

From: [Bill Ruth Lanning](#)
To: [FS-travel-comments-rocky-mountain-shoshone](#)
Subject: Shoshone National Forest Travel Management – Proposed Action comments
Date: Tuesday, July 26, 2016 12:50:18 PM

July 26, 2016

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

RE: Shoshone National Forest Travel Management – Proposed Action comments

Dear Mr. Robertson:

Please accept my comments regarding the Shoshone National Forest travel management plan's Proposed Action (PA). I am an active member of the Wyoming State Snowmobile Association and the Snow Explorers and Altitude Off-Road Club in Sublette County. While my general and specific comments are focused on winter over-snow vehicle (OSV) use. I also encourage you to maintain and enhance the existing off-road vehicle (ORV) trail system that currently exists within the Shoshone National Forest. The Shoshone National Forest is a diverse landscape that offers a wide variety of year-round recreation, as well as numerous other use opportunities. Like the Shoshone National Forest, the American public (the true owners of the lands within the Shoshone NF) are an extremely diverse group with widely varied recreation and consumptive use (logging, oil and gas, grazing, mining) interests. It is imperative that the Shoshone NF be managed under the "MULTIPLE USE" umbrella to meet these different needs. This includes managing the forest to continue to provide both OSV and ORV opportunities. Both OSV and ORV provide strong, essential economic support to the communities surrounding the Forest. The following are more site- and PA-specific comments:

Proposed Ungroomed Trail Additions

I support the addition of two ungroomed snowmobile trail routes included in the PA:

- <!--[if !supportLists]-->• <!--[endif]-->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
- <!--[if !supportLists]-->• <!--[endif]-->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 Trail

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

I urge you to continue to keep the High Lakes WSA open snowmobiling access. This is consistent with the WSA's authorizing legislation and Shoshone Forest Management Plan. This is remote, deep snow area which has been used by snowmobilers for many decades.

-

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.

Tracked full size vehicles/vans/trucks appear to be 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.’

Unless the Forest can provide documented proof that full-sized motor vehicles equipped with tracks operating on and off groomed or ungroomed snowmobile trails pose a verifiable safety hazard, this restriction must be dropped from the Travel Plan.

Snowmobile versus Other OSV Use

While it is not addressed in the PA Scoping Document, there have 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 clearly allows cross-country OSV travel in large designated open areas – off designated roads and trails.

The ‘snowmobile/other OSV’ is referenced 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.

Where snowfall is adequate, all OSVs 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 the new OSV Travel Rule supports the premise of establishing OSV use dates, I strongly disagree with the OSV use seasons being 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.

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. The forest's winter travel plan should clearly stipulate that 'OSV use is allowed where snowfall is adequate.'

Proposed Motorized Use Period Zone Boundaries

I concur with the WSSA's comments on the Clarks Fork and northern Wapiti Ranger Districts; the Greybull and southern Wapiti Ranger Districts; the Washakie Ranger District, and the Wind River Ranger District.

Thanks for the opportunity to comment on the Proposed Action. Feel free to contact me if you have any questions or need additional information.

Sincerely,
Bill Lanning



[REDACTED]