

July 14, 2016

Shoshone National Forest  
Attn: Rob Robertson  
333 East Main Street  
Lander, WY 82520



RE: Proposed Action – Shoshone National Forest Travel Management Plan

Dear Rob:

The Wyoming State Trails Program (WSTP) submits the following comments regarding the Proposed Action (PA) for the Shoshone National Forest (Forest) travel management plan. The WSTP, which administers the Wyoming Off-Road Recreational Vehicle (ORV) Program and the Wyoming Snowmobile Trails Program (Snowmobile), is committed to providing responsible management of motorized recreation and the enhancement of ORV/OHV and Snowmobile riding opportunities through grant funding and on-the-ground partnerships.

Our feedback is divided into Summer- and Winter-related comments and questions as follows:

## **SUMMER TRAVEL**

### **Forest-Wide Comments**

- 1. Many proposed travel routes submitted by various motorized user groups – which appear to have been dismissed by this PA – deserve reconsideration.** While we address this in more detail below in our area-specific comments, we feel that generally many of the proposed routes submitted by various motorized user group interests appear to have been dismissed from further consideration by the Forest's screening process. Many of these routes are existing trails or roads which have been used by residents and visitors for decades and which provide important links to local heritage as well as prime attractions and destinations on the Forest. Whether for stated 'resource, duplicity or Roadless' concerns, many/most seem to have been dismissed. We believe important routes will be closed by this PA and that many reasonable and simple linkages have been dismissed for invalid reasons. This will not, in our opinion, lead to a Forest road and trail (summer) transportation system that is healthy and widely accepted by citizens.

Roughly 80% of the Shoshone NF will staunchly remain a world-class 'backcountry non-motorized' experience irrespective of motorized travel plan decisions – so why not do the best we can to make the remaining portion of the Forest a better motorized recreation experience? All proposed road closures and dismissed expansions are in 'motorized' zones as per the Shoshone Forest Plan and should therefore be given better consideration by this process.

Our program can be an important partner as this travel plan moves forward for both funding and management expertise. We encourage Forest consultation with our staff to help develop best practices for motorized vehicle travel management and to tap our extensive experience with proper trail design layout, construction and maintenance approaches which have proven to mitigate or eliminate many issues across Wyoming. It is our opinion based upon our extensive motorized trail experience that many of the motorized route proposals which have been dismissed can actually be successfully implemented with our Program's assistance.

2. **The proposed Vehicle Width Classifications/Definitions for managing Motorized Trail Width should be revised to more closely reflect on-the-ground trail widths.** The PA proposes three Motorized Trail (MT) Width Breakdowns: Motorcycle (single track) Trails, 50-inch Motorized Trails, and 65-inch Motorized Trails.

Motorcycle Trails are in a class of their own, not central to the ‘width’ discussion. And they are nearly non-existent on the Shoshone (2.0 miles, and only on the Washakie District), with no new segments being proposed – which we’ll address further below.

On-the-ground reality is that only the Washakie District has MT that truly warrants a 50-inch vehicle width restriction. While the Wind River District has a very small amount of 50-inch MT, pretty much all of it could just as easily be slightly widened and managed as 65-inch MT. Additionally, all existing MT in the North Zone is located on old road beds, is all wider than 50” wide, and appropriate to be managed as 65-inch MT.

It should be noted that the neighboring Bridger-Teton National Forest (B-T) is currently in the process of establishing new MT width classifications that includes only two categories: 1) 64-inch motorized trail (all motor vehicles 64” or less in width allowed), and 2) motorized trail with no width restriction (all classes of motor vehicles allowed – but managed at a ‘trail standard’ versus a ‘road standard’). We believe this approach may have merit for the North Zone and Wind River District. The Shoshone should consider adopting similar MT width standards, consistent with wherever the Bridger-Teton ends up with their current efforts – for agency consistency and better public understanding.

Incorporating the premise of the B-T’s proposed ‘64” and No Width Restriction’ MT categories, we recommend the following for the Shoshone NF:

North Zone

All MT with ‘No Width Restriction’

Washakie Ranger District

All 50-inch MT, plus the small amount of Motorcycle Trail that exists on the forest

Wind River Ranger District

A mixture of 64-inch MT and ‘No Width Restriction’ MT

3. **The apparent ‘No Net Gain Policy’ in respect to Motorized Trails located in RARE II / Inventoried Roadless Area is inappropriate and should be dropped.** Motorized trails are expressly allowed in Inventoried Roadless Areas (IRA), including their new construction. Yet staff presentations during recent public meetings regarding the Summer MT proposed actions repeatedly referred to a “trade-out” (closing an existing MT segment in order to create a new MT segment) “in order to comply with instructions from our Regional Office that there be no net gain in MT through IRAs.” There is no such national policy in the Forest Service that we’ve been able to identify – so it’s inappropriate for Region 2 to mandate this for MT through Roadless Areas on the Shoshone NF since it wrongfully inhibits opportunities to improve motorized trail management on the forest.

The Shoshone NF is clearly a backcountry forest – with 1.4 million acres of designated Wilderness and only 22% of the total forest classified as ‘summer motorized use allowed.’ 100% of this very limited ability for motorized summer use is restricted to designated roads and trails – which is not going to change. The backcountry character of the forest is going to remain intact since there is zero

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possibility of increasing the ‘maximum 22% summer motorized’ scenario through this travel management planning process, even without such an illogical Regional policy.

The Management Approach outlined for Inventoried Roadless Areas on page 99 of the Shoshone Forest’s Land Management Plan (LMP) states: “The construction, reconstruction, and maintenance of motorized trails are consistent with the Roadless Area Conservation Rule. Development of such trails is guided by management area direction and the suitability designations for each management area.” The LMP allows construction of new and reconstruction of existing MT within Roadless – that’s simply proper management. And Area management and suitability guidelines do not allow MT to be anywhere not prescribed as ‘motorized allowed’ by the LMP. Consequently, this Regional policy directive should not over-rule abilities allowed by the local LMP.

There are many examples where previous appeal decisions have affirmed the legality of motorized trails within IRAs. One example is the Forest Service appeal decision related to the Smith River NRA Road Management and Route Designation Project Appeal No. 07-05-10-0005 (Six Rivers National Forest, California; Appeal Decision issued January 10, 2008) which affirmed that motorized trails are appropriate within IRAs. The Appeal Deciding Officer concluded that, “The 2001 Roadless Rule alone does not provide justification for elimination of ‘motorized trails.’ There is no justification presented in the EA/RDN for not having trails (vs. roads) in the IRA.”

The stated regional ‘no net gain’ policy has caused potentially good public suggestions for new motorized trail routes to be improperly dismissed, as well as existing valuable motorized travel routes to be proposed ‘closed.’ Our district-specific comments address this in detail below.

4. **We are concerned the Forest does not appear to have completed a comprehensive route inventory that includes all authorized as well as unauthorized travel routes – to identify and properly assess the merits of including all high value access routes into the travel plan.** Failure to conduct a comprehensive route inventory portrays an overall lack of interest in fully identifying motorized recreationists’ desired destinations on the forest. Many unauthorized motorized routes exist and are heavily used because they provide important access to points of interest and recreation destinations not provided by the ‘authorized’ travel routes. All current authorized and unauthorized routes must be considered in order to craft the best trail and road system for the Shoshone NF going forward. While many unauthorized routes were suggested for consideration during early project scoping, most seem to have been summarily dismissed from consideration. It is also likely that other existing unauthorized routes were not included in the list of proposals simply because citizens did not specifically understand the importance of recommending them. In either case, it’s the Forest’s responsibility to insure a full and proper look is given toward identifying potential routes to destinations desired by the public within areas of the Forest zoned as ‘motorized’ by the LMP.

In contrast, the Cody BLM office is currently conducting a thorough inventory of all current motorized use, whether it be on legal routes or not, so that the merits of including them in their travel plan may be considered. The Shoshone NF should consider following a similar process to help build better public acceptance of its final travel plan decision.

5. **We are concerned the Forest has perhaps unreasonably excluded proposals from the Proposed Action with rationale that was either not listed in the ‘screening criteria’ or could be easily addressed by partnering with the WSTP upon implementation.** Closing or further restricting existing access routes is a very touchy situation with the majority of local citizens. Many of the reasons cited for ‘change or closure’ of proposed segments in Tables 5, 7, 8 and 9 seem to be unfounded or fail to consider how WSTP partnerships may be able to mitigate or eliminate the stated rationale for change or closure of existing routes. While stated examples include watershed/wetland

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concerns; terrain feasibility; cost of construction/maintenance; gated/closed/level 1 roads; increased enforcement issues; and displacement of other users – substantive reasoning is not provided. WSTP requests that detailed analysis be provided that substantiates reasons the various proposals were not included in the PA or could not be attained through a partnership with our Program.

6. **Seasonal Restrictions:** The Proposed Action would place seasonal travel restrictions on an additional 114 miles of the motorized road and trail system – a very substantive 35% increase. These additions would result in 441 miles (about 47% of the total motorized system) being closed to travel for three to six months of the year – which is a bit concerning. While seasonal closures can provide important resource protection during key periods, many of the closures proposed to run until June 30 in particular seem excessively long. The Forest must safeguard against being overly-restrictive at the cost of not properly optimizing motorized access opportunities for the public – and not fall into the trap of believing wide scale general closures are sometimes mistakenly thought to be the best solution simply because they may be the easiest.

Consideration should also be given to consolidating the numerous different season start and end dates to best provide the public with a simplified set of rules to follow, which would also make it easier for non-resident users to plan trips to the Shoshone NF.

7. **Easements:** The rationale for dismissing routes from consideration for inclusion in the motorized travel system simply because there is not an existing easement may be a poor general decision factor. It is not improper for a road or trail across public land to be divided by private land, with or without an easement. There are actually many existing examples across the Forest and region where this occurs in an acceptable manner. It is up to the private land owner to allow or not allow public access across their land, and there are also opportunities for local municipalities and the WSTP to work with these landowners for public access easements. WSTP would like to see the Forest complete a full analysis for such routes based on all other criteria before being dismissed due to ‘no existing easement.’
8. **Target Management Objectives:** We believe Target Management Objectives (TMO) need to be developed that consider: user satisfaction, road and trail classifications, along with an implementation, operation, and maintenance guide. Such objectives can help decrease subjectivity as well as help build better understanding and acceptance of final travel management decisions.

User satisfaction is a very strong determining factor when it comes to travel management compliance. If final system routes do not fulfill user needs, they will still attempt to reach their desired destinations on unauthorized routes. Applying TMO principles to the Forest’s planning efforts will likely result in a travel plan that is better received by motorized users and make compliance with the final new system’s rules easier.

Implementation, Operation and Maintenance Guides can help improve discussions about the merits of each road or trail. They can also help enhance the importance of how volunteer and/or WSTP collaboration can be used to relieve, mitigate or eliminate certain management consideration criteria.

WSTP recommends that TMO criteria focus on defining intended use of various road and trail classifications that include:

- Roads for Transportation
- Roads for Recreation
- Trails for Recreation
- Trails to Destinations
- Trails for loop riding opportunities

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### Area-Specific Summer Comments

The WSTP generally supports all proposed new motorized roads and trails. Our area-specific comments below focus on specific proposals for which we have concerns, questions or objections:

#### **North Zone Comments**

- NZ-10: Carter – this proposal was dismissed due to it ‘not being feasible due to terrain and there are watershed concerns.’ The WSTP believes the stated terrain and watershed issues can be addressed through proper construction and trail siting techniques, so we request reconsideration of this proposal.
- NZ-11, 16, 17: Timber Creek / Logan Mountain / Sunlight Basin – all three proposals were dismissed due to ‘no easement across private.’ The WSTP believes all three proposals should be researched further to determine if an easement may be possible through partnerships.
- NZ-12: Timber Creek to Dick Creek Lakes – this portion was dismissed since it would ‘displace non-motorized users’ and because the motorized route is ‘not feasible due to terrain concerns.’ Motorized use appears to be acceptable in this area as per the Forest Plan – so we’re wondering how this would automatically displace non-motorized users, and why that should be an over-riding concern? It is our opinion that proper trail construction techniques typically used by WSTP would make this trail construction feasible – so we request that this proposal be reconsidered.
- NZ-13: Aspen Trail – this proposal should be reconsidered. Its location in Roadless is irrelevant, the potential concern about displacement of horse users is misguided, and WSTP’s partnership could fully address watershed concerns.
- NZ-15: Grass Creek – the lower portion of this proposal which has been dismissed due to ‘terrain and displacement’ concerns should be reconsidered. The WSTP is capable of constructing the trail improvements, which can be accomplished despite FS staff concerns about terrain. Furthermore motorized use is allowable in this areas as per the Forest Plan, so ‘displacement of non-motorized trail users’ is misguided.

#### **Washakie Ranger District Comments**

- WK-01: Cony Basin – this would not be an acceptable replacement for MT-01; current MT-01 is an important trail which must remain in place for motorized recreation access. If added to the motorized trail system, its purpose should be to provide loop opportunities companion to existing MT-01.
- WK-02: Elderberry Creek – this proposal should be reconsidered. Perceived cost and resource issues can be mitigated by partnership with WSTP and the wildlife concerns can be dealt with by seasonal restrictions.
- WK-03, 04: Bayer Mountain / Canyon Creek – there is a severe shortage of single-track MT on the Shoshone NF – a mere 2 miles on an entire forest whose backcountry character could/should easily lend itself to this least invasive type of MT. It is unfortunate that a preponderance of stock and other non-motorized trails have been allowed to usurp MT opportunities over the years in what have always been classified as ‘motorized’ use areas.
- This proposal should be reconsidered since it would be beneficial as multi-use trail for mountain biking as well as for motorcycle use. WK-03 and its connection to WK-04

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would provide valuable motorized single track trail linkage to the only existing segment of single track MT on the Shoshone NF. Concerns about wetland resource issues can easily be dealt with through the WSTP partnership, utilizing proven mitigation techniques which have been successfully implemented across all regions of Wyoming. Walk-in hunting concerns could easily be addressed by implementing seasonal use restrictions from about September 15 through November 22. Roadless concerns have also been stated for why this proposal was dismissed – which are baseless and inappropriately applied since the Forest Plan and the Roadless Rule specifically allow motorized trails in IRAs.

- WK-05: Cherry Creek – seasonal restrictions could be used to address wildlife concerns while the stated wetland concerns could be addressed through a WSTP partnership; this proposal should be reconsidered.
- WK-12: Young Mountain – the majority of this road is already improved to that of a Level 3 road; upgrading the rest of it would provide all Forest users a better experience, as well as protect the wetland resources that are currently being impacted.
- WK-19: Shoshone Basin – the WSTP is firmly opposed to converting this portion of MT-01 to a non-motorized trail. This motorized route has helped provide access to the Shoshone Lake area from Sinks Canyon for decades. The WSTP has made a very substantial investment (tens of thousands of dollars) in trail improvements and reconstruction on this route over the past several years – including hiring a helicopter to transport trail maintenance and construction materials to remote segments of this trail. It would be improper to walk away from such sizeable investments of user fee dollars in this area.

Rationale for this proposed change given in Table 8 states: “MT-01 runs along the Popo Agie Wilderness boundary. Conversion to foot trail would improve Wilderness character.” Section 504 of the Wyoming Wilderness Act of 1984 states, “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.” Consequently conversion of this existing motorized trail – simply to ‘improve Wilderness character’ – would be improper and a clear violation of law.

### Wind River Ranger District Comments

- WR-01: Sheridan Creek – this trail is located on existing old road, with a quality surface and is also used as a groomed snowmobile trail. There is very little non-motorized use of this road, so it is questionable why it is stated to be a ‘popular’ non-motorized trail? Since the CDNST follows a number of other motorized trails and roads, there is no real conflict since the precedence of dual use in this area of the Forest is clearly established. This old road is actually not signed on-the-ground as the CDNST, with the main route being primarily located on the Bridger Teton NF. This proposal should be reconsidered since the CDNST is not a valid reason to not use this existing road as a motorized loop trail.
- WR-03: Windy Mountain – this proposal should be reconsidered since ‘Roadless’ is not an acceptable reason to deny motorized trail use through this area, especially since there is already an existing road bed in place. This potential loop was actually previously proposed by Shoshone NF staff within the last 2 years, so it’s curious why this did not make the cut as a viable potential proposed action? This loop would be located mostly on existing road, and the wildlife concerns can be addressed with seasonal use restrictions.

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This is a great scenic loop opportunity because of the open terrain along this route – and by increasing loop opportunities, compliance issues generally decrease.

- WR-04A, B: Warm Springs – these two routes provide a vital connection between Union Pass and Camp Creek / Sheridan Creek-Oval area. They are on existing old roads which provide a great loop opportunity which is currently a heavy motorized use area. Consequently not allowing this loop connection would cause a major compliance issue. All stated riparian, terrain, and cost concerns can be mitigated through a WSTP partnership, so this proposal should be reconsidered. Since the Forest Plan allows motorized use in this area, it's unclear why the road is gated to apparently cater to only non-motorized recreation use?
- WR-05: Kitten Creek – this proposal should be reconsidered. It is located on an existing road which is currently getting a high volume of motorized use – so would be extremely difficult to keep closed. It receives very little non-motorized use, so should be open for motorized use on the constructed logging road portion to help enhance ORV/OHV riding opportunities in this area. Again, it is unclear as to why this road is gated?
- WR-06: Little Warm Springs – this is a well-constructed logging road, so there is no apparent resource damage. It should be irrelevant that this is a small loop since loop trails of any length generally help decrease compliance issues. Even at only ¼ mile in length, this well constructed route would help encourage compliance. This route should be reconsidered.
- WR-10: Warm Springs – this proposal should be reconsidered. It is primarily located on an old road and would make an ideal loop to Lake of the Woods and Fish Lake. It is currently heavily used by motorized users, so designating it as open trail will result in much better compliance than if it were closed. While the Forest has expressed concerns about compliance due to much of it being located in wide open areas, in all honesty it will be difficult to keep closed, so compliance will truly be better if it is open versus closed.
- WR-15: Upper Wind River – this route currently provides hunting and fishing access directly from Highway 26-287. Its proposed closure is not warranted and should be reconsidered.
- WR-16: Long Creek – this short road segment which has been labeled 'duplicate' and proposed for closure actually provides a useful loop for sightseeing and hunters. It should be kept open rather than be closed.
- WR-20, 55: Union Pass and Spruce Creek – WSTP is opposed to closing these two existing motorized access routes. While they may both dead-end, both provide important recreation access to the Forest and there are no apparent resource issues. Additionally there are not enough dispersed campsites in these areas, which receive a lot of motorized use during summer and fall. These are currently popular routes, so closing them will unnecessarily create non-compliance.

The rationale stated in Table 7 for both closures is baseless: "This will offset Roadless mileage of WR-11." As we stated above in Forest-Wide #2, it is improper to require an 'off-set closure' in order to create a beneficial loop trail. And in this case the Forest is closing 1.5 mile of motorized route and creating only 0.4 mile of new trail in Roadless for WR-11 in this purported off-set. Such a trade-off should 1) not be required to get a new trail loop, and 2) not result in a net loss for the trade-off. This is unacceptable.

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- WR-26: Bear Creek – this route provides extremely popular access to the Wilderness boundary. Rather than converting this to 65” MT, WSTP proposes that this segment be managed as ‘MT with No Width Restriction’ to prevent creating an unwarranted compliance issue.
- WR-36: Bald Mountain – this proposal should be reconsidered. This trail is currently in place and has high user demand since it is the only route to the top of the mountain. Scenic lookouts are a primary desired visitor destination, which helps justify the importance of dead-end routes on a trail system from a TMO perspective. The lower 1 ½ miles of this route is a well-constructed logging road and the route provides a great scenic view from the top.
- WR-40, 43: West Fork Long Creek – WSTP is opposed to closing/decommissioning these two existing motorized routes. We propose to instead construct a connector route between the two current dead-end routes. A properly located and constructed trail route can be sustainable, produce increased compliance in this area versus if the forest tries to close these two long-term routes, and result in an increased motorized loop opportunity.

### WINTER TRAVEL

Our comments related to winter over-snow vehicle (OSV) use are as follows:

#### Forest-Wide Comments

- 1. Support Not Establishing ‘Minimum Snow Depth’ Standards:** There were proposals floated during earlier travel management scoping to set an ‘18” minimum uncompacted snow depth’ requirement before OSV use could occur on the Shoshone NF. We are glad to see that no ‘minimum snow depth’ requirement is being proposed since this would be impossible to manage and enforce.

The final OSV Travel Rule eliminated ‘snow depth’ as a potential designation criteria; it instead addressed this issue by specifying that the OSV Travel Rule applies ‘where snowfall is adequate.’ Therefore the eventual winter travel plan for the Shoshone should also clearly state that ‘OSV use is allowed where snowfall is adequate.’ While some forests across the country have historically attempted to manage OSV use by minimum snow depths, this approach has generally been impractical since on-the-ground snow conditions can be extremely variable due to topography, trail aspect, wind, and other weather conditions. The Forest Service was wise to not include snow depth in its OSV Travel Rule designation criteria, and the Shoshone NF will be wise to keep such an unmanageable criteria out of future winter management scenarios.

- 2. Major Concerns with the Proposed Motorized Use Period Zones ‘Date Structure’:** The proposal to manage winter motorized use by ‘Upper and Lower’ use period zones needs considerable revision to make this concept acceptable and more consistent with normal adequate snowfall patterns, as well as historic OSV use patterns, on the Shoshone National Forest.

A December 1 beginning date for ‘lower’ use zones and November 15 for ‘upper’ zones is generally acceptable and consistent with normal ‘adequate snowfall’ patterns on the Shoshone NF. While in theory that part might work okay, there are also many examples where/when earlier OSV use may be desirable in some local areas of the Forest – so we expect there will be wide ranging public input.

Conversely the proposed end dates of April 1 for ‘lower’ zones and April 15 for ‘upper’ use zones are absolutely too early and entirely unrealistic for typical snow patterns as well as historic snowmobile use patterns on the Forest. Both proposed end dates would be devastating to snowmobile tourism and to recreation opportunities for local riders, unnecessarily creating significant compliance issues.



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Both proposed end dates should be at least 30 to 45 days longer – through at least April 30 in ‘lower’ use zones and through at least May 31 in the ‘upper’ use zones.

While we believe the proposed use dates were intended to bring similarity with neighboring Bridger-Teton NF, their model is old, not generally enforced, and likely to change in the future. So just because it happens to be your neighbor’s model does not mean it is a good model to adopt; it is not. And while none of the other Wyoming forests have exactly the same winter use rules, similarities would be that most have longer winter ‘snowmobile seasons’ than what the Shoshone has proposed.

We feel the Medicine Bow NF, another popular snowmobiling area with typically good snow conditions similar to the Shoshone, likely provides an acceptable model for the Shoshone to consider as a better ‘OSV use season dates’ alternative than your current proposed action. In the Medicine Bow: cross-country OSV travel is allowed November 16 through May 31; OSV use is not allowed off designated routes from June 1 to November 15; OSVs can be operated on routes designated for other motor vehicle use by the MVUM between June 1 and November 15; other wheeled motor vehicles are prohibited on designated or groomed snowmobile trails shown on the current State Trails map from December 15 through April 15. So if the proposed ‘upper’ use zone season were to be extended by about 45 days, it would be similar to how the Med-Bow currently regulates OSV use.

- 3. Major Concerns with the Proposed Motorized Use Period Zones ‘Area Boundaries’:** The proposed use period ‘zone boundaries’ appear to be based on arbitrary lines versus being backed by science or within completely distinct areas of the forest. We believe too much of the forest has been proposed to be placed in the ‘Lower use period’ zone than what we believe reflects true typical on-the-ground snow conditions. This would likely cause boundaries to be over-complicated and confuse the public. It would also very likely create unnecessary pitfalls rather than help simplify education and enforcement efforts, leading to far less than desired compliance.

Snow depth can be a highly variable factor, whether day to day, month to month, and certainly year to year. It’s a hard thing to definitively regulate without quickly becoming needlessly overly restrictive. The over-arching premise is that over-snow use should occur only ‘where/when snowfall is adequate.’ This requires that a reasonable degree of user responsibility be expected and allowed. The Forest cannot legislate common sense and should not over-regulate in an attempt to over-compensate for the small number of winter recreationists who don’t always behave logically. Broader, more logical, use area boundaries would greatly improve acceptance and success of this proposed new management model for the Shoshone NF.

We suggest adjusting the proposed use zone boundaries as follows, based upon an ‘adequate snowfall’ premise, to make them: 1) more easily understood by the public, 2) easier to administer, and 3) more logically aligned with typical snowfall patterns in each general area:

Clarks Fork and northern Wapiti Ranger Districts – the ‘Lower use zone’ should include just the Pat O’Hara Mountain area. The entire remaining portion of the district located north of the Pat O’Hara Mountain area that is ‘available for OSV travel’ should be categorized as ‘Upper use zone.’ While user discretion may be required at times dependent upon adequate snowfall in fringe areas, it would provide a much cleaner, more easily understood delineation for users.

Greybull and southern Wapiti Ranger Districts: this area is okay categorized as ‘Lower use zone.’

Washakie Ranger District – categorizing the entire Washakie District as a ‘Lower use zone’ would grossly misrepresent actual snowfall and OSV use conditions, improperly eliminating late winter snowmobile riding opportunities across the entire unit. The ‘Lower use zone’ should be dramatically

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reduced to include only that portion of the district located north of Sinks Canyon. The remaining balance of the district, everything south of Sinks Canyon, should generally be recategorized as ‘Upper use zone.’ While user discretion may be required at times dependent upon adequate snowfall in fringe areas, it would provide a much cleaner, more easily understood delineation for users.

Wind River Ranger District – the ‘Lower use zone’ should be revised to include only that portion of the district located north of Dubois (the overall Horse Creek area). The entire remaining portion of the district – the greater Union Pass/Continental Divide/Brooks Lake areas located west and south of Dubois, north and south of Highway 26/287 – should be recategorized as ‘Upper use zone.’ While user discretion may be required at times dependent upon adequate snowfall in fringe areas, it would provide a much cleaner, more easily understood delineation for users.

4. **Support for Proposed Width Restriction on Groomed Snowmobile Trails – but intent needs to be clarified:** While Table 1 on page 8 of the scoping document states “prohibits tracked vehicles larger than a UTV from using groomed trails to provide for user safety,” there is no exact definition or discussion provided in the document about the intended specifics of this statement.

It appears that ‘full sized motor vehicles equipped with track conversion kits’ are the intended target of this proposal, but it doesn’t clearly state that. While the PA proposes to define classes of vehicles allowed on summer motorized trails, it does not include snowmobile or OSV definitions, as well as fully define the intent of ‘tracked vehicles larger than a UTV.’ Consequently more information is needed in order to properly assess the intention and potential benefits/impacts of this proposal.

We suggest that the proposed action be amended to more specifically address potential vehicle width issues that may impact two-way traffic flow and user safety. Additionally, the weight of larger tracked vehicles should be considered to help prevent adverse impacts to groomed trail conditions and winter trail sustainability.

If vehicle width is the primary concern driving ‘prohibiting larger than a UTV,’ it’s important to understand that UTV width increases by 9” to 12” when track kits are added. So tracked UTVs are not necessarily a narrow vehicle. A recent research study, Supplemental Assessment of Tracked OHV Use on Groomed Snowmobile Trails, available at <http://www.snowmobileinfo.org/snowmobile-access-docs/Supplemental-assessment-of-tracked-ohv-use-on-groomed-snowmobile-trails.pdf> shows a 50” ‘trail legal’ Polaris RZR becomes 61” wide when tracks are added. Additionally two different tracked Polaris Rangers were measured to be 67.5” and 68.5” wide, while a tracked John Deere Gator was measured to be 70.5” wide. Comparatively, a snowmobile will typically be 48” or less in width.

We support prohibiting (better defined) full-sized motor vehicles equipped with tracks from using groomed or ungroomed snowmobile trails, except where authorized to do so by Special Use Permit (Brooks Lake Lodge access). All other tracked ATVs and UTVs should be allowed to operate on groomed or ungroomed snowmobile trails, as well as off-trail and all routes designated open to motor vehicle use by the MVUM – and are heavily used in some areas of the Forest for ice fishing access.

5. **There needs to be a single OSV definition used for OSV management on the Shoshone NF versus managing with competing ‘Snowmobile versus Other OSV Use’:** The WSTP submitted a proposal during pre-scoping that “All portions of the Shoshone National Forest classified as ‘Available for Winter Motorized Use’ should be designated as ‘open’ to motorized over-snow vehicle (OSV) travel in the winter travel plan.” We’ve had feedback from Forest staff that this is not possible due to a distinction the Forest Plan makes between a ‘snowmobile’ and ‘other tracked vehicles, such as ATVs’ – and that this means only snowmobiles can be allowed to operate off designated roads and trails while other types of OSVs must be restricted to designated roads and trails. We disagree.

Subpart C of the Travel Management Rule is what regulates OSV use and is distinctly different from Subpart B which regulates all other motor (wheeled) vehicle travel. Subpart C is clearly more permissive in that it specifically allows cross-country OSV travel in large designated open areas – off designated roads and trails.

The ‘snowmobile/other OSV distinction’ referred to by Forest staff appears to be on page 103 of the Forest Plan. It is important to note that this statement is specifically in reference to the Management Approach for “Roads and Trails” – not to ‘roads, trails and areas.’ Staff is misguided in its interpretation/application of this statement and in taking a position that snowmobiles are the only OSVs that can be allowed off-route. If OSVs generally (including snowmobiles) or specifically for all other OSV types were intended to be restricted entirely to designated roads and trails by the Forest Plan, such management approach should have/would have been outlined in the Recreation Management Approach section – but it is not.

Subpart C specifically allows OSV use (generally, and not just snowmobile use specifically) off designated roads and trails. The Federal Register notice accompanying the final OSV TMR goes to great length to explain the difference in impacts from OSVs versus other motorized vehicles. It stresses that an OSV is ‘operated over snow and not in direct contact with the ground like other motor vehicles.’ In the end OSVs have less impact because of their low ground pressure (low PSI/pounds per square inch of pressure) compared to other motor vehicles without tracks. A snowmobile has an average PSI of about 0.50, while the PSI of a tracked ATV is about 0.55 and a tracked RZR is 0.60, and then the PSI of larger tracked UTVs like Rangers and John Deere Gators is slightly less than 0.90. (See study referenced above and also ‘Assessment of Tracked OHV Use on Groomed Snowmobile Trails’ available at <http://www.snowmobileinfo.org/snowmobile-access-docs/Assessment-of-Tracked-OHV-Use-on-Groomed-Snowmobile-Trails.pdf> ) Comparatively a 4-wheel drive vehicle exerts 30 PSI of ground pressure, the PSI of a horse is 8 compared to 5 PSI for a man hiking, and 1.5 PSI for a wheeled ATV.

Scientific facts show there is no valid reason to not allow all OSVs (including tracked ATVs, UTVs and motorcycles) to be operated off roads and trails in designated open areas (all OSVs other than full-sized tracked motor vehicles). Their ground pressure is similar to that of a snowmobile and significantly less than all other recreational activities occurring on the Shoshone NF.

6. **Clarify that OSV Travel is allowed on Designated MVUM Routes through Crucial Big Game Winter Range and that Open OSV Travel is allowed in Crucial Big Game Winter Range Exemption Areas.** The Shoshone Forest Plan, on page 59 under Guidelines for species of local concern, outlines that: 1) OSV use is permitted on roads and trails open to wheeled motorized vehicles within crucial big game winter range (as per the MVUM), 2) OSV use is permitted on designated groomed snowmobile trails within crucial big game winter range, 3) snowmobile use is permitted on designated ungroomed snowmobile trails within crucial big game winter range, and 4) snowmobile use is permitted within identified crucial big game winter range exemption areas.

These are very important provisions that must be carried forward. Please add language to the Proposed Action to insure Forest intent is clear to all.

### **Area-Specific Winter Comments**

#### **North Zone Comments**

1. The WSTP supports the addition of the ungroomed Ghost Creek trail (NZ-4w), from Painter’s Outpost north to Highway 212, to the Beartooths snowmobile trail system. This trail will provide

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increased rider safety and also provides access to important on-trail services including food, fuel and permits.

2. The WSTP supports leaving the High Lakes Wilderness Study Area open to continued snowmobiling access, as allowed in the WSA's authorizing legislation and by the recently adopted Shoshone Forest's Land Management Plan. There are no known resource impacts related to OSV use in this popular deep snow area recreation.
3. Proposed 'use zone' end date and boundary changes as discussed in Forest-Wide Winter Comments #2 and #3 above.

### **Washakie Ranger District Comments**

1. Proposed 'use zone' end date and boundary changes as discussed in Forest-Wide Winter Comments #2 and #3 above.

### **Wind River Ranger District Comments**

1. The existing groomed snowmobile trail between the Brooks Lake Parking Area and the Tie Hack Parking Area is missing from the Winter Map for the WRRD. This existing trail is located in the Highway 26/287 road ditch and runs past Lava Mountain Lodge. It is shown on our Continental Divide Region – Snowmobile Trails Map and should be added to the maps being used for this process.
2. The WSTP supports the addition of the ungroomed Sublette Pass trail (WR-06w) to the snowmobile trail system. This ungroomed trail is signed on-the-ground and has been in existence for decades. It provides important access to backcountry riding in the Togwotee Pass area.
3. The proposed closure of the Falls/Deception (WR-02w) and Pinnacles (WR-03w) cross-country ski trails to snowmobile use appears to be acceptable since there has been an informal 'gentleman's agreement' between local snowmobilers and skiers to this effect for several years. At the same time it should be noted that snowmobile groups, locally and nationally, have expressed they will stand firmly opposed to any further snowmobile closures in this area. Given that the recently adopted Forest Plan, and this additional 1,354 acres closure, leaves only 21.7% of the forest (521,611 out of 2.4 million acres) open to potential winter motorized use – we'd probably be inclined to agree that any additional closures may be difficult to justify.
4. Proposed 'use zone' end date and boundary changes as discussed in Forest-Wide Winter Comments #2 and #3 above.

Thank you for this opportunity to comment. We look forward to working closely with Forest staff as this planning process proceeds. Please feel free to contact me at 307-332-5107 or by e-mail at [ron.mckinney@wyo.gov](mailto:ron.mckinney@wyo.gov) if you have any questions.

Respectfully submitted by,

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