



Dear Shoshone National Forest Travel Management Planning Team

I'm going to start this letter this time by saying the following:

**THIS IS SUPPOSED TO BE ABOUT
MOTORIZED TRAVEL MANAGEMENT –
NOT DEFACTOING MORE PUBLIC LANDS
INTO WILDERNESS. WITH MORE RULES
AND JUNK SEASONAL CLOSURES THAT
DON'T HAVE LEGS TO STAND ON
LOCKING THE PUBLIC OUT OF THEIR
MULTIPLE USE PUBLIC LANDS IS
CRIMINAL.**

**THIS IS SUPPOSED TO BE ABOUT WHAT
CAN WE DO TO MAKE A
COMPREHENSIVE PLAN TO
ACCOMMODATE THOSE WHO UTILIZIE
THE MERE 10% OF THE SHOSHONE
NATIONAL FOREST VIA MOTORIZED
TRAVEL. IT'S SUPPOSED TO BE ABOUT**

HOW WE CAN OFFER RATIONAL SOLUTIONS TO ACCESS THOSE LANDS AVAILABLE FOR MOTORIZED TRAVEL AND DO SO INTO THE FORSEEABLE FUTURE. HOW IS ASKING FOR ACCESS THAT IS PROBABLY LESS THAN 1% OF THE 10% WERE ALLOWED ASKING TO MUCH?

WE DON'T HAVE A USER PROBLEM WE HAVE A MANAGEMENT/LEADERSHIP PROBLEM.

It is overwhelming apparent that the travel management plan is about as unfair process as it can be, even more so than the Forest Revision. We don't have a problem with the forest or the travel management; we have a problem with the leadership, and the communication of those who are the so called managers and leaders. Decisions are being made that are no longer relevant, logical, or rational and certainly don't meet objectives set forth by local communities and are rather decisions and rules to mitigate those who have no knowledge of the area or the opportunities that the lands offer to those who use them the most. The decisions and alternatives offered to us are pitiful bare bones, with mostly little or no rational conception to a broad sweeping travel management plan and more of a stop gap solution to minimize MEANINGLESS LAWSUITS that may or may not come from radical environmental groups.

As a resident of Dubois, Wyoming for the past 45 years, a small business owner whom your decisions on the motorized travel affect greatly, a top tier selling agent for the Wyoming State Trails and an outdoor recreational enthusiast it is VERY CONCERNING THE PROCESS YOU USE TO CONDUCT THE MEETINGS, THE WAY YOU CONTACT THOSE INVOLVED AND THE METHODOLOGY IN MAKING THE DETERMINATIONS FOR THE PROPOSAL.

SEASONAL CLOSURES WITH UNBASED FACTS TO SUPPORT THEM IS A BLATANT OVERREACH OF YOUR AUTHORITY.

First and most troubling is the fact that necessary parties to be contacted were once again dropped from the emailing list, (myself included). It also seems very tactical that those dropped were the ones from the user's side. Maybe you dropped the non-users as well but none the less I and many other users were never email and or informed. Secondly you are allowing your team of people to draft the proposal who have little or no knowledge of the land, the existing or the potential opportunities that exists and are not willing to use a true collaborative process with boots on the ground with people like myself who understand the history, the land, the trails and the potential for a truly comprehensive motorized trail system that not only meets current needs and wants and will also create the most economical looping trail system and least impacts to the lands. YOU ARE WILLING TO ADOPT SOME TRAILS THAT WERE NEVER PART OF THE

INVENTORY LIKE THE WARMSPRINGS CANYON TRAIL THAT VIOLATES YOUR VERY OWN CRITERIA, BUT NOT OTHERS LIKE THE INDIAN POINT TRAIL THAT WAS A LEGAL TRAIL “ONE THAT WAS A LIFE CHANGING EXPERIENCE FOR A LOT OF USERS” AND IT WAS INSTALLED LEAGALLY THOUGH A COLABORTIVE PROCESS AMOUNG THE ATV CLUB AND THE FOREST SERVICE.

I am deeply concerned with how the Travel Management team and your decision making process, and the impacts that have been ignored to our community and our local economy is being handled. You only are giving us one meeting via on-line opportunities for our area which possess huge problems with those that are unwilling to participate or are incapable of participating in the on line process.

Collaboration on how the motorized travel plans and routes can be linked with adjacent lands including Bridger Teton National Forest, Wyoming Game and Fish, BLM, and Wyoming State Trust lands are not even in the thought process and still remain that way.

ADA is not even mentioned in the draft. The fact that people with disabilities don't have a voice as motorized travel is in a lot of cases the only way that they can access these public lands is extremely disturbing.

Search and Rescue and their needs are not addressed.

I know that the common response to all of these comments is that now is the time to voice your concerns as someone who has been engage in the whole forest revision and the Travel Management plans, this process is completely backwards. You are forcibly giving us alternatives that are not alternatives whatsoever as they don't address any of the things I have outlined above.

We have come forth with ideas and rational common sense proposals and they are being discredited from the very beginning without due justice simply because your people don't like them or because of the bash lash that they may pose from special interests groups. **MAKING CLAIMS THAT GREAT IDEAS BREAK THE RULES DUE TO ELK CALVING GROUNDS AND OR GRIZZLY BEAR HABITAT ARE BASELESS CLAIMS** as there is no evidence on either account that ORV Travel has an impact on them and the fact that they are calving and bears are existing everywhere in the ecosystem makes those claims debunked. Not to mention all of the trails both existing and proposed within the system actually fall within those parameters. So you install seasonal closures on some but not all proves that that there is ulterior motives like “THE GAME AND FISH AND THE FOREST SERVICES DISLIKE OF ANTER HUNTING” and so this give you the right to close areas off?

The SNF is asking the Wyoming State Trails to become the managing agency for a large part of the SNF trails and roads. I personally don't have a problem with this but there is no mention of what kind of annual funding the SNF is willing to provide to them to do the SNF job? The criteria that the SNF sets forth on MT roads and trails is unrealistic and will sooner or later break the budget and become a burden to the agency footing the bill. In the long term the user once again will be taxed with higher tag fees in order to have the same things we have now or will once again be force with ideas of more closures to align the system to the budget.

There are 5 million acres of lands on the Shoshone National forest of which there are only 500,000 acres of lands that are available for motorized travel. Of that 500,000 there are unjust classifications that came out of thin blue air that hinders travel on a lot of those areas from the Forest Revision. Seeking out every available opportunity for motorized travel and looping opportunity on these lands is essential to all the following groups. Disabled People, Elderly People, Children, Women and Men, Hunters, Fishermen and women, hikers, bikers, ATVer's, Motorcyclists, Jeep and truck people and even people with cars.

These lands were set aside for multiple uses and the designations like RARE I, RARE II and Non-Motorized travel within these multiple use areas via the last forest revision unjustly and illegally removes those ideals.

It is my opinion that the travel management team needs to start over from the very beginning with an open and transparent format that allows all interested parties to become players in the process. So that everyone who accesses their national forest with motorized travel has a say not just your say with your proposed alternatives. The SNF belongs to the people and they have spoken and you have ignored their voice. With the shape that our current forest service roads are in we all know that comprehensive reform is needed.

I personally have invited our local ranger Jeff VonKienast, District Ranger Lisa Timcheck, and the Environmental coordinator Mark Foster to become a part of a team so that true locals who know the land and the possibilities of a broad sweeping trail management plan and am ignored every single time! Your people offer very little local knowledge and or history as to any of the ideals locals have towards adding looping trails to the system. Their boots on the ground knowledge is lacking in a responsible dialog in exploring the possibilities for a great trails system. These key people are also lacking the in the history and designations and context in the Forest Revision.

Dubois, Wyoming is a town that has a one legged economy which is simply visitors to our town and area. They are either coming here specifically to use Dubois as a stopping point to Teton and Yellowstone National Parks or they are coming here specifically to recreate. Our forms of recreation are many but the ones that lead the way and have been that way for more than 40 years are Snowmobiling, Hunting, and Fishing. In recent years with technology advancements 4 wheelers have changed into Side X Sides and the volume of 2020 sticker sales proves the amount of people who come to the area to see and access their public lands via ORV travel is plentiful. It's also signifies how the travel management plan is already obsolete from the beginning of it starting 5 years ago and the need to scrap the plan and start over.

WITH ALL OF THAT BEING SAID.....

THERE ARE NO PREFERRED ALTERNATIVES

ALTERNATIVE 4 is the best option but is far overreaching and not practical, nor rational. It is my goal the SNF realize the following are not overreaching ideals and that they are practical common since ideas that will sustain a comprehensive ORV/ATV trail system that is also a trail system easily attainable and maintainable through the Wyoming State Trails.

I support the following:

ORV/ ATV TRAIL / ROAD CONSIDERATIONS

INDIAN POINT TO DUTCH OVEN SPRINGS (FSRD 554 – FSRD 285.4A)

- Trail already constructed utilizing specs from SNF.
- Cost to build is already done with Cooperation from Local ATV Club/SNF
- The SNF restrictions from Non-Motorized is defunk as Motorized travel exists to the north, east, west and south of the area.
- Fails to meet Scenic and Wilds as there is an airstrip at the bottom of the hill. There is Deeded land at the bottom of the hill with roads, and there is also a Utility Line in the Area.
- Wyoming Game and Fish opens the area on the 15th of May.
- The SNF has no restriction on the roads to the North of the trail.

- 1 Water crossing is on a gravel bed that has no steep banks and poses no erosion issues.
- Rogue use to the trail was never an issue during all the years it was open
- Creates a huge economic boost to the local economy for the looping opportunities it creates.

COW CAMP (FSRD 533 – FSRD534)

- Trail is already in place and currently being used.
- Provides a great looping opportunity.
- Mirrors the snowmobile system making maintenance an easier task

CLINT CREEK (FSRD 540- MT15)

- Utilizes existing roads and old routes
- Overlays existing Snowmobile Route **minimizing maintenance**
- Great Looping Opportunity
- Elk calving ground is poor excuse as elk calving ground exist everywhere now.

BACHELOR CREEK TRAIL (MT14 TO FSRD 283)

The precedent for this trail makes the route from Indian Point to Dutch Oven Springs even more desirable and allowable. This trail actually runs through a RARE area, and has multiple spring crossing, and the trail is prone to serious erosion issue. If you are willing to accept this for a trail when it really offers very little other than a very uncomfortable ride then you should be willing to accept any of these proposed. The looping opportunity that it offers doesn't really offer much for riders as the true destination from either direction is Moon Lake.

GAME WARDEN TRAIL (FSRD 538 – FSRD 537)

- Overlays existing Snowmobile Route minimizing maintenance
- Great looping Opportunity
- State Trails has been Utilizing ORV's to maintain trail for years for the snowmobile side.
- Utilizes existing Roads on both the SNF and BT
- Grizzly Bear Issue is debunk as Grizzlies are everywhere throughout the entire Absaroka and Wind River Ranges. Impact to Grizzlies from ORV travel shouldn't even be a talking point.

MOCCASSIN BASIN ROAD TO BARBERS POINT (FSRD 537-515)

- This route mirrors the snowmobile trails (XA) utilizing one maintenance program for both
- It can be done by utilizing and old road already there
- Provides a great looping opportunity keeping orv/atv off the highway alleviating the safety issues.
- An Existing Utility Easement can be also utilized for the trail.
- The Utility easement alone makes this area an area than can be developed outside of the Grizzly Habitat Inclusion

UPPER BRENT CREEK ROADS

Right now there is a season closure on **Brent Creek Road (511)** which has been in place for a number of years and a special order by previous local ranger. It was said that this was put in place for Elk Calving Grounds. **WE OPPOSED THE SEASONAL CLOSURE ON THIS ROAD.**

- Elk Calving Grounds Designation holds no water as Elk are calving everywhere now due to Bears and Wolves influence.
- This road is a south facing slope that burns off of snow long before most others.
- It is a lower elevation, and a good road with good compaction and very little rutting, especially the lower 2/3rds.
- The Game and Fish opens all of their areas which are as big of calving grounds as there is in this country all on the 16th of May, there is no precedence for this being closed.

SALT CREEK (FSRD 263.2A – FSRD533)

- Utilizes existing roads and old routes
- Overlays existing Snowmobile Route minimizing maintenance
- Great Looping Opportunity

SPUR ROADS

- All spur roads need to be inventoried at this time and kept open for all the resources that they provide. Hunting, fishing, hiking, sight seeing, and especially Firewood Collection. If the SNF only new the reasons for a lot of these roads they would understand the value of them. If the SNF spent as much time closing these roads and pound brown stakes in the ground as they did fixing the road there would be such a backlog of work and problems that we do.

CLOSED SERVICE ROADS

- In this time of need all closed gated service roads should be open for the summer months. For recreation and for firewood collection to help reduce the fuel loads that have been a direct result of the SNF management practices.

ROAD MAINTENANCE

- Road grading needs to be done in the spring when road are damp. By spring this means late June or July. Blading like was done this year in late August is pointless. The road is bone dry, the dust just flies, there is no compaction, fines are lost, and it's a complete waste of time and money. Not to mention the operator is unqualified and leaves boulders all over the road surface. He fails to fill in pot holes that become lakes again every spring and never crowns the roads surface.
- Mountains of Gravel have been sitting in certain areas not being used.

DECOMMISSIONING ROADS

There are some cases of two roads that serve the same purpose without question; however this ideal of Decommission road needs some serious consideration. There are many spur roads that serve as valuable access to hunting spots, caves, fishing and especially FIRE WOOD CUTTING and the like. They have been in existence for a very long time. Allowing people to spread out especially in times like hunting seasons is invaluable opportunities for the users.

If there are some cases for decommissioning, this shouldn't not be an action that is paid for out of the "States Trails" funds whatsoever. This is solely the responsibility of the SNF and needs to be done with extreme caution. **We have seen routes decommissioned by both the SNF and the Bridger Teton National Forest and in almost every case the decommissioning creates 3 new routes to the same exact destination or dead end. Not to mention The 1866 Mining Law provision - RS (revised statute) 2477 - states simply that "The right-of-way for the construction of highways over public lands, not reserved for public uses, is hereby granted.**

“And those precedents are being set daily on the legality of the repeal on a state by state case. The BLM has already set the president in Wyoming that makes the repeal defunk and that all old routes for mining, timber, off-road vehicle and livestock remain open for development or motorized recreation.”

TAP/TAR

Budgets are thin everywhere and the reality of our recent government shutdown they will become even more prevalent. However there are ways that the Forest service can become a bigger part of the solution than the problem. The demands of Fire and its personnel are eating up large amounts of the budget annually. These employees should and could be utilized in assisting the motorized travel plan. While the base staff stationed in each one of the districts it would appear to me that the time they spend while they are idle be spent in cleaning and clearing the sides of the trails and roads in the very least. They should all have adequate chainsaw training and for the personnel that aren't they can be the ones piling the waste to be burned just like thinning and timber sales in the winter. The gym that they are provided should be eliminated and that time should be spent in the field constructively working and making our roads and trails better.

There is no mention of Local groups mentioned in helping the state trails meeting goals of trail demands. The amount of time that is spent annually by locals cutting roads and trails open every single season isn't being fully recognized. Hundreds of man hours are busy each spring doing our part, and the reason there is such a problem is because of the SNF management practices. Beetle kill and fires and the lack of clear zones along the roads/routes edges are not being addressed.

Most trails proposed are logical preexisting routes that will require very little dollars to maintain or develop. There is also a very large amount of the trails proposed that overlay existing OSV so maintenance can be done once for both uses.

The Shoshone should be doing an annual spring survey of major roads and routes to assess damages that have occurred through the winter season and have a discretionary emergency budget so that repairs can be made ASAP so that the public is not being shut out of the public lands. Local District Rangers should be able to make those calls immediately and expedite the situations so that people are not shut out.

Budgets need to be set for Motorized Travel management and should be done in a responsible fashion so that budgets are in line with the amount of use. Fire personnel and their equipment or training should never be more than that of maintenance of Roads and or Trails.

WE have mountains of gravel in the Moccasin Basin Roads, Long Creek roads and gravel pits in and on Union pass, and Sheridan creek that are not being utilized? Why are the main roads not being graveled when the material is already there? Some of these piles have been there for 3 or more years?

Why is it we have money to fight fire but not gravel the roads used maintain the health of The SNF?

YOUTH

- Every single opportunity needs to be taken advantage of to allow our youth ride these trails and roads. It is a family affair and there is nothing in the world more important than a family being able to recreate together.

SEASONAL CLOSURE RESTRICTIONS

SEASONAL CLOSURES PROPOSED IN THE BURROUGHS CREEK, SPRING MOUNTAIN, UPPER EAST FORK COUNTY ARE UPSURD AND JUST A TAKINGS. The proposed specific actions outlined in the Alternative III do not fully address or mitigate relative issues. They are also overreaching for no apparent reason OTHER THAN A DELIBERATE ATTEMPT TO CONTROL ANTLER HUNTERS ONE OF THE GREATEST OUTDOOR ACTIVITIES WE HAVE IN THE SPRING. I will use the seasonal closure in the Upper Burroughs Creek road system as an example. The Alternative II says that this area is proposed to open July 1st. Dates of July 1st are simply an overreach and an abuse of power. Right now there is a season closure on Brent Creek Road (511) which has been in place for a number of years and a special order by previous local ranger. It was said that this was put in place for Elk Calving Grounds. This road is a south facing slope that burns off of snow long before most others. It is a lower elevation, and a good road with good compaction and very little rutting, especially the lower 2/3rds. First off Elk calves are mostly all born by the end of May or the first part of June and have since become very mobile with their mothers. In most cases they follow the snow to the higher elevations long before then to avoid the bugs. Even the Wyoming Game and Fish opens all of their lands at the very latest on May 15th. Most all of their lands encompass elk calving grounds these days.

Seasonal closures need to be reasonable and logical especially in regards to that of ORV/ATV travel as we all know that the light weight characteristics of these machines do not cause rutting or excessive wear or damage to trails and or roads. One last comment about elk calving grounds or grounds for any animals birthing the forest service needs to recognize with the influx of Grizzly Bear population and the overwhelming presence of wolves on wintering habitat, birthing grounds for all animals in the Upper Wind River valley has changed significantly. Birth grounds are not the same and exist across the entire valley now. Deer and Elk alike are birthing very close to town and if this is the case does your closures need to happen across every single area? If it does than why does the Game and Fish open the gate to all their lands on the 15th of May here in this valley and on the 1st of May on the Bridger Teton?

I believe that there may be some cases for seasonal closures to help manage the resource but they need to be consistent across the board to avoid confusion. They also need to be reasonable and rational and not overreaching.

OSV CONSIDERATIONS

I Opposed to full-sized vehicles (trucks and SUVs) equipped with tracks using OSV trails.

Full-sized vehicles equipped with tracks (your proposed new OSV Category 2) are too heavy and too wide to be used on designated snowmobile trails across the Shoshone National Forest. These vehicles can cause trail rutting/damage and create safety issues since many snowmobile trails are far too narrow for two-way traffic that would include these extremely wide tracked vehicles. They simply do not belong on any groomed or ungroomed snowmobile trails on the SNF because of weight and width issues.

Exceptions to our opposition to allowing full-sized tracked vehicle operation on the SNF would include tracked conversion vehicles operating with permission under a special use permit issued by the Forest (Brooks Lake Lodge vans, utility company vehicles, etc.). Otherwise, the use of these large tracked vehicles on the SNF should be limited to only designated roads which are not part of the State's groomed and ungroomed snowmobile trails system.

I SUPPORT - KEEPING THE ENTIRE HIGH LAKES WILDERNESS STUDY AREA OPEN TO SNOWMOBILING.

The WSSA supports Alternative 2 on this topic since it would keep the entire High Lakes WSA 100% open to continued OSV use. This is consistent not only with Congressional intent but is also supported by your EA analysis – which clearly shows that use patterns have not changed significantly since the 1970s. Since the area’s potential wilderness character has not been harmed by snowmobile use since the WSA’s establishment, OSV use must be allowed to continue.

We are opposed to closing the northern and eastern portions of High Lakes as is proposed by Alternative 3. Snowmobilers have had to fight off attacks from environmental and no motorized groups who continually try to close this area to our use. They already have 80% of the Forest for their exclusive nonmotorized use, plus they keep wanting to close more of the already very limited area open to OSVs and snowmobiling. Congress was very clear in its intent that this entire area is to remain open for continued snowmobile use – until such time that either use changes significantly to the point that the area’s character is threatened, or until Congress itself determines differently. 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.

I SUPPORT – OPENING THE DUNIOR SPECIAL MANAGEMENT AREA BACK TO ITS PREVIOUS USES

The Dunior is not Wilderness nor does it meet the criteria. There was a town in the Dundee Meadows, there are Model T Ford Trucks in the woods, and there are sites of homes everywhere in the valley. It needs to be reopened immediately to OSV and management returned to previous designations.

OSV SEASON DATES - I SUPPORT DATES OF OCTOBER 1ST – JUNE 30TH

The proposed dates of November 1 through May 31 for the North Zone (Beartooths) and Wind River (Dubois) District – and December 1 through May 31 for the Washakie (Lander) District – are very realistic since there is always adequate snow for snowmobiling in these areas during these times. However, these are the absolute minimum OSV season dates we are prepared to accept – and we will fight any efforts by conservation and nonmotorized groups to shorten these proposed season dates.

Our support for Alternative 2’s proposed open and close dates is conditional since we have a lot of members who feel these proposed season dates are too short – so they are quite upset. The vast majority of our membership has ridden snowmobiles, on adequate snow, much earlier than November 1 as well as much later than May 31; not everywhere on the Forest, but certainly routinely in many high elevation areas in more years than not. There very definitely are years when October snow storms prevent hunters from accessing their backcountry hunting areas or camps since deep snow causes roads to become inaccessible by wheeled vehicles. Consequently, extending the opening date for OSV use on adequate snow to somewhere between October 1 or no later than October 15 is what we request – so that hunters have a fair chance to access their hunting areas and so that desired wildlife harvest targets have a reasonable chance to be met in years with early, deep snow.

Additionally, at season’s end, there are a lot of dedicated snowmobilers who regularly continue to ride their snowmobiles until somewhere between June 15th and June 30th – in high elevation areas where adequate snow remains. It has been their tradition for decades and they don’t want their riding access restricted due to arbitrary dates on the calendar that really have nothing to do with when there typically is still more than adequate snow in many high-country areas. SNOTEL data shows there are many places on the SNF where snowfall is absolutely sufficient to be able to add 15 to 30 days to both the front-end and back-end of your final OSV season dates – so we request that you revise Alternative 2 accordingly.

It is also our position that – if there is sufficient snow depth in areas of the Forest zoned available for OSV use – snowmobilers and other OSV users should be given priority / continue to be able to access it versus having our very limited motorized use zones closed on an early, random date –

particularly if the reasoning to end OSV use early is to ‘provide exclusive use of that snow by non-motorized recreationists.’ Those individuals and groups already have exclusive use of over 2 million acres of the SNF that we are entirely shut out of – while we openly share our 20% of the Forest with them versus ever having exclusive use of it. Consequently, it would be inherently wrong to reward them for being unwilling to abide by the same multiple-use principles we operate under every day of the year (all motorized trails on the SNF are ALWAYS open to multiple use by non-motorized recreationists – regardless of whether it is winter, spring, summer or fall).

I SUPPORT OSV OPERATION ON SNOW-COVERED ROADS OUTSIDE THE DESIGNATED OSV SEASON DATES.

We request that OSV use be allowed on designated wheeled routes (open roads and trails), when they are snow-covered, outside whatever the final OSV operating dates end up being in the final Travel Plan decision. This will help keep public access open to roads and trails on the SNF during shoulder seasons when snow is too deep for travel by wheeled trucks, ATVs and UTVs.

CROSS-COUNTRY SKI AREAS CLOSURE TO OSVS

We accept closure of the Falls/Deception and Pinnacles cross-country ski trail areas since there has been an informal ‘closure’ agreement between area snowmobilers and skiers for years.

I OPPOSED TO THE PROPOSED 12-INCH MINIMUM SNOW DEPTH FOR OSV USE OR TRAIL GROOMING.

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 be set, only that there be “adequate” snow depth for OSV use. Since snow depth can be extremely variable depending on natural metamorphoses in the snowpack, wind, and other wide ranging weather conditions, this rule would be impossible to enforce and would also create an unwelcome tool for groups trying to shut snowmobiling down when snow is actually quite adequate for OSV operation across the majority of the Forest’s landscape.

With the wind scour we have in Wyoming, there routinely will be bare ground in one spot when just beyond that particular spot there can be one, two, three or more feet of snow. There are also features like a ‘snow shadow’ where tree limbs prevent snow from reaching the ground – creating bare spots along the trail that may rarely have twelve inches of snow while the remainder of the trail will have tons of snow. And roads or trails along south-facing slopes are notorious for holding less snow due to sunshine causing snow to shrink quicker than snow on more shaded areas. There are countless other examples as to how snow depth will vary greatly from point to point to point – making it virtually impossible to have consistently deep snow pack even in the dead of winter. So, you’re setting a 12-inch minimum snow depth standard will absolutely, unnecessarily prevent trail grooming as well as OSV use across the forest if it is applied and enforced to the letter of the law – which environmental groups and other anti-motorized groups will absolutely insist you do.

I Support adding the ungroomed Ghost Creek Trail to Painter’s Store in the Beartooths. I also support adding the ungroomed trails in the Sublette Pass area near Togwotee Pass to you mapped trail system since they’ve actually existed and been sign on the ground for decades.

I Oppose any carving out of special use lands on any of the lands that are not designated Wilderness for special interest groups. Skiers have the opportunity to utilize all the land we do and all the land that snowmobiler’s don’t. They also take advantage of our groomed trails without paying a dime and the sledding community never says a word.

Thank you for the opportunity to comment on the Motorized Travel Management Plan. There is much needed change to come to an agreement on the alternatives as they don’t meet current needs

socially or economically. Nor do they include a round table collaboration effort from the major players. The SNF Revision was supposed to be the Blue Print for setting goals for the SNF to meet over the next 10 years. I was not intended to eliminate Multiple Uses and defacto these lands as Wilderness Areas. I can appreciate the fact the managing agency wants to support the back country appeal of the SNF, but the mere nature of the SNF and the Wilderness designations is encompasses. The forest revision was a sham and the designations within were shoved down the publics throat making an even larger portion of the SNF off limits. The current Orders and Policies that have been directed by Secretary Perdue do not in any way modernize the Blueprint for the SNF as far as allowing motorized recreation or management of the Road System. Utilizing this document that started 5 years ago already makes it Obsolete.

**Please add me to any further correspondence
via email at [REDACTED]**

I may also be reached at [REDACTED] if there are any questions.

Sincerely,

[REDACTED]