

Dubois Sno-Katters Snowmobile Club
Dubois, Wyoming

November 5th, 2021

Mark Foster, Environmental Coordinator
Shoshone National Forest
808 Meadow Lane Avenue
Cody, Wyoming 82414

RE: Shoshone National Forest Travel Management – Proposed Action comments

Dear Mr. Foster:

The following comments are submitted on behalf of the Dubois Sno-Katters snowmobile club. Our club was established in 1966 and has been a long-standing organization that has been instrumental in the development of the current OSV operations on the Wind River District of the Shoshone National Forest. Our comments are focused on winter over-snow vehicle (OSV) use, with some recommendations for changes or alternatives and clarifications to help improve its acceptance and manageability. We have included previous comments submitted in June 2016, December 2017, and September 2020 regarding this travel planning process. The Club generally supports most concepts outlined for OSV management in Alternative 4. However, we also request several important changes to Alternative 4 to help improve OSV management. We also stand firmly opposed to Alternative 3 since it proposes unwarranted OSV closures in the High Lakes Wilderness Study Area and the Line Creek Research Natural Area on the North end of the forest as well as does not add the Sublette Pass trail on the Wind River.

Our specific comments are as follows:

Proposed Ungroomed Trail Additions

The Dubois Sno-Katters Club are grateful for and fully support the addition of the ungroomed snowmobile trail (WR-06w) included in the preferred alternative.

The Sublette Pass trail has been in existence for decades and provides important access to backcountry riding areas north of the Togwotee Pass Highway; it is appropriate that this trail be added to the system.

Opposed to allowing Class 2 Over-Snow Vehicles (OSVs) on most designated OSV trails

We are absolutely opposed to allowing Class 2 OSVs (full-sized trucks and SUVs equipped with track conversions) on almost all OSV trails maintained by the State of Wyoming across the SNF

We request that Class 2 OSV management guidelines be revised as follows, using ‘class of vehicle’ regulation authority provided under Subpart C:

- **Groomed Trails** – Class 2 OSV use should be excluded from all trails groomed by the State of Wyoming on the SNF; specific exceptions for special circumstances like access to Brooks Lake Lodge can be granted by the appropriate District Ranger.
- **Ungroomed Trails** – Class 2 OSV use should be excluded from all OSV trails maintained in an ungroomed status by the State of Wyoming. EXCEPTION: all ungroomed OSV trails located in the greater Burroughs Creek/Horse Creek area north of Dubois should be designated ‘open’ to Class 2 OSV use.
- **Other Motorized Routes** – Class 2 OSV use should be allowed on all other motorized roads and trails designated ‘open’ to motorized vehicle travel by the MVUM, but **not** when being utilized as managed (groomed or ungroomed) OSV routes during an area’s corresponding OSV use season.

Full-size tracked vehicles do not belong on the managed national forest snowmobile/Class 1 OSV trails because they are simply too wide, too tall, too slow and too heavy. They create a safety hazard due to their width and slower operational speeds – particularly on many trails which are narrow. Class 2 OSVs are also much heavier with significantly higher weight displacement compared to all Class 1 OHVs including trail groomers. Their heavy weight creates much greater potential for trail rutting due to insufficient trail compaction to support their weight.

Proposed Cross-Country Ski Trail Closures

The club will cautiously accept implementing a formal closure to snowmobiling in the Falls/Deception (WR-02w) and Pinnacles (WR-03w) cross-country ski trail areas, only because there has been an informal agreement between area snowmobilers and local skiers for many years.

Please keep in mind that those non-motorized users that require absolute solitude and do not support multiple use can find that opportunity close by in the thousands of acres of wilderness that have been off limits to OSV since the inception of the wilderness act.

Therefore the Dubois Sno-Katters will be firmly opposed to any additional proposed OSV use closures that may surface as this travel planning process moves forward.

Support Alternative 4’s OSV Season Dates

We support the proposed dates of November 1 through June 15 for the North Zone (Beartooth’s) and the Wind River District (Dubois area), along with December 1 through May 31 for the Washakie District (Lander area). These dates are reasonable and appropriate since there is typically more than adequate snow for snowmobiling in these areas during these times. While your analysis of historic SNOTEL data used a minimum snow depth screening range of 12 to 18 inches, other science-based publications suggest that a minimum of only 4 to 6 inches of snow cover is sufficient to armor ground cover. Consequently, even though your screening threshold was three times greater than other science-based suggested snow depth buffers, your SNOTEL

analysis proved, without question, that lands will be properly protected by adequate snow cover during the proposed OSV season dates.

It's also important that OSV's can be operated on roads and motorized trails designated open to motor vehicle travel by the Motorized Vehicle Use Map (MVUM) during other seasons of the year. Consequently, OSVs can still be used to provide access to backcountry camps, private lands, hunting areas, cabins or other recreation activities when open motorized routes become impassable due to snow cover outside the OSV season dates.

Support keeping the entire High Lakes Wilderness Study Area (WSA) open to snowmobiling

Many members of our club Have Visited and ridden in the High Lakes area. The Dubois Sno-Katters support Alternative 4 on this topic since it would allow the entire High Lakes WSA open for continued OSV use. This is consistent with Congressional intent. It is also supported by your EA analysis which clearly shows that use patterns have not changed significantly since the 1970s. Since the potential wilderness character of this area has not been harmed by snowmobile use since the WSA's establishment, OSV use must be allowed to continue. Additionally, the adjacent Line Creek Research Natural Area should also remain open to continued Class 1 OSV travel.

We are strongly opposed to Alternative 3 since it would close the northern and eastern portions of High Lakes. This is unjustified and contrary to existing federal law. And we know that our Wyoming Congressional Delegation continues to strongly support continued snowmobiling access within the entire HLWSA – so the entire area should remain open under your final travel plan.

Objection to Buffer Zones used in Motorized Trail Analysis

We believe it was inappropriate, even illegal in respect to Wilderness, that ½ mile and 5-mile “buffer zones” were used in analysis of potential user conflict in this EA's analysis.

The Wyoming Wilderness Act of 1984 specifically prohibits buffer zones adjacent to Wilderness Areas. It specifically states that: *“Congress does not intend that the designation of wilderness areas in the State of Wyoming lead to the creation of protective perimeters or buffer zones around each wilderness area. The fact that non wilderness activities or uses can be seen or heard from within any wilderness area shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area.”*

So, why would the Forest use ‘Wilderness’ as a screening factor to potentially disallow adjacent motorized use? Such analysis is contrary to federal law, so cannot be used as a decision-factor.

Additionally, motorized trails are expressly allowed within Inventoried Roadless Areas, so this is an inappropriate screening factor. This ill-conceived buffer zone prescription should not be used to eliminate or diminish opportunities for potential motorized trail routes and areas within portions of the SNF in which the 2015 Forest's Land Management Plan allows potential motorized recreation.

Opposed to the use of Minimum Snow Depths

The 2015 OSV travel rule (Subpart C) lists only two potential criteria for the designation of OSV use on USFS lands: Class of Vehicle and Time of Year. It does not require that any numerical minimum depth of snow cover be set, only that there be “adequate” snow depth for OSV use. While it appears that Alternative 4, the latest Proposed Action, has backed away from outwardly establishing a ‘minimum snow depth rule’ on the SNF, your repeated use a ‘12- to 18-inch minimum’ snow depth threshold in the OSV analysis sections makes it feel like you’re still back-dooring us on this issue. Inferring either directly or indirectly that 12 to 18 inches of snow are required for proper OSV management is simply wrong. It is contrary to Subpart C which, again, only sets ‘season of use’ and ‘class of vehicle’ as the two criteria for Subpart C implementation. Minimum snow depth is clearly not an intended regulatory factor and simply cannot be allowed to stand given undue precedents it would establish.

Your analysis of alternatives improperly uses ‘12 to 18 inches’ as a *minimum* threshold when, in fact, much less snow depth in the range of 4 to 6 inches (Alger 2019) has proven to provide adequate snow cover to protect land from snowmobile operation. In particular, the use of ‘Switalski, 2016’ as a purported set of ‘Best Management Practices’ is unacceptable since it was developed as self-serving ‘documentation’ by the Winter Wildlands Alliance (WWA), an anti OSV organization. Additionally, inclusion of ‘Fassnacht 2018,’ which was funded by the Colorado Mountain Club (CMC), and which was also a primary reference on this topic represents yet another ‘source’ document whose sole purpose is to orchestrate biased positions founded on nonmotorized advocacy groups’ efforts to justify their unscientific 12-to-18-inch minimum snow depth position. The inclusion of these two reports as primary source documentation represents shoddy and biased analysis work on the part of the Forest and must be removed as a guiding reference for this process.

The statement on page 338 of the EA that “minimum snow depths required for protecting these areas range from 12 to 18 inches” is clearly unsubstantiated and unjustified. We find that it is clearly taken out of intended context from the Forest Service Watershed Conservation Practices Handbook where such depths are intended to apply only to vehicles operated directly “in wetlands; in streams, swales and lakes; or on severely burned soil or detrimentally compacted, eroded or displaced soil.” Consequently, its proper context needs to be fixed in the administrative record before proceeding to a final decision with this process. Nothing in that manual suggests that ‘12 to 18 inches’ is intended to be applied watershed-wide, but rather to only the very specific cited locations within a watershed.

The Dubois Sno-Katters support and are members of the American Council of Snowmobile Associations (ACSA), a national organization committed to advancing snowmobiling safety and proper snowmobiling management. For the last ten years ACSA has operated a cooperative agreement with the U.S. Department of Transportation – Federal Highway Administration to identify, produce and disseminate credible educational information related to snowmobile safety and access. This work has been funded by the Recreational Trails Program (RTP) and has built an online library of credible snowmobile related resources housed at www.snowmobileinfo.org. One of the many projects done under this partnership with federal oversight produced a report titled *Minimum Snow Depth Requirements for OSVs: Status Report & Suggested Best*

Management Practices which can be downloaded at:

<https://www.snowmobileinfo.org/snowmobile-access-docs/minimum-snow-depth-requirements-for-osvs.pdf>

The following is an excerpt from that document; we encourage you to review this report in its entirety to gather more informed perspectives on this topic than what were introduced into this process by WWA and CMC:

In closing, thank you for the opportunity to comment and give feedback on this EA.

It clearly shows that the Proposed action will not result in significant impacts from snowmobiling.

We value the partnership that we have established with the Shoshone National forest over the years and look forward to working together in the future.

Respectfully,

Dubois Sno-Katters

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Cc: Lisa Timchak, Forest Supervisor
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