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June 21, 2013

Mr. Daniel Jiron  
Rocky Mountain Regional Forester  
740 Simms Street  
Golden, CO 80401

Dear Regional Forester Jiron,

On behalf of the Wyoming Outdoor Council's members and supporters, I write to address the ongoing forest plan revision process on the Shoshone National Forest. Founded in 1967, the Wyoming Outdoor Council is a statewide, non-profit conservation organization that works to protect public lands, wildlife and environmental quality in our state. Our priority within this plan revision is to maintain the backcountry character of the Shoshone. In particular, we have focused on the importance of limiting areas on the Shoshone suitable for oil and gas surface disturbance.

Three areas deserve protection in the form of a management prescription that would make them unsuitable for oil and gas surface development in the final forest plan. These include: the Lander Front, the Dubois Valley and the Absaroka Front. In the draft forest plan there were inconsistencies between proposed management of adjacent BLM, private, state and tribal lands—management that is largely designed to curtail industrial development in favor of recreation, wildlife habitat and open space—and the Forest Service's proposed management of these areas. Although we have been told that the Shoshone is in the process of making some meaningful changes that would likely remedy many of these inconsistencies in the final plan, we ask that you ensure these positive changes occur. The value of each of these areas is described in more detail below.

#### **I. The Lander Front**

The Lander Front is a mixture of BLM, private and state land buffering the southern portion of the Wind River Range managed by the Shoshone National Forest. The draft plan indicated national forest acreage located between designated wilderness and off-forest lands under conservation easement and/or BLM lands

subject to no surface occupancy stipulations would be suitable for oil and gas surface development. This area of the national forest's potential for oil and gas development is, according to the accompanying draft EIS, "very little to none." And indeed, there are no lands leased for oil and gas development here and no wells in production. The scenic, recreational and wildlife values on this part of the forest on the other hand, are tremendous. Mountain scenery, clean air and water, easy access to a diversity of recreational pursuits including hiking, camping, fishing, hunting, internationally recognized rock climbing, Nordic skiing, ATV and snowmobile use are just a few examples of the amenities the Shoshone provides that enhance the Lander community's quality of life and invites visitors to experience.

In the past, these amenities have been difficult to quantify monetarily. That is changing, however, and today, many of these values can be analyzed in dollars and cents. For example, Lander's thriving real estate market, which attracts retirees and young families alike, is a reflection of the presence and importance of these amenities. In addition, the second largest employer in Fremont County, the National Outdoor Leadership School, relies on the Shoshone to provide outdoor classrooms free from industrial development. Central Wyoming College and Wyoming Catholic College also have respected outdoor leadership programs as part of their curriculum and draw students from across the country who want to pursue these interests. And when residents are asked why they choose to live in Lander, raise their families, and locate their businesses there, it is these numerous amenities the Shoshone National Forest and nearby BLM lands provide that are the primary reasons they mention.

These are also the amenities that are threatened if oil and gas surface development on this part of the national forest were to proceed. In establishing a management framework for the next two decades, a forest plan should, at the very least, safeguard established uses that are integral to a community's character and directly tied to its successful and growing economy. If these uses are managed well, they will still be valuable assets decades from now.

## **2. The Dubois Valley**

As the Wyoming Game and Fish Department has recognized, the Dubois Valley is incredibly important wildlife habitat, particularly for big game animals. At the same time, there is hardly any existing oil and gas development in the valley, and no producing wells whatsoever on the Shoshone. In its RMP revision process, the Lander Field Office of the BLM identified this area of high wildlife and low mineral value as unavailable for future oil and gas leasing in its final plan. Although the BLM intended this designation before the controversy surrounding the Scott Well #2 arose, we understand the public's concern about this drilling proposal—a proposed oil well just outside Dubois that, if authorized, would be the first well drilled on the Shoshone in more than 20 years—solidified BLM's commitment to making its lands buffering the forest unavailable for oil and gas leasing.

In contrast, and despite the documented controversy and local citizen concern surrounding the Scott Well #2 proposal, the preferred alternative in the Shoshone's draft forest plan would allow surface disturbance from oil and gas development on nearly all its lands around Dubois. This inconsistency is unfortunate, as this is a rare opportunity when neighboring federal lands are undertaking management plan revision at the same time. It is an opportunity for the Forest Service to work with the BLM and the state's wildlife experts to seek consistent management designations that reflect the highest and best uses of the lands in question, and to be responsive to the public's comments and vision for these lands. On this part of the Shoshone, that vision does not include oil and gas development, but instead supports wildlife habitat, recreation and tourism.

### **3. The Absaroka Front**

Similar to the examples discussed above, there are distinct areas on the northeastern part of the Shoshone along the Absaroka Front where the Forest Service's oil and gas suitability designations are not in accord with the BLM's designations curtailing this very use. Of particular concern is Bald Ridge, which is north of the Chief Joseph Highway and south of the Clark Fork. Bald Ridge is one of eight potential research natural areas considered in the Shoshone's revised forest plan. Its unique vegetative ecology and its importance in providing big game crucial winter range make this area unsuitable for industrial development. The BLM in its Bighorn Basin draft resource management plan recognizes this and identifies the BLM lands adjacent to Bald Ridge as unavailable for future oil and gas leasing. In surprising contrast, the Shoshone's preferred alternative indicates Bald Ridge itself is suitable for oil and gas development.

Our nation's first national forest, the Shoshone has no history of successful oil and gas production. There are fewer than 8,000 acres leased on the forest and no wells in production today. On the Shoshone, future oil and gas development will never offer the kind of important revenue or domestic energy supply that other fields are generating or are projected to generate in Wyoming. If allowed to proceed in the future, oil and gas development on the Shoshone will not be an economic benefit, but instead will adversely affect a central landscape in Wyoming that contributes to a substantial and sustainable recreation and tourism industry. The outdoor recreation industry generates more than \$4 billion in annual revenue for Wyoming.<sup>1</sup> This industry produced \$3.6 billion in retail sales and services in Wyoming—17 percent of our gross state product.<sup>2</sup> Travel and tourism also generates additional revenue. In 2011, the Wyoming Office of Tourism boasted \$2.88 billion in direct expenditures.<sup>3</sup>

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<sup>1</sup> Outdoor Industry Foundation, 2006; *The Active Outdoor Recreation Economy: a \$730 billion contribution to the U.S. Economy* at 29. Please see [www.outdoorindustryfoundation.org](http://www.outdoorindustryfoundation.org).

<sup>2</sup> *Id.* at 30.

<sup>3</sup> Wyoming Office of Tourism's 2011 *Year in Review* report at 2.

The forest plan revision process is an opportunity to ensure the highest and best uses of the Shoshone are sustained and the revised plan should be one that guides management in an effective way for roughly the next two decades. Poor planning and controversial designations at this time will only lead to problems in years to come. As citizens have learned the hard way, once areas are deemed suitable for oil and gas development in a forest plan, it is difficult to stop leasing proposals. And once leased, it is rare that development does not proceed.

Making the lands along the Lander and Absaroka Fronts and in the Dubois Valley unsuitable for future oil and gas surface development in the final forest plan is an approach that would honor inter-agency efforts to manage habitat and landscapes across jurisdictional boundaries. It would respect the priorities of local people (as illustrated by the majority of the public who submitted comments on the draft plan and as acknowledged by several county commissioners and Governor Mead himself) and would retain the tangible economic drivers that recreation, open space, tourism and wildlife habitat provide to the communities surrounding the forest.

Thank you for your consideration of this important issue. We look forward to reviewing the final forest plan and continuing our participation in the process.

Sincerely,

A handwritten signature in black ink that reads "Lisa D. McGee". The signature is written in a cursive style with a large initial "L" and "M".

Lisa D. McGee  
Program Director  
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