



December 1, 2017

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

RE: Shoshone National Forest Travel Management – Revised Proposed Action comments

Dear Acting Supervisor:

The following comments are submitted on behalf of the Wyoming State Snowmobile Association (WSSA) regarding the Shoshone National Forest travel management plan's Revised Proposed Action (PA). Our comments are focused on winter over-snow vehicle (OSV) use and include suggestions for changes to help improve its acceptance and manageability.

We incorporate and reiterate our previous comments submitted in June 2016 regarding the Shoshone's original PA by reference. Our comments regarding the Revised PA are as follows:

Proposed Width Restriction on Groomed Snowmobile Trails

WSSA supports the Revised PA to 'Prohibit tracked over snow vehicles wider than untracked 64" wheelbases from using groomed snowmobile trails.' We understand this to mean full-sized motor vehicles equipped with a track conversion kit will be prohibited on groomed trails, while large side-by-side UTVs will be allowed – recognizing that a 64" wheelbase UTV will be 9" o 12" wider (73" to 76" total width) when equipped with a track conversion kit.

Proposed Motorized Use Period 'Zone Boundaries'

The proposed Low Elevation and High Elevation use period 'zone boundaries' are ill-conceived and totally illogical. They are based upon a flawed premise that there is substantive difference in snowpack depths across the Forest and that, after April 1, there is generally insufficient snowpack across the entire Washakie District as well as a sizeable portion of the Wind River District to support responsible snowmobiling. That premise is total nonsense and the thought of managing winter travel by high and low elevation zones should be abandoned.

The NRCS National Water & Climate Center (NWCC) operates seven SNOTEL sites in or very near this plan area. Their website at https://wcc.sc.egov.usda.gov/nwcc/rgprt?report=snowmonth_hist&state=WY provides historic 'Start-of-Month' data for 'January 1 through June 1' which includes Snow Depth data dating back to 2004 along with Snow Water Equivalent (SWE) data dating back to 1979 which can be used to extrapolate snow depths prior to 2004.

This NWCC data shows how far off-base the proposed action to manage winter use by high and low elevation areas really is. The PA fails to recognize that snowpack is built through a cumulative process that results in far deeper snowpack in mid-winter, late-winter, into spring. The Revised PA would unjustifiably shut off snowmobile access far too early by closing 'low elevation' areas on April 1. Historic SNOTEL records which are summarized in Table 1 below show there is actually more snow on April 1, as well as on May 1, compared to average snow depths earlier in the season on January 1. This data also shows there is no substantive snow

depth difference between areas labeled by the PA as ‘high elevation’ on the Wind River District versus those labeled ‘low elevation’ on that same district as well as across the entire Washakie District. The proposed high and low elevation management scheme is totally illogical, backed by zero science, and therefore must be removed from the PA and any further consideration in this process.

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

Proposed Motorized ‘Use Period’ Zones

The proposed winter motorized ‘seasons’ remain generally unreasonable and not supported by WSSA membership as well as the public. While the Revised PA made some improvement to the overall framework compared to the original PA, further revisions are needed to make OSV use seasons publicly acceptable.

A ‘3-Legged Stool’ approach is needed for better, more stable OSV Management: A major problem with the PA is that it continues to be built on only two provisions: (1) OSV use is allowed in specified areas only between specific dates, or (2) OSV use is totally prohibited everywhere the remainder of the year. This is an incomplete management scheme that will prove to be unsuccessful and unnecessarily create compliance issues.

We previously commented that the Medicine Bow-Routt National Forest’s travel management rules are a better model which should be adapted for OSV management on the Shoshone National Forest. The Medicine Bow’s OSV rules revolve around three provisions rather than only two, which add clarity and stability to public access management. Their provisions include: (1) cross-country OSV travel is allowed November 16 through May 31;

(2) OSV use is not allowed off designated routes from June 1 to November 15; and (3) OSVs can be operated on routes designated for other motor vehicle use by the MVUM between June 1 and November 15.

Their last provision, #3 which clarifies that OSVs can be operated on designated MVUM routes when there is snow cover, is extremely important to our members and to public access in general. Snowmobiles are purpose-built 'over-snow' vehicles which can be easily damaged when not operated on snow – so there is an underlying 'only on snow cover' operational premise. Consequently, when there is snow cover on designated motor vehicle routes between June 1 and November, OSV use should be acceptable without adverse resource impacts. If there isn't snow cover on a designated route, snowmobile use generally will not occur. And if an OSV happens to drive across a bare patch of ground on that MVUM-designated route, it's no different than other vehicles driving over that route without snow cover – there is not an unacceptable impact.

The Revised PA made improvements to the North Zone's proposed OSV use season by revising it to 'November 15 to May 15,' but at the same time stood firm on overly restrictive use seasons proposed for the two southern districts. We must do better for there to be reasonable public access.

The Wind River District has continually stated they 'need to be in sync with the neighboring Bridger-Teton National Forest. That's a poor model that has been in place since 1990 and most certainly will be revised to become better in-sync with the new Subpart C – OSV Travel Rule. And what the dates say on their map (December 15 through April 30 for the Togwotee area) is not consistent with how snowmobile use has been allowed to occur on-the-ground over the past 26 years. Reality is that snowmobile use has been openly allowed before and after those dates, including the grooming of snowmobile trails years ago as early as Thanksgiving and now routinely beginning around December 1.

Data-Based Proposal: As we discussed in respect to 'Zone Boundaries' above, SNOTEL data summarized in Table 1 clearly establishes that adequate snow cover extends well into Spring across the entire Shoshone National Forest. There is typically still at least two to four-feet of snow cover across the entire forest on May 1 with the Beartooths area of the North Zone still having over 6-feet of snow. Consequently, an 'end date' somewhere between May 15 and June 1 on the South Zone and between June 1 and June 15 on the North Zone should be considered as a more realistic, data-supported, OSV management option since, as shown in Table 1, there is still generally sufficient snow cover across the South Zone on June 1 while the Beartooths still generally has 50-inches of snow cover. A realistic OSV season 'start' date should be generally around November 15 when sufficient snow for safe snowmobile operation has typically started to accumulate. Additionally, a provision like the Medicine Bow's #3 must be included in your final travel rule to clarify that OSV use on MVUM routes is permissible when those routes are covered with snow outside the primary OSV season.

Thanks for the opportunity to comment on the Revised Proposed Action. We look forward to continuing to work with Forest Service staff as this process moves forward. Feel free to contact me if you have any questions or need additional information.

Sincerely,

Taylor Jones, President
Wyoming State Snowmobile Association



Cc: WSSA BOD
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