



Craig Trulock
Acting Forest Supervisor
Shoshone National Forest
808 Meadow Lane Avenue
Cody, WY 82414

December 5, 2017

Re: Comments on Shoshone National Forest Travel Management

Submitted via email to: travel_management_comments@fs.fed.us

Cc: Rob Robertson, Olga Troxel, Rick Metzger, Sue Stresser, Steve Schacht

Dear Acting Supervisor Trulock,

Thank you for the opportunity to comment on the revised proposed action for the Shoshone National Forest Travel Management project. Winter Wildlands Alliance (WWA) is a Boise, Idaho-based nonprofit national advocacy organization representing the interests of human-powered winter recreationists across the U.S. Our mission is to promote and preserve winter wildlands and a quality human-powered snowsports experience on public lands. WWA represents over 50,000 members and 41 grassroots partner organizations in 16 states, including the Togwotee Backcountry Alliance and Wyoming Wilderness Association in Wyoming, and the Beartooth Recreational Trails Association just over the border in Red Lodge, Montana. Many of WWA's members visit the Shoshone National Forest for nordic and backcountry skiing, snowshoeing and winter hiking. WWA is specifically interested in the winter portion of the travel plan, particularly those areas that will be designated as open on the over-snow vehicle (OSV) use map (OSVUM).

We have commented extensively throughout this travel planning process to date, including submitting 3 winter travel proposals, pre-scoping comments, scoping comments, and various additional materials over the past 2 years. Attached to this letter we are re-submitting all of these materials to ensure they are part of the project record and so that you have them on hand as you move forward with Alternative development.

The attached materials include the following:

1. [WWA winter travel proposals.pdf](#): We submitted these three proposals to the Shoshone National Forest in 2015.
2. [Shoshone pre-scoping comments.pdf](#): Submitted by WWA, The Wilderness Society, and Togwotee Backcountry Alliance on September 22, 2015.
3. [Changes in OSV technology.pdf](#): This handout was shared with Sue Streeser and Olga Troxel during an in-person meeting on February 2, 2016 to illustrate how OSV technology has changed since the Wyoming Wilderness Act was enacted. Advances in OSV technology allow OSVs to travel further into the backcountry and up steeper slopes, in all conditions, than was possible when the High Lakes WSA was designated. The Forest Service must take these changes into consideration when determining how to manage OSV use within the WSA.
4. [Shoshone minimization letter.pdf](#): Submitted on March 11, 2016
5. [Shoshone scoping comments.pdf](#): Submitted on June 24, 2016 along with [Exhibit A-BMPs.pdf](#) and [Exhibit B – maps.pdf](#)



6. [Minimization Criteria Compliance Key Concepts TWS BRC Final.pdf](#): Shared with Sue Stresser and Olga Troxel during a Beartooth Pass field trip on June 6, 2017.
7. [High Lakes.pdf](#) and [OSV map.pdf](#): Shared with Sue Stresser and Olga Troxel during a Beartooth Pass field trip on June 6, 2017 and emailed to Rob Robertson on August 14, 2017. These maps, and the accompanying shapefile [HLWSA OSV line.zip](#) illustrate a boundary that we believe would bring the Shoshone National Forest into compliance with the Wyoming Wilderness Act and the Travel Management Rule. We proposed that the Shoshone designate an OSV use area on the Beartooth Plateau that extends to this boundary and that the area between the boundary and the Montana state line not be designated for OSV use.
8. [ShoshoneNF WinterAccess FinalReport 20170605.pdf](#): Shared with Sue Stresser and Olga Troxel during a Beartooth Pass field trip on June 6, 2017 and emailed to Rob Robertson and Rick Metzger on June 12, 2017, along with [Gallatin FEIS recreation chapter.pdf](#). We recommend the Shoshone use this information to supplement public comments and ascertain areas that provide non-motorized winter recreation opportunities.
9. [Olson et al. 2017.pdf](#): Emailed to Rob Robertson and Olga Troxel on August 11, 2017. This paper includes management recommendations for meeting the minimization criteria and providing for desirable winter recreation opportunities for motorized and non-motorized winter recreation user groups.

In general, our interest in this planning process can be categorized under the following topics:

1. The Shoshone winter travel plan must comply with the 2015 Over Snow Vehicle Rule and underlying Executive Orders (11644 and 11989), designating specific areas and routes for OSV use which are located in compliance with the minimization criteria.

We understand and appreciate that the Shoshone recently completed a forest plan revision which classifies many areas of the forest as not suitable for OSV use. However, the Shoshone cannot simply designate all “suitable” areas as open to OSV use in the travel plan unless the Environmental Impact Statement (EIS) clearly describes how the boundaries of these areas comply with the minimization criteria. The burden of proof is on the Forest Service to clearly explain why specific areas and trails are to be designated for OSV use.

While we understand that the majority of the Shoshone is already closed to OSV use because it is designated as Wilderness or deemed unsuitable in the Forest Plan, this is not a reason to gloss over winter travel planning. The 2015 OSV Rule, requires the Forest Service to designate OSV open areas that are “discrete, specifically delineated space[s] that [are] smaller . . . than a Ranger District”¹ and with the objective of minimizing “Damage to soil, watershed, vegetation and other forest resources,” and “Conflicts between motor vehicle use and existing or proposed recreational uses of National Forest System lands.”² The Forest Service must designate OSV areas in a manner that reflects where OSV use actually occurs, where it’s feasible for OSV use to occur, or which areas of the forest provide quality OSV recreation opportunities. There must be a discussion of how the boundaries of these areas have been located to minimize impacts to

¹ 36 C.F.R. §§ 212.1

² 36 C.F.R. § 212.55(b)



other forest resources or uses, and a discussion of why these areas are or should be open to OSVs.

Due to the requirement to manage the forest as “closed unless designated open”, identification of a “motorized area closure” in the “Winter Travel Management Proposed Action, SubPart C Changes to Motorized Travel – Wind River RD” map is inconsistent with the OSV Rule. Any area not specifically designated for OSV use is closed and these areas do not need to be specifically identified beyond not being designated open. Rather than justify closing areas to OSV use, the EIS must justify why each area is designated *open*. As this map stands now, it appears that all areas on the Shoshone that the Forest Plan identified as “suitable” for OSV use are automatically being designated “open” in the proposed travel plan, excepting a small area closure on the Wind River district. While we very much support not designating the area surrounding the cross-country ski trails on Togwotee Pass for OSV use what the Forest Service needs to do in this process is determine which areas will be designated *open* for OSV use, not which areas will be closed. We recognize that in some sense this is purely a semantic argument but it is the heart of winter travel planning.

2. Areas and trails that are important for non-motorized winter recreation should not be designated for OSV use.

We have described in detail the areas where skiers and snowshoers recreate, and our suggestions for minimizing use conflict in these areas in previous comments. To supplement these comments, we have also provided a report titled “Accessible Backcountry Skiing in the Shoshone National Forest.” WWA worked with GIS experts at the Outdoor Alliance to model accessible backcountry ski terrain across the Shoshone. We request that the Shoshone incorporate this information in the EIS as part of the analysis to determine how proposed designated OSV use areas are or are not located in a manner that will minimize conflict between uses. The Gallatin National Forest used a similar approach in its 2006 winter travel management plan, which we suggest the Shoshone look to as an example.

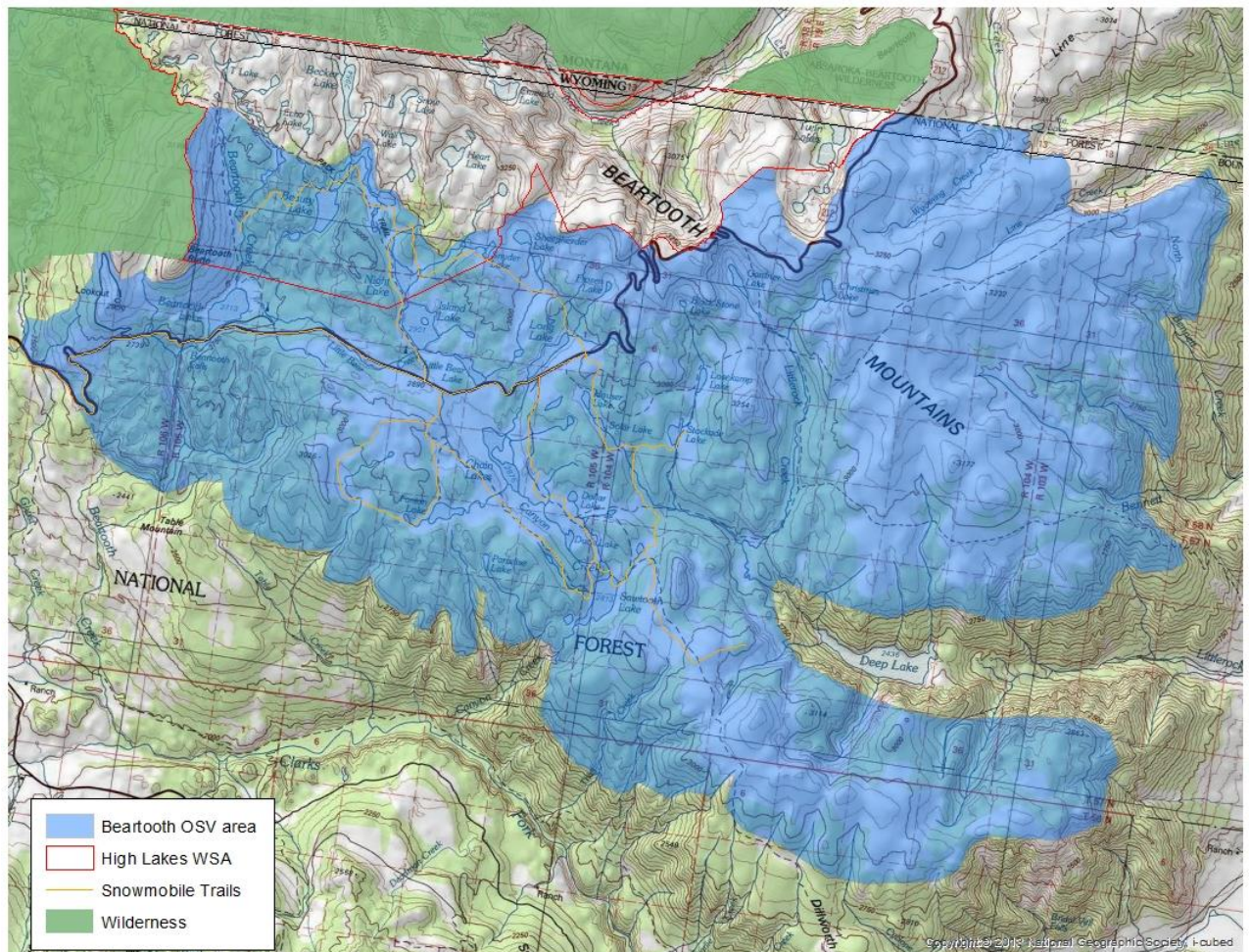
This past summer we sent Shoshone NF staff a recently published paper examining skier and snowmobiler “habitat use”.³ This paper, by Forest Service scientists, was written with the intent of providing information to help with travel management decisions and provides insights into the terrain characteristics favored by motorized and non-motorized winter recreationists. For example, Olson et al. found that the areas where skiers and snowmobilers tended to overlap (and therefore, the areas with the most potential for use conflict) were those that were closer to roads, had moderate slopes, and were in areas of patchier or more fragmented forest. Meanwhile, outside of these areas snowmobilers tended to favor areas with low slope and low terrain variability, in lower elevation areas with more open canopy and less precipitation while skiers favored steeper slopes and more complex terrain. The Shoshone should consider this information as it determines which areas to designate for OSV use.

³ Olson et al. 2017. *Modeling large-scale winter recreation terrain selection with implications for recreation management and wildlife*. Applied Geography 86: 66-91.



3. Winter travel management within the High Lakes Wilderness Study Area (WSA) must comply with the 1984 Wyoming Wilderness Act, limiting OSV use within the WSA to “the same manner and degree” as what likely occurred during the winter of 1983.

We have already provided extensive comments concerning the High Lakes WSA and the Wyoming Wilderness Act. Rather than repeat those here, we offer a suggestion. It seems unreasonable and unlikely to attempt any sort of permit system to limit OSV use within the WSA. However, we believe the most effective way for the Shoshone to manage OSV use within the WSA to keep use in line with the “manner and extent” that occurred during the winter of 1983, and to comply with the OSV Rule’s requirement to minimize impacts to and conflict with wilderness character (a “use”) is to limit the footprint of OSV use within the WSA. The Forest Service may not ever be able to determine how many people snowmobiled in High Lakes in the early 1980’s but it is fairly easy to ascertain where a 1983-era snowmobile could and could not go. Generally, they were restricted to groomed trails. We propose that the Forest Service designate OSV use on the Beartooth plateau as shown on the following map:



We suggest connecting this Beartooth OSV area to other OSV areas, such as a Pilot Creek OSV Area and Crandall OSV area via designated OSV routes wherever possible.



4. The Shoshone winter travel plan should include OSV season dates and a minimum snow depth or density restriction.

We generally support the OSV season dates in the Proposed Action. However, we are concerned that allowing OSVs on the forest as early as November 15 and as late as May 15 will not meet the requirement to minimize impacts to wildlife. Mid-November is peak season for big-game hunting, a time when many wildlife are already stressed, and grizzly bears begin emerging from their dens in April. The EIS should describe in detail what impacts OSV use has on ungulates, grizzly bears, and other wildlife and how allowing cross-country OSV travel as early as November 15 and as late as May 15 meets the requirement to minimize impacts to these species.

We question the need to change the OSV season in the Greybull and southern Wapiti zone, and across much of the Clarks Fork ranger district from the originally proposed December 1 – April 15 to November 15 – May 15. These areas are generally low elevation and we believe that December 1 – April 15 is more appropriate. This would eliminate conflict with hunting season in areas that receives high levels of hunting pressure and align the OSV season more closely with the snow season. It's a rare November that sees enough snow for consistent OSV use across most of the Shoshone. For consistency we recommend that the OSV season across the forest be December 1- April 30, with an extended spring season on the Beartooth pass ending May 15. This season coincides with the season set by the neighboring Bridger-Teton and avoids any conflict with hunting season.

Requiring sufficient snow is an important tool to use to minimize the impact that OSV use has on soils, vegetation, and subnivalian wildlife habitat. As we've detailed in previous comments, the weight of an OSV compacts snow, affecting melt rates which in turn impact plant regeneration. Snow compaction also impacts wildlife that utilize the subnivalian zone – literally crushing this important habitat and rendering it unusable. Likewise, without sufficient snow to serve as a buffer, OSVs can compact the soils underneath, leading to the many of the same effects brought by wheeled vehicles traveling cross-country.

We recognize that this subject is not very well understood, although at the same time anybody who skis or snowmobiles knows that more snow equates to less impact to snow layers below. While there is no exact standard for how much snow is sufficient to minimize OSV impacts to these underlying resources, the rule of thumb in avalanche safety is one meter (39 inches) – that is, it is generally considered that a skier or snowmobiler on top of the snow can trigger an avalanche on snow layers up to a meter below the surface. This of course depends on snow density, and we encourage the Shoshone to think about snow density as a management tool as well – perhaps a minimum snow density standard accompanied by a minimum snow depth standard.

Regardless of whether the forest implements a minimum snow depth, low elevation areas that rarely receive enough snow to even support over-snow travel should not be designated open for OSV use. For example, the Beartooth Front should not be designated for OSV use. This area is the lowest elevation area in the entire Greater Yellowstone Ecosystem and rarely, if ever, receives enough snow to support OSV travel.



Thank you for considering these comments, and our previous input. We look forward to continuing to engage in the winter travel planning process.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Eisen", with a stylized flourish at the end.

Hilary Eisen
Policy Director