



Submitted electronically at: objections-chief@fs.fed.us

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Reviewing Officer for
Thomas Tidwell, Chief USDA Forest Service
Attn: EMC-Administrative Reviews
1400 Independence Ave. SW
Mailstop 1104
Washington, D.C. 20250-1104

Objectors:

Cathy Purves, Lead Objector
Trout Unlimited
250 North 1st Street
Lander, WY 82520
cpurves@tu.org
307-332-6700 ext. 10

Calvin Hazelwood, Chair
Wyoming Council Trout Unlimited
250 North 1st Street
Lander, WY 82520
Calvin.Hazelwood@Williams.com
307-321-1476

Leon Sanderson
Dubois Anglers and Wildlife Group (DAWG)
P.O. Box 28
Dubois, WY 82513
sandersonstudio@wyoming.com
307-851-6253

Jeff Judkins, President
Popo Agie Anglers Chapter of TU
710 Wood Street
Lander, WY 82520
jeff_judkins@nols.edu
307-349-9433

Jackson Hole TU Chapter
185-B North Center Street
Jackson, WY 83001

East Yellowstone Chapter of TU
P.O. Box 3008
Cody, WY 82414

Upper Bear River TU Chapter
P.O. Box 947
Evanston, WY 82930

Subject: Shoshone National Forest Revised Land Management Plan, 2014 Revision

Responsible Official: Daniel J. Jiron, Regional Forester, Rocky Mountain Region

Statement of the Issue(s): The Forest Service changed the direction of the intent of the Draft Land Management Plan (DLMP) and Draft Environmental Impact Statement (DEIS) with the introduction of a new and unanalyzed alternative (Alternative G) in the Final Environmental Impact Statement (FEIS) and Draft Record of Decision to the Revised Land Management Plan (DROD), released on January 2014. One of the introduced changes was the increased motorized recreation access designation (referred to as Management Areas) into premiere backcountry and potential wilderness areas, including Francs Peak Inventoried Roadless Area (IRA) and Wood River IRA. We believe the Forest Service should not have recommended motorized recreational vehicle use in these two potential wilderness areas. Alternative G was not available for public consideration in the draft forest plan. Our objection contains several issues:

- 1) The Forest Service should not have recommended a decrease for backcountry, year-round non-motorized areas (MA1.3) for Francs Peak and Wood River IRAs, two important IRAs that are considered iconic wild forest areas that represent wilderness settings;
- 2) The Forest Service should not have increased acreage for motorized recreational vehicle use through the designation of new MA's in the FEIS/DROD for the four most popular backcountry places, and in particular Francs Peak and Wood River IRAs, where combined summer/winter, summer, and year-round motorized vehicle access has been increased;
- 3) The inclusion of Alternative G is an entirely new Alternative in the FEIS and DROD, not otherwise offered to the public for review, and offering new substantial changes from the proposed alternative under the DEIS/DLMP. These significant new circumstances require further National Environmental Protection Analysis (NEPA) analysis, including public review; and,
- 4) Through a survey process, initiated by the Forest Service, it was demonstrated that the public overwhelmingly supports, and the Forest Service acknowledges, maintaining these backcountry areas as non-motorized areas.

Background of Objecting Parties: Trout Unlimited, the Wyoming Trout Unlimited Council, the Popo Agie Anglers Chapter of Trout Unlimited, the Jackson Hole Chapter of Trout Unlimited, the East Yellowstone Chapter of Trout Unlimited, the Upper Bear River Chapter of Trout Unlimited (hereafter referred to as "TU"), and the Dubois Anglers and Wildlife Group (DAWG) all have members who fish, hunt, recreate, and do business within the Shoshone National Forest (SNF). TU and the DAWGs value the high level of unique backcountry landscape available within the SNF and often expend considerable labor and finances to help improve and maintain its unusual backcountry character. Francs Peak and Wood River IRAs in particular contain some of the last of the wild natural character remaining in our national forests.

During the time period the SNF has undergone this lengthy and important planning process, TU and the DAWGs have been active participants, attending public meetings, providing substantive comments during the various opportunities offered, and meeting with SNF staff. This includes responding to the original planning process beginning in 2005, participating in the initial scoping process in 2010, participating in the second round of scoping in February 2012, and commenting

on the DLMP/DEIS in November 2012 (which identified Alternative B as the Preferred Alternative). When the SNF released the FEIS and DROD on January 24, 2014, the selection of Alternative G, a brand new alternative not offered in the DEIS/DLMP, was a surprise. Therefore, we are submitting this objection letter and ask for your consideration of the issues we identified above.

Demonstration Statement for Filing the Objection:

TU and the DAWGs expressly identified our support for increased protective measures and stronger management direction for important backcountry areas in our comment letter to the DLMP/DEIS. We felt this could be achieved with the selection of Alternative D. Additional advocacy for the reduction of motorized recreation in sensitive backcountry areas was voiced by us (see comments on the Draft LMP and DEIS, pages 2-3, by TU, Wyoming TU Council, the DAWG, and the four TU Chapters, dated November 26, 2012; scoping comments by TU and Wyoming Wildlife Federation, pages 3,6,8-9, dated February 2, 2012; and scoping comments by TU, pages 2-3, dated November 19, 2010). It is through these references and our past participation that we provide the required “link” demonstrating prior substantive formal comments and the content of our objection. In addition, our objections also concern an issue that arose after the opportunity for formal content passed (i.e., lack of NEPA analysis on the new Alternative G).

Discussion of the Issues:

- 1) The Forest Service should not have recommended a decrease for backcountry, year-round non-motorized areas (MA1.3) for Francs Peak and Wood River IRAs, two important IRAs that are considered iconic wild forest areas that represent wilderness settings;**

The SNF has maintained over the years, through written and oral context, that the Wood River and Francs Peak contain potential wilderness areas that remain some of the wildest country on this forest existing outside of designated wilderness areas. TU and the DAWG agree. In fact, TU thought enough of the Wood River and Francs Peak IRAs as premier backcountry places to publish a document (Attachment A) reflecting the importance of these two areas (<http://www.oursportingheritage.org/wp-content/uploads/2011/11/WY-Where-the-Wildlands-are.pdf>).¹ We firmly believe, with support from science, that roadless backcountry areas protect cold, clear headwaters which support our state’s native trout and thriving sport fishery, provide top-quality big game habitat with important security, parturition, and critical areas for survival, and remain places for outdoor recreationists (including sportsmen and women) to experience solitude, unique outdoor experiences, and the best hunting and angling opportunities.

The Wood River and Francs Peak IRAs contain headwater streams that are situated in some of the more steeper and rugged backcountry landscapes in Wyoming. Sensitive soils and sparse vegetation present challenges in stability when impacted with normal climatic events caused by snow, snowmelt runoff, and summer thunderstorms. Our concern with sedimentation and erosion events due to some of the forest’s extremely sensitive soils was expressed early and

¹ “Where the Wild Lands Are: Wyoming. The Importance of Backcountry Areas to Wyoming’s Fish, Wildlife, Hunting & Angling.” A Report Produced by Trout Unlimited. 2006.

often in our initial scoping comments to the DLMP, especially as they applied to native trout and coldwater streams.² Our comments of concern continued in our response to the DEIS/DLMP where the document failed to provide adequate analysis on impacts to coldwater streams, impacts from roads and motorized trail increases in sensitive backcountry areas, and lack of adequate soils discussion.³

TU and the DAWGs believe the Forest Service has erred in its decision to reduce the amount of non-motorized backcountry year-round acreage assigned under MA1.3 for Francs Peak and Wood River IRAs. While our main concern is with the increase in summer motorized access, based on the more dramatic and problematic effects and impacts such use has on the environment, it is impossible to separate winter and summer use access under Alternative G's proposal since the majority of the MAs contain a combined approach. It is, however, important to remind ourselves that the term "summer motorized" also includes fall and early winter access potential, all of which can impact the ecosystem.

In an attempt to clarify for ourselves where some of the increase in summer, year-round motorized access occurred, we created our own comparison table (Attachment B) that was specific to Francs Peak, Wood River, Dunoir, and Trout Creek. We used figures provided by Forest Service staff in a table they created (after the release of the FEIS) based on stakeholder's requests for more information (Attachment C). Our resulting analysis demonstrates that the Forest Service actually decreased protection, though the Forest Service states in the DROD that they attempted to create prescriptive MAs in Alternative G which "*increases protection to back country areas, particularly the four back country areas most advocated for (Trout Creek, Francs Peak, Wood River, and Dunoir Special Management Unit)*"⁴. We disagree with this statement. TU's comparison table identifies significant increases in year-round motorized vehicle access (by 19,454 acres) under Alternative G, compared with Alternative B. In fact, Alternative B provides more protection for these four areas under MA1.3, especially for Francs Peak and Wood River, where a total of 146,708 acres are designated for non-motorized backcountry year-round use vs. 84,519 acres of non-motorized backcountry use under Alternative G. For Francs Peak and Wood River alone, there is a loss of 54,564 backcountry non-motorized acres under Alternative G's MA1.3 designation.

Francs Peak Discussion: Our effort in trying to understand how the SNF came up with the decision to remove acreage from Francs Peak MA1.3 into four newly created management prescriptions for more diversified motorized use resulted in the following summary. According to the information provided by Forest Service staff, Francs Peak, under Alternative B in the DEIS, has 57,049 acres designated as non-motorized year-round under MA1.3. Under Alternative G, this acreage is reduced to 40,934 acres. This loss of 16,115 acres is redistributed toward backcountry motorized use, both summer and winter. Total non-motorized backcountry area for Francs Peak is reduced by 17,301 acres. Because the FEIS does not break out specific IRAs for backcountry motorized use, it is impossible to compare these figures against any of the other

² TU & Wyoming Wildlife Federation. Scoping Comments to the Proposed Draft Shoshone National Forest Land and Resource Management Plan. February 2, 2012. Pages 5-9; Trout Unlimited Scoping Comments to the Shoshone National Forest Plan Revision. November 19, 2010. Pages 2-3.

³ Trout Unlimited, DAWGs, Wyoming Trout Unlimited Council. Comments to the Shoshone National Forest Draft Land Management Plan and Draft Environmental Impact Statement. November 26, 2012. Page 2-3, & 7.

⁴ Draft Record of Decision for the Land Management Plan Revision. Shoshone National Forest. January 2014. Page 7.

Alternatives, other than that which the Forest Service provided us in their table (developed informally after the release of the FEIS).

Maps provided by the FS in the FEIS are also equally uninformative in trying to understand motorized and non-motorized distribution by each alternative. Again, we had to specifically request new maps that helped better define management delineation areas after the FEIS was released. To the best of our abilities, we were able to ascertain that under Alternative G, the management areas exceeded far into this rugged backcountry area. For instance, in MA3.3A (Backcountry Motorized Year-Round), more than 9,000 acres would become available with a boundary line that extends as far west as the divide of Jojo Creek and Deer Creek, over Timber Peak to the trailhead of Francs Fork. Not only are these important headwater streams and coldwater native trout habitat, but this area also includes important summer and winter range for elk and bighorn sheep and grizzly bear secure habitat, all within this boundary.

Wood River Discussion: As our second important IRA worthy of further protection, this area has equally high quality backcountry values. Information we developed in our comparison table for Wood River IRA provides more compelling reason to reconsider the motorized designation for this important IRA. Under Alternative B in our comparison table, Wood River IRA has 44,168 acres identified as MA1.3. Under Alternative G, only 5,719 acres have been designated for this backcountry non-motorized year-round area. This impressive loss of 38,449 acres is redistributed among the backcountry motorized use, summer and winter. Under the old 1986 Plan (and identified as Alternative A), according to Forest Service figures, Wood River IRA had 40,533 acres under MA1.3 designation. We find this redistribution of acreage into motorized designations unacceptable.

Maps in the FEIS provide a cursory view for comparing Alternative G for the Wood River against Alternative F, the most permissive motorized access use under the DEIS. Since the FEIS does not delineate specific MAs for Alternative F as it does for Alternative G, we are only able to view the general maps showing significantly more acreage availability in G than F.

The Forest Service emphasized in communication to the Wyoming Outdoor Council⁵ that these changes to the backcountry management designation for Wood River is no different between Alternative A (1986 Plan) and Alternative G. Their reasoning was that the 1986 Plan allowed snowmobile access and there is some level of local and incidental use, but without any specific designated snowmobile trails. They further go on to state in this correspondence with Wyoming Outdoor Council that because of the lack of development and lack of any specific destination designation, they expect low use. We disagree with statements such as this since it is based on misguided assumptions that 1) the Forest Service is dismissing their own data that states motorized backcountry use is on the rise, and 2) the public will not increase participation once a formal designation for summer or winter motorized access route is adopted, especially given the potential marketing opportunities for communities seeking to increase winter tourism (or even summer) use.

⁵ Email correspondence between Lisa McGee, Wyoming Outdoor Council, and Bryan Armel, SNF, February 4, 2014 and shared with TU.

There is a lack of information in the FEIS and DROD as to how the Forest Service decided to increase motorized access routes into potential wilderness areas. Simultaneously, the FEIS and DROD is flawed by not providing adequate reasoning as to why they would increase motorized vehicle access into two of the most important backcountry wild places in the SNF. We would assume that by allowing motorized vehicle access into potential wilderness areas, the Forest Service would have included extensive supportive analysis for this decision. Instead of providing such analysis and information in the FEIS as to how individual areas will be managed, it appears the Forest Service applied a general blanket approach for increasing backcountry motorized access. This lack of analysis, especially given the significance of IRAs and the extensive damage that can be done by motorized vehicles to the environment, appears as a failure in responsibility on the Forest Service's behalf in conducting adequate NEPA analysis. This statement is supported with NEPA's implementing regulations requiring the Forest Service to "present the ...alternatives in comparative form, thus sharply defining the issue and providing a clear basis for choice among options by the decision maker and the public."⁶ Not only does the Forest Service not provide adequate analysis for each individual area, there is no resulting discussion on the impacts to these two potential wilderness areas from the increased motorized access. This, too, is a violation of the language in the Forest Service Handbook.⁷

Solution: We recommend that the Forest Service withdraw Francs Peak and Wood River IRAs from any type of designated motorized use designation and place these areas back into MA1.3 category.

- 2) The Forest Service should not have increased acreage for motorized recreational vehicle use through the designation of new MA's in the FEIS/DROD for the four important backcountry areas, and in particular Francs Peak and Wood River IRAs, where combined summer/winter, summer, and year-round motorized vehicle access has been increased;**

In trying to better understand how the Forest Service was able to develop the reasoning behind these new MA prescriptions under the Management Area 3.5 umbrella designation, we consulted with the Forest Service staff, seeking explanations for the maps presented in the FEIS and clarification on the acreage designations. We were referred to the tables and maps in the FEIS which do not provide details; rather, they provide generalities in terms of acreages in IRAs across the Forest. Or, they provide boundaries on maps that illustrate MAs but do not identify specific IRAs with overlaying MAs. Even with a more detailed table made specifically by Forest Service staff and shared among interested stakeholders (Attachment C) we were still left trying to understand why and how these acreages were determined.

It is interesting to note that Alternative G is more expansive in its backcountry motorized delineations than the *least* conservation oriented alternative in the DEIS, Alternative F. Alternative F was designed to provide the most commodity production and access for motorized recreational use, with the least emphasis on non-motorized backcountry recreation. Though Table 18 in the FEIS is confusing to read, it does appear that Alternative G provides significantly more motorized winter and summer backcountry access than Alternative F (page 55), even after accounting for the specific MA demarcations. For instance, under Alternative G,

⁶ 40 C.F.R. § 1502.14.

⁷ Forest Service Handbook. 1909.12, 72.4 & 72.5.

the Table states that there are 185,879 acres available for backcountry winter motorized while Alternative F has no such acreage. For summer motorized access, Alternative G identifies 46,596 acres of available backcountry landscape while Alternative F has only 4,563 acres available.

Even the amount of backcountry access corridor is significantly increased in Alternative G over Alternative F (14,051 acres in G vs. 3,349 acres in F). Since these management delineations did not exist in the DEIS, and the FEIS does not provide sufficient explanation for comparison among the other alternatives which are not analyzed by these new management delineations, we can only assess this information based on what we see in the FEIS.

It is very difficult to effectively and fairly understand the information provided in the FEIS and DROD, given the lack of available information which should document the new Alternative offering. We believe that the Forest Service did an injustice to the public by not providing a thorough analysis of the importance of these backcountry areas and by assigning four new motorized prescriptions without the benefit of public input or required analysis.

Solution: Remove these iconic backcountry landscapes, especially Francs Peak and Wood River IRAs, from motorized access designation as defined under Alternative G and keep these areas under a MA1.3 prescription.

3) The inclusion of Alternative G is an entirely new Alternative in the FEIS and DROD, not otherwise offered to the public for review, and offering new substantial changes from the proposed alternative under the DEIS/DLMP. These significant new circumstances require further National Environmental Protection Analysis (NEPA) analysis, including public review.

We are concerned about how the Forest Service finalized a plan, using a brand new Alternative that incorporates new management area allocations that are not comparable against previous management areas identified in the DEIS, and commits important backcountry IRA acreages to motorized use, all without appropriate NEPA analysis and public input. We believe that by expanding motorized use into areas that have been identified as potential wilderness areas and introducing this for the first time in the FEIS violates the requirement “hard look” legal analysis defined through NEPA.

Indeed, if the FEIS is found to be different substantially from the DEIS and with new proposed changes that reflect new environmental impacts, NEPA requires the planning process to begin again with the DEIS.⁸ In addition, an agency must file a “supplemental EIS” (SEIS) if: “(i) The agency makes substantial changes in the proposed action that are relevant to environmental concerns; or (ii) There are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts.”⁹ We believe this to be the case under the introduction of Alternative G in the FEIS and its new language and impacts which differ substantially from the DEIS/DLMP.

Under the DROD Rationale section, the statement is made that seven alternatives were considered in detail (page 5). We disagree and refer to our earlier discussion where omission of

⁸ Calvert Cliffs’ Coordinating Committee, Inc. v. U.S. Atomic Energy Commission, 449 F.2d 1109 (D.C. Circuit 1971).

⁹ 40 C.F.R. § 1502.9(c).

analysis and general information with respect to motorized backcountry use under Alternative G makes this statement difficult to believe. This is particularly true for the sections which discuss Recreation uses and opportunities (Issue 1) and Special areas and designations (Issue 2). While some Issues may have received considerable more review in Alternative G (such as Issue 5 for Oil and Gas Development—which we actually support), we believe, given the importance of backcountry areas on the SNF to the public, that the Forest Service did a disservice to its constituents.

Designating motorized use prescriptions for Francs Peak and Wood River IRAs is particularly confusing to us, since the Forest Service all along has acknowledged that those four areas receiving the most support for wilderness are some of the most popular and important backcountry areas on the SNF. Even more confusing is language in the DROD, which provides conflicting statements. For example, on page 7 of the DROD under Issue 1 (Recreation Uses), the statement is made that based on public comment to the DEIS, “... *Alternative G identifies areas that are suitable for expanding summer motorized recreation...*” while on page 8, under Issue 2 (Special areas and designations), the discussion revolves around increased protection and the importance of backcountry character. In fact, Issue 2 statements consistently recognize that a significant portion of the public is in favor of protecting these special backcountry places. The statement is made that “*Public comment on the DEIS indicated broad public support for maintaining the back country character of the Shoshone*”, and “*Four areas (Francs Peak, Wood River, Trout Creek, and Dunoir SMU) received the most support for wilderness recommendations by people advocating for more wilderness. My [Forest Supervisor] decision in Alternative G is to increase the protection of those areas by assigning back country management prescriptions.*”

The reasoning provided under Issue 2 for expansion of motorized access into these backcountry areas remains inconclusive. The statement is made that activities “*such as planting and prescribed fire for whitebark pine restoration and activities to restore native populations of Yellowstone cutthroat trout are easier to conduct outside of wilderness where the foregoing activities are precluded*”. These four areas are not designated wilderness areas. And although TU and the DAWG advocated under Alternative D for some wilderness designation under these four areas, these areas remain open for many activities not allowed in designated wilderness areas. We believe this line of reasoning is neither sustainable nor supportable for expanding prime potential wilderness areas into developed motorized ATV trails or other motorized vehicles.

There are more appropriate places on the SNF where such activities, using responsible management guidelines, can occur and can be managed more efficiently given the staffing ability within the Forest Service. Indeed, the Roadless Rule of 2001 currently provides for the use of a multitude of activities, including grazing, limited timber harvest, some permitted motorized uses, oil and gas development, and specific temporary road development in IRAs. We believe there are appropriate areas that can be designated for responsible and managed motorized vehicle use. But these four areas, and in particular Francs Peak and Wood River IRAs, are primitive enough that expanding these areas for backcountry motorized use and attempting to manage such backcountry areas for impacts and violations would be against public sentiment, costly and prohibitive given the lack of adequate staffing in the SNF.

In all of our comments submitted to the Forest Service during this extensive planning process we have emphasized the need to analyze impacts from roads, trails, and off-road

vehicles. We are concerned about the impacts from various types of human activities and what those impacts will do to these sensitive landscapes. We continue to be concerned about how the Forest Service prepared the impact analysis from the various types of forest use, both potential and actual. Our comments to the DLMP of November 2012 reflect that concern (where we felt that Alternative B did not provide enough analysis and protective measures for managing impacts from roads, trails, land use authorizations, and reduced motorized recreation in sensitive backcountry areas). Alternative G remains even more disturbing in its lack of analysis as it opens up far more country for motorized use than the original preferred Alternative B.

By opening up these four areas, and specifically Francs Peak and Wood River, we contend that runoff and sediment generated by the use of off-highway vehicles will increase and negatively impact these unique and important backcountry areas. Research shows that routes within 300 feet of stream channels, lakes, and wetlands are considered to be within the “riparian influence zone”. When roads, trails, and other encroachments in close proximity to these zones begin to increase, the potential for directly and indirectly modifying rivers and streams increase significantly.¹⁰ Other factors which can have impacts on riparian and streams include airborne particulates from motorized use which can settle out in streams and an elevated risk of contamination with hydrocarbons.¹¹ Lastly, the potential for introducing or spreading aquatic nuisance species is a very real risk and could be devastating to these backcountry primitive areas. The FEIS does not provide any analysis on these impacts to these important landscapes, fisheries, water quality, and wildlife under this new Alternative. For potential wilderness areas such as Francs Peak and the Wood River IRAs, this is especially alarming. The Forest Service has failed in its duties to implement appropriate and required NEPA analysis.

Numerous studies, including those conducted by the Forest Service, have confirmed that ATV use and other motorized vehicle use increases sedimentation, channeling, stream impacts, and impacts to big game species and other wildlife.¹² At the numerous Cooperators’ meetings held by the Forest Service and with the public in attendance, the Forest Service staff stressed that the greatest impacts to aquatic areas would be from aquatic invasive species, grazing, timber harvest, roads, trails and motorized use.¹³ In the numerous handouts presented to those in attendance, references to these impacts were identified and Alternative F in the DLMP was identified as having the most impact to aquatic resources. Since we have earlier

¹⁰ Gucinski, H., et al. 2001. “Forest Roads: A synthesis of scientific information.” General Technical Report PNW-GTR-509, Portland, OR: USDA Forest Service, Pacific Northwest Research Station. 103 p.

<http://www.fs.fed.us/pnw/pubs/gtr509.pdf> ; Belt, et al. 1992. “Design of forest riparian buffer strips for the protection of water quality: Analysis of scientific literature.” <http://www.uidaho.edu/cfwr/pag/pagr8.html>.

¹¹ Deiter, D. 2001. “Watershed Report for the OHV Event Environmental Assessment.” Fishlake National Forest Supervisors Office, Richfield, UT. Specialist Report dated 2 March 2001. 23 p.; Deiter, D. 2002a. “Watershed Monitoring Report for 2001 Fillmore ATV Jamboree.” Fishlake National Forest Supervisors Office, Richfield, UT. Specialist Report dated 24 September 2002. 11 p.

¹² Ouren, D.S., Haas, Christopher, Melcher, C.P., Stewart, S.C., Ponds, P.D., Sexton, N.R., Burris, Lucy, Fancher, Tammy, and Bowen, Z.H., 2007, Environmental effects of off-highway vehicles on Bureau of Land Management lands: A literature synthesis, annotated bibliographies, extensive bibliographies, and internet resources: U.S. Geological Survey, Open-File Report 2007-1353, 225 p.; Minnesota Dept. Natural Resources. 2002. “Assessing the ecological impacts of ATV trail construction and use on public lands: factors to consider and a review of the literature.” Prepared by and for the Environmental Review Program, Ecological Services Division, Minnesota Dept. Natural Resources. October 2002. Draft.; Havlick, David G. 2002. “No Place Distance: Roads and Motorized Recreation on America’s Public Lands.” Island Press. Washington D.C. 297 pp.

¹³ TU Staff participated in 4 of the advertised Cooperator’s meetings over the course of this planning process.

identified Alternative G as having more impacts to the landscapes of Francs Peak and Wood River than Alternative F, this is especially troublesome.

The Forest Service could have easily performed this analysis, especially when so much work has been conducted on Forest Service lands with respect to this topic.¹⁴ Demonstrations such as the 2008 Forest Service referenced study indicate that ATV traffic does have an impact on natural resources, as these trails become high-runoff, high-sediment producing strips where naturally occurring landscapes normally do not create such “strips”. Such use can directly impact streambanks, riparian areas, and substrates of these highly braided watershed systems evident in the Francs Peak and Wood River drainage landscapes. Other studies demonstrate the direct relationship between how heavily an area is driven and the amount of vegetation loss.¹⁵

Impacts from OHV use and roads to big game are also well documented.¹⁶ Since the Francs Peak and Wood River areas are prime big game habitat areas, it is disconcerting to us that the Forest Service failed to include appropriate analysis on these impacts when they opened up these areas to motorized recreation use. As we mentioned earlier in our discussion, summer motorized recreation also includes access to these areas in the fall during hunting seasons. In TU’s “Where the Wild Lands Are” report, we specifically identify the Wood River roadless area in demonstrating the importance of maintaining backcountry areas as primitive management areas. The Wyoming Game and Fish Department recognizes the importance of this high value habitat area to bighorn sheep and elk. Hunters spend years, often a lifetime, trying to get a bighorn sheep license in Hunt Area 5. Maintaining secure habitat, where roads and human impacts are not compatible, helps big game populations thrive.¹⁷ Where secure habitat is not available or insufficient, more restrictive hunting is implemented by Wyoming Game and Fish biologists since this means less animals are available. This results, eventually, in an economic impact both to the Wyoming Game and Fish Department and to local communities that border these iconic landscapes. With more restrictive hunting, the number of hunters decreases, as does the number of hunters who spend money in these communities. In the SNF’s sensitive ecosystem, particularly in the backcountry areas of Francs Peak and Wood River IRAs, it would not take long for ATV trails to severely alter a primitive ecological landscape.

Overall, motorized use also causes significant problems from unauthorized use and can be a major problem for forest managers. The SNF has indicated it experiences unauthorized use of trails and improper off-highway use in both accessible areas and inaccessible areas and regards this as a significant challenge to monitor. This was even mentioned in the FEIS when they reference a 2009 Wyoming Statewide Comprehensive Outdoor Recreation Plan, citing

¹⁴ US Forest Service. 2008. “Effects of All-Terrain Vehicles on Forested Lands and Grasslands”. National Technology & Development Program/Recreation Management. US Department of Agriculture. December 2008. In this study, which included 7 national forests, they found that following any level of disturbance, runoff and sediment generated on the ATV trails increased by 56 percent and 625 percent, respectively, compared to the undisturbed forest floor.

¹⁵ Payne, et al. 1983. Vehicle impacts on Northern Great Plains range vegetation. *Journal of Range Management* 36(3): 327-331.

¹⁶ Izaak Walton League of America. 2007. “Collision Course? Off-Road Vehicle Impacts on Hunting and Fishing.”

¹⁷ Naylor, Leslie M. et al. 2008. “Behavioral Responses of North American Elk to Recreational Activity.” *Journal of Wildlife Management* 73(3): 328-338.; Rowland, M.M., et al. 2004. “Effects of Roads on Elk: Implications for Management in Forested Ecosystems.” *Transactions of the North American Wildlife and Natural Resource Conference* 69.; Wisdom, M. J., et al. “Effects of Off-Road Recreation on Mule Deer and Elk.” *Transactions of the North American Wildlife and Natural Resources Conference* 69.

motorized recreation as “*the most challenging land management issue for the foreseeable future*”. Yet, none of this discussion occurred under Alternative G.

The public enjoys all aspects of use within the SNF and TU recognizes there are areas that can be properly developed to include managed recreation use while other areas should be left as they are—backcountry primitive areas that are specifically designated as non-motorized year-round use. The DLMP states that approximately 874 miles of National Forest System roads and approximately 32 miles of motorized trails are currently open and would remain open under all the alternatives except Alternative C (the only Alternative that would include decommissioning some System roads and motorized trails). We are not asking that roads or current trails be closed; rather under our preferred Alternative D selection (and in other Alternatives), there would be a small increase in the total miles of roads and motorized trails.

Solution: We ask that the Forest Service remove Francs Peak and Wood River IRAs from motorized use designation based on the predicted impacts from OHV use and because of the lack of adequate NEPA analysis.

4) Through a survey process, initiated by the Forest Service, it was demonstrated that the public overwhelmingly supports, and the Forest Service acknowledges, maintaining Francs Peak and Wood River IRAs as backcountry year-round non-motorized areas.

As mentioned earlier in our discussion regarding NEPA deficiencies (Item #3), the Forest Service is contradictory in its view of public sentiment towards Francs Peak and Wood River IRAs. The DLMP/DEIS describes the importance of Francs Peak and Wood River IRAs as outstanding candidates for wilderness, and the Forest Service in numerous meetings with the public reiterated this understanding. Thus the public was led to assume that backcountry areas identified as non-motorized use areas would remain that way under the Forest Services’ preferred alternative B.

In a 2008 survey initiated by the SNF, researchers investigated public values and preferences for conditions on the SNF.¹⁸ The study surveyed local residents, including constituents of the local government cooperators who participated in the plan revision process, of all four counties connected to the SNF. The results of the survey illustrated the overwhelming support for non-motorized year-round recreation (89%). Other preferences the public held with high value included wildlife viewing (98%), fish and wildlife habitat (96%), horse packing (85%), and wilderness (76%). On the other end of the spectrum, OHV recreation gained only 39% of a favorable ranking among respondents.

The survey also specifically queried public response to inventoried roadless areas on the SNF and the results provided more evidence that the public is not in favor of motorized backcountry use on the SNF. In fact, survey respondents overwhelmingly preferred non-motorized use of these backcountry landscapes to OHV use. Non-motorized recreation use ranked a 93% favorable response compared with a 2% opposition response. In response to ATV use in inventoried roadless areas, 56% responded in opposition while 26% responded in favor of

¹⁸ Clement, J., Cheng., A. 2008. Report: Study of Preferences and Values on the Shoshone National Forest. Department of Forest, Rangeland and Watershed Stewardship, Colorado State University.

such use in these designated areas. For the Forest Service to present a new alternative that increases motorized recreation into backcountry primitive areas, and more so than even the most permissive alternative (F) in the DEIS/DLMP, illustrates the lack of recognition of the public's preferences for this Forest. This is extremely discouraging to the TU and the DAWGs who have advocated for a stronger balanced approach as we participated in the planning process.

Solution: Based on the overwhelming evidence acknowledge by the public and the Forest Service's own surveys, we ask the Forest Service to withdraw the motorized use designations for Francs Peak and the Wood River under Alternative G.

Conclusion:

TU and the DAWG support many aspects of the new Alternative G, including the significant reduction in available surface lands for oil and gas development, increased vegetation management, the increase in special management areas, and the wild and scenic river evaluation assessments. We are not requesting that the Forest Service adopt the DEIS/DLMP's preferred Alternative B in our objection to parts of Alternative G. Instead, we ask that the Forest Service remove the new motorized management designations prescribed for Francs Peak and Wood River IRAs. By doing this, the Forest Service will continue its impressive efforts to keep the Shoshone National Forest the significant and nearly intact northern temperate zone ecosystem it claims to be while continuing to provide all types of recreational opportunities for the genuine mix of diverse public that uses this iconic wild forest.

On behalf of Trout Unlimited, the Wyoming Council of Trout Unlimited, the Popo Agie Anglers Chapter, the Jackson Hole Chapter, the East Yellowstone Chapter, the Upper Bear River Chapter, and the Dubois Anglers and Wildlife Group, we respectfully submit this objection and ask for your consideration of our concerns. We remain available for any potential discussion as you seek resolution to these issues we have raised.

Sincerely,



Cathy Purves
Science and Technical Advisor
Trout Unlimited
250 North 1sts Street
Lander, WY 82520
307-332-6700 ext. 10
cpurves@tu.org

Attachments

- Attachment A “Where the Wild Lands Are: Wyoming. The Importance of Backcountry Areas to Wyoming’s Fish, Wildlife, Hunting & Angling.” Pages20-21.
- Attachment B Comparison of Shoshone NF Plan Management Areas & Acreages for Selected Plan Alternatives B & G. TU Internal Table. March 2014.
- Attachment C Management Area Acres for Selected Areas in Alternatives A, B, G. Table prepared for stakeholders by SNF staff and emailed February 11, 2014.

Where The Wild Lands Are: Wyoming

THE IMPORTANCE OF BACKCOUNTRY AREAS TO
WYOMING’S FISH, WILDLIFE, HUNTING & ANGLING



A Report Produced by Trout Unlimited



Attachment A – continued:

WOOD RIVER BACKCOUNTRY

One day in 1981, a ranch dog came home from a foray in the hills outside Meeteetse, Wyoming, with a dead animal that no one had ever seen before. It was a black-footed ferret, a little predator that was thought to be long extinct. Suddenly, the tiny town in northwestern Wyoming became a sensation. Biologists and journalists from around the world came to see the last colony of black-footed ferrets in existence. Now, more than two decades later, the black-footed ferret is on its way to recovery from near extinction, and the colony of ferrets that originated at the base of the Absaroka Range outside Meeteetse has provided the gene stock for ferrets in numerous western states.

Black-footed ferrets may not be on the minds of the average sportsman who shoulders a .30-06 and hikes into elk country, or the angler who casts for native trout, but they do speak to the wildness of the land surrounding this little cowtown-turned-wildlife paradise. At the heart of this landscape are the drainages of the Greybull and Wood rivers, two little-known streams that feed into the famous Big Horn River and are both excellent fisheries in their own right. These two rivers drain some of the wildest country in the lower 48.

Collectively, the Greybull-Wood River roadless lands comprise some of Wyoming's most unique high country. In many ways, the steep mountains and braided river bottoms remind one more of Alaska than the heart of Wyoming. Timber is scarce on much of this terrain, which provides quality habitat for many species of mammals. The wide-open nature of this land makes for unusual interactions between animals that usually roam other ecosystems.

"I've seen pronghorns at 11,000 feet and bighorn sheep and grizzlies running around in the same country," said Jerry Longobardi, the Meeteetse game warden for the Wyoming Game and Fish Department. "I don't think there's anywhere else on Earth that has that."

Longobardi has patrolled this stunning setting for two decades and in that time, he has come to know it well. His forays into the tall country have resulted in not only unusual wildlife observations, but historic discoveries as well, including numerous bison skulls at high altitude in the mountains.

"There's no trees," said Longobardi. "Why would a buffalo lie around swatting flies in the riverbottoms when they could go clear to the top of the mountain? And they did."

Although bison no longer roam in the high country, today the Greybull-Wood River area provides excellent habitat for other species, particularly bighorn sheep and elk. For bighorn sheep hunters, the local hunting unit (Hunt Area 5) is one of the most

coveted in all of Wyoming. Each year, an average of 50 rams are taken in this one hunt area alone, representing more than 35 percent of all rams taken in the state.

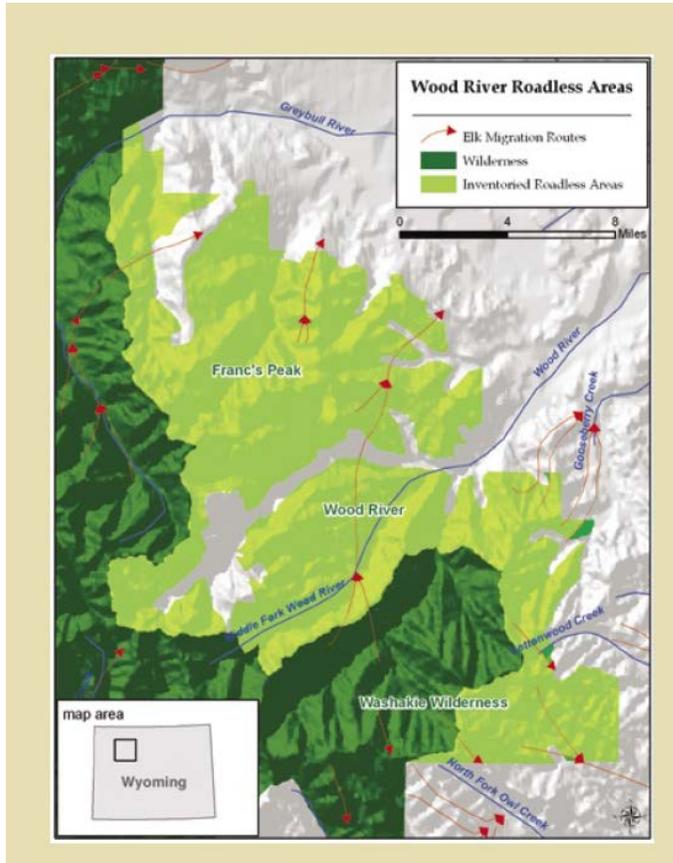
"I have seen a lot of country in my life and I think it's the best bighorn sheep and elk habitat I've ever seen anywhere," said Longobardi, who worked for several years in Alaska on the North Slope oil pipeline and cowboied in Montana and Wyoming before becoming a game warden for the state.

"This is a pretty neat and unusual place and a lot of it is totally unprotected," said Longobardi. "It's some of the wildest country, if not the wildest country, in all of Wyoming and it's not designated wilderness."

Wood River backcountry, photo by Brian Sybert



Attachment A Continued:



When road networks eliminate elk security habitat and hunting pressure is not limited by big game managers, herd condition can suffer as a result of over-harvest. Take, for example, hunt area 81 south of Moran. The area used to possess some of the best elk habitat in the country, with an abundance of open meadows interspersed with sagebrush and timber. It was logged in the late 1950s and early 1960s, and the road network eventually took a toll on the elk herd. The over-harvest of bull elk resulted in bull:cow ratios of just 9:100, with only 4:100 mature bulls (20 bulls per 100 cows is considered good).

The absence of mature bulls throws off the timing of the breeding season, causing calves to be born over a period of months, rather than hitting the ground all at once. This allows predators to have a greater impact on calf survival than they would if calves were born at the same time. These are the types of impacts that game managers seek to avoid when they reduce the length of general seasons or implement limited quota hunts.



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Attachment B: TU's Comparison Table of Shoshone NF Management Areas for Selected Plan Alternatives B & G.

Comparison of Shoshone NF Plan Management Areas & Acreages for Selected Plan Alternatives B & G

Designated Management Areas:	MA1.3 – Backcountry non-motorized Year-Round	MA3.3A – Backcountry Motorized Year-Round	MA3.3B – Backcountry Summer Non-Motorized & Winter Motorized	MA3.5 – (1986 Plan) Summer Non-Motorized & Winter Motorized	MA3.5A – Year-round Motorized Backcountry Restoration	MA3.5C – Summer Motorized Backcountry Restoration	MA3.5D – Year-Round Non-Motorized Backcountry Restoration	Comments
Acres by Alternatives Area:	B	G	B	G	B	G	B	TOTAL DIFFERENCES/ GAIN OR LOSS OF ACRES (Non-Motorized Highlighted in Yellow)
Dunoir (Note: Under Alt. G, a new bicycle access allowed on a designated trail.)	7,625 Loss of 7,625 acres from MA 1.3 under Alt. G. 1986 Plan had 7,616 MA1.3 acres.	1,475 173 acres less Motorized under Alt. G.	1,302 Gain of 7,798 acres Summer NIM under Alt. G.	11,878 Loss of 7,798 acres Summer Non-Motorized & Winter Motorized	6,402	374	613	Alt. G provides 7,798 more acres in Summer Non-motorized than Alt. B (4,080 vs. 11,878). Total Non-Motorized for Alt. G is 11,878 acres vs. 11,705 acres for Alt. B (173 more acres in G). GAIN FOR ALT. G.
Franc's Peak IRA	57,049 Loss of 16,115 acres from MA 1.3 under Alt. G. 1986 Plan had 57,557 MA 1.3 acres.	9,389	5,917	7,716*	6,402	374	613	Alt. B provides 1,799 more acres in Summer Non-motorized than Alt. G (7,716 vs. 5,917). Total Non-motorized for Alt. B is 64,765 acres (57,049 + 7,716) vs. 47,464 acres (40,934 + 5,917 + 613) for Alt. G (17,301 more acres in B). LOSS FOR ALT. G.
Wood River IRA	44,168 Loss of 38,449 acres from MA1.3 under Alt. G. 1986 Plan had 40,533 MA 1.3 acres.	5,719	37,027	8,769*	3,836	4,933	613	Alt. G provides 28,258 more acres in Summer Non-motorized than Alt. B (37,027 vs. 8,769). Total Non-motorized for Alt. B is 52,937 acres (44,168 + 8,769) vs. 42,746 acres for Alt. G (5,719 + 37,027). 10,191 more acres with Alt. B. LOSS FOR ALT. G.
Trout Creek	37,866	37,866	1,475	16,485	10,238	5,307	613	GAIN-GAIN: 37,866 B/C acres. ALT B Total Summer NIM = 20,565 acres. ALT G total Summer NIM =55,435 acres (34,870 acre difference). HOWEVER, ALT G, has 19,454 more acres of Year-Round Motorized acres (20,929 vs. 1,475) than ALT B.
TOTALS:	146,708	84,519	1,475	16,485	10,238	5,307	613	
<p>–Non-Motor use shows Alt. B as more protection significant in the 2 IRAs-54,564 acres for Alt. G, 27,319 ac.diff.</p>								

TU Comparison Table for SNF Final Plan- March 2014

Attachment C: SNF Table on Management Area Acres for Selected Areas in Alternatives A, B, G

Management Area Acres for Selected Areas in Alternatives A, B, G				
Area	Mgmt Area	Alt A	Alt B	Alt G
Dunoir				
	1.6B	28,880	28,883	28,883
Sum		28,880	28,883	28,883
Dunoir Additions				
	1.3	7,616	7,625	
	2.3	159		
	3.3A	780	1,475	1,302
	3.3B		4,080	11,878
	4.2	1,856	275	275
	5.1	4,549	2,803	2,803
	5.4	1,299		
Sum		16,258	16,258	16,258
Franc's Peak				
	1.3	57,557	57,049	40,934
	3.3A			9,389
	3.3B			5,917
	3.5		7,716	
	3.5A			6,402
	3.5C			374
	3.5D			613
	4.2	4,363	2,426	1,800
	4.5A	137	137	1,901
	5.1		631	631
	5.4	5,906	4	4
Sum		67,964	67,964	67,964
Trout Creek				
	1.3	37,932	37,866	37,866
	3.3A	255		
	4.2	24		
	5.4	1,058	1,403	1,403
Sum		39,270	39,270	39,270
Wood River				
	1.3	40,533	44,168	5,719
	3.3B			37,027
	3.5		8,769	
	3.5A			3,836
	3.5C			4,933
	4.2	6,988	2,556	2,133
	4.5A	36	36	1,881
	5.1	8,593	1,388	1,388
	5.4	855	89	89
Sum		57,006	57,006	57,006