



December 7, 2017

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

Re: Shoshone National Forest Travel Management Revised Proposed Action

*Submitted electronically to:* [travel\\_management\\_comments@fs.fed.us](mailto:travel_management_comments@fs.fed.us)  
[rrobertson@fs.fed.us](mailto:rrobertson@fs.fed.us);

Dear Shoshone Travel Planning Team,

Thank you for the opportunity to provide feedback on the Shoshone National Forest's (SNF) revised Proposed Action released November 10, 2017. Please accept the following comments on behalf of the Wyoming Wilderness Association.

The Wyoming Wilderness Association (WWA) is a non-profit outreach, education and advocacy organization working to protect Wyoming's public wild lands. Our organization represents nearly 1,000 members across Wyoming and the United States. Our constituency is made up of conservation and outdoor enthusiasts including hunters, anglers, hikers, horsemen, and motorized and non-motorized recreationists who value Wyoming's public wild lands. WWA is involved in statewide advocacy efforts to protect our last remnants of wilderness-quality lands. WWA was active in the Shoshone's Forest Plan revision process with the mission of protecting the wilderness character of our first and oldest National Forest.

WWA has been engaged in the Shoshone's Travel Planning since the finalization of the Shoshone's Land Management Plan. WWA is committed to protecting the SNF remaining roadless areas and to hold the SNF accountable to enforcing and maintaining its existing motorized route system. WWA has invested in positively influencing this planning process through an extensive Travel Monitoring Project and the Shoshone's Compliance Working Group.

The following comments, projects and attachments from the Wyoming Wilderness Association have already been submitted as part of this planning process.

- **10.30.15 pre-scoping comments**, in which WWA comments on the Forest's 'first cut' at a proposed action.
- **10.31.15 pre-scoping proposal responses**, in which WWA responds to proposed additions in the pre-scoping process. Many of these observations are relevant to proposed additions in the latest revised proposed addition.

- **7.25.16 official scoping comments and attachments**, in which WWA debates the purpose and need identified for new motorized loops, especially on the Wind River Ranger District. These comments provide the most information as to what we expect to see in the range of alternatives a Draft EIS. wide-range of alternatives.
- **The WWA Travel Monitoring Project (TMP)** which provides 300 photo-tagged waypoints illustrating unauthorized motorized use, maintenance and enforcement concerns. The Project report and associated data can still be found here <https://www.wildwyo.org/snf-travel-management-plan>. The results of the TMP report enforce WWA’s commitment to no additional motorized routes on the WRRD.
- **8.31.17 Travel Analysis Report (TAR) comments** in which WWA presents significant concerns with the travel analysis process used in the newly presented TAR meant to satisfy travel rule requirements.

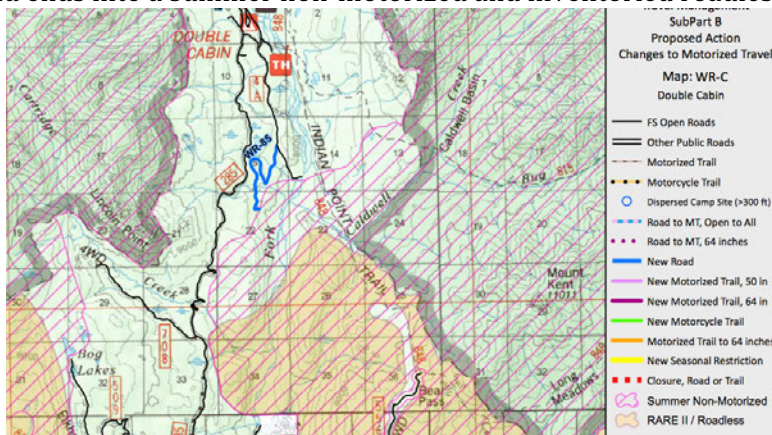
WWA asks that all of our previously submitted comments are reviewed and considered during the development of the range of alternatives in the draft EIS. To date, we are worried that the Shoshone’s myopic focus on three new motorized loops has overridden meaningful public comment in the travel planning process.

Here we offer comments specific only to the new information in this revised proposed action.

I. Thank you for the improved readability and interpretability of the proposed action. The information is presented in a clearer format for the reader to understand proposed changes. The improved effort on this version is visible and appreciated.

II. We support identifying and adding established routes to established dispersed campsites to the MVUM. We have not had the time or ability to review or ground truth each of these proposed additions, but WWA supports the effort to legitimize established routes greater than 300 ft.

III. *Please explain and justify proposed additions WR 85.* Four new proposed motorized routes on the Wind River District have all been labeled as WR85. These proposed additions are seemingly random dead end routes, the exact type of route that WWA has shown is most likely to lead to unauthorized motorized use. One of these routes ascends steep terrain and dead ends into a summer non-motorized and inventoried roadless area.



Please explain the rationale for each of these WR85 additions. The proposed action states only that these additions were identified in the Travel Analysis Report. Based on our significant concerns with the revised Travel Analysis Report we specifically stated in our

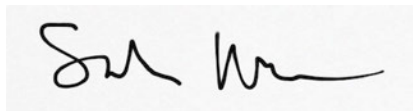
comments that *"If the SNF plans to rely on determinations made in the 2017 TAR, we request that the IDT provide a written explanation of the process or rationale used to determine which roads are deemed Needed or Not Needed, and how the risk-benefit analysis was used in that determination."* (WWA 8/31/2017).

IV. We also propose the following closures to be included for consideration in your range of alternatives. These cite-specific closures are based on our documented observations of maintenance or enforcement concerns on these specific routes, and because dead ends lead to continuing motorized use on unauthorized routes. Many of these concerns have been outlined in our TMR or previous scoping comments. The .kmz data (<https://www.wildwyo.org/snf-travel-management-plan>) provides photo documentation of these waypoints overlaid on the SNF Open Road Layer. These proposals are in addition to broader closure recommendations and alternative development WWA has suggested in previous scoping comments and TAR comments.

- 2632a (at its junction with MT13) and
- 2632b
- SR600 in its entirety rather than at the dead end with the IRA
- 5541e
- 551e
- 538 (currently closed due to resource concerns)
- 540.1b
- 548 West Fork Long Creek (multiple spurs, unauthorized use, continuing use onto storage roads)
- 732 leads to multiple unauthorized routes with no closures and regular motorized use
- 529.1a
- 542 (move gate to the junction with MT11 since multiple branching unauthorized routes occur off of the dead end spur)
- MT14, as opposed to the new proposed re-route. In addition to known resource concerns, this ATV route borders a designated wilderness and dead ends with no destination or connector route.

Thank you for your consideration of our comments. The Wyoming Wilderness Association is invested in the implementation of a responsible Travel Management Plan that honors the Forest Plan Revision and the Shoshone's uniquely wild backcountry character. We look forward to a travel planning process that allows for meaningful public input and results in an accountable, enforceable and sustainable designated route system.

Respectfully submitted,



[Redacted contact information]

