SNF Travel Plan Priority comments:

- **Insist the Forest Service honor public comments and use its limited resources to enforce, maintain and improve the Shoshone’s existing roads and trails - NOT add new ones.**

- Oppose the multiple new motorized trails, route construction and motorized loops proposed on the Wind River District. Adding more motorized trails to the District with the largest motorized trail system and the greatest enforcement and maintenance needs does not meet user demand or public comment concerns.

- Strongly oppose these two new OHV routes/loops specifically:
  - 1. the Warm Springs Canyon additions (WR07, WR13) and
  - 2. Benchmark Roadless Area MT14 additions (WR03, WR90, WR11, WR78). These new route proposals would have significant and cumulative impacts to inventoried roadless areas, Wild and Scenic eligible Rivers, unique geologic areas, and existing non-motorized recreation.

- **Tell the Forest Service to mitigate increasing snowmobile use in the High Lakes WSA and comply with the Wyoming Wilderness Act through winter travel planning. Request the snowmobile season be limited from December 1 to April 30.**

- Thank and support new seasonal road closures, one of the best tools for protecting wildlife and preserving road conditions.

- Support formalizing the voluntary OSV closure around the Deception cross-country trails groomed by local volunteers (WR02w)

Make it personal:

- Share your experiences recreating on the Shoshone and personal accounts of how unmanaged or illegal motorized use, lack of agency funding, or the state of the current road/trail system has affected your recreation opportunities on the Shoshone.

- If you have observed an increase in motorized use on or near the Shoshone, share personal observations, and state that additional motorized routes will have significant cumulative effects when added to current level of use.

- If you have had difficulty providing meaningful public comment due to lack of necessary information, opportunity, or proposal details, share those examples.

- If you have previously submitted comments, resubmit them, or request a record of your previous comments to confirm they have been considered.

If you are familiar with the Wind River District/Togwotee/Dubois area we have roughly recapped some of the most significant proposals for your information below. The Shoshone National Forest needs to hear from Dubois residents and Wind River recreationalists about your concerns with the existing motorized route system and how additional motorized routes would impact wild froncountry areas.
Wind River District

Motorized loop and trail additions:

The Wind River Ranger District (WRRD) existing route system boasts 331 miles of system roads, approximately a dozen motorized loops, six ATV-designated trails and three ATV-specific “large, effective” motorized loop opportunities -more than double any other district on the Forest. The Wind River District has inherited old logging roads and five grandfathered ATV trails without sufficient public comment or planning. Travel planning is the opportunity for the SNF to take a hard look at existing roads and trails and identify a minimum sustainable road system. Still, every draft and alternative of the Shoshone’s travel planning has placed the bulk of motorized trail additions on the Wind River District, where there is the least demand and the most documented existing enforcement concerns.

New 65” OHV trails proposals to note in 2021 Alternative 4:
- The Benchmark Roadless Area MT14 proposals. The new Windy Mountain proposal WR03 would replace the previous Bachelor Creek proposal included in Alternative 2
- The Warm Springs Canyon loop proposal (WR7, WR 13, continuing proposal from 2015)
- WR04b is a brand new proposal in the Sheridan Creek area that would connect to MT11 using the J snowmobile trail but requiring 1.5 miles of trail construction
- Two new, smaller connector routes in the Long Creek area that create at least two new motorized loops using existing open roads (WR43 and WR-27A)
- WR90 converts all existing Wind River 50” motorized trails (22 miles) to 65”

Wind River Proposal Specifics

Benchmark Roadless Area and MT14 Additions - Windy Mountain and Bachelor

Description of changes: In the new Alternative 4 the SNF proposes WR03, a new NFST traversing Windy Mountain to connect to Salt Barrels Park. The SNF would also widen MT14 - the 50” ATV trail along the Wilderness boundary - to 65” (WR90). This WR03 proposal would replace the previous Bachelor Creek trail proposed in Alternative 2 - WR11 and WR78.

Windy Mountain - WR03. This proposal 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.
WR3 Windy Mountain Map. Yellow highlight shows new route addition. WR90 highlighted in blue expands Mt14 from 50” to 65”.

Comment Suggestions:

Oppose any new routes, additions or expansion to MT14 or the Benchmark Roadless Area. All related proposals -Windy Mountain, Bachelor Ck, and widening MT14- would impact popular existing non-motorized recreation, impact the character of the Inventoried Roadless Area, and significantly increase OHV traffic and enforcement concerns. Provide examples of non-motorized recreation, illegal motorized use and enforcement/resource concerns specific to this area.

The WR3 proposal:
- Effects the wilderness character of an Inventoried Roadless Area
- Impacts bighorn sheep winter range and would be open to wheeled-vehicles year round.
- Has well-documented enforcement concerns through indefensible open alpine terrain (see photos)
- Would increase traffic along the wilderness boundary on a contested ATV trail (MT14) with known resource concerns
- Utilizes a steep service road prone to erosion with increased traffic
- Conflicts with current, high-value non-motorized recreation for local residents
- Is redundant and not needed. There are two motorized access routes providing access to 524 and MT14 from both the East and West. *Note that the new public easement from the Three Spears Ranch now allows legal access to FSR524 from town of Dubois
WR3, Windy Mountain. Example of illegal use from Salt Barrels Park “The Great Temptation” in 2016. Adding access from Windy Mountain WR03 will exacerbate enforcement concerns.

WR3, Windy Mountain. Example of illegal use from WR03 proposal visit, October 28th, 2021, approximately half mile from any legal public FS route. New WR03 motorized trail proposed to be open to all wheeled vehicles Jan 1-Dec 31 despite mapped crucial winter range.
WR3, Windy Mtn. A hiker walks down the steep grade of FSR961. Dozens of Upper Warm Springs residents regularly walk this gated road, one of the few places left in the area that effectively excludes OHV’s. The Upper Warm Springs homeowner subdivision borders a designated inventoried roadless area that used to provide quality non-motorized access to the Fitzpatrick Wilderness, only two miles away on foot via this route.

**Warm Springs Canyon Additions**

*Warm Springs Canyon Loop* proposals include:

- WR07: new trail construction through a steep wide-open meadow hillside using an illegal user-created route.
- WR13 builds a new trail on Forest replacing adjacent road on private
- WR13 proposes significant new construction across a steep rock-slide canyon and crossing Warm Springs Creek-eligible Wild and Scenic River.

The three combined proposals require over 4 miles of construction, but would also significantly increase access to multiple miles of previously inaccessible routes.

**Comment Suggestions:**

- "Large effective loop" would increase traffic to previously inaccessible routes and bisect intact wildlife habitat.
- Unique geologic features including massive rock slides, geysers, a natural bridge and steep remote canyon-cliff habitat.
- Increased traffic, impacts and illegal motorized use. New WR07 connecting the popular Union Pass/Crooked Creek road and developments to an otherwise inaccessible system will significantly increase traffic and impacts across a large network of previously inaccessible routes. Known illegal motorized use and enforcement concerns generated from or reported
by Porcupine and Stoney Point residents will increase. Ask how the FS is considering these significant cumulative effects.

- Unique natural and cultural resources that the FS has not surveyed- tie hack plumes, nesting peregrines, moose habitat, bat roosts, aquatic species of concern.

- Question significant technical new route construction required across a steep rock canyon with multiple rock slides. The SNF states that proposals occurring “on steep slopes prone to erosion or landslides” were dropped if the effect was unmitigable (EA p 43).

- Note lack of details limits meaningful comment. The SNF has included this proposal in travel planning since 2015, plenty of time for FS staff to visit the site and determine feasibility, provide a basic route description, and identify potential resource impacts.

Beginning of proposed Warm Springs Loop, view of user-created route at FS portal entrance from the Union Pass scenic byway.
Warm Springs Loop section WR07. Illegal use of ineffective closures at proposed WR07. This issue was a tour spot on a Wind River District travel plan field trip highlighting enforcement concerns. As of 2016, FS staff admitted they were unable to effectively close this highly visible illegal route seen from the popular Union Pass road.

Existing tie hack flume along Wind River Canyon near proposed ATV trail crossing (WR13). No new route proposals have been surveyed or screened for cultural resources.
WR13- Warm Springs Rock Slide - just below proposed canyon crossing (Member photo, 2021)
Warm Springs Canyon proposed crossing- an undeniably scenic and unique habitat on the Wind River District. Multiple natural and cultural resources of local interest are likely to be impacted but have not been surveyed, identified, or analyzed by the FS in over seven years of proposing this route through travel planning.

**Bear Creek**

WR26. The Bear Creek road accesses an important trailhead to the Washakie Wilderness. The route is known to have serious resource concerns impacting native cutthroat special regulation headwaters. Currently the last 1-2 miles are only accessible by UTV; passenger cars park higher up and walk in. Previous proposals include converting to 65” only (current ground scenario) or closing and decommissioning the route completely (both losing important Wilderness access). The preferred Alt 4 proposes no solution, but converts the FSR to an FST open to all-wheeled vehicles. The preferred alternative also adds more motorized loop routes at Wilderness boundary (WR71).
Bear Creek Proposal. Alternative 4 Converts FSR with known resources concerns to FSTrail open to all wheeled vehicles. WR71 increases motorized trail access (to dispersed campsites) after fording Bear Creek.

Bear Ck Comment Suggestions:

- Ask the FS to commit to maintaining, improving or re-routing this important access road to a wilderness trailhead instead of building new ATV trails.
- A seasonal closure until June 15 would significantly preserve the road.
- Ask the FS why they haven’t proposed any road improvements or seasonal closures since raising known resource concerns in 2015.

FSR 501, Bear Creek Rd, heading north towards Washakie Wilderness trailhead, May 28.

FSR 501, May 28, 2021. No repairs or maintenance have been attempted since known resource issues were raised in 2015. Road conditions were so bad (and wide) that accessing the wilderness trailhead by foot was incredibly difficult.
FSR 501, Bear Creek motorized ford/crossing just before Wilderness boundary. Significant runoff into Bear Creek. This Bear Creek ford ½ mile from the Washakie Wilderness boundary would be an easy location to propose a closure to protect resources. Instead, the new WR-71 proposal encourages the creek crossing by adding more motorized trails and increasing motorized OHV traffic to impacted creekside campsites.

**WR Seasonal Closures**

Only 22% of the Wind River District's 331 miles of roads include seasonal restrictions, and less than half of Wind River's 40+ miles of NFSTs include seasonal restrictions. Every other district proposes seasonal restrictions on 80% of their NFSTs.

Almost all roads and trails, including new trail proposals, on WRRD are open to wheeled vehicles JAN 1-DEC 31. This is true for all roads and trails on the south zone of the highway in the Warm Springs area. Thank the Shoshone for their proposed seasonal closures and request that they consider more seasonal closures on the Wind River District to protect crucial winter range and preserve road conditions.

**WR Trails expanded to 65” (WR90)**

The Wind River District's five existing <50” ATV trails are all proposed to be expanded to 65”, a total of 22 miles. This is described as “groundbreaking” construction on the KMZ layer. What level of construction is required, and have any of these existing routes been surveyed for potential resource concerns?

- Strongly oppose expanding MT14 (WR90) to 65”. This is a highly contested ATV trail along the Fitzpatrick Wilderness boundary with known resource concerns. Expanding the trail would significantly increase (currently low) OHV traffic through the Benchmark Inventoried Roadless Area and along the Wilderness boundary.

**Winter Proposals**

*Deception Cross-Country Ski Area -WR02*

Thank and support a community-accepted snowmobile closure around the volunteer-groomed Deception ski trail. This small closure protects a small nordic ski trail groomed by local volunteers and highly-valued and visited by local families and tourists alike. The proposal to officially adopt the current voluntary closure diversifies local winter recreation opportunities with no cost to the snowmobile community.