



October 30, 2015

Wind River Ranger District
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Subject: Shoshone National Forest pre-scoping Travel Management Plan comments

Dear Supervisor Alexander and Wind River District Ranger Metzger,
Thank you for this opportunity to provide pre-scoping comments regarding the Shoshone National Forest's Travel Management Plan. Please accept the following comments on behalf of the Wyoming Wilderness Association (WWA).

The Wyoming Wilderness Association is a not-for-profit outreach, education and advocacy organization working to protect Wyoming's public wild lands. Our organization represents over 850 members across Wyoming and the United States. Our constituency is made up of conservation and outdoor enthusiasts including hunters, anglers, hikers, horsemen, and motorized recreationalists who value Wyoming's public wild lands. WWA is involved in statewide advocacy efforts to protect our last remnants of wilderness-quality lands and voice the importance and value of both the wild places and wildlife to our state. The Wyoming Wilderness Association first opened its office in Dubois in 2010, with the intent of protecting the wilderness character of the Shoshone's most pristine and most vulnerable wild places through the Shoshone's Forest Plan revision process. In the last four years WWA has employed year-round resident staff, seasonal interns, promoted Dubois as a national tourist destination, and hosted numerous free and open to the community events. The Wyoming Wilderness Association is invested in a wild Shoshone Forest and in the long-term sustainability of Dubois's economy and quality of life.

It is our understanding that comments regarding current travel proposals submitted by October 31st will be considered for the District Ranger's first cut decision at a proposed action on December 15th. As you advised, our comments at this early junction are not comprehensive, but meant to influence the "first cut" at a proposed action presented at the Wind River District's December 15th meeting. We look forward to submitting more substantial comments following the December meetings to influence the Forest's official proposed action and scoping document set to publish in Spring 2016.



Wyoming Wilderness Association is not proposing any system road closures at this time. Our primary Travel Plan concern continues to be the dozens of existing “closed” non-system roads that see an equal amount of motorized travel as some system roads, provide more illegal use, and cause more significant resource damage. Based on our extensive route monitoring observations in 2015¹, a proposed road closure would likely only cause the route to be deleted from the map, while existing travel continues unidentified and unregulated. Our primary focus through the Travel Plan will continue to be on effectively closing existing unauthorized routes, as is required by the Forest Plan and under the 2005 Travel Rule. WWA’s substantial pre-scoping comments will include a comprehensive documentation of the unauthorized routes that currently see motorized travel and focus on the importance of making the MVUM an accurate reflection of on the ground use. In the meantime, we feel it will be fairly easy for the Shoshone to identify redundant or unnecessary system roads that could offset future system route additions.

As District Ranger Metzger and the Shoshone’s Travel Plan officials determine the screening process and review proposals for new motorized trails, we ask you to consider the following:

A. Alignment with Shoshone Forest Plan.

All proposed actions must comply with the Shoshone’s 2015 Revised Land Management Plan. WWA was surprised and disappointed to see proposals WR-2 and WR-9 presented for public discussion when they clearly conflict with Forest Plan non-motorized prescriptions. These non-motorized prescriptions were the result of a 10-year public process that should not be taken lightly. It is our understanding that the North Zone screened similar invalid proposals before presenting them for public comment, and hope that this will be a consistent protocol across the districts in the future.

We also ask that any proposed action support the Shoshone Forest Plan’s identification of the Shoshone as a uniquely wild, backcountry forest. (page) Any proposed travel actions should reflect this self-identified backcountry niche, as stated in the Supervisor’s Traveller Edition 1. One of the most effective means to accomplish this goal is to prioritize preserving the intact, wild nature of the Shoshone’s RARE II Inventoried Roadless Areas. The Wind River District has received proposed route additions in the Telephone Draw, Castle Rock, Warm Springs Creek and Union Pass Roadless Areas. Motorized routes less than 50” are not legally prohibited under the Roadless Area Conservation Rule, but we hope that

¹ All photos and observations are part of WWA’s citizen driven efforts to monitor and document motorized routes on the Shoshone. In only our first season of data collection, 35 citizens have submitted photos and waypoints of motorized travel observations. This demonstrates the significant citizen investment in ensuring a responsible travel plan for the Shoshone.



you will weight the importance of these areas in maintaining the Shoshone's uniquely wild backcountry character. Many of these areas provide unique and easily accessible wilderness-quality experiences for a wide variety of users. Not only are these roadless areas essential to the nature of the Shoshone, they are significant on a national level. Inventoried Roadless Areas comprise only 2% of our nation's land base, but provide invaluable social and ecological benefits: critical connected wildlife habitat, necessary sources of clean water and air, easily accessible quality outdoor experiences and sustainable economic benefits.

B. Do not reward illegal behavior.

Please do not reward illegal behavior. New system trails must not be designated as the result of illegal user-created routes: this sets a bad precedent for the Shoshone, for the ATV community, and for public lands nation-wide. A decision to adopt illegally created routes would directly reward illegal actions and encourage illegal behavior in the Wind River District in the future. User-created routes are rarely created with the design standards necessary for sustainable ATV trails.

C. Consider appropriate terrain to encourage route compliance.

The District Ranger and ATV Ranger have both stated that it is difficult if not impossible to enforce ATV compliance to designated routes if there is no "defensible space" or "pinch points". (See August 1st WRRD field trip notes). Our documented observations of illegal use across various landscapes of the South Zone repeatedly confirm that high alpine, open meadows see the most frequent off-trail violations. Violations are more likely where antler hunting and big game hunting occur.

D. Do not construct new routes.

The Wind River District has an abundance of old established road beds and has been largely unsuccessful in prohibiting motorized travel on many miles of these unauthorized routes. It should be assumed that any proposed route addition will provide motorized access for the foreseeable future.

E. Route Design.

Spur roads. Consider the likelihood of user-created routes when proposing opening or creating dead-end or spur roads. Spur roads, unless terminating in a destination spot or geographic feature, tend to encourage illegal routes to connector points. This can currently be demonstrated on FSRs 2632b, 2632a, 732, and 600, 501E, 549, for examples.



Loops. We are confused by the Forest Service's focus on creating loop opportunities and the insistence that loops will reduce illegal use. Thus far we have seen no evidence to support this assumption on the Shoshone, and in many places we've observed just the opposite. For example, the Wildcat Loop, FSR 554>528>545, is one of the Shoshone's most popular ATV loop opportunities, and we have documented more illegal off-trail use and unauthorized routes in this area than anywhere else on the Forest. In contrast, the jeep (but primarily ATV trail) to Moon Lake has a negligible amount of unauthorized route mileage compared to many other WR SRs. And although it traverses open meadows that are admittedly difficult to enforce, there is little off-trail use and significant compliance to this designated route. One rationale for this observed difference is that OHV users travelling to a destination spot are doing just that, attempting to get to a destination, the OHV is simply the vehicle used to get there. Motorized users seeking loop opportunities for the sole purpose of ATV travel may be more tempted to adventure off-trail.

When correlating existing motorized opportunities with unauthorized travel across the Shoshone's Districts, one could reasonably conclude that more motorized loops or more motorized access only results in more motorized violations. This is an especially reasonable assumption considering the fixed, limited law enforcement staff available to patrol designated system miles.

Travel Analysis should inform Travel Plan Decisions.

Underlying all of the above tenants should be the consideration for enforcement capability. At this point in the Travel Plan process the most prevalent theme of WRRD public meetings has been a "lack of enforcement", as well as the need for increased signage and effective barriers. This is a shared concern between motorized and non-motorized users. The Forest Service has stated that they will be unable to increase law enforcement (LEO) staff or presence, and that District Forest Protection Officers (FPO) will still only be able to address motorized violations opportunistically. Relatedly, the 2005 Travel Rule directs the responsible official to consider "the need for maintenance and administration of roads, trails, and areas that would arise if the uses under consideration are designated; and the availability of resources for that maintenance and administration." (36 CFR Part 212, Subpart A).

Most importantly, we request that the Supervisor and the District Rangers take a hard look at each District's existing travel system to accurately identify the Purpose and Need for any proposed changes. Typically the scoping comment period is designed to identify the issues and concerns that should be addressed by a proposed action and range of alternatives. It is confusing that this pre-scoping comment process is focused on commenting on dozens of specific proposed



additions before determining if any, what kind or how many motorized trail additions are actually needed on each District.

The Travel Plan process thus far has been narrowly focused on additions or deletions to the MVUM system routes, but the recurring broader concern (especially on the South Zone) regards the illegal use that occurs off of both system and non-system roads and the need for better signage and maintenance of existing roads. The FEIS states that the “increases in off-highway vehicle recreation in unauthorized areas are leading to increased wildlife disturbance, soil erosion, and sedimentation in streams,” (FEIS at 439). While the Forest Plan includes the following objective, “At least three new, wheeled motorized trail loop opportunities are available.” (RDTR-OBJ-05, 2014), this should not overshadow the requirements of Travel Planning or existing Forest Plan directives. It is also important to remember that comments submitted on the Shoshone’s Forest Plan demonstrated that 75% of all commenters and 75% of Wyoming residents opposed any more motorized access on the Shoshone. According to the 2009 Wyoming Statewide Comprehensive Outdoor Recreation Plan, the most common concern expressed by Wyoming residents was excessive motorized use (Draft EIS at 482). A 2008 Colorado State University report reviewing public preferences and values in the Shoshone’s neighboring counties (Fremont, Hot Springs, Teton and Park) concluded similar results: In reporting favorable public uses of the SNF, the vast majority of respondents strongly supported wildlife habitat (96%) and non-motorized opportunities (89%) rather than ATV recreation (39%).²

The Revised Shoshone Forest Plan defines the principal goals of travel management planning:

- Reduce the development of unauthorized roads and trails and the associated impacts to water resources and aquatic ecosystems, wildlife, and user conflicts.
- Identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands.

These goals should not be overshadowed by an objective to provide additional loop opportunities. Importantly, the 2005 Travel Rule, Forest Service Manual and Handbook and Code of Federal Regulations direct the Shoshone to conduct Travel Analysis to identify the minimum road system necessary and to inform the Travel Plan process. Under the 2005 Travel Rule, 36 CFR Part 212, Subpart A requires identification of the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of NFS lands and use of a science-based roads analysis at the appropriate scale in determining the minimum road

² Report: Study of Preferences and Values on the Shoshone National Forest, Colorado State University, Commissioned by the State of Wyoming Governor’s Office. January 16, 2008.



system. Decisions to add roads to the forest transportation system must be informed by travel analysis conducted at an appropriate scale.” (FSM 7703.26). Forest Service Manual (Chapter 7712.4) also directs that a Travel Analysis Report be completed in accordance with FSH 7709.55, section 21.6. “The report should identify access needs and opportunities based on current budget levels and realistic projections of future funding. “ The manual also directs the agency to “use the results of travel analysis to develop proposed actions for travel management decisions.” (FSM 77105.3).

It is concerning that a Travel Analysis Report has not been completed or presented to the public before the District Rangers are proposing additions to the Travel System. At the very minimum, an analysis of existing system road and unauthorized road density should have been presented publicly to help identify the Purpose and Needs of the Travel Plan. For example, the Laramie Ranger District immediately disclosed this information to inform their pre-scoping Travel Plan comment period: "Pole Mountain currently has approximately 200 miles of designated roads (open or gated) and more than 100 miles of unauthorized routes on 55,000 acres (86 square miles). This amounts to 2.3 miles of designated roads and 1.2 miles of unauthorized routes—or a total of 3.5 miles of roads—per square mile. In comparison, the East Snowy Range unit has 1.9 miles of designated roads and motorized trails per square mile and the West Snowy Range unit has 2.0 miles of designated roads and 0.4 miles of unauthorized routes per square mile."

At the very minimum, this basic information about the existing travel system should be presented to the public and used to determine proposed actions on each district. It would be especially informative to inventory and disclose the current status of unauthorized routes. What percentage of unauthorized routes on the Wind River district are effectively closed to travel, signed closed, or still see regular motorized use? This is the type of information necessary to inform a responsible Travel Plan.

As we have noted at several stages of this process, it is important to identify and acknowledge significant differences between each District’s existing travel system opportunities, issues and needs, and for the Rangers and Supervisor to work together to address these district-specific needs while meeting Forest-wide goals and objectives. The above Road and Travel Analysis Reports would be extremely helpful in making these comparisons and determining what travel changes are needed on each district. For example, the clause to provide new loop opportunities (RDTR-OBJ-05, 2014) was likely included for the benefit of Park County Residents, and understandably so. Currently, looking at the MVUM, there is not a single motorized loop opportunity on the North Zone of the Shoshone. Nor are there any designated ATV-only trails on the North Zone. Reports from WWA members, travel monitor volunteers, and partner conservation groups documented a negligible amount of off-trail violations on the North Zone, and all reports indicate that the



ATV Ranger persistently signs or barricades any unauthorized, unclassified or user-created routes. The Cody ATV club has over 100 voting members, hosts ATV trail service projects, and demand for motorized opportunity was notably greater at the June Cody meeting compared to either of the South Zone meetings. A hard look at the existing travel system on the North Zone might support the need for more motorized opportunities on these northern Ranger Districts.

In contrast, on the Wind River District alone there are approximately 13 sizable motorized loops in the existing designated system. There are currently six designated ATV trails, and three of those designated ATV trails provide outstanding motorized loop opportunities. Several other existing motorized loop opportunities are so rugged they see very little 4wd traffic and provide outstanding ATV trails without an official ATV-only designation. Despite these existing loop opportunities on the Wind River District, illegal off-trail use and lack of enforcement is a major concern expressed by all user groups at Dubois public field trips and meetings. Illegal, off-trail use is common place off of system roads and non-system roads alike. In direct contrast with the North Zone practice of persistently signing closed roads, the Wind River District Ranger contends that signing closed roads closed is unnecessary and insists that ATV users need only reference their map to identify designated routes. One justification for not signing closed roads closed, presented at the August 1st WRRD field trip, is that closed signs are repeatedly driven over, stolen or vandalized. Admittedly, the Wind River District is tasked with signing and closing a far greater number of unauthorized routes than the North Zone, due to the nature of the landscape and area logging history. The fact that the Wind River District is currently unable to adequately sign its open roads or effectively close unauthorized routes is critical factor when determining whether new motorized routes are needed. With this existing situation we request the Wind River District focus on the primary goals of travel planning, “Reduce the development of unauthorized roads and trails and the associated impacts to water resources and aquatic ecosystems, wildlife, and user conflicts” and “identifying the minimum road system necessary”, rather than focus on additional motorized route proposals.

The Wyoming Wilderness Association is optimistic that the District Ranger’s proposed action presented on December 15th will be a thoughtful reflection of the Wind River District’s existing Travel Plan needs.

Acknowledging that this comment opportunity is meant only to inform the District Ranger’s “first cut” at a proposed action, we would like to focus your attention on two areas the Wyoming Wilderness Association strongly opposes any additional motorized routes. We have also attached minimal, initial responses to the 36 proposals in a separate document.



Wiggins Fork Roadless Area: (See WR-02, WR26, WR-30)

Wilderness Evaluation Areas: Castle Rock (02053) and Telephone Draw (02054).

The contiguous Telephone Draw and Castle Rock Inventoried Roadless areas make up nearly 30,000 acres of wild and scenic front country bordering the Washakie Wilderness. Combined, these two areas provide some of the best easily accessible front country for hunters, hikers and horsemen, motorized and non-motorized users alike. Both wilderness areas were recommended for wilderness in the Alternative C of the 2012 Shoshone Draft Plan Revision.

The wildlife values of this intact, relatively undeveloped habitat cannot be understated. Much of the area is defined elk calving and elk crucial winter range (FEIS Map 15), big game crucial winter range (Map C) as well as a significant amount of bighorn sheep winter range. Game and Fish biologists have confirmed that the area serves as important elk and deer migration area, as elk and deer move from the Washakie Wilderness towards winter ranges on BLM, the East Fork Winter Range Complex, and the Wind River Reservation to the east.

The Telephone Draw Roadless area contains 13 miles of creeks that provide important habitat for native Yellowstone cutthroat trout as well as the Wiggins Fork eligible Wild and Scenic River segment. The existing roads in Telephone Draw provide easy access to outstanding quality fishing opportunities for native cutthroat trout.

Due to its remoteness (10 miles outside of town and 20 miles on dirt road) and dearth of existing ATV opportunities, designating an ATV trail in this area would do little to benefit Dubois's local economy and would not provide any notable destination ATV opportunities. Importantly, this area is widely championed for its excellent motorized-access hunting opportunities. Arguably the greatest threat to hunter success today is illegal off-trail ATV violations.

Any new proposals in this area would not be in keeping with protecting the backcountry character of the Shoshone. Proposal WR-2 conflicts with the Forest Plan non-motorized prescription. The "existing road" referenced is in fact almost completely rehabilitated and a new motorized trail here would bisect a large chunk of important intact wildlife habitat. WR26 would limit historic pick-up and jeep hunter access to a wilderness trailhead and negatively affect harvest opportunities.

WR30 would increase motorized traffic in critical big game habitat and is located in terrain that encourages illegal violations and cross-country travel. WR30 represents part of an old road that may at one time have presented a more sustainable (higher, drier) travel route than the current 501rd that traverses a notably problematic bog/mud area. Rather than proposing additional motorized routes in a wide-open area with recognized wildlife values, we propose improved maintenance of the existing 501 FSR.

WR30 proposal/ existing illegal route:



501 FSR proposed maintenance: (aka little Wayans Hole)





Warm Springs Creek Roadless Area: (See WR-03, WR-11, WR-28, WR-08)
Warm Springs Creek Wilderness Evaluation Area 02902.

This inventoried roadless area just outside the town of Dubois borders the Fitzpatrick Wilderness, is locally championed year-round elk habitat, and critical bighorn winter range. This wilderness evaluation area was ranked high in both the need and availability criteria under the Forest Service's own assessment for inclusion in the National Wilderness Preservation System. The area was included as recommended wilderness in Alternative C of the Shoshone's 2012 Draft Forest Plan. The area provides important motorized and non-motorized recreation opportunities for a significant number of local year-round residents.

WWA opposes additional motorized routes in this area not based only on its roadless area characteristics, but because the current area proposals would reward illegal use, would establish new roads instead of using existing road beds, and would occur in exactly the type of terrain that the District has identified as most difficult to enforce or maintain.

Currently, motorized use in this area is unregulated and unenforced and existing system roads are not maintained or appropriately signed. The MVUM illustrates one motorized trail loop originating at the Upper Warm Springs Forest Service boundary. On the ground, however, the interior area of the loop is riddled with miles of unauthorized routes and off-trail motorized use. These unauthorized routes are not signed or barricaded closed, and there has been no attempt to encourage compliance to the designated system routes (such as signing the system road open at illegal trail junctions). These many miles of unauthorized routes see regular motorized use, generate a significant amount of illegal cross-country travel and provide access to blazed, illegally constructed user-created routes.

Not only are non-system unauthorized routes not signed closed or physically closed, the area fosters at least two non-system routes that the Ranger has deemed open to motorized travel. For all intents and purposes the roads to Grandy Reservoir (WR8) and the road to Bald Mountain (WR36) are currently considered open to public motorized travel. The Ranger has expressed he would have difficulty enforcing a closure on these well-established roads, and the public currently assumes them to be legally open.³ This approach conflicts with the Forest wide direction and public instruction that only designated MVUM routes are legally open to public motorized travel.

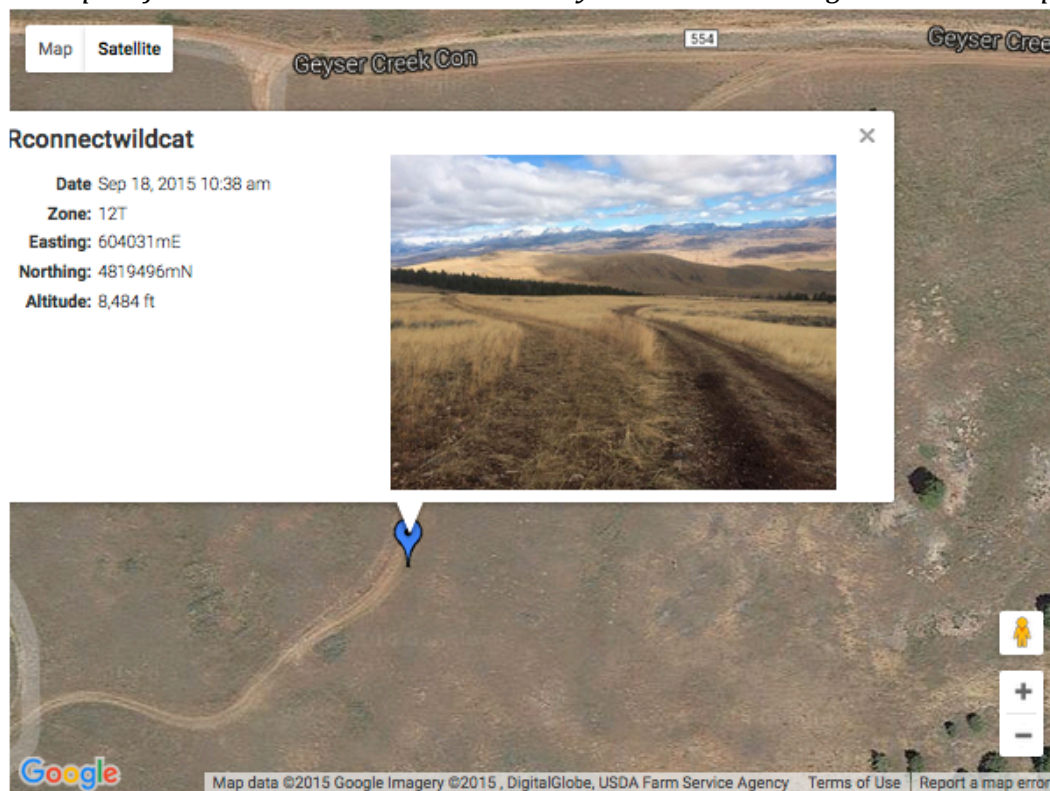
³ In Late October, 2015, the Wind River District posted 29 closed signs in this area. While we appreciate the effort, this push only highlights that 29 necessary closed signs were previously non-existent. One local resident stated this was the first closed sign posted on several of the routes in at least 5 years. We also question the timing of the signage, since many residents perceived the gesture to mean previously open roads were being closed as part of the Travel Plan process.



The current lack of enforcement, signage or effective closures in this area is especially concerning considering the trailhead is 5 miles, or a 15 minute drive, from the Wind River District office. The agency's palpable complacency regarding unauthorized travel in this area has translated to a similar attitude reflected by motorized users. Local residents have been forced to take on the responsibility of "enforcement" in this area, and are repeatedly tasked with constructing their own barriers to deter user-created routes.

The unauthorized route to Windy mountain (closed to public, open to DTE, High Plains Power, and more) is appropriately gated, locked, and well-signed as closed to motorized travel. Still, illegal use occurs every season, with local residents burdened with the responsibility of replacing moved barriers, signs, and creating natural barriers in user-created bypasses.⁴

Example of established unauthorized non-system routes not signed closed or open.



⁴ One solution to the existing enforcement issue, while still meeting the need for new ATV opportunities, would be to adopt an adaptive management strategy in the resulting Travel Plan: the condition that any new motorized routes could be effectively closed at any future time in the case of illegal use and resource damage. Unfortunately the Forest Service has already demonstrated they would be unable to effectively close said trail.



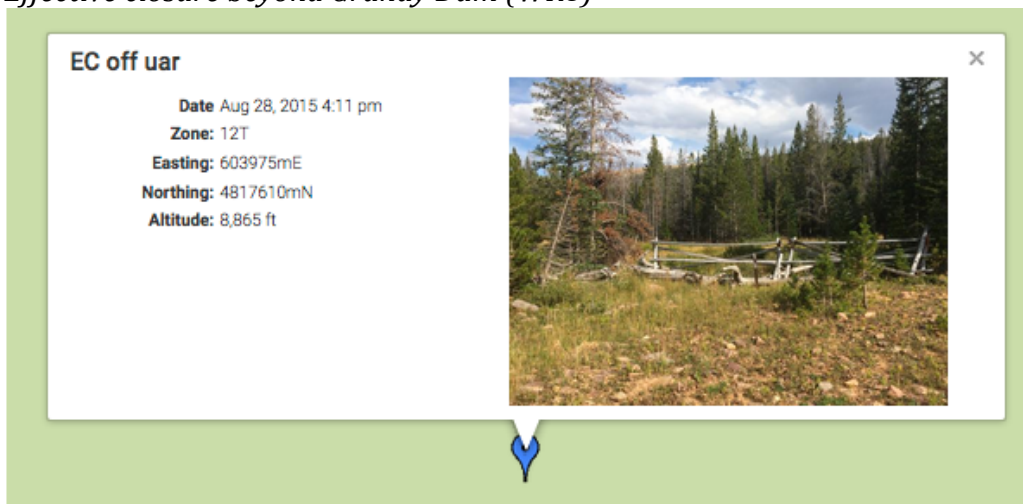
Another, about ½ mile from Forest Service boundary on 545:



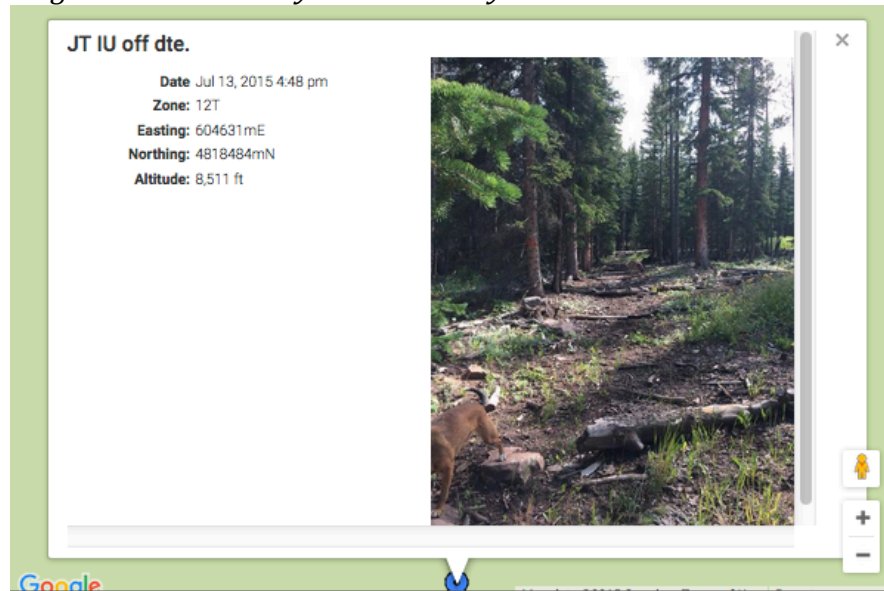
Entrance to non-system road to Grandy Reservoir, not signed closed and open to public travel. WR8. (Proposal map indicates there is a gated closure at this junction):



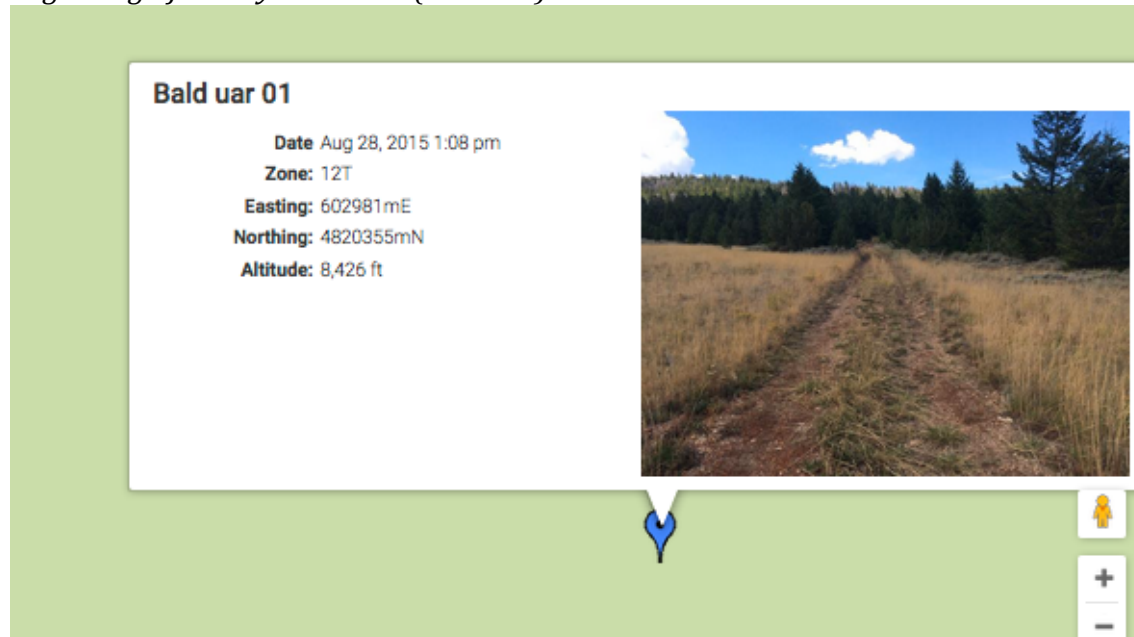
Effective closure beyond Grandy Dam (WR8)



Illegal route to Grandy barricaded by local residents



Beginning of non-system road (2+ miles) to Bald Mountain



Illegal use off unauthorized Bald Mtn routes

aldmtnUAR

Date Sep 18, 2015 10:02 am
Zone: 12T
Easting: 603243mE
Northing: 4820349mN
Altitude: 8,409 ft



Road at top of Bald Mountain

balduarEnd

Date Aug 28, 2015 2:20 pm
Zone: 12T
Easting: 601467mE
Northing: 4819260mN
Altitude: 9,769 ft





Illegally constructed routes off of one unauthorized Warm Springs creek routes



New routes in this area would directly reward illegal behavior. More importantly, it is inappropriate for the Wind River District to propose additional motorized routes in a roadless area where it currently is unable or unwilling to enforce the 2005 Travel Rule or existing Forest Plan directives. The Forest Plan provides direction for management of roadless areas, and states that the 2001 Roadless Rule provides limitations that “increase the likelihood that inventoried roadless acres within wilderness evaluation areas will maintain their wilderness capability attributes during plan implementation.” The Revised Forest Plan states the following goals for roads and trails:

- Resource impacts from use of unauthorized motorized routes are eliminated, along with the unauthorized route.(RDTR-GOAL-09)
- Unauthorized routes should be closed and rehabilitated as soon as practicable. (RDTR-GUIDE-04)

“As soon as practical” should be before designating new motorized routes in the area. It would be inappropriate for the Wind River District to support any new motorized routes in this roadless area where they presently fail to meet clear directives to allow motorized travel only on designated system routes, close unauthorized routes, and to protect the area’s roadless characteristics.



Specifically, we strongly oppose the proposal to create a new route along the Windy Mtn. access road to Salt Barrels Park. WR-3 proposes about two miles of new trail that traverses the exact landscape that invites violations and the Wind River District currently admits is difficult or nearly impossible to enforce compliance.



The existing access road is steep and prone to erosion even with limited travel.







The threat of establishing and/or transporting invasive species across the landscape is a serious concern. Most of the trail does not provide an established road and is devoid of terrain features that could facilitate route compliance.



The Upper Warm Springs Creek area is an important, easily accessible front country area that is used by a wide-variety of resident users. The revised Land Management Plan highlights the importance of just these types of areas: Front country areas provide a wide range of recreation opportunities for motorized and non-motorized recreation in a natural setting. These areas serve as gateways to the Forest's recreation opportunities. (Revised Forest Plan, page 86) Currently, non-motorized system trail opportunities are non-existent compared to system motorized opportunities in the Shoshone's front- country, and this is especially apparent south of the highway. The closed DTE road (WR3) is one of the few non-motorized trails for residents to walk or ride on. Proposing to convert the primary non-motorized foot/horse path into an ATV trail (WR11), while an existing motorized route already provides access to the wilderness trailhead, does not support a wide-range of recreation opportunities in this area. A concerted effort is needed to strike a balance here between the motorized users, hikers, and horsemen that utilize these backyard, front country areas.



WWA would like to again express our shared investment in supporting and fostering Dubois' economy. WWA acknowledges the important role that ATV operations contribute to the local economy as well as funding our state trails system. Given the existing ATV loop opportunities that already exist, however, we cannot envision a new loop trail that would significantly affect our status as a destination ATV spot. We propose instead maintaining, signing and promoting the existing excellent loop opportunities that exist. The Wyoming Wilderness Association is offering to work with the Town of Dubois, the Chamber of Commerce, and the ATV club to produce promotional materials for our existing outstanding ATV opportunities, especially the Wildcat Loop (545-554), Horse Creek Loop (505-5051A-285), and the MT11-532- 542.1 ATV-only loop.

We also look forward to continued efforts to identify and promote mountain bike opportunities on the Shoshone. Several Wyoming Wilderness Association mountain bike outings have identified illegal roads that would make enjoyable, scenic, long distance loop connectors in the Geyser Creek and Union Pass areas. These trails would bring neighboring cyclists directly into the town of Dubois. Uniquely rugged mountain bike loop opportunities, in conjunction with DART's (Dubois Area Recreation and Trails) overlook trail and proposed skills course, as well as forecasted BLM opportunities, will diversify Dubois's tourist appeal.

We should also note that Dubois's outstanding big game hunting opportunities provide significant revenue to the local economy. The negative affects of roads and motorized travel on big game populations and on hunting success has been documented extensively.⁵ It is important to again acknowledge the Shoshone's unique backcountry niche, since it is the wild character of the Forest that draws people to the Shoshone, or the 'horse forest'. A 2012 Dude Ranchers Association report indicated a \$3,651,000 gross revenue from the six dude ranches that operate on the Shoshone during the 2012 season. The Shoshone will never replace the Bighorns as a destination ATV forest, or the Bridger-Teton as a mountain bike destination. In trying we would quickly compromise the unique appeal of our Forest, the backcountry "horse forest" that draws visitors across the nation today. Throughout the Travel Plan it will be important to remember the Shoshone's role as our nation's first National Forest, and acknowledge that its unique wilderness and roadless area characteristics are national commodities with benefits reaching beyond the town of Dubois itself.

Finally the Wyoming Wilderness Association again officially requests that any proposed action include a detailed plan for effectively closing unauthorized non-system roads. This plan would require improved signage of open roads, persistent

⁵ Where the Wildlands Are: Wyoming, The Importance of Backcountry Areas to Wyoming's Fish, Wildlife, Hunting & Angling. A Report Produced by Trout Unlimited. 2006. Tom Reed. Page 18.



signing of closed roads, and implementing physical barriers wherever possible. Secured funding, prioritized decommissions and a set timeline is needed to demonstrate the Shoshone's commitment to making the MVUM an accurate reflection of on the ground use.

We look forward to the December 15th meeting and future comment opportunities. Please do not hesitate to contact us with any questions or suggestions.

Respectfully submitted,

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