

Shoshone National Forest

July 25, 2016

Attn: Rob Robertson

333 East Main Street

Re: Comments on Shoshone

Lander, WY 82520

Travel Management Subpart C

The comments below are submitted regarding the Travel Management Subpart C project that is in pre-planning stages for the Shoshone National Forest. These comments are submitted on the behalf of the Stewards of the Greys, Great Western Trail - Wyoming Council and the Top of the Rockies, Wyoming based OSV Recreation organizations.

After reading the Shoshone Forest Plan and related Travel Management documents, it is disappointing to see that there is more public land being closed to snowmobiling.

The Shoshone NF is the 8th largest Forest in the United States covering 2.4 million acres. However it has only 200 miles of groomed trails. The State of Wyoming has 2,000 of groomed OSV trails. Although Shoshone is the largest Forest in Wyoming it has the least amount of groomed OSV trails available.

Economics:

The Shoshone NF needs to produce an economic study to forecast the economic losses due to OSV closures. We would prefer to see the impact in documentation prior to the record of decision.

Currently, Wyoming's OSV business generates \$175,755,000.00 (2011-2012) in annual revenues including jobs, taxes, tourism and related income. During times of significantly reduced state revenues, we expect the Forest Service to not add to the economic hardships we currently are experiencing by negatively impacting recreation income.

The expectation is that the Forest Service will increase OSV recreation opportunities within the Shoshone Forest to improve the economic revenues of surrounding communities through these difficult times in our state of Wyoming. Additional miles of groomed OSV trails directly increase OSV revenues and we encourage the Shoshone NF to include this as a viable alternative to more OSV restrictions. There are numerous funding sources for new groomed trails which are offered by Wyoming State Trails program.

OSV use in the Shoshone:

The June 2016 report by the International Snowmobile Manufacturers Association, Wyoming State Trails and Wyoming State Snowmobile Association indicate that snowmobile use continues to increase on an annual basis.

The URL to this report is: <http://www.snowmobile.org/docs/isma-snowmobiling-fact-book.pdf>

This is not only happening in the Shoshone, but includes the entire state of Wyoming. Wyoming is typically one of the top 3 snowmobile recreation states in the USA.

The result of increased public OSV use, should be an increase in the amount of groomed trail miles available to snowmobilers.

Shoshone Ecosystem Impact Due to OSV:

There has been no science provided supporting any negative air/land/water/plant/animal impact directly as a result of OSV in the Shoshone.

We believe there are no grounds to reduce OSV available miles. We expect OSV access to be enlarged to 400 miles of groomed trails based on OSV recreational use patterns.

Fear of Lawsuit against the Shoshone NF:

Extreme environmentalist organizations have legal teams which profit from litigation against "mixed use" recreation decisions. In Wyoming, this is more difficult due to state laws and it is our expectation that the "threat" of litigation not influence any Shoshone OSV decisions.

Public Concern about anti-motorized bias during the NEPA:

It is our expectation that no Shoshone NF employees are members of anti-motorized groups nor are they sympathetic to any extreme environmentalist causes without an equal level of support for the needs of the snowmobile community.

It is important that Shoshone exhibit no anti-motorized bias during the processes that leads to a record of decision. It is understood that employees of the Shoshone may be cross country skiers or may prefer "quiet recreation". We expect no personal bias as a result of these preferences by Shoshone Forest Service staff. We understand that some Forest Service employees are passionate about non-motorized recreation and we suggest these employees be removed from influencing the project to provide a fair decision.

Yellowstone OSV:

The most environmentally sensitive National Park in the USA has studied the impacts of OSV over the past 40 years. Many national forests are using the decades of science, monitoring and OSV analysis produced by Yellowstone. Over the last 10 years Yellowstone has found no negative impact caused by OSV to water quality, snow pack, air quality, plants, humans or animals. Conclusions that OSV "may, could, might" impact the ecosystem are speculation. There must be evidence to support it. And for now, the over 200 documented OSV studies do not support that OSV is negatively impacting the winter ecosystems of our forests.

Seasonal Closures of OSV trails:

We are opposed to seasonal closures for the following reasons:

Closures based on a "date" are not seasonal, they are "calendar" date closures. "Seasonal" Closures are supposed to be done based on the condition of the trail system meaning that some years (due to high snow packs) OSV is allowed to use specific routes longer, where in lower snow years, it would end earlier.

OSV does not cause "resource damage" on groomed trails. These trails are dirt and displacing dirt does not harm the ecosystem. Snowmobiles are expensive vehicles (many over \$10,000.00) and a rider would ride track damage riding in the dirt and/or overheat.

Using a snowmobile on a trail that has low snow depths is the same as riding an ATV, UTV or motorcycle after a significant summer rain storm. Both conditions exist, water on the road, mud holes, etc. Why is a snowmobile be restricted when all other forms of motorized recreation are allowed to traverse wet, muddy, trails?

Conclusion:

The OSV community believes that there is a significant "Motorized Use Inequality" occurring in the Shoshone National Forest. We look forward to working with the Shoshone leadership to re-balance the mixed use inequality of the Forest and as always, showing that we are excellent stewards of our cherished public lands.

Many Thanks,

Byron Baker

Director - Stewards of the Greys

President - Great Western Trail –Wyoming Council

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