

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:

We submit the following comments in response to the Shoshone National Forest travel management plan's Proposed Action (PA). Our comments are focused on winter over-snow vehicle (OSV) use, with some suggestions for changes or alternatives and clarifications to help improve its acceptance and manageability.

They are as follows:

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

We are very grateful for and fully support the addition of the ungroomed snowmobile trail included in the PA:

The Sublette Pass trail (WR-06w ) 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.

#### **Missing Snowmobile Trail**

We would also like to bring to your attention 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 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 while moving forward in the process.

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

The club will cautiously accept 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.

Therefore, we will 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**

We 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 under 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 ungroomed snowmobile trails.

We would also like to see procedures and protocols that would address who yields to who and when for our OSV trail system. We share our trails with many non-motorized users, who pay little to nothing for their maintenance that can hear us long before we see them. Therefore it makes sense that they give right of way to the motorized user. This needs to be addressed on the final OSV maps.

We would strongly 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 and use dates**

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.

We are very 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.

**Wind River Ranger District:** to make use zones more easily understood by the public, the 'Lower' use zone should only include everything directly north of Dubois (the overall Horse Creek area), the 'Upper' use zone should then include everything west and south of Dubois including the 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.

We would strongly suggest winter OSV use start dates of 11-15 to 04-30 for the lower zone and 11-1 to 6-15 for the high elevation zone.

In closing, we actively support and are members of the WSSA and will be in full support of any additional comments addressing forest wide OSV use that we as a club may have not addressed directly. We thank you for the opportunity to comment on the Proposed Action. We look forward to working with Forest Service staff as this process moves forward. Feel free to contact us if you have any questions or need additional information about our club and its mission.

Respectfully,

Fred E Ziegler

Linda L. Ziegler