



November 16, 2021

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

Attention: Shoshone NF Travel Management Planning Project

Dear Mr. Foster and Planning Team:

On behalf of the American Council of Snowmobile Associations and the snowmobilers across the country, please consider these comments regarding the Shoshone National Forest (SNF) travel management plan's 2021 Environmental Assessment (EA). Our comments are focused on winter over-snow vehicle (OSV) use. We generally support most concepts of the proposed management concepts outlined in Alternative 4, but request several suggested that would continue to improve your travel plan's public acceptance for proper OSV management, its overall manageability, and provide an acceptable range of over-snow recreation opportunities while also providing proper resource 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.

Our specific comments are as follows:

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.

We do not believe the comparisons to Yellowstone National Park and how lots of large tracked vehicles are a proper comparison for many reasons.

1. The snow roads in Yellowstone are groomed on a much more regular basis and are compacted on a daily basis.
2. In comparison, OSV trails on the SNF are located in deep snow country and are not groomed nearly as frequent (including some that are quite infrequent or not groomed at all).
3. Consequently, the compaction on most SNF OSV trails is significantly less dense than snow roads in Yellowstone.

Continuing forward with your current proposal will improperly encourage increased Class 2 OSV use on winter trails and most certainly create rougher trails and increased safety issues compared to current conditions.

The primary reason most trails are left ungroomed is because the entire route is not passable by a groomer due to insufficient width or height clearance, it has unmanageable snow depth, and/or is located in extremely challenging topography. It does not make sense to promote travel by these large Class 2 vehicles into uncompacted deep snow areas is completely ludicrous; it will only create unnecessary safety issues and invite preventable resource damage when they get stuck while trying to churn their way through places these over-sized vehicles are not meant to be during extreme winter conditions.

We strongly encourage you to not encourage Class 2 OSV use.

Support Alternative 4's OSV Season Dates

We support the proposed dates of November 1 through June 15 for the North Zone (Beartooths) 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

We support Alternative 4 on this topic since it would keep the entire High Lakes WSA 100% 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 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.

Support New Ungroomed OSV Trails

- We are supportive of the addition of the new ungroomed Ghost Creek trail between Highway 212 and Painter's Store in the North Zone of the SNF. This new ungroomed trail route will provide a connection to an on-trail business as well as help disperse parking and trail access from the Highway 212 corridor when snowfall is sufficient.
- We also support adding the existing ungroomed trails in the Sublette Pass area on the Wind River District, near Togwotee Pass, to your mapped OSV trail system. These trails have actually existed and been signed on the ground for decades.

Accept Closure of Cross-Country Ski Areas 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 at these two locations.

Objection to Buffer Zones used in Motorized Trail Analysis

We believe it was inappropriate to use a "buffer zone" in the 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 nonwilderness 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."*

Such analysis is contrary to federal law.

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, has not outwardly established a ‘minimum snow depth rule’, we do question why there is so much reference to a required 12 to 18 inches of snow. 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 poor research and very 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. That statement 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 American Council of Snowmobile Associations (ACSA) is 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.

BEST MANAGEMENT PRACTICE RECOMMENDATIONS

Related To

MINIMUM SNOW DEPTH REQUIREMENTS FOR OSVs

1. **Avoid Generalized Numerical Snow Depth Standards:** Jurisdictions should resist establishing inflexible numerical snow depth measurements in order to provide the best adaptive management protocols for OSV travel management across a landscape. The development of numerical standards for OSV use is complicated by the fact that terrain and snow-cover are often extremely variable across the landscape. And snow is a complex material that changes constantly from the time it starts to develop high in the atmosphere, through all of the time it is on the ground, until it finally melts. Since snow is ever-changing and continually transformed by metamorphosis, wind, and other uncontrollable weather conditions, it can only be expected to be uniformly measured at a specific locality – and that measurement will be valid for only that particular, tiny point in time. Consequently, any measured snow depth will rarely be consistent when applied to an entire landscape versus the locality where the measurement was performed since snow depth is always subject to being smaller or larger in a different location – which could be within sight distance of the snow measurement location – as well as be different an hour, hours, or a day later depending upon atmospheric conditions at that location.

Furthermore, once a ‘minimum depth’ threshold is compacted by either trail grooming or being driven over by an OSV, snow depth falls back below the minimum depth threshold – prohibiting use – until enough new snowfall is deposited over the groomed or tracked path – illustrating the fallacy of such arbitrary standards.

In the end, numerical snow depth standards only invite needless inappropriate challenges to OSV use by those wishing to restrict their use in properly designated motorized use zones – rather than truly providing for meaningful resource protection or appropriate best practice for winter trails management. Consequently, OSV management is best served by the straightforward guiding principle of ‘where snowfall is adequate.’

2. **Do Not Exceed Six Inches of Snow Depth If an Ill-Advised Minimum Snow Depth Restriction Is Considered:** While numerical minimum snow depths are firmly not recommended and strongly advised against as a best management practice, any ill-advised minimum snow depth restrictions which are established related to being able to start trail compaction / grooming should not exceed six (6) inches of uncompacted snow depth. The first snowfalls that are processed on a trail create the base for the remainder of the winter. An early solid, smooth base of snow will help keep the trail smoother throughout the rest of the winter. Consequently, vigorous smoothing and heavy compaction is important for early snows and should be done to the greatest extent possible, depending up equipment and budget availability. Trail compaction with a packer bar, roller or drag pan should begin early in the season, as soon as adequate snow begins to accumulate, so that snow layers no more than 6 inches in depth are consistently packed from the ground up. Newly fallen snow layers should ideally be cut to 6 inches or less before compacting to ensure full compaction throughout the layer. Early snow which is allowed to accumulate to thick deep layers, as well as thick layers of newly fallen snow during the season, typically do not compact well.
3. **Recognize the Armoring Benefits from Early Season Snowmobile Compaction:** Snow compaction from snowmobile traffic helps to armor soil and underlying vegetation. Consequently, OSV use should be allowed to begin early in the season, just as soon as adequate snow cover (generally 4 to 6 inches) begins to accumulate. A snowmobile’s track and weight tend to increase the density of the trafficked snow layer. This densification makes the snow layer considerably stronger and works to ‘armor’ the underlying terrain. This is the essence of trail grooming practices, but even the weight of snowmobiles or other tracked OSVs being operated prior to grooming can cause this effect and is a particularly important, beneficial contribution to best management practices early in the winter season related to OSV use.
4. **Twelve-Inch Minimum Rule Only Appropriate in One Limited Circumstance:** OSV operation should not be allowed in *watersheds with ‘severely burned soil and detrimentally compacted, eroded and displaced soil’* unless there is a minimum of 12-inches of snow cover. Outside this situation, any area-wide 12-inch

minimum snow cover rule is generally considered unnecessarily restrictive and detrimental to proper OSV management.

We appreciate the opportunity to comment on this EA. We believe the EA clearly demonstrates that the Proposed Action will not result in significant impacts from snowmobiling or other Class 1 OSVs. The analysis also demonstrates the many partnerships with motorized groups have worked well in the past and have helped provide proper motorized use management on the Forest. We believe snowmobiling and OSV use to continue being a viable and important recreation activity, as well as an important economic contributor to local communities.

Sincerely,

Christine Jourdain
Executive Director
American Council of Snowmobile Associations

