



Wyoming Wilderness Association
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Submitted electronically to Jeff VonKienast, Mark Foster, Lisa Timchak

Re: MT14 Trail Improvements and Travel Planning

Dear SNF Travel Planning Team,

Please consider our significant concerns around the scheduled MT14 ATV trail improvements made public just last week. (July 12, read in

<https://county10.com/headsup-scheduled-work-on-motorized-trail-to-impact-moon-lake-area/>)

Jeff, thank you for getting back to me and the discussion regarding these concerns yesterday. Mark and Lisa, I wanted to include you in this conversation as it strongly pertains to travel planning. Please include these comments in your travel management plan records.

As discussed with Ranger von Kienast, maintenance and improvement on your existing route system is commendable and generally not in conflict with ongoing travel planning efforts. There are several reasons why the unexpected and recently announced blasting project for MT14 has alarmed many individuals and partners heavily invested in the Shoshone's travel planning process:

- The proposed Bachelor Creek loop - a proposal requiring significant new route construction to create a "large effective loop" utilizing MT14 - has been one of the most contentious and opposed proposals since the beginning of travel planning. (WR 11, WR 78, and other iterations, proposed as early as 2015 and recently included in the 2020 draft preferred alternative.)
- The fate of MT14 itself is presently debated through multiple travel plan proposals. Proposals to close this trail have been submitted by the public during travel planning and should be included in future draft alternatives.
- Requests for the history and record of decision for this ATV trail bordering the Fitzpatrick Wilderness have been repeatedly submitted and gone unanswered during official travel planning comment periods. This requested information should have been provided to the inquiring public before approving blasting improvements without analysis or public involvement.
- The many comments submitted against the new Bachelor Creek loop additions have noted a currently low level of use on the existing MT14 trail, and questioned how increasing traffic along this trail will impact the environment. Making trail improvements to this trail at this time irreversibly alters the parameters, context and impacts of the current proposed travel plan alternatives. (Submitted requests for analysis for the MT14/Bachelor Creek loop proposals include impacts on the adjacent designated Fitzpatrick Wilderness, wilderness potential of the inventoried roadless area, and existing non-motorized recreation opportunities in this area. See Attached, WWA2016, page 37).

Prioritizing significant financial and physical improvements on a trail whose fate is actively debated during travel planning appears pre-decisional and signals that the SNF is not seriously considering public input in its travel planning decisions. As an organization heavily invested in the travel planning since its inception, WWA opposes this project at this time. On behalf of our concerned local members and conservation partners, we strongly encourage the SNF to postpone improvements on MT14 until the travel planning process concludes.

We appreciate the SNF's initiative and desire to utilize State Trails resources to improve the existing system and MVUM compliance, but counter that these resources be used on any of the other Wind River District's roads or trails desperately in need of improvement. If the resource concerns on MT14 are so great as to make this trail project the urgent priority at this time, the SNF is well within its right to issue a temporary closure on MT14 until travel planning determines its outcome. By postponing this project until the travel planning process concludes, the Forest has an opportunity to maintain critical public trust by 1) eliminating the pre-decisional actions on a controversial route; and 2) displaying good financial stewardship in the case that the travel planning eliminates the need for these improvements entirely.

After speaking with Ranger von Kienast, it is unclear whether postponing this project is even possible within the recently announced timeline. This in itself is unfortunate. If the SNF had reached out to the many individuals and organizations that have commented on MT14 and opposed the Bachelor Creek loop since 2015, there could have been appropriate discussion about the implications of this project and plausible alternatives. Even outside of travel planning and timing concerns, the decision to approve a blasting project on an ATV trail delineating the boundary of the Fitzpatrick Wilderness during Stage 1 fire restrictions reasonably warranted careful consideration, analysis and outreach to stakeholders, partners and the public.

Finally and most urgently, WWA again officially requests documentation on the history and record of decision on MT14's designation as an ATV trail. Routine maintenance of existing designated trails may not require NEPA, but since information on the timing and rationale for designating MT14 has been questioned and unanswered throughout travel planning, we again request this history and documentation be provided before trail improvements commence.

Thank you for your consideration of these concerns and your commitment to the integrity of the travel planning process.

Respectfully,



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