December 8, 2017

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

Shoshone National Forest OSV Travel Management - Revised Proposed Action comments

Dear Forest Supervisor:

Thank you for allowing us to comment on this project. The purpose of this letter is to provide comments on the recent "Proposed Alternative" document. The focus of our comments will be for OSV, or Subpart C.

I am the president of the Great Western Trail – Wyoming Council and Top of the Rockies snowmobile Clubs, involving a large group of OSV recreationists located in Idaho, Montana, Wyoming and Utah.

We support the recent (attached) comments and recommendations made by the Wyoming State Snowmobile Association president, Taylor Jones. We also have additional comments and recommendations:

- The OSV portion of the Shoshone Travel Management Plan, has no expansion of groomed trails for snowmobile recreation although, OSV recreation has significantly increased. In fact, the proposed action wants to close 1,354 acres for "Cross Country Skiing" we are opposed to this action, unless the USFS opens an area of similar size elsewhere in the Shoshone NF for OSV. In addition, Shoshone needs to show proof that cross country skiing has increased in the Forest. We have see cross country use shrink in the Shoshone. Is this because the staff of the Shoshone are mostly cross country skiers? We hope not.
- 2. We suggest that Shoshone perform forest recreation surveys for both winter and summer. We believe that this process would uncover the large increase in snowmobile recreation in most of the Shoshone Ranger Districts. Shoshone needs to manage the forest based on its use and not the influence of the extreme environmentalists and organization who like to litigate to change forest land management.
- 3. Shoshone needs to perform a more complete economic analysis of the current proposed alternative. The current alternative would have a negative impact on local economies by reducing OSV recreation visits due to seasonal closure and reduced areas to ride snowmobiles. The economic loses need to be reported to business in the surrounding area(s).
- 4. Shoshone should expand their groomed OSV trail system by 100 miles for 2019 and add more groomed trail miles each year thereafter. Wyoming has 2,000 miles of groomed trails. Each mile of groomed OSV trail generates \$80,000.00 in State and local revenues. Wyoming State trails will groom trails designated by the USFS at no cost. The local economy benefits from \$80,000.00 per mile, per year.
- 5. No additional restrictions should be considered in an effort to make Shoshone a "buffer zone" to the adjoining national parks or wilderness areas. This practice is not acceptable.

- 6. Shoshone should not increase "Seasonal Closures". The Shoshone NF claims they use "Seasonal Closures" but they actually use "Calendar Closures" where hard dates are used to close areas of the forest. The intent of seasonal closures was to "monitor" trails, opening and closing the trails based on the season, not a date on the Ranger's calendar. Some "Seasons" would allow OSV to continue into May or June while other seasons may close OSV trails in March. Please consider the actual intent of what seasonal closure means.
- 7. Recently, the USFS published the "Healthy Forests / Healthy Communities" initiative. How do any of the "Preferred Alternatives" comply with this nationwide USFS project?

Thank you for allowing us to submit our comments. We would like to be added to the list of stakeholders on this project. Although it is a long drive, we are willing to meet in person with the project team if suitable advanced notice can be provided.

Sincerely,

Byron Baker

President - Wyoming Council Great Western Trail



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