



December 9, 2017

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

Re: Comments to Revised Proposed Action of Travel Management Plan

Dear Acting Supervisor:

I am commenting as an individual with over 40 years of winter recreation experience who is a member of the Sweetwater Snowpokes Snowmobile and ATV Club and also a District 9 director of the Wyoming State Snowmobile Association.

**Proposed Width Restriction on Groomed Snowmobile Trails**

I support a width restriction for tracked over-snow vehicles as stated in the Revised Proposed Action as long as tracked UTVs (that could be 73" to 76" total width when converted) would be allowed. A Model 2000 Tucker Sno-Cat® trail groomer is 104" to 117" total width and is a common model used for trail grooming. I know there is a cooperative agreement between Federal and State agencies but I am concerned that groomers have not been addressed as far as width acceptance. I also understand and accept that the Revised Proposed Action would prohibit full-sized motor vehicles equipped with a track conversion kit from using groomed trails.

**Proposed Motorized Use Period 'Zone Boundaries'**

The proposed Low Elevation and High Elevation use period 'zone boundaries' are totally illogical, are not supported by Snotel data sites, would be impossible to enforce, and would prove to be unsuccessful. The Snotel data for this area, as presented by the WSSA, covers snow depth data dating to 2004 and snow water equivalent (SWE) data back to 1979. This information shows the collective data needed to substantiate how far off the Revised Proposed Action is for managing over-snow use by high and low elevations.

Table 1 from the WSSA comment letter shows snow cover of 10" or greater at 100% on April 1 and 92.5% on May 1 and 20" or greater of snow cover at 80 or 90 percent of time for the same periods. Ten inches of snow cover is sufficient for snowmobile operation. The Bridger-Teton Avalanche Center instructors inform their students that the snowpack is built through a cumulative process that results in a deeper snowpack in mid-winter, late winter, and into spring as reflected in Table 1. Most snowmobilers are not willing to damage their expensive snowmobiles or equipment with minimal snow cover.

**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
<b>Washakie District</b>												
<b>South Pass</b> 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
<b>Deer Park</b> 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
<b>Townsend Ck.</b> 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
<b>Wind River District</b>												
<b>Togwotee Pass</b> 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
<b>Little Warm</b> 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
<b>Burroughs Ck.</b> 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
<b>North Zone</b>												
<b>Beartooth Lk.</b> 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
<b>All Areas - % of time with snow cover</b>												
<b>10" or &gt; snow cover</b>	100		100		100		100		92.5		54.7	
<b>20" or &gt; snow cover</b>	87.7		95.2		99.1		98.1		85.8		44.3	

**The Winter Use Season Proposed for the Shoshone National Forest is Too Short**

A reasonable over-snow vehicle season start date would be between November 1 and November 15. Using the Snotel data from Table 1, a reasonable season end date for the Washakie and Wind River Districts would be between May 15 and June 1. Using the same data, a reasonable season end date for the North Zone would be between June 1 and June 30. It is understandable that over-snow vehicle use on the National Forest has changed over the past 30 years but a consistency of opening and closing dates for over-snow vehicle winter multiple use would be a benefit to all concerned, especially enforcement and planners for the upcoming travel management plan for the Bridger-Teton National Forest since the Shoshone National Forest borders the Bridger-Teton.

**Over-Snow Vehicle Use on Designated Motor Vehicle Use Map Routes when there is Snow Cover**

Allowing over-snow vehicle operation on already designated MVUM routes when there is snow cover on these routes between the accepted Travel Management Plan start and end dates for the Shoshone's winter use season is extremely important to the snowmobile community, hunters, and general public access for all multiple-use activities. It would be unacceptable for the at-large public if this provision is not in place as there could be periods of time when no motorized access would be possible because of snow conditions on MVUM open motorized use areas. Again, it is important to note a consistency to MVUM routes and over-snow vehicle winter travel dates to incorporate the whole travel plan into other winter travel plans in bordering National Forest management areas. This will cause less confusion to the multiple-use public and fewer enforcement problems.

Thank you for the opportunity to comment on the revised Proposed Action.

Sincerely,

  
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George Pryich

