

August 31, 2017

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Re: Shoshone National Forest Travel Management Proposed Action

Submitted electronically to: travel_management_comments@fs.fed.us rrobertson@fs.fed.us;

Dear Shoshone Travel Planning Team,

Thank you for the opportunity to provide feedback on the Shoshone National Forest's (SNF) recently released Travel Analysis Report (TAR). Please accept the following comments on behalf of the Wyoming Wilderness Association (WWA). The Wyoming Wilderness Association (WWA) is pleased that the Shoshone National Forest has taken the important step of Travel Analysis (TA) and produced a Travel Analysis Report (TAR) to help inform the ongoing travel planning process. We are concerned that the modified TAR fails to meet the intended objectives of Travel Analysis and can not adequately inform the ongoing travel planning process as needed. Our primary concerns are noted below. Observations and feedback are primarily focused on the Wind River Ranger District (WRRD), where WWA focused travel monitoring efforts and are most familiar with the existing travel system.

The 2017 TAR does not explain how roads are determined Needed or Not Needed. The SNF TAR does not explain the process or analysis used to conclude which roads the SNF has determined Needed or Not Needed. The TAR carefully describes the analytical process for assigning a risk/benefit score for each road segment, but does not explain how, or if, that score was used to determine which roads are deemed *"Likely Needed"* or *"Likely Not Needed"*. The SNF's initial 2015 TAR² classified all roads in the "risk/benefit categories of Medium Benefit/High Risk, Low Benefit/High Risk, Low Benefit/Medium Risk and Low Benefit/Low Risk as *Likely Not Needed for Future Use."* (TAR 2015 page 21). This original TAR outlines the science-based process used to analyze and rate the existing road system, and then appropriately provides the analytical framework for developing proposed actions to implement the minimum road system and to change existing travel management decisions. The revised (2017) TAR

¹ Our Trave Mon tor ng Report has been prov ded to the SNF but can a so be found at https://www.w dwyo.org/snf-trave -management-p an

² Th s 2015 TAR was not prov ded upon request unt 2016 but was s gned n 2015.

instead, seemingly arbitrarily, determines roads as *Needed* or *Not Needed* regardless of the quantitative risk-benefit analysis. The 2017 TAR now identifies most *Low/Low* roads as *Needed*, while a handful of similarly rated *Low/Low* road segments are considered *Not Needed*. To better explain, looking specifically at the Wind River Ranger District (WRRD), the TAR carefully outlines how 34 miles of road segments were scored as *Low Benefit/Low Risk*, but is wholly unclear why 88% of those *L/L* roads are determined *Needed* and only 12% of those same L/L roads are deemed *Not Needed*. Taking an even closer look at the risk and benefit quantitative scores, many of the *Needed* Low/Low roads received a higher risk rating than benefit rating, while some determined *Not Needed* had a higher benefit rating than risk (Table 1). Most confusingly, several roads that received a benefit rating of zero and a risk rating greater than one were still determined *Likely Needed* in the 2017 TAR.

Table 1. Examples of Level 2 (open to the public) road segments rated Low Benefit/Low Risk on the Wind River Ranger District illustrating risk rating scores of roads determined Likely Needed or Likely Not Needed. These examples illustrate the lack of any clear connection between the risk-benefit rating and the TA's determination of need. Several roads with zero benefit and a low risk rating are determined needed while several roads with a higher benefit than risk rating are determined likely not needed.

| ID | RoadID | RoadName | BeneCalc | RiskCalc | BeneRisk | MRS | Need | Miles |
|-----|--------|---------------------------|----------|----------|----------|-----|----------------------|-------|
| 888 | 510.1D | RAINBOW LAKE | 0 | 2 | Low/Low | Y | Likely Needed | 0.15 |
| 942 | 529.1A | R2D2 | 0 | 2 | Low/Low | Y | Likely Needed | 0.19 |
| 944 | 529.1C | STONY POINT WEST | 0 | 3 | Low/Low | Y | Likely Needed | 0.26 |
| 945 | 529.2A | WARM SPRINGS MOUNTAIN | 1 | 3 | Low/Low | Y | Likely Needed | 1.21 |
| 947 | 531.1A | UNION PASS COW CAMP | 0 | 2 | Low/Low | Y | Likely Needed | 0.24 |
| 950 | 532.2A | OLD DUNOIR TOWN | 1 | 2 | Low/Low | Y | Likely Needed | 0.23 |
| 953 | 532.2D | TWO DOGS | 2 | 3 | Low/Low | Y | Likely Needed | 0.17 |
| 964 | 536 | TROUT CREEK GRAVEL PIT | 0 | 1 | Low/Low | Y | Likely Needed | 0.68 |
| 974 | 540.1F | WAGON GATE | 1 | 2 | Low/Low | N | Likely Not Needed | 0.36 |
| 400 | 263.2B | S WM SPGS | 1 | 0 | Low/Low | N | Likely Not Needed | 0.76 |
| 876 | 505.1E | WEST SIMERSON | 0 | 1 | Low/Low | N | Likely Not Needed | 0.07 |
| 905 | 513.2E | POOR FARM ROAD | 2 | 3 | Low/Low | N | Likely Not Needed | 0.37 |
| 924 | 515.2G | BROOKS LAKE PASTURE | 2 | 1 | Low/Low | N | Likely Not Needed | 0.14 |

| 943 | 529.1B | STONY POINT EAST | 0 | 3 | Low/Low | N | Likely Not Needed | 0.26 |
|------|--------|--------------------|---|---|---------|---|----------------------|------|
| 990 | 545.3E | UPPER AIRPORT ROAD | 0 | 1 | Low/Low | N | Likely Not Needed | 0.44 |
| 1009 | 554.1B | ROCK PILE | 2 | 1 | Low/Low | N | Likely Not Needed | 0.57 |
| 1015 | 556.2B | MUD LAKE | 1 | 2 | Low/Low | N | Likely Not Needed | 0.16 |
| 1033 | 590 | COUNTY LINE | 0 | 1 | Low/Low | N | Likely Not Needed | 0.39 |
| 1043 | 632 | CAMP CREEK | 3 | 3 | Low/Low | N | Likely Not Needed | 0.16 |
| 1047 | 649 | WEST FORK FLATS | 3 | 2 | Low/Low | N | Likely Not Needed | 0.62 |

Another confusing example is the determination of the Castle Creek road as *Likely Not Needed*. The Castle Creek Road is the only access route to one wilderness trailhead popular for recreation and hunting and received a *High Benefit/Medium Risk* rating. This was the only road on the Wind River Ranger District with a rating other than *Low/Low* that was determined Not Needed, but all other High Benefit/Medium Risk rated roads on the WRRD were determined Needed.

The TAR is meant to provide the analytic basis for developing proposed changes to the travel management system, it is not a decision-making document. The TAR can not inform travel management decisions if it does not explain its analysis and resulting conclusions. *The* TAR must explain the process by which they determined roads as Needed or Not Needed, and how the risk-benefit analysis was used in that conclusion.

The TAP lacks the necessary expertise or best available information to adequately quantify the risks to wildlife and other resources. We agree with the TAR that the risk to terrestrial wildlife is an overriding social, economic and resource concern central to most Shoshone Forest users. Unfortunately, the risk to wildlife in the TAR was quantified only by the narrow and seemingly subjective measure of 'motorized use level'. For comparison, the interdisciplinary team (IDT) used a clear, quantitative analysis of risk to watershed and aquatic organisms. The IDT assessed the risk of any road segment to water resources by quantifying the percentage of road within 300 ft of a stream, utilizing the watershed framework and considering mass wasting in its numerical risk score. The risk rating to Aquatic Organism Passage was quantified using the number of stream crossings on any road segment that impede passage. It is worth noting that the IDT included a fish biologist and a hydrologist, but notably lacks a wildlife expert. (TAR 2017, page 5). There are several reasons why relying solely on motorized use level was determined, if it is based on the best available information or a subjective measure. Not only will this measure

change over time, but even roads with 'low' motorized use level present some risk to wildlife.³ In some cases, low or unpredictable motorized use can result in even greater disturbance to wildlife⁴ and our own travel monitoring showed that the least travelled motorized routes often had the greatest amount of illegal unauthorized motorized use (WWA TMR 2016).

The wildlife risk analysis should consider road density by watershed level, edge habitat, habitat fragmentation, hunting pressure, enforcement concerns, and wildlife conflict potential. Any road segment crossing though riparian areas, secure elk habitat, critical grizzly habitat, critical big game winter range or notable summer range or migration corridors should be quantified in the risk analysis. All species of concern identified in the Final Forest Plan, not just big game, should be considered in the risk analysis to some degree.

The TAR disregards documented sources of unauthorized motorized use in its risk analysis. Unauthorized or illegal motorized use has been the overriding issue raised in Travel Planning to date, and dictates the true risks that the motorized route system poses to wildlife, recreation, and environmental resources. A quick review of WWA's TMR provided to the SNF shows that many road segments that the SNF rated 'Low Risk' are known to be the source of multiple miles of unauthorized unregulated motorized use. For example, This is critically relevant site specific information that should be incorporated into the risk analysis for relevant road segments.

For example, SR 732 received a risk rating of Low, determined Likely Needed, even though we documented the lack of any terminating closure to lead to multiple miles of regular unauthorized motorized use (See photo waypoints P410-18). SR2632A determined as Low Risk, Likely Needed, despite multiple sources of unauthorized motorized use and infrastructure need (see photo UP photo waypoints or ExhibitA5).

The TAR does not accurately assess the Risk of Level 1 or non-system roads. From what we can decipher in the TAR, the SNF assigns all Level 1 roads, or storage roads, a Low Risk rating in the TAR. This risk analysis appears to be based on the assumption that all Level 1 roads are physically gated and closed to public motorized use, even though we have documented that many Level 1 or non-system WRRD roads lack <u>any</u> physical barrier, receive regular motorized use, and are a significant source of unauthorized motorized use on the Wind River Ranger District (WRRD). Disregarding the known need for infrastructure on these existing Level 1 or non-system roads misinforms both the risk and budget analysis, and even effectively closed roads can still have significant impacts.⁵

One example of this is U608, a non-system route that was determined to have Low Risk and Likely Needed in the 2017 TAR. WWA illustrated this same unauthorized route as an infrastructure priority site (WWA 7/2016 Exhibit A page 5) since there are no indications of

³ Johnson, B. K., J. W. Kern, M. J. W sdom, S. L. F ndho t, and J. G. K e. 2000. Resource se ect on and spat a separat on of mu e deer and e k dur ng spr ng. Journa of W d fe Management 64:685-697.

⁴ W sdom, M.M., M. J., Johnson, B. K., & Penn nger, M. A. 2004. Effects of roads on e k: mp cat ons for management n forested ecosystems.

⁵ See d.

closure and since the unclosed, unsigned, unauthorized route leads to several miles of frequent illegal motorized use.

Similar examples include: U659.1 see photo waypoint JoH16; U551E see photo waypoint LC16; SR961.1B see photo waypoint JT11. (We could not review all closed L1 or non-system roads in the TAR since they were displayed in the exact same format as the open MVUM Level 2-5 roads; these are just some examples).

The budget analysis is lacking key components. The TAR budget analysis ignores the deferred maintenance backlog, the annual budget shortfall between cost and revenues, and disregards known infrastructure needs that have already been acknowledged by the SNF. The budget analysis must outline the current or anticipated budget for the 'annual cost of maintaining signs and signposts' as well as 'maintaining gates on level 1 roads'. Through our Travel Monitoring Project presentations and our participation in the Compliance Working Group, the Wyoming Wilderness Association has heard from the SNF that a significant increase in resources and commitment is needed to sign, barricade, or decommission dozens of well-established Level I or *non*-system roads. This acknowledged and anticipated need for increased resources does not appear to be included in the budget analysis. (See WWA 7/17 page 20,21). The budget analysis also incorrectly assumes that Level 1 roads have zero cost. This assumption ignores the regular cost of patrol, gate maintenance and monitoring inherent in any storage roads, but specifically ignores the current documented need for the installation of physical barriers on at least several storage roads. (See U608 example above).

The TAR was never made available to the public during the public comment period. The SNF held public meetings in March of 2017 to announce the results of travel analysis and initiate the associated public comment period ending on August 31 2017. The TAR was not finalized or made available at the time of those public meetings, and to date the report has not been available to the public on the website, despite multiple requests and reminders from conservation partners. The TAR was only provided to those conservation partners that made repeated requests, but it was unclear if this was the same final version intended for public comment. The SNF must not point to this time period as a public comment opportunity if the public was not given an opportunity to comment. If the SNF truly desires feedback on specific roads, they should consider presenting the analysis in a way that allows for meaningful public feedback. For any future TAR presentations to the public, please please consider presenting your analysis of open Level 2-5 roads separately from the analysis of closed, Level 1 storage roads. Asking public motorized users to review the necessity of roads they previously didn't know existed, presenting closed roads in the same format as open motorized roads, will only cause more confusion.

Summary and Recommendations

Throughout the travel planning process, WWA and others have requested a hard look at the SNF's existing motorized route system using the best available information, best available science, and transparent budget restrictions. We have stressed the importance of accurately

depicting the existing motorized route system⁶ and illustrated concrete examples of discrepancies between the Shoshone's depiction of the motorized system and the on-theground reality.⁷ We have requested the best available science be used to assess impacts to wildlife, specifically requesting road densities and watershed-level analyses.⁸ Conservation groups were hopeful that a proper and rigorous travel analysis would help the SNF meet these basic requests. WWA noted in scoping that *"Not only is the Forest Service required to conduct Travel Analysis to inform the PA, but the Travel Analysis Report requirements (see FSH 7709.55, Chapter 20) provide many of the baseline information pieces we have previously requested as necessary foundations for informed Travel Plan decisions and a successful Travel Plan process that would result in an informed PA. (WWA 7/17, page 27). Unfortunately the modified 2017 TAR does not meet those expectations and can not adequately inform travel management decisions. It continues to be critical that the DEIS provide an accurate analysis of existing environmental impacts (no action alternative), and a wide range of alternatives that would identify a financially and environmentally sustainable minimum road system.⁹*

It is our understanding that the SNF intends to release a new modified Proposed Action, possibly as soon as soon as this fall. We would encourage the SNF to refrain from presenting new proposed actions or redundant public comment opportunities until the travel planning team has the time and ability to analyze its existing road system, ground truth existing routes and proposed actions, clearly and accurately depict the existing motorized system on public documents and incorporate public comment requests to date. The SNF should carefully review previously submitted comments and ensure that any additional proposed changes or travel planning documents have addressed those concerns or requests.

• The SNF should refer to its original, easily interpreted 2015 TAR when considering proposed changes to the existing system. If the SNF plans to rely on determinations made in the 2017 TAR, we request that the IDT provide a written explanation of the process or rationale used to determine which roads are deemed *Needed* or *Not Needed*, and how the risk-benefit analysis was used in that determination. The SNF must also explain the rationale for determining that roads with zero benefit are considered "Likely Needed".

• The TAR should be reviewed and signed by at least one wildlife biologist, a botanist familiar with the SNF's rare plant species, and a South Zone recreation professional or law enforcement officer.

• The DEIS must include a wide variety of alternatives that represent the range of the minimum road system suggested in the 2015 and 2017 TAR.

• an alternative in the DEIS that would close to motorized use all 256 miles of road that are identified as likely not needed for future use in the 2015 TAR

⁶ (WWA 7/2016, pages 15-18)

⁷ (WWA 10/15 page 12, WWA 7/2016, page 18)

⁸ (WWA 7/16 page 23)

⁹ (WWA 7/2016 page 19)

- An alternative that closes all Level 2-5 roads with a Low/Low risk-benefit score (all of which were determined Likely Not Needed in the 2015 TAR)
- An alternative that closes and decommissions all roads with a zero benefit rating
- Either the DEIS or the TAR must
 - Present a budget analysis that includes the deferred maintenance backlog, the annual budget shortfall between cost and revenues, and accounts for known system infrastructure needs acknowledged by the SNF
 - Present the analyses in a manner that allows readers to provide meaningful feedback on the specific areas and routes with which they are most familiar. (Eg district by district, see WWA 7/16 page 25).
 - Accurately assess the environmental impacts that the existing system, (or each alternative), poses to wildlife. (Reference WWA 7/2016 page 23).

Thank you for your consideration of our comments. WWA knows that analyzing the entire Forest's motorized route system is no easy task, and that the Shoshone has been kept especially busy with wildfires and eclipse events the last two summers. Thank you for taking the time to conduct travel analysis and for all of your efforts on the travel planning process to date. We continue to look forward to an informed, transparent travel planning process that allows for meaningful public input and results in a sustainable designated route system.

Respectfully submitted,



