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Comments: [External Email]Shoshone National Forest Travel Management Planning Project

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Thank you for the opportunity to comment on the Shoshone National Forest Travel Plan. My comments are directed to the Wind River District I am most familiar with.

I must begin by thanking the National Forest and its dedicated employees for their service in light of the serious underfunding that has plagued our National Forests for decades. The lack of Congressional funding support for the National Forest system has made adequate administration, planning and enforcement almost impossible. The Wind River District of the Shoshone National Forest is a classic example of where adequate funding for planning, administration, maintenance and enforcement is desperately needed but clearly lacking.

The most basic question that must precede all others is when you cannot adequately maintain, administer and protect your existing roads and trails, why are you proposing to expand them?

According to your information The Wind River Ranger District existing route system consists of 331 miles of system roads, a dozen motorized loops, six ATV-designated trails and three ATV specific "large effective" motorized loop opportunities, which is more than double any other district on the Shoshone National Forest. Any travel plan update should start with a careful fact based analysis of your existing road system, and determine if it is sustainable as it currently exists. Do you have the capacity and more importantly the demonstrated commitment and resources to maintain the existing road and trail system to prevent resource damage and protect crucial wildlife winter range? Until you can answer those basic questions affirmatively you should not even consider any expansions. Please provide this critical information as the foundation of the plan update.

The missing fact based analysis of existing conditions is made more troubling by the lack of seasonal closures to protect wildlife habitat and road conditions. Habitat conditions should be clearly identified on every road segment and seasonal closures adopted when necessary for crucial winter range protection. I support your proposed seasonal closures and ask that you adopt more as the need for them is identified in a fact based crucial winter range analysis done in cooperation with the Wyoming Game and Fish.

Windy Mountain - WR03. Your preferred alternative would open the gated administrative NFSR961 road, require new route construction through an Inventoried Roadless Area to connect to Salt Barrels Park (FSR524), and expand MT14 from 50" to 65" (WR90). This proposal was strongly opposed during the 2015 scoping period and previously "screened out" due to enforcement concerns. This is nothing short of an absolute disaster in the making. Your proposal would open an area adjacent to wilderness that will be wide open for motorized abuse with no controls and no enforceable closures. Why are you proposing this?

Another very troubling proposal relates to the Little Warm Springs Canyon area. I have visited this special area on foot many times and it is an extraordinary natural area. The natural bridge and nearby geyser are amazing

natural features, and the historic log flume running down the canyon is a significant historic resource. These features should be clearly recognized, analyzed and protected and not treated as tourist attractions for motorized access and abuse. Your "analysis" and proposed action have no factual recognition of the significance of these features or analysis of the impacts that unregulated motorized access could have on them. Your travel management plan should recognize those special places where roads and motorized vehicle trails should not exist in order to protect natural resources and recreational opportunities

You have been at this process for a long time and getting something "done" is a strong motivation. Given the lack of proper analysis of your existing road and trail system, I respectfully suggest that a responsible plan update would not allow any new roads or trails or trail enlargements until a comprehensive analysis of the current system is completed and adequate resources committed to its management and maintenance.

Thanks again for the opportunity to comment.

Hank Phibbs

[PII]

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