

From: Snowy Range Snowmobile Club <srscwy@gmail.com>
Sent: Monday, December 11, 2017 11:43 PM
To: FS-travel-comments-rocky-mountain-shoshone
Cc: Snowy Range Snowmobile Club
Subject: Shoshone National Forest OSV Travel Revised Proposed Action Comments

12/11/17

To:

Shoshone National Forest

Attn: Acting Forest Supervisor

808 Meadow Lane Avenue

Cody, WY 82414

From:

Snowy Range Snowmobile Club

PO Box 1930

Laramie, WY 82073

Dear Acting Forest Supervisor:

Snowy Range Snowmobile Club (SRSC) in Laramie, WY is submitting comments on the Revised Proposed Action for the Shoshone National Forest travel management plan. A good percentage of our members regularly recreate on snowmobile in the Shoshone National Forest and have first-hand experience with winter travel in the area. Our Club and many members are directly and negatively impacted by the Revised Proposed Action. The Revised Proposed Action will prevent the enjoyment of and responsible use of the forest by the snowmobiling public.

Regarding Proposed Over Snow Vehicle Width Restriction on Groomed Snowmobile Trails

SRSC is supportive of the Revised Proposed Action to allow tracked UTV and OHV conversions on snowmobile trails while prohibiting full size passenger and Jeep type vehicles with track conversions. A width restriction on groomed snowmobile trails should allow for tracked UTV conversions and

acknowledge that a track conversion kit adds to the overall width (track) of the vehicle. In this case, minimizing the size and weight of the vehicle is important both for maintaining the integrity of the snowmobile trail and providing a measure of safety between vehicle encounters.

Regarding Proposed Motorized Use Period ‘Zone Boundaries’

We fail to see the rational and defensible criteria used to develop the boundaries for the usage periods. The revised proposed action proposes to use snowpack as a means to define boundaries. A simple survey of the snow conditions during the winter will clearly show this approach is flawed. Snow is a dynamic medium. Consistency, rate of deposition, exposure, surface conditions and compaction rates all play into the “snow pack”. Snow depths in one area may have entirely different properties than those of another. Variations in snowpack are such, that two areas with the same snowpack may have entirely different abilities to support snowmobile travel. Additionally, snowpack can be variable in one area due to local terrain, winds and weather patterns.

Stating that SNOTEL measurement site can be used to infer the suitability of snowpack across a large area is inappropriate. The only way to reliably determine snowpack over large areas is to have inordinately numerous sampling sites or the resources to conduct regular remote sensing operations to determine snowpack – both of which are prohibitive. Local, on-the-ground observations are the only reliable method to determine if the snow cover in an area is suitable for snowmobile travel. In general, we are opposed to setting high/low elevation boundaries for the use zones. A better method that maintains flexibility while providing for resource protection is encouraged.

Our local forest (Snowy Range – Medicine Bow Route National Forest) uses the guidance in Forest Order MBNF 2013-32 regarding snowmobile use on the Forest. While this order is often too restrictive regarding late season (May-June) snowmobiling, it strikes a reasonable compromise in the early season when the ground and vegetation are vulnerable. Much like compliance with any Forest rule – the onus is on the person recreating to know and abide by the law. Remedies are available for those that choose to forego abiding by the regulations. The key wording is “when snow cover conditions are insufficient to protect soil and vegetation resources”. This statement alone should be sufficient to govern winter travel management. Current regulations provide for effective enforcement and protection of resources.

Many of our members relate first-hand experience that the snowpack is vastly sufficient to support snowmobile activities after April 1 and well into May.

Proposed Motorized ‘Use Period’ Zones

The SRSC voices strong opposition to the proposed seasons and date ranges when snowmobiling will be allowed. These seasons are irrational and do not represent the actual pattern of snowmobile use in the

Shoshone. We support the use of OSVs on all MVUM designated routes at any time of the year. In actuality, these routes will only be used by OSVs when there is adequate snow cover as owners do not want to risk damage to expensive equipment. Those OSVs utilizing the routes when snow is marginal or none existent are most likely traveling at slow speeds or have tracks designed for operation on dirt/gravel roads. It is illogical to prevent OSV use on a route that is snow covered but otherwise open to wheeled vehicles.

Date ranges continue to be an unfavorable option for setting a snowmobiling “season”. Once again, an OSV management plan that allows for snowmobiling, provided vegetation and soil resource damage should not occur, is sufficient. Dates are far too arbitrary and are often based on area-specific or historic data. Snowfall is dynamic and varies with the year. An adaptive and proactive management style based on local conditions in the immediate area of OSV operations will allow for the maximum length of a snowmobile season while protecting the resources. The end date in the Snowy Range referenced in the Forest Order above is of concern to the SRSC and remains one of the least supported elements of the order, we encourage no definitive end date. Snowmobiling in our area has been possible in a manner protective of the resource every May and well into June or the Start of July since the order was signed: demonstrating that a simple static date does not effectively manage OSV use and is too restrictive. If there are area-specific closures in late season that may be appropriate, then these should be looked at on a case by-case basis. Once again, a forest-wide broad-brush approach is not appropriate.

The term “winter” is used with varying interpretations and implications across forest documents. Any use of the term should be normalized and backed by definition.

We appreciate the opportunity to comment on the Revised Proposed Action.

Regards,

Matt Burkhart (Public Lands and Trails Coordinator)

for

Snowy Range Snowmobile Club

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Snowy Range Snowmobile Club

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Laramie, WY

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