

BOARD OF COUNTY COMMISSIONERS

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Park County, Wyoming
Organized 1911

Original Park County Courthouse
Cody, Wyoming
Completed 1912

July 7, 2016

Shoshone National Forest
Attn: Rob Robertson
333 E. Main St.
Lander, WY 82520

RE: Comments related to the May 2015 Shoshone Nat'l Forest Travel Management Scoping Document

Dear Sir:

Thank you for this opportunity to comment. We recognize the importance for the public and cooperators to be able to offer comments to help shape the significant travel decisions being made.

Following are our comments specific to the North Zone proposals:

1. Line Creek NZ-01

The Board is in favor of the motorized trail connecting FSR 123.1B to 140 and new construction connecting 140 with 121 as per the travel management handout.

2. Morrison Jeep Trail NZ-03

We are in favor of moving the gate on the Morrison Jeep Trail to the proposed gate location, but also suggests consideration be given to relocating it to the original gate location, as indicated on Map 2. The Morrison Jeep Trail and additional road/trail created by relocating the gate are outside of the grizzly bear PCA.

3. Sweetwater Creek NZ-07

We strongly oppose the closure of a portion of FSR 423. The Board supports increased public access to the Shoshone National Forest via roads and OHV trail use. The Board also asserts that no road or trail closures within the North Zone of the Forest are warranted, especially forest system roads that have been used by the public for decades. Repairs to the washed out portion of the FSR 423 should be completed as quickly as possible. If funds to complete the repairs are not available, the Forest Service should reach out to the public for options.

4. Gwinn Fork / Timber Creek NZ-12

We support the proposed motorized trail, opening the closed portion of FSR 202.2C. The proposed trail is outside of the grizzly bear PCA. The Board also supports the proposed conversion of the non-system road connecting 204.2E to 203.1B as it is also outside the grizzly bear PCA. Whether it has seasonal closures or restriction of trail sign or type could be subject to on-the-ground land manager input.

5. Gooseberry NZ-14

We support the proposed road to create a loop on FSR 213; however, new construction will be supported only after careful consideration of its impacts to all parts of the landscape, including but not limited to: wildlife and habitat, economic cost, and terrain. The proposed segments involve new construction but utilizing closed roads, existing trails, or old logging roads. Construction of these potential loops will provide high quality experiences sorely needed in the northern portion of the Shoshone National Forest. The proposed roads are outside of the grizzly bear PCA.

6. Grass Creek NZ-15

We support the proposed road to create multiple loops between FSR 213 and 218. Construction is needed, but lies in an old road bed. The proposed road is outside of the grizzly bear PCA.

7. Beem Gulch NZ-19

Additional information is needed as to why season use restriction is necessary after years of public use under the current management. This is not clear from the information provided in the existing documents, maps or public meetings.

8. Line Creek NZ-20

We support closure only if other roads in NZ-01 are opened for looped trails as proposed.

9. Sulphur Creek NZ-23

The closure at the private land boundary is supported only as a last resort.

10. Wood River NZ-27

The commissioners support public access to dispersed camping areas with spur roads.

11. Blackjack, Dick Creek NZ-28

We support reopening the existing road, providing a looped opportunity. Seasonal restriction for resources protection should seriously consider public use. Additionally, 'seasonal restriction' needs to be defined.

12. Little Rock Creek NZ-30

Additional information is needed as to why seasonal use restriction is necessary. This is not clear from the information provided in the existing documents, maps or public meetings.

13. Rattlesnake NZ-34

The Park County Commissioners support public access to dispersed camping areas with spur roads.

14. Fantan Lake NZ-36

We support public access to dispersed camping areas with spur roads.

15. Crandall Creek NZ-37

We support public access to dispersed camping areas with spur roads.

16. Antelope Bench NZ-38

We support public access to dispersed camping areas with spur roads.

17. Paint Creek NZ-39

We support public access to dispersed camping areas with spur roads.

18. Carter Mountain NZ-40

We support public access to dispersed camping areas with spur roads.

19. Ghost Creek NZ-4w

This is a very good addition to the current trail system on the Beartooth. It would help to reduce congestion at the junction parking area by allowing cabin owners from the Crandall area to access the trail system without trailering to the junction. There are few, if any, wildlife conflicts and little to no impacts on the resource. It would also help to disperse use on the lower portion of the current trail. It has been used historically by residents of the area. Marking the trail would help to keep foot traffic on it and would improve safety with the presence of reflective markers to improve visibility of the trail in low light conditions and during storms. We feel this is an overall good addition to the area, and will enhance the current trail system with little to no impact on wildlife or resources.

20. North Zone Seasonal Date Adjustments (Table 6, 26 proposed after 7 deletions)

It is not clear from the document, maps or public meetings why these seasonal adjustments (most reducing public access) are necessary. More information is needed but we question

question whether non-multiple use considerations have been elevated over public travel. Since all of these areas have been used by the public for decades, a thorough explanation is needed.

21. Proposed Changes to Motorized Travel Forest-wide (Table 9, 3 proposed)

a. SHO-02

We support the change with consideration to be made on a case-by-case basis.

b. SHO-02w

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, if correct, we must generally accept the premise of establishing 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 slightly earlier beginning date would be consistent with historic OSV use in some parts of the forest.

Conversely, the proposed end dates of April 1 for 'lower' zones and April 15 for 'upper' use zones is far too early in both cases, totally unacceptable and unrealistic with consideration 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 thirty to ninety days longer, to at least May 1 in 'lower' use zones and to June 1 or later in the 'upper' use zones, with the ability, at Forest Service discretion, to extend season ending dates

This change would be generally consistent with how the Medicine Bow National Forest manages its winter use season (in our opinion, a better comparable winter use model for other Wyoming forests). In the Medicine Bow Forest, cross-country Over Snow Vehicles (OSV) travel is allowed November 16 through May 31; OSV use is not allowed off designated roads from June 1 to November 15. OSVs may be operated on routes designated for other motor vehicle use by the Motor Vehicle Use Maps (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 is most appropriate for our local conditions.

We support the fact that the scoping document (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 instead to stipulate that the OSV travel rule applies simply ‘where snowfall is adequate.’ Consequently we believe it is important that the Shoshone National 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 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 within distinct areas of the forest or determined by results of scientific study. Over-snow use should occur only ‘where/when snowfall is adequate.’ But because that is a highly dynamic condition, regulation based on this is difficult and could quickly become overly restrictive. A reasonable degree of user responsibility must be factored in and allowed. Based upon an ‘active 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 on adequate snowfall in fringe areas, depending on actual snowfall conditions.

Greybull and southern Wapiti Ranger Districts: all of this area should remain ‘lower’ use zone.

c. **WR-11w**

In Table 1 of the PA Scoping Document it states under the Proposed Action for winter motorized travel: ‘prohibits tracked vehicles larger than a (Utility Task Vehicle) 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 detail needs to be included in this proposal in order to allow the public and cooperators to fully understand and judge the forest’s intentions.

While we have 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

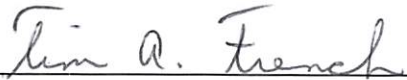
(see <http://www.snowmobileinfo.org/snowmobile-access-docs/Supplemental-assessment-of-tracked-ohv-use-on-groomed-snowmobile-trails.pdf>)

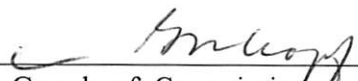
The commissioners would support prohibiting full-sized motor vehicles equipped with tracks from using groomed or un-groomed snowmobile trails, as well as operating off-trail (other than where authorized to do so through a Special Use Permit, such as on the groomed trail to Brooks Lake). However, we see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

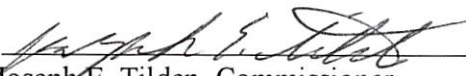
We appreciate your consideration of our comments in the process to complete the Proposed Action and look forward to working with Forest Service staff. Please contact us if you have questions or need additional information.

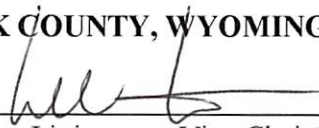
Sincerely,

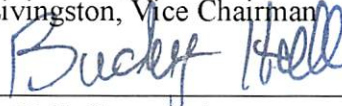
BOARD OF COUNTY COMMISSIONERS of PARK COUNTY, WYOMING


Tim A. French, Chairman


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Bucky Hall, Commissioner

cc: Honorable Governor Matthew H. Mead
Joe Alexander, Shoshone National Forest Supervisor
Sue Stresser, Shoshone Nat'l Forest District Ranger (Clarks Fork, Wapiti, Greybull Districts)