

December 5, 2017

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



RE: Revised Proposed Action – Shoshone NF Travel Management Plan

Dear Acting Supervisor:

I'm writing on behalf of the Western Chapter of the American Council of Snowmobile Associations regarding the Shoshone National Forest travel management plan's Revised Proposed Action. The Western Chapter is an organization comprised of leadership from Western state snowmobile associations that include Wyoming, Montana, Colorado, Utah, Idaho, Oregon and Washington. Many of the members we represent from these Western states regularly snowmobile on the Shoshone National Forest, so appropriate management rules and reasonable winter use seasons are important to us.

Our comments focus on recommendations to improve over-snow vehicle (OSV) management and include:

Use Zones based on elevations are illogical and should not be used for OSV management. The concept of managing OSV use by high and low elevation use zone boundaries is totally illogical and generally prove to be unsuccessful.

We are aware that historic SNOTEL data for the area covered by this winter travel plan has been submitted by the Wyoming State Snowmobile Association (WSSA) and by the Wyoming State Trails Program. This data clearly shows that your proposed March 30/April 1 season-end dates are far too early in the year, which would inappropriately curtail OSV recreation opportunities as well negatively affect the tourism economy in surrounding rural communities.

SNOTEL data clearly shows that:

- April 1 snow depths average between 37.2 inches and 73.4 inches at all seven locations
- May 1 average snow depths remain between 26.6 inches and 74.1 inches at all locations
- May 1 snow depths are actually higher than January 1 average snow depths at all locations
- 10 inches of snow depth is plenty sufficient for snowmobile operation: all locations had '10-inches or greater' snow depth on the first day of January, February, March and April; 92.5% of all areas still had '10-inches or greater' snow depth on May 1, and 54.7% of all areas still had that much on June 1

- 20-inches of snow depth is more than adequate for snowmobile operation: however, there was never '20" or greater' snow depth in every area, every year, on the first day of any month. In respect to a '20-inches or greater' depth threshold, actual average snow cover ranged as follows: January 1 – 87.7% of the time, February 1 – 95.2%, March 1 – 99.1%, April 1 – 98.1%, May 1 – 85.8%, and June 1 – 44.3%.
- Snowpack is built through a cumulative process that results in far deeper snowpack in mid-winter, late-winter, into spring.
- There is no substantive snow depth difference between areas labeled by the PA as 'high elevation' on the Wind River District, 'low elevation' on the Wind River District, or 'low elevation' on the entire Washakie District.

The Winter Use Season Proposed for the Shoshone National Forest is far too short. A reasonable 'OSV season start date' should be in the range of November 1 to November 15, when sufficient snow for safe snowmobile operation has typically started to accumulate.

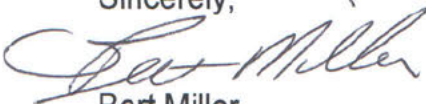
SNOTEL data shows that adequate snow cover extends well into Spring across all areas of the forest covered by this winter travel plan. Consequently, a reasonable, 'season end date' for the Wind River and Washakie Districts (universal across both districts) should be somewhere between May 15 and June 1. A reasonable 'season end date' for the North Zone should be between June 1 and June 30.

The Winter Travel Plan should allow OSV use on designated MVUM routes when there is snow cover. Allowing OSV operation on designated MVUM routes when there is snow cover between the Shoshone's winter use season's start and end dates would help clarify public access rules and improve overall travel rule compliance. This would mean that if a MVUM designated road or trail has snow cover and does not have any seasonal restrictions in effect – it should be open to OSV travel outside the specified OSV winter use season. Without this provision, there could be periods of time when no motorized access would be possible to open motorized use areas.

Support for width restrictions on groomed snowmobile trails. It is appropriate to keep heavy, wide full-sized vehicles equipped with track conversion kits off groomed trails to improve safety and prevent damage to groomed trail surfaces.

Thank you for the opportunity to comment on this travel planning process.

Sincerely,



Bert Miller
Western Chapter Chairman

