



Shoshone National Forest  
Wind River Ranger District  
[REDACTED]

October 30, 2015

Dear Ranger Rick Metzger,

We appreciate this opportunity to comment on the existing motorized use proposals that are being considered by the Wind River Ranger District as the Shoshone National Forest begins building its December “tentative proposed action for summer travel.”

The Greater Yellowstone Coalition envisions a healthy and intact Greater Yellowstone Ecosystem where critical lands and waters are adequately protected; wildlife is managed in a thoughtful, sustainable manner; and a strong, diverse base of support is working to conserve this special place as part of a larger, connected Northern Rocky Mountain Region. Since 1983 we have been working to safeguard this rare intact ecosystem that is largely found in Wyoming, while also extending into Idaho and Montana. The Greater Yellowstone Coalition has approximately 40,000 members and supporters from across the region and nation who have an interest in ensuring the integrity of the natural wild and backcountry character of this ecosystem that encompasses the entire Shoshone National Forest.

Although numerous proposals that have been submitted for the Wind River District of the Shoshone National Forest, we won't address them individually. However, there are important criteria that need to be considered in reviewing these proposals. We recommend that the Wind River District:

1. Actively enforce its existing summer motorized system before considering any expansion of motorized system routes.
2. Refrain from constructing any new summer motorized trails, roads, or routes.

- a. Especially within the PCA and big game secure habitat; within existing inventoried roadless areas; within wetland and fen areas; along/within riparian corridors; within high alpine meadows; within big game crucial winter range; and within one mile from the boundaries of Wilderness, Dunior Special Management Unit, the Primary Conservation Area, and Inventoried Roadless Areas.
3. Refrain from adopting any existing summer unauthorized/user-created trail, road, or route as an authorized system trail, road, or route.
  - a. Especially within the PCA and big game secure habitat; within existing inventoried roadless areas; within wetland and fen areas; along/within riparian corridors; within high alpine meadows; within big game crucial winter range; and within one mile from the boundaries of Wilderness, Dunior Special Management Unit, the Primary Conservation Area, and Inventoried Roadless Areas.
4. Consider decommissioning existing trails, roads, or routes that:
  - a. Exist within the PCA and big game secure habitat; within existing inventoried roadless areas; within wetland and fen areas; along/within riparian corridors; within high alpine meadows; within big game crucial winter range; and within one mile from the boundaries of Wilderness, Dunior Special Management Unit, the Primary Conservation Area, and Inventoried Roadless Areas.
  - b. Meet the SNF LMP guidelines for closing or decommissioning routes.
5. Consider implementing added resource protections along existing motorized routes

## **ENFORCEMENT OF MOTORIZED ROUTES**

Actively enforcing the existing summer motorized system is critical to protecting wildlife, sensitive habitats and water resources. This is noted in the FEIS of the Shoshone National Forest Land Management Plan 2015 Revision (SNF LMP):

On the Shoshone, off-highway vehicle use is following this national trend. Increases in off-highway vehicle recreation in unauthorized areas are leading to increased wildlife disturbance, soil erosion, and sedimentation in streams (FEIS, Vol. 1, pg.8, CD version).

Actively enforcing the existing summer motorized system will also support one of the two goals of travel management planning noted in the Shoshone National Forest Land Management Plan 2015 Revision (SNF LMP):

Reduce the development of unauthorized roads and trails and the associated impacts to water resources and aquatic ecosystems, wildlife, and user conflicts (LMP, pg.104, CD version)

Actively enforcing the existing summer motorized system should be consistent forest wide. There currently exists a stark contrast to what is seen on the ground within the Wind River District and the Clarks Fork, Greybull, and Wapiti Ranger District. For example the Clarks Fork, Greybull, and Wapiti Ranger District has signage placed directing recreationalists to use authorized routes and discouraging use from unauthorized routes. The Wind River District currently exhibits little evidence of placing or maintaining such signage.

Hence, we feel enforcement is fundamental to the health of the forest and vitality of the wildlife. Expanded use of tools like signage and blockades on the Wind River District, similar to other areas on the forest, should be more widely employed. Blockades placed at the end of in/out or spur routes prevent those routes from creeping beyond the official endpoint. Signage directs users to the authorized system routes and discourages the use of unauthorized routes and creation of more. These measures help enforce the MVUM; further guides users who may not have the MVUM at their fingertips while driving; and show that the Wind River District personnel are actively managing the forest's resources.

In summary, both existing authorized and unauthorized motorized routes should be enforced before considering the addition of any new motorized routes – trail or road – on the Wind River District.

## **NEW MOTORIZED ROUTES**

We see little justification for adding additional mileage to the authorized system of motorized routes for several reasons. First, there is already an existing lack of enforcement on the Wind River District allowing for numerous unauthorized routes to be utilized on a daily basis. These unauthorized routes contribute to an increase in area road density, which affects local wildlife.

Managing the landscape to reduce hazards to grizzly bears, therefore, requires balancing road density standards with the amount of secure habitat available, something previously not considered when establishing road-density standards on public lands (Summerfield et al. 2004). If road densities become too great, secure areas become isolated islands surrounded by heavily roaded areas. Travel among secure islands then becomes more hazardous, effectively fragmenting the landscape (Journal of Wildlife Management 74(4):654–667; 2010; Schwartz et al., pg 661).

We encourage the Wind River District to consider all motorized routes (trail/road) both authorized and unauthorized that currently have use on them when determining “road density”

measurements. Regardless of the width of trail/road, the effects of the motorized use on wildlife is the same. And until the existing unauthorized routes are actively closed and efforts are made to restore the natural vegetative cover, they also should be accounted for in road density measurements.

Numerous key wildlife species are adversely affected by road densities, including the Grizzly Bear, Rocky Mountain Elk and Big Horn Sheep. The Shoshone National Forest has articulated in various ways the importance of each of these species. Below is one example of research that supports this link between the density of motorized use and its effect on wildlife.

Wisdom et al. (2004) found that elk moved when ORVs passed within 2,000 yards but tolerated hikers within 500 ft. Wisdom (2007) reported preliminary results suggesting that ORVs are causing a shift in the spatial distribution of elk that could increase energy expenditures and decrease foraging opportunities for the herd. Elk have been found to readily avoid and be displaced from roaded areas (Irwin and Peek, 1979; Hershey and Legee, 1982; Millspaugh, 1995). Additional concomitant effects can occur, such as major declines in survival of elk calves due to repeated displacement of elk during the calving season (Phillips, 1998). Alternatively, closing or decommissioning roads has been found to decrease elk disturbance (Millspaugh et al., 2000; Rowland et al., 2005). (The Wilderness Society, Using Road Density as a Metric for Ecological Health in National Forests: What Roads and Routes should be Included? Summary of Scientific Information, Last Updated, November 22, 2012)

Furthermore, we discourage the Wind River District from considering new trails or roads that are

- inside the PCA and big game secure habitat,
- inside existing inventoried roadless areas,
- within wetland and fen areas,
- within/along riparian corridors,
- within high alpine meadows,
- inside big game crucial winter range, and
- within one mile from the boundaries of Wilderness, Dunior Special Management Unit, the Primary Conservation Area, and Inventoried Roadless Areas.

All of the listed areas are adversely affected by motorized routes, whether they are classified as trails or roads. As noted in the FEIS of the Shoshone National Forest Land Management Plan 2015 Revision (SNF LMP):

The greatest potential impacts to aquatic resources from land management activities are primarily associated with livestock

grazing, timber harvest, roads, trails, and motorized use. (Vol. 1, pg. 15, CD Version)

Off-road vehicle activities that create bare or disturbed soil provide conditions for invasive species establishment and spread, including on roads and roadsides, trails, and trailheads, parking lots, developed and dispersed camping sites, popular fishing locations, and heavy-use areas around summer homes and lodges. Off-road vehicle travel has high potential to introduce and spread noxious weeds, and in turn move rangeland vegetation away from desired conditions. (Vol. 1, pg. 172, CD Version)

Motorized travel has high probability of introducing non-native invasive species.

With knobby tires and large undercarriages, ORVs can unintentionally transport invasive non-native species deep into forestlands. For example, one study found that in a single trip on a 16.1 km (10 mi) course in Montana, an ORV dispersed 2,000 spotted knapweed (*Centaurea stoebe*) seeds (Montana State University 1992). In Wisconsin, a survey of seven invasive plant species along ORV routes found at least one of these exotic plant species on 88% of segments examined (Rooney 2005). ORVs in roadless areas pose a particular risk of spreading invasive non-native species because roadless areas often have less weeds present. Gelbard and Harrison (2003) found that ORVs are the chief vector for invasive species infestation in California roadless areas, which were shown to be very important refuges for native plants. Furthermore, as a result of ORV use, the size and abundance of native plants may be reduced, which in turn permits invasive or nonnative plants to spread and dominate the plant community (GAO 2009). (Switalski & Jones; Off-road vehicle best management practices for forestlands: A review of scientific literature and guidance for managers; Journal of Conservation Planning Vol 8 (2012), pg.16.)

Invasive plant species decrease forage quality for big game and other wildlife. The SNF LMP directs protection and retention of secure habitat which includes the native forage as noted below:

On crucial winter range, management is to maintain the quality and quantity of forage to encourage big game to winter on public lands and not move onto private lands. Management emphasizes the retention of an adequate quantity and quality of forage for wintering wildlife on big game crucial winter range following the

commercial livestock grazing period. (SNF LMP, pg. 180, CD Version)

The Shoshone National Forest has a responsibility to manage for native vegetation and prevent the encroachment of invasive species (SNF LMP, pg. 20, CD Version).

Beyond road density and resource endangerment that motorized routes contribute toward, the current maintenance standards don't appear to warrant additional system routes. There are 1,141 miles of system roads, 1,652 miles of non-motorized summer trails, 32 miles of motorized summer trails on the Shoshone National Forest (SNF LMP, pg. 101, CD Version). According to the 2015 SNF LMP objectives, annual maintenance will occur on at least 60% on levels 3, 4, and 5 and at least 5% on level 2 system roads and at least 15 % of system trails (pg. 103, CD Version). Adding more roads and trails will add to the strain of keeping up with the maintenance and enforcement on existing roads and trails.

In summary, the Wind River District should refrain from constructing new authorized trail, road, or route; as well as refrain from adopting any existing summer unauthorized/user-created trail, road, or route as an authorized system trail, road, or route. This especially applies within the PCA and big game secure habitat; within existing inventoried roadless areas; within wetland and fen areas; along/within riparian corridors; within high alpine meadows; within big game crucial winter range; and within one mile from the boundaries of Wilderness, Dunior Special Management Unit, the Primary Conservation Area, and Inventoried Roadless Areas.

## **DECOMMISSIONING MOTORIZED ROUTES**

The Shoshone National Forest Land Management Plan, 2015 Revision, states in its objectives for roads and trails that "There are fewer than 1,400 miles of System roads on the Shoshone (pg. 103, CD Version)." Currently there are 1,141 miles of System roads, hence decommissioning at least 141 miles is in line with the forest objectives. We encourage the Wind River District to examine and analyze the System roads throughout the district for ones that could be recommend for decommissioning.

In doing this, we encourage the Wind River District to also consider decommissioning roads that exist:

- inside the PCA and big game secure habitat,
- within existing inventoried roadless areas,
- within wetland and fen areas,
- along riparian corridors,
- within high alpine meadows,
- within big game crucial winter range, and
- within one mile from the boundaries of Wilderness, Dunior Special Management Unit, the Primary Conservation Area, and Inventoried Roadless Areas.

Eliminating motorized roads within these areas, enhances wildlife habitat and vitality. As noted in the SNF LMP the forest has the responsibility to “Restore and maintain a diverse range of ecosystems (pg. 20, CD Version).” Decommissioning roads facilitates ecosystem restoration.

Furthermore, we remind the Wind River District of the Shoshone National Forest Land Management Plan, 2015 Revision, guidelines for closing or decommissioning motorized routes:

Close or decommission routes if:

- The travelway cannot be maintained due to natural events or human causes
- Unacceptable damage occurs to soil, wildlife, flora, cultural, aquatic, or other resources
- Financing or partnerships are not available to perform critical maintenance
- Route is not needed for access, or multiple routes exist (pg. 104, CD Version).

These filters appear very appropriate for evaluating the existing System roads on the Wind River District. The Travel Management Planning Process is an opportune time to review the existing System roads. For example, if there is a duplicate or parallel route, this is a good time to delete the lower quality or less used route. If a route lacks a destination, purpose, or function then it would seem non-essential, and therefore could be eliminated. And if the route proves to have major damage and/or is found incompatible for general maintenance, then it makes sense to decommission the route and remove it from the System.

In summary, decommissioning non-essential and/or problem System roads within sensitive habitat areas is in accord with the Forest Plan. Plus a decommissioned road can become future habitat for wildlife, particularly in or near sensitive habitat areas. This especially applies within the PCA and big game secure habitat; within existing inventoried roadless areas; within wetland and fen areas; along/within riparian corridors; within high alpine meadows; within big game crucial winter range; and within one mile from the boundaries of Wilderness, Dunior Special Management Unit, the Primary Conservation Area, and Inventoried Roadless Areas.

## **ADDITIONAL RESOURCE PROTECTIONS ALONG MOTORIZED ROUTES**

The following recommendations are intended to benefit the land, water, and wildlife resources that act as the interface between motorized and non-motorized use.

First, we recommend that the Wind River District establish an end of road blockade at least 200 feet from the high water mark of all lake access motorized routes. This will encourage motorized vehicles to park and proceed by foot to the water source rather than driving to the edge. This is in line with the Forest regulations and will eliminate unnecessary resource damage that has been increasing along lake shores throughout the Forest. These endpoint parking

locations can also provide an opportunity for information boards that remind forest users of pertinent regulations on such topics as dispersed camping, leave no trace, and bear safety. These barriers can also provide the visual distance of 200 feet, which is the minimum distance from lakes that camping is allowed.

Second, we recommend that the Wind River District proactively addresses all existing motorized route stream crossings to ensure that the highest possible water quality is maintained.

While driving on roads has long been identified as a major contributor to stream sedimentation (for review see Trombulak and Frissell 2000), recent studies have found ORV use on trails to be a significant source of fine sediment in streams (Chin et al. 2004, Ayala et al. 2005, Welsh 2008). Stream sedimentation greatly degrades aquatic habitat (Newcomb and MacDonald 1991). For example, Chin et al. (2004) found that in watersheds with ORV use streams contained higher percentages of sands and fine sediment, lower depths and lower volume – all characteristics of degraded stream quality. (Switalski & Jones; Off-road vehicle best management practices for forestlands: A review of scientific literature and guidance for managers; Journal of Conservation Planning Vol 8 (2012), pg.15.)

Adding culverts and bridges where needed will assist with maintaining and/or improving the stream quality and aquatic habitat.

Third, we recommend that the Wind River District consider adding bear safe food storage options (poles/boxes/required approved personal storage containers) in popular road dispersed camping locations that are within the PCA and potentially in other high conflict areas. Realizing there is a potential for an increase in human bear interactions particularly in dispersed camping areas, this would be a proactive measure to reduce potential negative interactions and increase positive interactions for both bears and humans.

Forth, we support appropriate temporary or seasonal closures of roads that may affect calving and migrating ungulates, spawning cutthroat trout, feeding grizzly bears, muddy soil conditions, and other such adaptive management situations.

In summary, the Wind River District should consider implementing added resource protections along existing motorized routes that include but are not limited to things like barriers at lakes, bridges over streams, bear safe food storage options, and seasonal closures.

## CONCLUSION

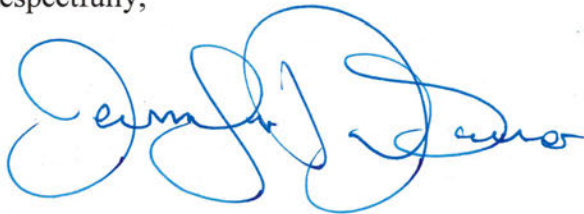
The Travel Management Planning Process is a splendid opportunity for the Shoshone National Forest to examine its current motorized route system and make adjustments that best support the backcountry nature and health of the Forest, as well as the needs of recreationalists.

Based on our recommendations outlined above, we believe the following proposals should be omitted from further discussion and future consideration: WR-02; WR-27; WR-01; WR-09; WR-04A; WR-03; WR-08; WR-11; WR-28; WR-21; WR-22; WR-23; WR-05; WR-13 (connect FSRs 528.2D to 529); WR-06; WR-24; WR-30; WR-31; WR-33; WR-34; WR-34A; WR-34B; WR-35; and WR-36.

Based on our recommendations outlined above, we believe the following proposals should continue to be discussed and integrated in to the proposed action for summer motorized travel: WR-25; WR-29; WR-16; WR-15; WR-17; WR-18; WR-20; WR-37; WR-38; WR-39; and WR-41.

The Greater Yellowstone Coalition appreciates the time and energy that the Wind River District and Shoshone National Forest staff at large have already invested into this process. We look forward to working together to create an ecological and effective Travel Management Plan in the next few years. Please feel free to contact us if you have any questions.

Respectfully,



Jenny DeSarro  
Wyoming Conservation Associate  
Greater Yellowstone Coalition