



**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,



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