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19 September 2020

Mark Foster (Environmental Coordinator)
Shoshone National Forest
808 Meadow Lane Avenue
Cody, WY 82414

RE: Shoshone NF Travel Management Planning Project

Dear Planning Team:

AMPL is a non-profit dedicated to keeping our public lands open to all recreation users. Many of our members snowmobile in the Shoshone National Forest from all over Wyoming and all over the country. Our comments on your Preliminary Environmental Assessment (EA) include:

We generally support parts of Alternative 2: Exceptions to our support of this Alternative are noted below.

We support the OSV Season Dates proposed by Alternative 2: 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 acceptable since there is always adequate snow for snowmobiling in these areas during these times, but we do feel the time is too limiting. There is often snow earlier than Nov/Dec. and would refer you to our points below regarding the better standard of “adequate” snowfall.

We strongly support keeping the High Lakes Wilderness Study Area open to snowmobiling as proposed by Alternative 2: We are very much opposed to closing the northern and eastern portions of High Lakes as is proposed by Alternative 3. Congress made it clear in the Wyoming Wilderness Act of 1984 that snowmobiling should be allowed to continue in this area, and gave no authority to the Forest Service to change this authorization. We would stand in strong opposition to any attempt to deviate from Congressional lawmaking regarding Wyoming’s Wilderness Study Areas.

We are opposed to allowing full-sized vehicles (trucks and SUVs) equipped with tracks to use snowmobile trails: These vehicles are too heavy and too wide to use on snowmobile trails. They will cause trail damage and create unsafe issues. They do not belong on Shoshone NF snowmobile trails.

We are opposed to the proposed 12-inch minimum snow depth before snowmobile use or trail grooming is allowed: The 2015 OSV travel rule only requires that there be “adequate” snow depth for OSV use and does not require any numerical minimum depth be set. In addition, it is our belief this

rule would create an unwelcome tool for groups to try to shut snowmobiling down when snow is actually adequate enough to snowmobile.

We support adding the new ungroomed Ghost Creek trail to Painter's Store in the Beartooths. We also support adding the ungroomed trails in the Sublette Pass area near Togwotee Pass to your mapped trail system since they've actually existed and been signed on the ground for decades.

We support allowing OSV operation on snow-covered roads outside the designated OSV season dates: Allowing OSV use on designated wheeled routes will keep public access open to roads and trails during shoulder seasons when snow is too deep for trucks, ATVs and UTVs.

Your assessment shows that there has not been any significant damage to the Shoshone National Forest from snowmobiling. We believe this demonstrates current management practices work well.

Thank you for this opportunity to comment. Please add our organization to your contact list.

Sincerely,



Amy Edmonds
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cc: United States Senator Mike Enzi
cc: United States Senator John Barrasso
cc: United States Representative Liz Cheney
cc: Lisa Timchak, Forest Supervisor