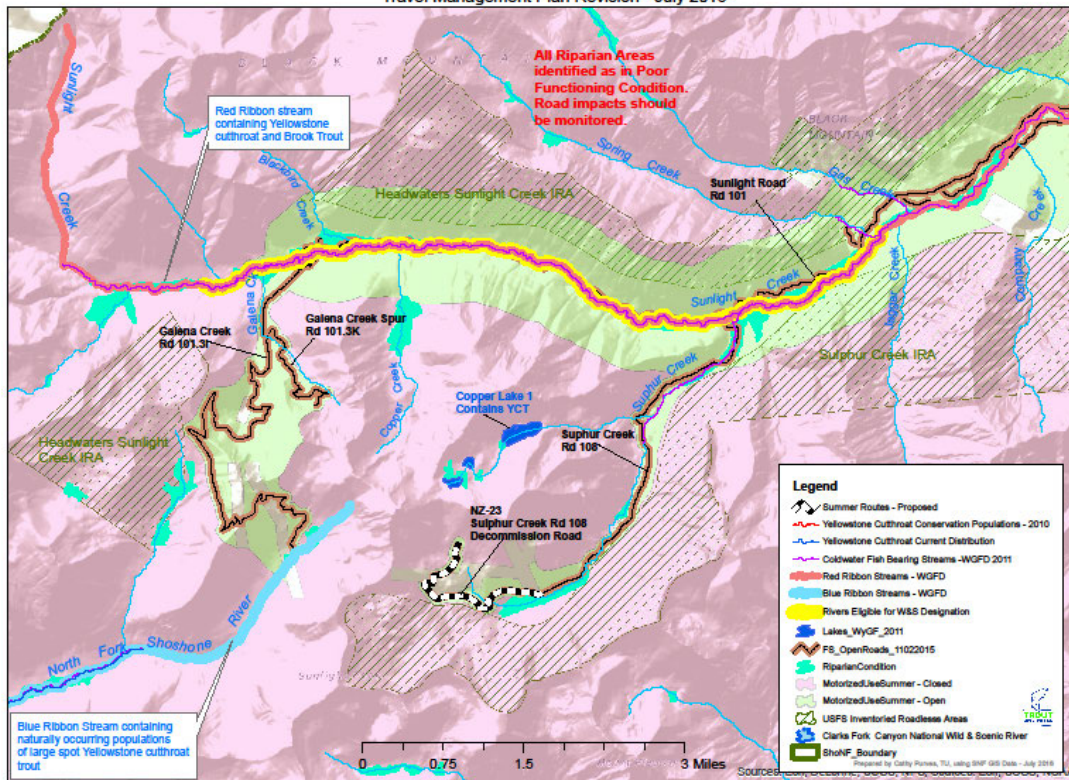
- Line Creek/Littlerock Creek: **Proposals NZ-01, NZ-20, NZ-30**

Trout Unlimited supports the seasonal closure recommendations along the Line Creek-Little Rock motorized trail route. Protecting the integrity of the South Beartooth Highway IRA is important in maintaining its backcountry wildness, its high habitat value for grizzly bears, bighorn sheep and elk, and its watershed values to lower stream reaches. **Recommendation:** This high elevation open country lends itself to its popularity with OHV users. With the increase road width to 65-inches, we recommend the SNF consider construction of a bridge crossing Bennett Creek similar to the one currently on Littlerock Creek. This will help remediate some of the secondary erosion issues that are possible from the crossing of Bennett Creek without a bridge.

- Upper Sunlight – **Proposal NZ-23 (map)**

This basin area contains important watershed and grizzly bear concentration value to Sunlight Creek and Sulphur Creek drainages. Two IRAs exist within this canyon (Headwaters Sunlight Creek IRA and Sulphur Creek IRA) and significant watershed and riparian impacts are evident along numerous drainages. Identified as one of the more popular motorized routes in the northern end of the SNF, part of its popularity is due to the significant fisheries. Closure of the upper portion of Sulphur Creek road is supported by TU as it should help minimize the erosion activities that are impacting the riparian areas. The streams in this area (Galena Creek, Copper Creek, Sulphur Creek, and Gas Creek) are important for providing clean water to the downstream Red Ribbon Sunlight Creek trout stream. This portion of Sunlight Creek is also an eligible river for a Wild and Scenic designation under the new SNF Forest Plan FEIS/ROD. We recommend management prescriptions for this area to remediate the riparian conditions which are currently identified as in Poor Functioning Condition. Finally, the Copper Lakes are popular places with OHV use, but more predominately with pioneering illegal ORV use accessing the Lakes by coming over the top from the Copper Creek drainage. There are a number of new illegal trails in this area. **Recommendation:** Trout Unlimited proposes that stronger enforcement be included in this particular proposal in an effort to highlight responsible OHV use and engage those local alliances that wish to continue ORV use in this area.

Current & Proposed Summer Routes - Shoshone NF - Clarks Fork Ranger District - Upper Sunlight
Travel Management Plan Revision - July 2016



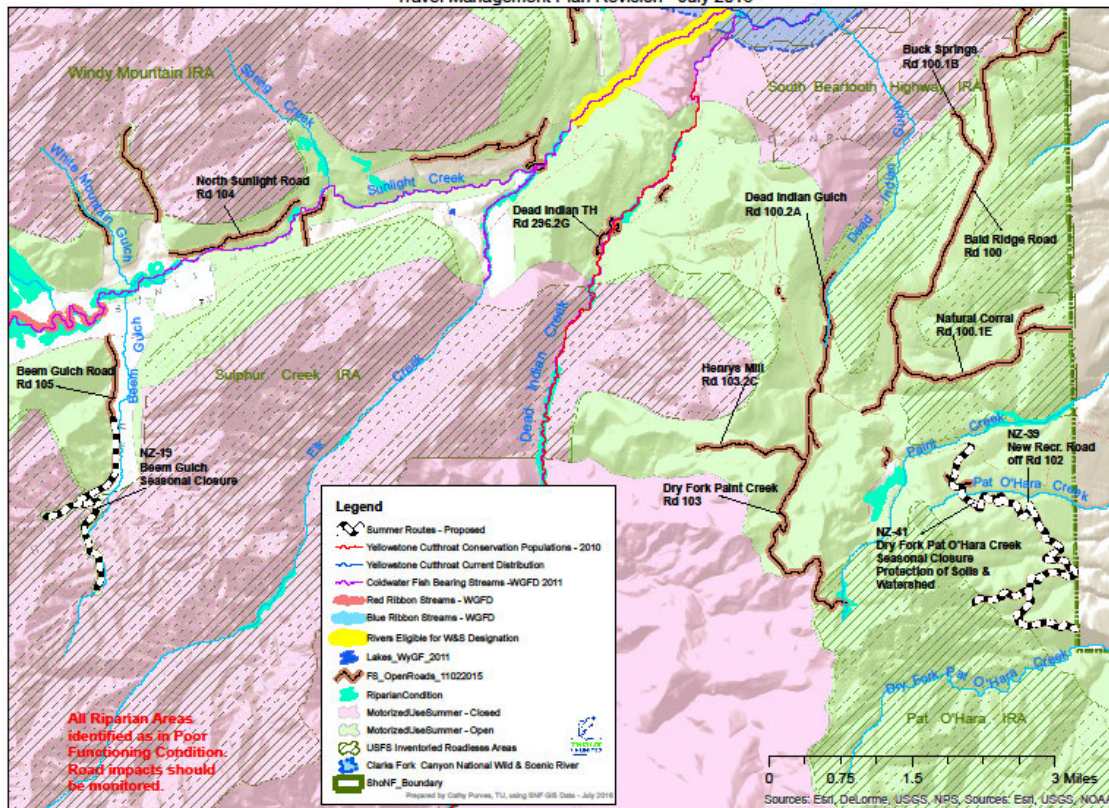
- **Morrison Jeep Trail – Proposals NZ-03, NZ-38**

Due to the limited amount of motorized trail access in the North Zone area, TU supports the proposed NZ-03 (gate re-establishment) for the Morrison Jeep Trail. The ORV user group in the Cody area maintains this road and engages in responsible ORV use. The bigger concern for TU is the siltation and riparian conditions existing along the Clarks Fork of the Yellowstone and along Russel Creek. **Recommendation:** Trout Unlimited recommends the SNF provide some prescriptive management actions to address these long-term impacts to this section of the Wild and Scenic River.

- **Beem Gulch/Dry Fork Pat O’Hara: Proposals NZ-19 and NZ-41 (map)**

Trout Unlimited supports the seasonal closures identified for Beem Gulch and the Dry Fork Pat O’Hara Creek. In addition, we would recommend an increased monitoring presence on the impacts this road is having downstream into Sunlight Creek. The confluence of Beem Gulch and Sunlight Creek no longer provides Red Ribbon trout fisheries. The very narrow bands of access for both Beem Gulch spur roads border on crossing into non-motorized areas. **Recommendation:** In addition to seasonal closures, TU recommends closing the trail to motorized use at the Sulphur Creek IRA boundary. We also recommend closing the small section of road that goes into the Pat O’Hara IRA.

Current & Proposed Summer Routes - Shoshone NF - Clarks Fork Ranger District - Beem Gulch/Dry Fork Pat O'Hara
Travel Management Plan Revision - July 2016

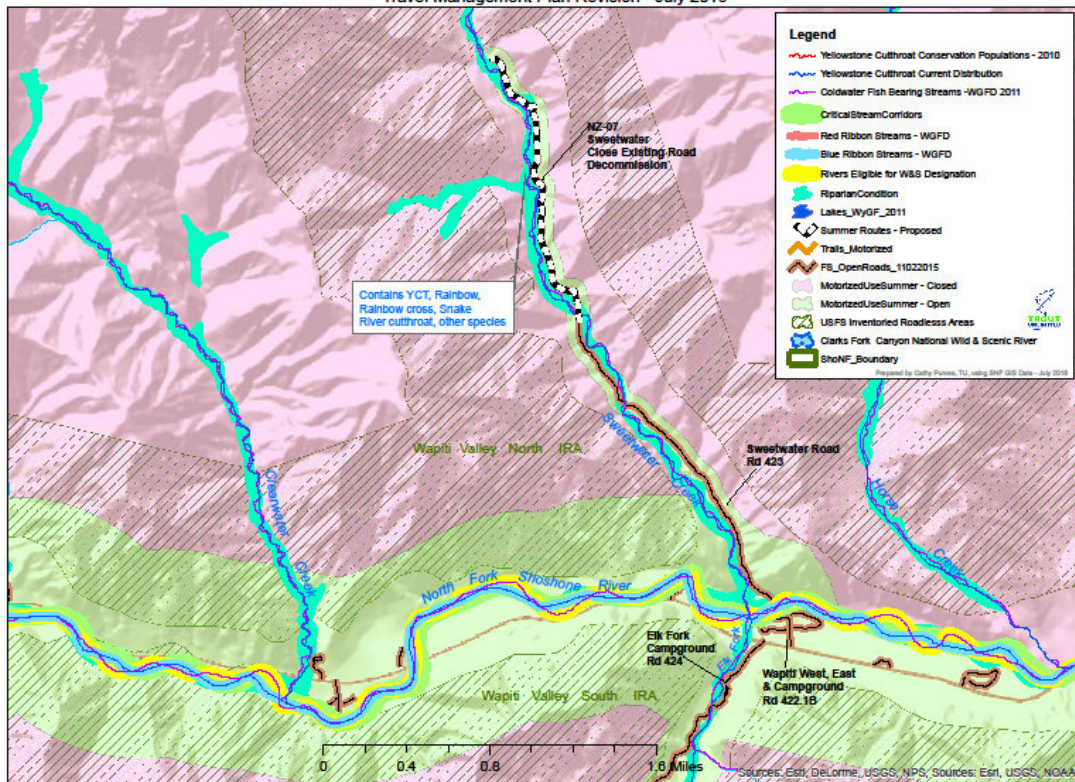


3. Wapiti Ranger District

- Elk Fork & Sweetwater: **Proposal NZ-07 (map)**

The dynamic nature of Sweetwater Creek and its geology typically creates annual washouts along the stream bed where the road crosses the creek. Bedrock is now exposed where the road crosses this creek. Despite the significant riparian issues that are in poor functioning condition, TU believes this section of road should not be closed. We believe solutions can be found to remediate the current problems. In addition, Sweetwater Creek provides excellent spawning gravel and is a good incubation area for trout. Both the Sweetwater Creek and the North Fork of the Shoshone River are very popular fisheries with the public. The North Fork of the Shoshone River is a Blue Ribbon fishery and fishing is good and very popular with residents and nonresidents alike. This stretch of the Shoshone River has been identified as a critical stream corridor by WGFD. Much of that is due to the high level of siltation and erosion issues, experienced by the drainages off Clearwater, Sweetwater and Horse Creek. In addition to the high fisheries value this drainage provides, it is also an important mule deer hunt area. Deer frequent this area and ease of accessibility make it very popular with the public. **Recommendation:** The road should be fixed and proposals for creating a long-term crossing should be included in the SNF management prescriptions. The SNF should consider this watershed a high priority for trying to resolve the significant issues and involve numerous partnerships willing to help with this problem.

Current & Proposed Summer Routes - Shoshone NF - Wapiti Ranger District - Elk Fork & Sweetwater
Travel Management Plan Revision - July 2016



4. Washakie Ranger District

- Little Rock Creek: **Proposal WK-10, WK-31**

Creation of a new motorized loop road with a 50 inch width should include a bridge over Rock Creek due to the riparian condition within the entire watershed area. Most of the area has a rating of Poor Functioning Condition and part of that condition can be attributed to the numerous low water crossings at the numerous creeks in the area. The early gold mining history in this area also contributes to Rock Creek’s function challenges. If bridges are outside of the budget for this particular area, fish-friendly culverts should be installed to maintain flow, minimize erosion, and provide ORV access without compromising important stream functions. We support the seasonal closure changes though we understand the immense popularity of this open country over South Pass.

- Mount Arter/Cony Basin: **Proposals WK-01, WK-19 and WK-26**

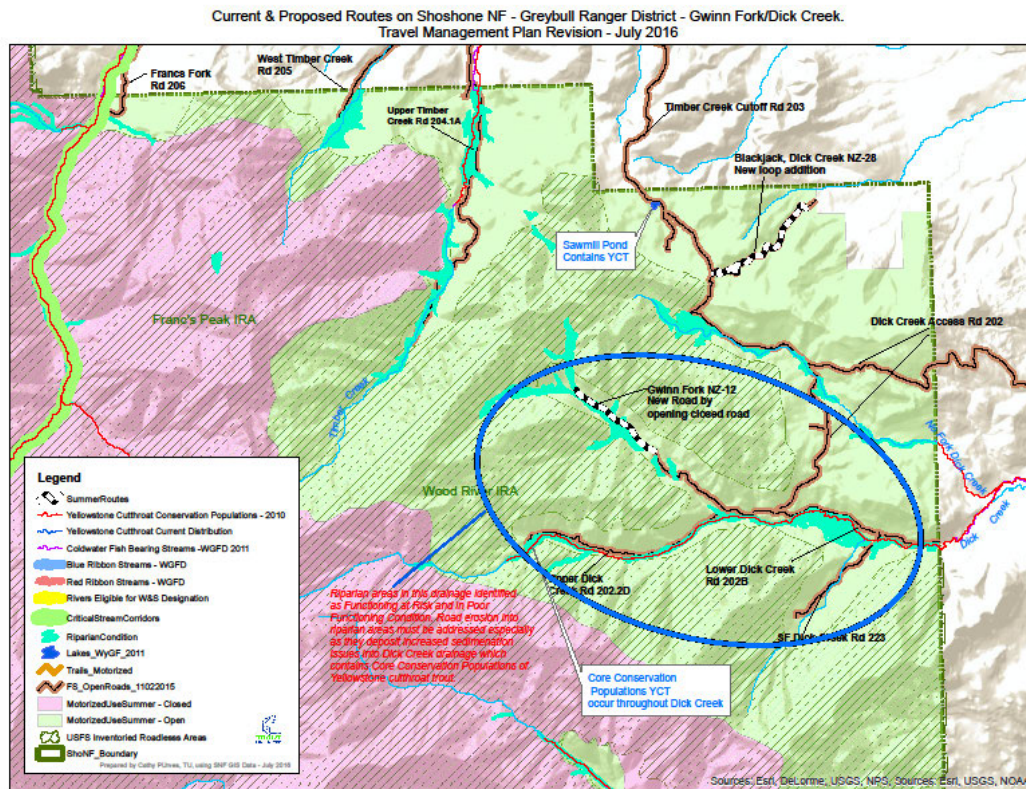
While the idea of supporting the decommissioning of the Shoshone Basin Road from a motorized to non-motorize road is enticing, we are concerned about the implications from a management standpoint and the idea of a new road into an IRA from a roadless standpoint. This general area has many roads currently crossing through the Middle Fork IRA, some illegal, and all highly popular with locals from the communities of Lander and Riverton. It’s a stretch for TU to consider adding new roads into IRAs and though we may consider the Pete’s Lake Road loop access, our bigger concern is the Cony Basin Road proposal with almost 3 miles of new road through the IRA. Creating a new 50-inch motorized trail through the Middle Fork IRA appears to be counterproductive, especially when the current Shoshone Basin Road is established and well-known. We are concerned about enforcement and user conflict by current non-motorized users who frequent this part of the forest. **Recommendation:** Given the riparian conditions in this portion of the

proposal (Poor Functioning Condition) we would like to see the SNF provide reasoning and management implications for making this recommendation.

5. Greybull Ranger District

- Gwinn Fork/Dick Creek: Proposals NZ-12 and NZ-28 (map)

Trout Unlimited worked hard to prevent increased motorized use into the Wood River and Franc’s Peak IRAs during the SNF plan revision process. We were pleased when our objections were listened to and resolved appropriately, leaving motorized access out of these two valuable IRAs. We are concerned with the



proposal for the Gwinn Fork Road to open up a previously closed road in an area that has strong riparian condition issues and is key big game habitat. The Gwinn Fork drains into Dick Creek which is a YCT core conservation stream. Though the Scoping comments state there are little resource issues, we disagree. Erosion and siltation issues

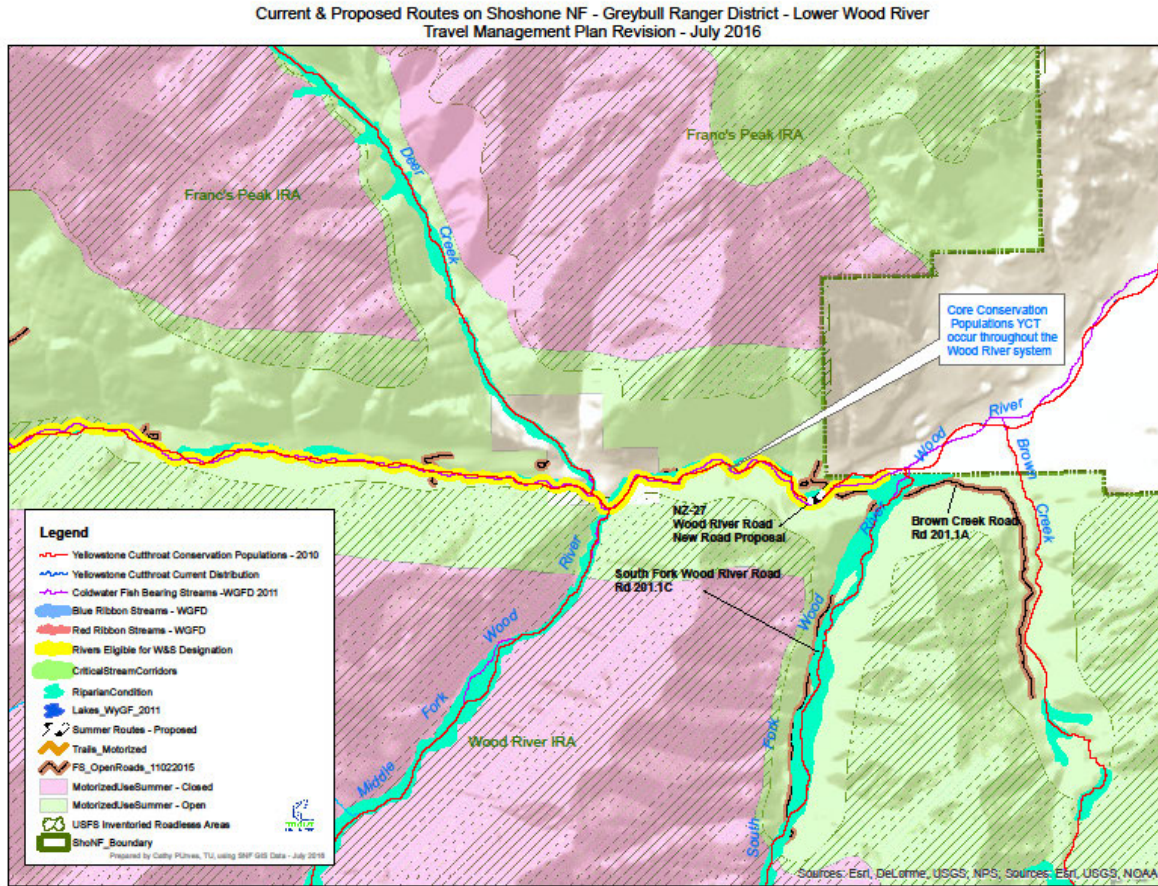
can increase with this road expansion. The riparian status condition currently has been identified by agencies as Functioning at Risk and in Poor Functioning Condition. Increased ORV use will only exacerbate the continuing situation. We appreciate the need for additional ORV road options but in this particular drainage we do not support the road expansion. In addition to its impacts to YCT streams, this area is also a prime area for early season elk bowhunting. And study after study indicates, motorized vehicle use impacts big game distribution. Most likely, elk will be dispersed once this area opens up for motorized use.

Recommendation: We recommend the SNF provide a thorough review of the Gwinn Fork area and how enforcement, remediation and protection of the fisheries and wildlife habitat will be undertaken. The proposal for Blackjack-Dick Creek NZ-28 is supported by TU as it provides a valuable loop alternative and options for accessing new country and dispersed recreation.

- Lower Wood River: Proposal NZ-27 (map)

The addition of a new spur road for camping purposes poses no problems for TU; however, the campsite is situated along the Wood River and should be evaluated for any increased sedimentation issues that arise from crossing the river. Currently the riparian area within this river stretch is identified as in Poor Functioning Condition. This stretch of river contains core conservation populations of YCT and has been

identified as a river eligible for a Wild and Scenic status. **Recommendation:** In order to meet the objectives and guidelines for both the YCT Agreement and the Wild & Scenic status, we ask the SNF to review this location in order to make sure the best possible scenario can be provided for a recreational camping experience without compromising the high attributes of the Wood River.



- Corral Creek: **Proposal NZ-42**

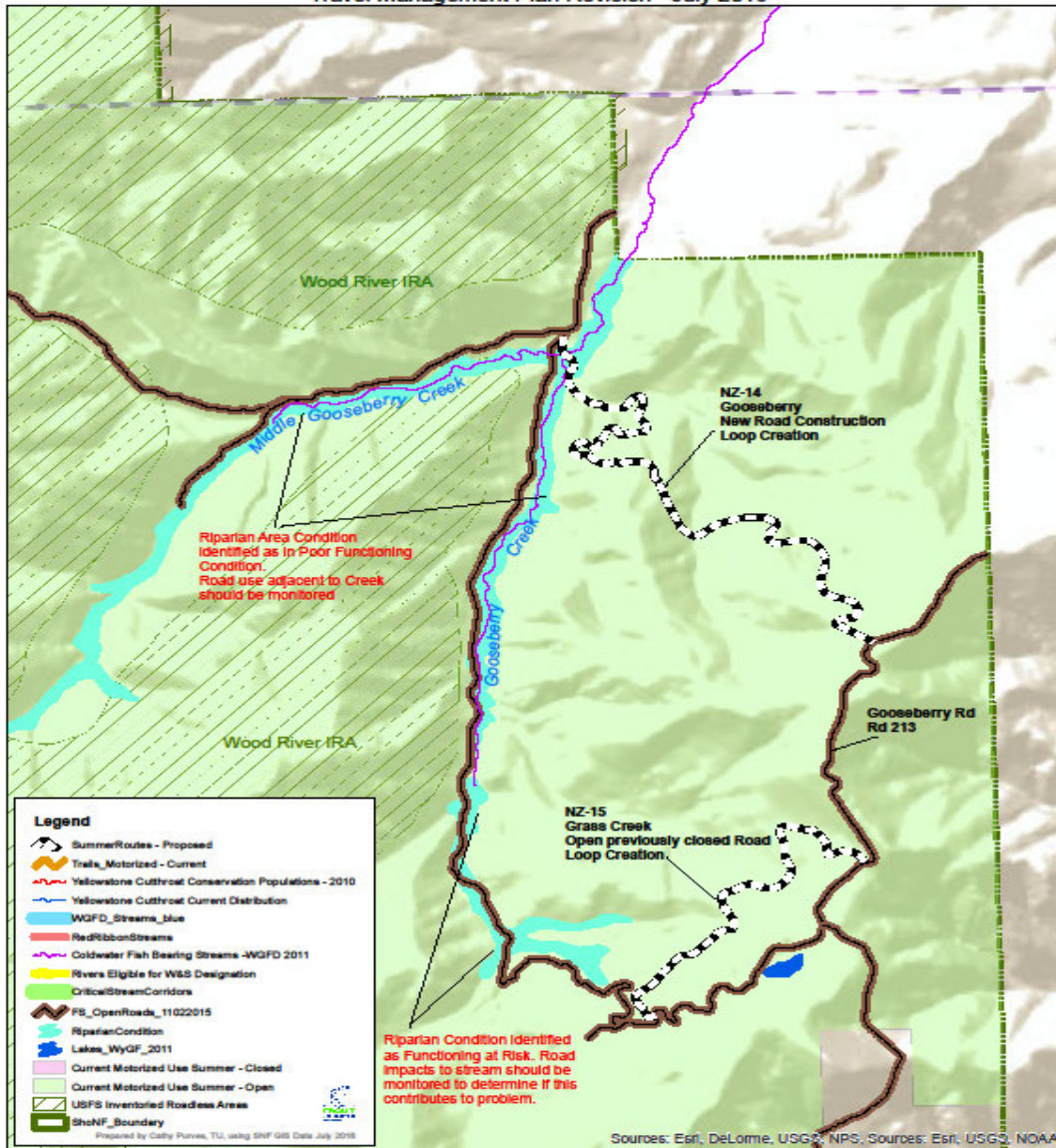
Though not identified in the Scoping Document, NZ-42’s location includes portions of the road, identified as a Motorized Trail, within the South Fork IRA. Trout Unlimited supports the seasonal closure of this road as it will help in minimizing resource damage to soils and riparian areas, keeping this backcountry area in a more stable status.

- Gooseberry-Twin Lakes: **Proposals NZ-14 and NZ-15 (map)**

The proposal to construct approximately 2 miles of new road poses some concerns for TU since the current Gooseberry Road 213 parallels Gooseberry Creek (and the Wood River IRA) and has been identified as Functioning at Risk. Because this area contains important big game habitat, any increase in the number of motorized users can decrease opportunities for solitude and can result in increased stress and displacement of wildlife. This results in a less than quality hunting and fishing experiences for the general public.

Recommendation: Impacts from this road should be monitored and management prescriptions should be implemented prior to the establishment of a new road.

Current & Proposed Summer Routes - Shoshone NF - Greybull Ranger District - Gooseberry/Twin Lakes
Travel Management Plan Revision - July 2016



Summary

Trout Unlimited supports the efforts the SNF has undertaken in developing a proposed action for the Travel Management Plan EIS process. Below we have listed the key considerations we believe must guide the future of motorized use on the SNF:

- Effects on wetlands and riparian areas.
- Effects on route sustainability and potential for sedimentation into water sources and other water quality concerns.

- Effects on terrestrial wildlife including big game, threatened, endangered and sensitive species and management indicator species, and other terrestrial and aquatic species.
- Effects on the character of inventoried roadless areas and Wilderness areas.
- Effects on the agency's ability to manage and enforce the OHV system.
- Effects on opportunities for non-motorized recreation.
- Effects on the spread of noxious weeds and the spread of other invasive species.

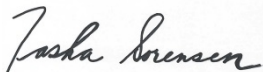
The SNF provides incredible opportunities for backcountry solitude, camping, fishing, hunting and an assortment of recreational activities. Travel planning is a very serious issue with the public and our comments have been developed with respect to the motorized travel community and their wishes to expand motorized routes in this forest. Consistent and fair travel restrictions can benefit every user. Increasing roads within the SNF means that increased monitoring, enforcement, and maintenance will be required. We urge the SNF toward alternatives in the EIS that will provide positive recreational experiences for all users, responsible use education, reduce impacts to fish and wildlife, and to consider whether they can fiscally manage such increases for the next 15-20 years of the life of this Travel Management Plan. We also strongly suggest that the SNF consider alternatives that include investing public involvement in road and trail management and maintenance.

The following summary of our recommendations includes:

1. Vest users to help maintain these trails.
2. Partner in compliance (education)—invest in effective outreach programs that can measure a change in perception/behavior based on program objectives. This behavior starts early and is generational.
3. Maintain consistent signage.
4. Simplify & eliminate multiple maps for an area. Keep maps updated.
5. Indicate reason for decommissioned or seasonal closure (wildlife or resource protection, etc.) to help the public better understand such actions.
6. Maintain current road and trail systems.

We look forward to continued dialogue with the SNF as the Travel Management environmental analysis moves ahead. Should you have any questions with respect to our recommendations in this scoping process, please feel free to contact us.

Sincerely,



Tasha Sorensen
Wyoming Sportsmen Coordinator
Trout Unlimited



Cathy Purves
Foundation & Science Coordinator
Trout Unlimited

