



June 27, 2016

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

RE: Shoshone National Forest Travel Management – Proposed Action comments

Dear Rob:

The following comments are submitted on behalf of the Wyoming State Snowmobile Association (WSSA) regarding the Shoshone National Forest travel management plan's Proposed Action (PA). Our general and specific comments are focused on winter over-snow vehicle (OSV) use, with suggestions for changes and clarifications to help improve its acceptance and manageability. Our comments are as follows:

#### **Proposed Ungroomed Trail Additions**

The WSSA supports the addition of two ungroomed snowmobile trail routes included in the PA:

- WR-06w – the ungroomed Sublette Pass trail has been in existence for decades and provides important access to backcountry riding areas north of the Togwotee Pass Highway; it is appropriate that this trail be added to the system
- NZ-4w – the ungroomed Ghost Creek trail addition from Painter's Store north to Highway 212 will provide important access to services and increase user safety whenever there is adequate snowfall on this trail route; it is appropriate that this trail be added to the system

#### **Missing Snowmobile Trail**

We note that the groomed snowmobile trail from the Tie Hack Parking area past Lava Mountain Lodge to the Brooks Lake Parking area, which is located in the Highway 26/287 road ROW borrow ditch and is shown on the State of Wyoming's Snowmobile Trails Map, is missing from the 'Winter – Wind River Ranger District Proposed Action Map.' Please see that this omission is corrected on plan maps moving forward.

#### **High Lakes Wilderness Study Area**

The WSSA supports keeping 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 Management Plan. This is remote, deep snow area which has been used by snowmobilers for many decades. There are no resource impacts related to winter use in this deep snow area recreation and it should remain open to winter motorized recreation use.

### **Proposed Cross-Country Ski Trail Closures**

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

This will result in an additional 1,354 acres being closed to OSV use, leaving only 521,611 acres of the Shoshone National Forest’s 2.4 million acres (21.7%) available for OSV use. Consequently WSSA will likely be firmly opposed to any and all additional proposed OSV use closures that may surface as this travel planning process moves forward.

### **Proposed Width Restriction on Groomed Snowmobile Trails**

In Table 1 of the PA Scoping Document it states under the Proposed Action for winter motorized travel: ‘prohibits tracked vehicles larger than a UTV from using groomed trails to provide for user safety.’ Since there is no further definition to this statement elsewhere in the PA document, it seems more meat needs to be put to this proposal in order to fully understand and judge the forest’s intentions.

While we get the impression that ‘tracked full size vehicles/vans/trucks’ are the intended target, the PA document does not clearly state whether that’s the case. Planning documents should clarify whether the concern is: width, weight, or both? While the PA proposes to define classes of vehicles allowed on summer motorized trails, it fails to include snowmobile or OSV definitions, as well as fully define the intent of ‘tracked vehicles larger than a UTV.’

It’s important to understand that a UTV’s width is typically increased by 9” to 12” when it is converted from a wheeled vehicle to a tracked vehicle. Consequently a 50” wide wheeled Polaris RZR becomes 61” wide when tracks are added. Tracked Polaris Rangers have been measured to be 67.5” to 68.5” wide, while a tracked John Deere Gator was measured to be 70.5” wide (see <http://www.snowmobileinfo.org/snowmobile-access-docs/Supplemental-assessment-of-tracked-ohv-use-on-groomed-snowmobile-trails.pdf> ).

The WSSA would support prohibiting full-sized motor vehicles equipped with tracks from using groomed or ungroomed snowmobile trails, as well as operating off-trail (other than where authorized to do so through a Special Use Permit, such as on the groomed trail to Brooks Lake). However the WSSA generally sees no reason to prohibit tracked UTVs from operating on groomed or ungroomed snowmobile trails.

### **Snowmobile versus Other OSV Use**

While it is not addressed in the PA Scoping Document, we have heard comments over the past months from Forest staff regarding the ‘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 cannot.

Subpart C of the Travel Management Rule 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.

We are familiar with the ‘snowmobile/other OSV’ reference on page 103 of the Forest Plan; however we must point out 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 touting 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.

The WSSA believes that, where snowfall is adequate, all OSVs (other than full-sized tracked vehicles as discussed above) should be allowed to operate in designated open areas off roads and trails.

### **Proposed Motorized Use Period Zones**

The Proposed Action states that winter motorized use will be managed according to upper and lower ‘use period’ zones. This proposal would allow OSV use in the lower zone from December 1 to April 1 versus November 15 to April 15 in the upper winter use zone. While we understand that under the new OSV Travel Rule we must generally accept the premise of establishing OSV use dates, we strongly disagree with the OSV use seasons as proposed.

The beginning date of December 1 for ‘lower’ zones and November 15 for ‘upper’ zones is generally acceptable and consistent with normal ‘adequate snowfall’ patterns on the Shoshone National Forest. However a little bit earlier would be consistent with historic OSV use in some parts of the forest

On the other hand, the proposed end dates of April 1 for ‘lower’ zones and April 15 for ‘upper’ use zones are far too early in both cases, totally unacceptable and unrealistic in respect to normal adequate snowfall patterns as well as historic OSV use patterns on the Shoshone National Forest. We suggest that both end dates be modified to run at least a month to month and a half longer – to at least May 1 in ‘lower’ use zones and to at least June 1 or longer in the ‘upper’ use zones.

This would be generally consistent with how the Medicine Bow National Forest – in our opinion, a better comparable winter use model for other Wyoming forests – manages its winter use season: 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. The Shoshone National Forest should amend its Proposed Action and adopt a winter use season more similar to the Medicine Bow’s for OSV management that’s most appropriate for our local conditions.

We support the fact that the PA does not propose to manage OSV use by minimum snow depths since that has proven to be an unsuccessful, archaic approach to winter use management. We would oppose any management plan amendments tiered to snow depths since such a factor can be grossly inconsistent within the same sight lines due to variable weather and topographical conditions. It is important to note that the final OSV travel rule eliminated ‘snow depth’ as a potential designation criteria, wisely choosing to instead stipulate that the OSV travel rule applies simply ‘where snowfall is adequate.’ Consequently we believe it is important that the forest’s winter travel plan also clearly stipulate that ‘OSV use is allowed where snowfall is adequate.’

### **Proposed Motorized Use Period Zone Boundaries**

We are concerned that the proposed use period ‘zone boundaries’ will be confusing and unnecessarily over-complicated for the public – and result in unnecessarily manufacturing future compliance pitfalls.

Many of the proposed boundaries appear to be based more on arbitrary lines versus backed by science or within completely distinct areas of the forest. Over-snow use should occur only ‘where/when snowfall is adequate.’ But since that can be a highly variable situation from year to year as well as from month to month, it’s a hard thing to definitively regulate without quickly becoming overly restrictive. Consequently a reasonable degree of user responsibility must be factored in and allowed.

Based upon an 'adequate snowfall' premise, we suggest the following realignment of use zone boundaries to make them (1) more easily understood by the public, (2) easier to administer, and (3) better aligned with generalized potential area snowfall patterns:

**Clarks Fork and northern Wapiti Ranger Districts:** to make use zones more easily understood by the public, the 'Lower' use zone should include only the Pat O'Hara Mountain area; the 'Upper' use zone should then include everything north of the Pat O'Hara Mountain area – with user discretion required based upon adequate snowfall in fringe areas dependent upon actual snowfall conditions

**Greybull and southern Wapiti Ranger Districts:** all of this area should remain 'Lower' use zone

**Washakie Ranger District:** it would be improper to classify the entire Washakie District as a 'Lower' use zone since that misrepresents actual OSV use conditions and opportunities; the 'Lower' use zone should be revised to include everything north of Sinks Canyon; the 'Upper' use zone should then include everything south of Sinks Canyon – with user discretion required based upon adequate snowfall in fringe areas dependent upon actual snowfall conditions

**Wind River Ranger District:** to make use zones more easily understood by the public, the 'Lower' use zone should only include everything north of Dubois (overall Horse Creek area); the 'Upper' use zone should then include everything west and south of Dubois (greater Union Pass/Continental Divide/Brooks Lake areas, north and south of the highway in its entirety) – with user discretion based upon adequate snowfall in fringe areas dependent upon actual snowfall conditions.

Thanks for the opportunity to comment on the Proposed Action. We look forward to continuing to work with Forest Service staff as this process moves forward. Feel free to contact me if you have any questions or need additional information.

Sincerely,

Bert Miller, President  
Wyoming State Snowmobile Association



Cc: WSSA BOD  
Joe Alexander, Shoshone Forest Supervisor  
Sue Stresser, North Zone District Ranger  
Steve Schacht, Washakie District Ranger  
Rick Metzger, Wind River District Ranger