



Sharetrails.Org / BlueRibbon Coalition
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December 11, 2017

Shoshone National Forest
Attn: Acting Forest Supervisor
808 Meadow Lane Avenue
Cody, WY 82414

RE: Shoshone National Forest Travel Management – Revised Proposed Action

Dear Acting Supervisor:

Please accept these comments from Sharetrails.org/BlueRibbon Coalition (BRC) regarding the Shoshone National Forest revised Proposed Action (PA) for the Forest's Travel Management project.

Sharetrails.org/BlueRibbon Coalition (BRC) is a national recreation group that champions responsible recreation and encourages individual environmental stewardship. With members in all 50 states, BRC is focused on building enthusiast involvement with organizational efforts through membership, outreach, education and collaboration among recreationists. We work with land managers to provide recreation opportunities, preserve resources and promote cooperation with other public land users.

Sharetrails.org/BRC members use motorized and non-motorized means, including Off-Highway Vehicles (OHV), snowmobiles, equestrian, mountain bikes and hiking to access and enjoy recreating on state and federally managed lands throughout the United States, including those of the National Forest System and Bureau of Land Management (BLM). Our members enjoy access to the Shoshone National Forest and have concrete plans to continue such access through the above-described means, to the extent authorized by the Forest Service.

Sharetrails.org/BRC serves as a leading advocate for responsible management of recreation on public lands. This role has included partnering with academia, conservation groups and the agencies in scientific research and supporting educational projects to address excessively loud OHV exhaust noise, wildlife research, and other issues. BlueRibbon is a grassroots, user-supported nonprofit organization and has achieved a surprising prominence in the public land management arena.

Sharetrails.org/BRC would like to support and submit for inclusion in their entirety into the record the Wyoming State Snowmobile Association (WSSA) comments addressing the Travel Management Rule Subpart C over-snow vehicle analysis. See Attachment A.

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The project will also include important opportunities to address wheeled motor vehicle travel under Subpart B of the Travel Management Rule. We are encouraged that the Revised Proposed Action includes several elements that reflect awareness of the wide and developing array of planning techniques and could be associated with a “state of the art” planning effort. These elements include designation of unauthorized routes, recognition of loop riding opportunities and other desirable route elements, diversity of trail/vehicle types, conversion of roads to motorized trails, and active management rather than closure to address “minimization” of impacts or claims of subjective “user conflict.” We look forward to working with the agency in refining these concepts to address particular areas and routes on the Forest.

We finally note the agency’s apparent intent to address Subpart A planning duties in this process. We have seen it recently reported within Region 2 that creation of the “minimum road system” is another aspect of the 2005 Travel Management Rule. This is untrue. The “minimum road system” was slipped into what were then the “transportation system” regulations through the same eleventh hour Clinton Administration heroics that produced its Roadless Rule. See, 66 Fed.Reg. 3206-3218 (Jan. 12, 2001). Subpart A is cryptic, poorly understood, inconsistently applied, and the focus of recent attention by anti-access advocates. They have not, to this point, been successful in using Subpart A as a litigatory trap that might dash agency designations, but we predict you will see renewed effort to that end. We recommend the agency proceed with caution in weaving Subpart A into this process. Whatever Subpart A means, it should not have any practical impact on trails, and it should not be applied in a way that can be claimed, by any engaged interest group, to reflect predetermination of any viable outcome to the route designation process.

We appreciate the opportunity to participate in this process and look forward to working with the Forest as the project develops.

Sincerely,

Jack

Jack Welch
National Snowmobile Ambassador
BlueRibbon Coalition/Sharetrails.org
Phone: [REDACTED]
Email: [REDACTED]

Don

Don Amador
Western Representative
BlueRibbon Coalition/Sharetrails.org
Phone: [REDACTED]
Email: [REDACTED]

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Attachment A

Wyoming State Snowmobile Association (WSSA) Comments



December 1, 2017 DRAFT

Shoshone National Forest
Attn: Acting Forest Supervisor
808 Meadow Lane Avenue
Cody, WY 82414

RE: Shoshone National Forest Travel Management – Revised Proposed Action comments

Dear Acting Supervisor:

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

We incorporate and reiterate our previous comments submitted in June 2016 regarding the Shoshone's original PA by reference. Our comments regarding the Revised PA are as follows:

Proposed Width Restriction on Groomed Snowmobile Trails

WSSA supports the Revised PA to 'Prohibit tracked over snow vehicles wider than untracked 64" wheelbases from using groomed snowmobile trails.' We understand this to mean full-sized motor vehicles equipped with a track conversion kit will be prohibited on groomed trails, while large side-by-side UTVs will be allowed – recognizing that a 64" wheelbase UTV will be 9" o 12" wider (73" to 76" total width) when equipped with a track conversion kit.

Proposed Motorized Use Period 'Zone Boundaries'

The proposed Low Elevation and High Elevation use period 'zone boundaries' are ill-conceived and totally illogical. They are based upon a flawed premise that there is substantive difference in snowpack depths across the Forest and that, after April 1, there is generally insufficient snowpack across the entire Washakie District as well as a sizeable portion of the Wind River District to support responsible snowmobiling. That premise is total nonsense and the thought of managing winter travel by high and low elevation zones should be abandoned.

The NRCS National Water & Climate Center (NWCC) operates seven SNOTEL sites in or very near this plan area. Their website at https://wcc.sc.egov.usda.gov/nwcc/rgrpt?report=snowmonth_hist&state=WY provides historic 'Start-of-Month' data for 'January 1 through June 1' which includes Snow Depth data dating back to 2004 along with Snow Water Equivalent (SWE) data dating back to 1979 which can be used to extrapolate snow depths prior to 2004.

This NWCC data shows how far off-base the proposed action to manage winter use by high and low elevation areas really is. The PA fails to recognize that snowpack is built through a cumulative process that results in far deeper snowpack in mid-winter, late-winter, into spring. The Revised PA would unjustifiably shut off snowmobile access far too early by closing 'low elevation' areas on April 1. Historic SNOTEL records which are summarized in Table 1 below show there is actually more snow on April 1, as well as on May 1, compared to average snow depths earlier in the season on January 1. This data also shows there is no substantive snow

depth difference between areas labeled by the PA as ‘high elevation’ on the Wind River District versus those labeled ‘low elevation’ on that same district as well as across the entire Washakie District. The proposed high and low elevation management scheme is totally illogical, backed by zero science, and therefore must be removed from the PA and any further consideration in this process.

Table 1: SNOTEL Summary of Monthly Averages – Snow Depth & Snow Water Equivalent (SWE), in inches

SNOTEL Site	January 1		February 1		March 1		April 1		May 1		June 1	
	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE
Washakie District												
South Pass Elevation: 9,040 feet	34.6	7.3	39.4	9.9	51.3	12.8	53.6	15.4	44.6	14.8	14.6	5.2
Deer Park Elevation: 9,700 feet	29.2	7.0	34.9	9.5	46.0	12.3	50.1	15.2	45.1	16.8	18.6	8.3
Townsend Ck. Elevation: 8,700 feet	19.5	4.0	22.6	5.2	31.9	6.8	37.2	9.1	26.6	7.8	4.4	1.3
Wind River District												
Togwotee Pass Elevation: 9,580 feet	46.1	11.4	57	15.8	68.3	19.6	73.4	23.6	69.6	26.0	41.9	19.1
Little Warm Elevation: 9,370 feet	23.4	4.9	28.8	6.8	36.4	8.6	38.8	10.8	27.5	9.5	5.2	1.6
Burroughs Ck. Elevation: 8,750 feet	30	6.6	37.1	9.5	43.2	11.8	45.1	14.0	39.3	13.1	10.6	3.0
North Zone												
Beartooth Lk. Elevation: 9,360 feet	44.3	10.6	56.8	14.7	65.7	18.1	73.1	21.8	74.1	24.5	50.4	18.1
All Areas - % of time with snow cover												
10" or > snow cover	100		100		100		100		92.5		54.7	
20" or > snow cover	87.7		95.2		99.1		98.1		85.8		44.3	

Proposed Motorized ‘Use Period’ Zones

The proposed winter motorized ‘seasons’ remain generally unreasonable and not supported by WSSA membership as well as the public. While the Revised PA made some improvement to the overall framework compared to the original PA, further revisions are needed to make OSV use seasons publicly acceptable.

A ‘3-Legged Stool’ approach is needed for better, more stable OSV Management: A major problem with the PA is that it continues to be built on only two provisions: (1) OSV use is allowed in specified areas only between specific dates, or (2) OSV use is totally prohibited everywhere the remainder of the year. This is an incomplete management scheme that will prove to be unsuccessful and unnecessarily create compliance issues.

We previously commented that the Medicine Bow-Routt National Forest’s travel management rules are a better model which should be adapted for OSV management on the Shoshone National Forest. The Medicine Bow’s OSV rules revolve around three provisions rather than only two, which add clarity and stability to public access management. Their provisions include: (1) cross-country OSV travel is allowed November 16 through May 31;

(2) OSV use is not allowed off designated routes from June 1 to November 15; and (3) OSVs can be operated on routes designated for other motor vehicle use by the MVUM between June 1 and November 15.

Their last provision, #3 which clarifies that OSVs can be operated on designated MVUM routes when there is snow cover, is extremely important to our members and to public access in general. Snowmobiles are purpose-built ‘over-snow’ vehicles which can be easily damaged when not operated on snow – so there is an underlying ‘only on snow cover’ operational premise. Consequently, when there is snow cover on designated motor vehicle routes between June 1 and November, OSV use should be acceptable without adverse resource impacts. If there isn’t snow cover on a designated route, snowmobile use generally will not occur. And if an OSV happens to drive across a bare patch of ground on that MVUM-designated route, it’s no different than other vehicles driving over that route without snow cover – there is not an unacceptable impact.

The Revised PA made improvements to the North Zone’s proposed OSV use season by revising it to ‘November 15 to May 15,’ but at the same time stood firm on overly restrictive use seasons proposed for the two southern districts. We must do better for there to be reasonable public access.

The Wind River District has continually stated they ‘need to be in sync with the neighboring Bridger-Teton National Forest. That’s a poor model that has been in place since 1990 and most certainly will be revised to become better in-sync with the new Subpart C – OSV Travel Rule. And what the dates say on their map (December 15 through April 30 for the Togwotee area) is not consistent with how snowmobile use has been allowed to occur on-the-ground over the past 26 years. Reality is that snowmobile use has been openly allowed before and after those dates, including the grooming of snowmobile trails years ago as early as Thanksgiving and now routinely beginning around December 1.

Data-Based Proposal: As we discussed in respect to ‘Zone Boundaries’ above, SNOTEL data summarized in Table 1 clearly establishes that adequate snow cover extends well into Spring across the entire Shoshone National Forest. There is typically still at least two to four-feet of snow cover across the entire forest on May 1 with the Beartooths area of the North Zone still having over 6-feet of snow. Consequently, an ‘end date’ somewhere between May 15 and June 1 on the South Zone and between June 1 and June 15 on the North Zone should be considered as a more realistic, data-supported, OSV management option since, as shown in Table 1, there is still generally sufficient snow cover across the South Zone on June 1 while the Beartooths still generally has 50-inches of snow cover. A realistic OSV season ‘start’ date should be generally around November 15 when sufficient snow for safe snowmobile operation has typically started to accumulate. Additionally, a provision like the Medicine Bow’s #3 must be included in your final travel rule to clarify that OSV use on MVUM routes is permissible when those routes are covered with snow outside the primary OSV season.

Thanks for the opportunity to comment on the Revised 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,

Taylor Jones, President
Wyoming State Snowmobile Association

[Redacted signature block]

Cc: WSSA BOD
Sue Stresser, North Zone District Ranger
Steve Schacht, Washakie District Ranger
Rick Metzger, Wind River District Ranger

Table 2: Townsend Creek (#826) Elevation: 8,700 feet

Snow and Snow Water Equivalent (SWE) measured in inches; NA indicates Snow data is not available, however 'SWE times a factor of 3 to 4 up to 6' typically provides a good approximation of Snow depth

Year	January 1		February 1		March 1		April 1		May 1		June 1	
	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE
1981	NA	3.3	NA	4.0	NA	4.4	NA	7.6	NA	1.0	NA	0.0
1982	NA	3.4	NA	4.8	NA	5.4	NA	6.4	NA	2.5	NA	0.0
1983	NA	3.2	NA	3.5	NA	4.5	NA	8.4	NA	13.6	NA	8.1
1984	NA	5.8	NA	7.0	NA	8.2	NA	10.4	NA	13.8	NA	0.0
1985	NA	3.3	NA	3.7	NA	6.2	NA	7.7	NA	3.6	NA	0.0
1986	NA	6.3	NA	7.1	NA	12.6	NA	14.5	NA	14.0	NA	0.0
1987	NA	6.1	NA	7.7	NA	9.6	NA	12.2	NA	5.3	NA	0.0
1988	NA	5.1	NA	6.3	NA	7.0	NA	10.6	NA	5.1	NA	0.0
1989	NA	2.1	NA	3.1	NA	4.4	NA	6.4	NA	0.4	NA	1.1
1990	NA	3.3	NA	4.5	NA	5.2	NA	7.9	NA	6.1	NA	0.0
1991	NA	4.1	NA	5.2	NA	5.8	NA	8.2	NA	12.0	NA	0.7
1992	NA	4.8	NA	5.7	NA	6.2	NA	8.9	NA	0.0	NA	0.0
1993	NA	4.9	NA	6.4	NA	6.9	NA	9.0	NA	9.4	NA	0.0
1994	NA	4.3	NA	5.2	NA	7.2	NA	9.8	NA	6.2	NA	0.0
1995	NA	5.1	NA	6.9	NA	8.6	NA	10.2	NA	13.2	NA	13.6
1996	NA	5.7	NA	8.1	NA	9.0	NA	11.9	NA	10.5	NA	0.0
1997	NA	6.2	NA	8.0	NA	9.1	NA	9.8	NA	12.7	NA	0.0
1998	NA	5.6	NA	7.1	NA	8.6	NA	11.9	NA	11.5	NA	0.0
1999	NA	4.5	NA	5.8	NA	8.7	NA	9.8	NA	19.7	NA	4.7
2000	NA	1.8	NA	3.5	NA	4.9	NA	7.0	NA	3.6	NA	0.0
2001	NA	2.9	NA	3.3	NA	4.4	NA	5.1	NA	1.1	NA	0.0
2002	NA	2.0	NA	3.2	NA	4.2	NA	5.8	NA	2.9	NA	0.0
2003	NA	3.0	NA	3.9	NA	6.6	NA	10.6	NA	5.3	NA	0.0
2004	23	4.3	23	5.3	52	9.0	26	8.7	31	10.2	0	0.0
2005	31	5.5	35	7.8	35	8.4	42	10.0	34	10.4	0	0.0
2006	13	2.8	18	4.0	25	5.4	27	6.7	0	0.0	0	0.0
2007	12	2.8	23	4.5	26	5.4	37	7.8	5	2.8	0	0.0
2008	17	2.8	24	4.6	30	6.4	38	8.9	23	8.1	0	0.0
2009	25	3.7	18	4.3	18	4.6	38	8.4	40	11.5	0	0.0
2010	22	4.8	25	5.5	29	6.3	49	10.6	38	11.3	20	7.4
2011	25	4.8	26	5.6	35	7.5	35	8.8	31	9.4	23	7.6
2012	23	4.9	25	5.5	40	8.1	23	6.5	0	0.0	0	0.0
2013	11	1.5	13	2.5	24	4.2	23	5.5	24	7.2	0	0.0
2014	18	3.3	22	4.0	26	5.2	34	8.0	18	5.3	0	0.0
2015	18	3.0	16	3.5	27	5.1	16	5.3	14	5.0	0	0.0
2016	15	2.5	18	3.4	23	4.9	60	11.2	51	13.0	0	0.0
2017	20	3.8	31	7.0	57	12.3	72	18.4	63	19.9	18	6.7
AVG.	19.5	4.0	22.6	5.2	31.9	6.8	37.2	9.1	26.6	7.8	4.4	1.3
%10">	100		100		100		100		79		21	
%20">	50		64		93		93		64		14	

Table 3: Deer Park (#923) Elevation: 9,700 feet

Snow and Snow Water Equivalent (SWE) measured in inches; NA indicates data is not available

Year	January 1		February 1		March 1		April 1		May 1		June 1	
	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE
1998	NA	NA	NA	NA	51	NA	59	NA	51	NA	15	NA
1999	21	5.9	36	9.9	47	14.8	51	16.3	70	25.6	35	19.4
2000	10	3.1	20	7.6	30	10.8	36	13.7	24	13.1	0	0.0
2001	26	6.6	29	7.1	37	9.0	35	9.9	30	10.8	0	0.0
2002	25	7.0	40	9.1	36	9.5	38	11.8	31	13.6	3	1.8
2003	17	4.5	21	5.5	37	9.2	53	15.1	40	14.0	1	0.6
2004	49	8.1	39	10.9	65	14.8	36	14.1	41	17.8	9	4.7
2005	54	13.1	60	16.8	62	19.4	70	21.8	70	24.5	35	16.8
2006	38	8.8	48	12.6	51	14.5	54	17.2	36	15.7	0	0.0
2007	16	4.4	28	6.8	42	9.5	42	12.0	25	9.7	0	0.0
2008	25	5.4	40	9.3	41	11.7	55	15.7	42	15.9	30	13.9
2009	29	6.3	25	6.3	31	7.7	45	10.9	46	15.3	9	3.6
2010	29	7.1	39	9.2	40	10.2	53	13.8	53	17.8	46	17.9
2011	52	12.6	47	14.1	53	16.1	59	19.1	63	22.3	68	25.4
2012	23	5.1	30	7.5	53	10.6	31	10.7	16	7.1	0	0.0
2013	26	7.3	24	7.9	33	9.5	33	11.3	33	13.0	0	0.0
2014	25	6.3	29	8.0	45	12.1	60	17.0	50	18.2	13	4.1
2015	27	6.0	23	6.3	35	8.4	24	8.8	22	9.0	18	7.7
2016	23	5.3	29	6.7	35	8.9	73	16.6	65	19.5	31	12.2
2017	40	9.7	57	18.0	95	27.8	95	32.4	93	37.2	59	29.4
AVG.	29.2	7.0	34.9	9.5	46.0	12.3	50.1	15.2	45.1	16.8	18.6	8.3
%10">	100		100		100		100		100		50	
%20">	84		100		100		100		100		37	

Table 5: Little Warm (#585) Elevation: 9,370 feet

Snow and Snow Water Equivalent (SWE) measured in inches; NA indicates Snow data is not available, however 'SWE times a factor of 3 to 4 up to 6' typically provides a good approximation of Snow depth

Year	January 1		February 1		March 1		April 1		May 1		June 1	
	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE
1979	NA	5.4	NA	7.8	NA	8.5	NA	9.5	NA	7.0	NA	0.0
1980	NA	2.9	NA	6.8	NA	7.6	NA	11.6	NA	7.7	NA	0.0
1981	NA	3.9	NA	4.7	NA	6.4	NA	8.8	NA	4.2	NA	0.0
1982	NA	5.5	NA	9.0	NA	10.7	NA	13.5	NA	13.3	NA	0.0
1983	NA	4.9	NA	6.6	NA	7.8	NA	10.9	NA	11.7	NA	5.2
1984	NA	7.1	NA	7.8	NA	8.5	NA	10.2	NA	14.4	NA	2.2
1985	NA	5.5	NA	5.9	NA	7.8	NA	10.2	NA	5.5	NA	0.0
1986	NA	6.3	NA	8.5	NA	15.7	NA	16.1	NA	16.5	NA	0.0
1987	NA	6.8	NA	8.4	NA	9.4	NA	10.8	NA	2.7	NA	0.0
1988	NA	3.2	NA	5.4	NA	6.7	NA	9.3	NA	5.3	NA	0.0
1989	NA	4.5	NA	6.8	NA	9.1	NA	13.4	NA	10.0	NA	0.0
1990	NA	3.9	NA	6.9	NA	8.0	NA	9.7	NA	8.4	NA	0.0
1991	NA	6.5	NA	8.1	NA	8.5	NA	11.8	NA	13.0	NA	3.0
1992	NA	5.3	NA	5.9	NA	6.6	NA	7.5	NA	1.2	NA	0.0
1993	NA	3.5	NA	6.0	NA	7.2	NA	9.5	NA	10.2	NA	0.0
1994	NA	2.3	NA	3.9	NA	6.6	NA	8.5	NA	6.1	NA	0.0
1995	NA	4.7	NA	6.3	NA	8.2	NA	11.3	NA	15.5	NA	9.7
1996	NA	9.1	NA	11.8	NA	13.7	NA	15.9	NA	17.6	NA	8.3
1997	NA	11.2	NA	13.9	NA	15.2	NA	17.9	NA	19.5	NA	0.0
1998	NA	3.8	NA	7.4	NA	8.4	NA	11.2	NA	10.7	NA	0.0
1999	NA	6.3	NA	8.8	NA	12.5	NA	14.7	NA	19.1	NA	7.4
2000	NA	2.4	NA	5.9	NA	8.5	NA	10.4	NA	6.9	NA	0.0
2001	NA	3.8	NA	4.3	NA	6.0	NA	7.6	NA	5.0	NA	0.0
2002	NA	4.5	NA	6.3	NA	7.3	NA	10.3	NA	9.0	NA	0.0
2003	NA	3.9	NA	5.8	NA	7.6	NA	10.2	NA	6.4	NA	0.0
2004	23	4.3	27	5.5	32	6.7	19	6.5	19	5.6	1	0.2
2005	26	4.2	25	5.6	28	6.6	34	8.1	25	7.5	2	0.7
2006	21	4.6	26	6.2	32	7.6	38	9.3	11	4.1	0	0.0
2007	19	4.1	22	5.3	30	6.6	25	7.5	14	4.9	0	0.0
2008	22	4.3	33	6.6	34	7.9	46	10.4	33	10.0	0	0.0
2009	25	5.2	33	7.5	39	8.8	54	12.1	45	13.5	0	0.0
2010	13	3.0	20	4.3	21	5.0	30	6.8	28	8.1	10	3.5
2011	30	6.5	36	8.1	42	9.8	46	12.7	50	15.8	44	15.7
2012	22	3.8	26	5.2	37	7.3	30	7.9	2	0.4	0	0.0
2013	26	5.6	32	6.6	35	7.5	36	9.1	29	8.9	0	0.0
2014	28	5.8	35	7.3	53	11.9	53	14.5	37	13.4	0	0.0
2015	28	5.6	28	6.5	36	8.3	29	8.8	14	4.3	0	0.0
2016	22	4.1	27	5.1	33	6.8	42	9.4	25	8.0	0	0.0
2017	23	4.2	33	7.0	58	13.8	61	18.1	53	19.2	16	5.7
AVG.	23.4	4.9	28.8	6.8	36.4	8.6	38.8	10.8	27.5	9.5	5.2	1.6
%10">	100		100		100		100		93		21	
%20">	86		100		100		93		64		7	

Table 6: Burroughs Creek (#379) Elevation: 8,750 feet

Snow and Snow Water Equivalent (SWE) measured in inches; NA indicates Snow data is not available, however 'SWE times a factor of 3 to 4 up to 6' typically provides a good approximation of Snow depth

Year	January 1		February 1		March 1		April 1		May 1		June 1	
	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE	Snow	SWE
1979	NA	7.3	NA	10.7	NA	12.8	NA	13.2	NA	11.1	NA	0.0
1980	NA	4.4	NA	10.0	NA	12.0	NA	14.5	NA	11.2	NA	0.7
1981	NA	5.2	NA	6.8	NA	8.4	NA	8.9	NA	4.0	NA	0.0
1982	NA	11.2	NA	16.9	NA	18.4	NA	20.2	NA	20.6	NA	3.9
1983	NA	5.7	NA	8.1	NA	9.5	NA	11.5	NA	12.7	NA	6.4
1984	NA	7.0	NA	8.2	NA	9.1	NA	10.6	NA	10.8	NA	0.8
1985	NA	6.5	NA	7.0	NA	8.8	NA	10.8	NA	3.8	NA	0.0
1986	NA	8.0	NA	11.3	NA	23.4	NA	23.6	NA	20.1	NA	7.0
1987	NA	4.5	NA	8.2	NA	11.0	NA	14.4	NA	4.6	NA	0.0
1988	NA	4.6	NA	7.7	NA	11.1	NA	13.5	NA	7.9	NA	0.0
1989	NA	6.2	NA	10.6	NA	12.9	NA	18.6	NA	13.4	NA	0.0
1990	NA	4.4	NA	9.6	NA	10.8	NA	12.6	NA	12.7	NA	1.8
1991	NA	6.8	NA	8.4	NA	9.0	NA	12.7	NA	14.7	NA	7.5
1992	NA	6.5	NA	7.1	NA	8.1	NA	9.3	NA	8.0	NA	0.0
1993	NA	4.9	NA	6.7	NA	8.4	NA	11.9	NA	13.5	NA	0.0
1994	NA	3.9	NA	6.1	NA	9.5	NA	11.1	NA	10.8	NA	0.0
1995	NA	4.9	NA	7.4	NA	10.6	NA	13.7	NA	18.4	NA	14.5
1996	NA	10.5	NA	15.5	NA	18.3	NA	21.4	NA	22.7	NA	16.4
1997	NA	15.6	NA	20.0	NA	21.7	NA	23.9	NA	24.2	NA	2.6
1998	NA	5.9	NA	11.5	NA	12.1	NA	15.0	NA	16.1	NA	1.5
1999	NA	7.6	NA	11.3	NA	15.1	NA	16.0	NA	17.9	NA	8.2
2000	NA	4.0	NA	7.6	NA	10.5	NA	12.6	NA	10.6	NA	0.0
2001	NA	4.5	NA	4.7	NA	7.4	NA	8.5	NA	8.1	NA	0.0
2002	NA	6.4	NA	9.1	NA	10.0	NA	14.2	NA	15.6	NA	0.9
2003	NA	6.7	NA	10.7	NA	13.2	NA	18.2	NA	16.9	NA	0.0
2004	34	6.8	36	8.3	40	9.6	35	10.8	35	12.1	3	0.6
2005	27	5.0	27	6.5	32	7.8	40	9.7	41	11.4	8	2.0
2006	33	7.5	44	10.2	46	12.1	49	13.8	38	13.5	0	0.0
2007	26	6.2	31	8.5	42	10.8	36	11.3	31	11.0	0	0.0
2008	38	8.3	46	10.9	47	13.1	63	16.5	51	16.6	29	10.1
2009	37	7.6	45	12.0	49	13.1	59	15.7	59	18.4	13	1.9
2010	19	4.2	27	5.7	28	6.4	37	8.4	33	9.6	20	5.5
2011	36	7.9	41	10.1	49	12.1	58	15.8	67	20.7	58	20.3
2012	29	5.7	43	9.8	53	12.9	44	13.9	33	11.2	7	1.4
2013	22	6.4	33	7.9	32	8.5	40	10.4	44	12.5	0	0.0
2014	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA	NA
2015	32	7.7	33	9.5	42	12.0	30	11.5	11	4.5	0	0.0
2016	23	5.5	32	7.2	34	8.9	38	10.8	23	7.0	0	0.0
2017	34	8.1	44	12.3	68	20.6	58	23.5	45	20.3	0	0.0
AVG.	30	6.6	37.1	9.5	43.2	11.8	45.1	14.0	39.3	13.1	10.6	3.0
%10">	100		100		100		100		100		31	
%20">	92		100		100		100		92		23	

