

January 11, 2016



TO: Joe Alexander, Forest Supervisor
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The Wyoming State Trails Program (WSTP) submits the following winter motorized route and area considerations for the Shoshone National Forest's Travel Management planning process:

1. All portions of the Shoshone National Forest classified as 'Available for Winter Motorized Use' should be designated as 'open' to motorized over-snow vehicle travel in the winter travel plan.

The newly adopted Shoshone National Forest Land Management Plan – 2015 (LMP) classified 592,400 acres (24%) of the forest as 'Available for Winter Motorized Use.' This contrasts with the previous 1986 forest plan which allowed snowmobile/over-snow vehicle (OSV) use to potentially occur on 887,600 acres (36%) of the forest. Since the 2015 LMP has already reduced OSV access by one-third (295,200 fewer acres are available now compared to pre-2015), we believe due diligence was done on this subject during forest planning and any further reduction to the available winter motorized travel area is unwarranted. Consequently all existing 'blue areas' on the forest's winter travel management planning maps should be transferred to open riding areas on the Over-Snow Vehicle Use Map (OSVUM) which will eventually be produced through this planning process.

When Subpart C of the Forest Service Travel Management Rule (36 CFR Parts 212 and 261) was revised in 2014 the *Area* definition in 212.1 was specifically expanded to state: "Area – a discrete, specifically delineated space that is smaller, and, except for over-snow vehicle use, in most cases much smaller, than a Ranger District." Consequently it is fully intended and clearly appropriate to designate large blocks of forest as 'open' to cross-country OSV travel. And even without the expanded Area definition, all currently open 'blue areas' on the Shoshone National Forest are substantively smaller than any of your ranger districts.

2. Provide Designated Routes through 'MA 5.4 Managed big game crucial winter range' areas and opening 'Exemption Areas' to OSV travel.

The Desired Conditions for Species of Local Concern (LMP, page 57) states, "Forest roads and trails through big game winter range are open to public motorized use to provide access to non-winter range lands when necessary."

On page 59 in respect to Guidelines for Species of Local Concern the LMP further states: "On big game crucial winter range, management activities that disturb big game should be conducted outside the season of use (December 1 through April 30) or designed to reduce disturbance to big game when the activity is necessary to sustain or improve crucial winter range conditions. Exceptions are allowed for over-snow motorized use as follows:

- Over-snow motorized vehicle use is permitted on roads and trails open to wheeled motorized vehicles within crucial big game winter range consistent with law and regulations (see MVUM 14 map).
- Over-snow motorized vehicles use is permitted on designated groomed snowmobile trails within crucial big game winter range.
- Snowmobile use is permitted on designated ungroomed snowmobile trails within crucial big game winter range.
- Snowmobile use is permitted within identified crucial big game winter range exemption areas (see Map C). (SPLC-GUIDE-04)"

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The Management Approach for Species of Local Concern on page 61 of the LMP also specifically states that “Snowmobile use is permitted within identified winter range exemption areas. Exemption areas are areas where existing motorized use is limited and not a detriment to crucial winter range. Exemption areas are identified by the Forest Service in cooperation with Wyoming Game and Fish Department.”

Consequently this winter travel planning process must ensure full analysis of all potential routes needed to provide appropriate OSV travel through winter range to non-winter range areas, and then appropriately display these routes on the OSVUM. All identified ‘exemption areas’ should also be included in the ‘Available for Winter Motorized Use’ status lands as the final winter travel plan and OSVUM are developed.

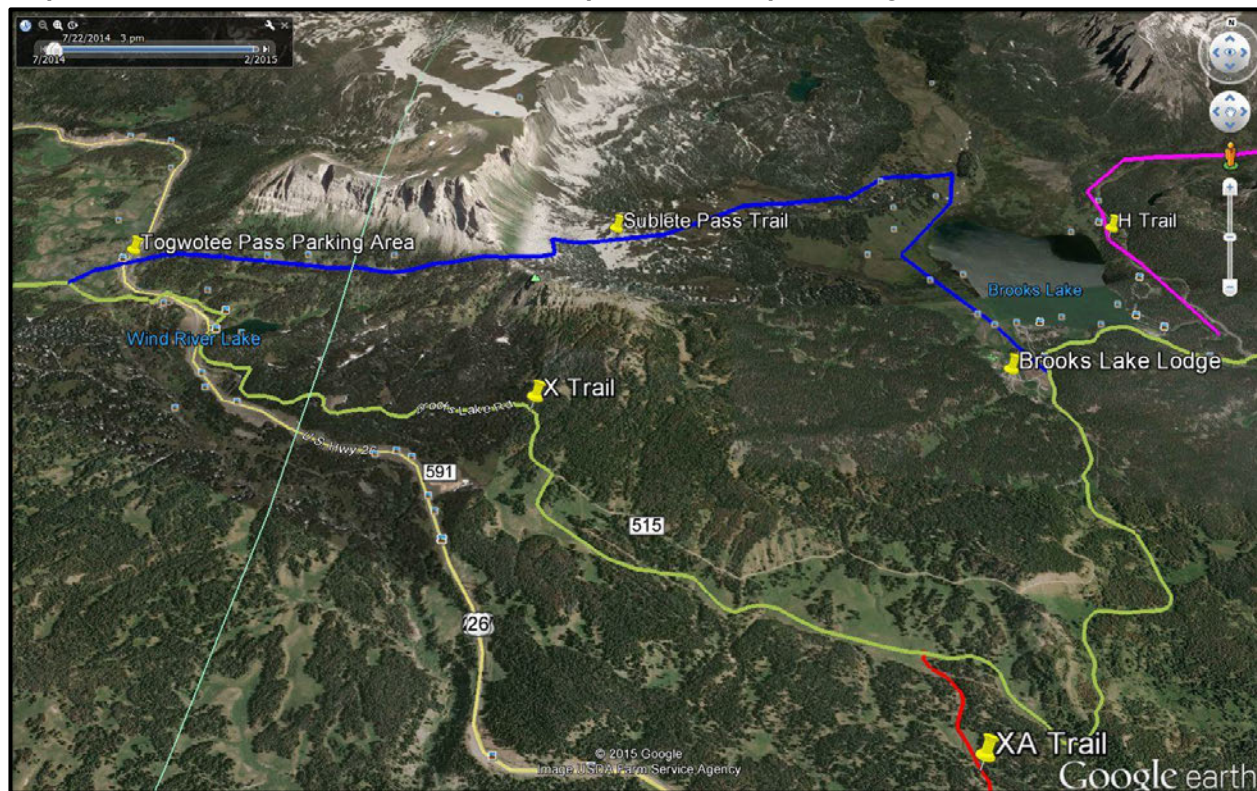
3. **All current groomed and ungroomed trail routes shown on the State’s snowmobile trail map should be retained and shown on the winter travel map.**

All current groomed and ungroomed snowmobile trail routes shown on the State’s snowmobile trail map are long-standing and heavily used winter trails. Therefore all existing designated snowmobile trail routes should be carried forward through this planning process.

4. **The signed but ungroomed ‘Sublette Pass’ snowmobile trail has existed on the ground for decades and should be added to the winter travel map.**

The ‘Sublette Pass Trail’ is a signed (with orange trail blazers on trees) but ungroomed snowmobile trail that has been in use for several decades. It connects the Togwotee Pass Parking Area to Brooks Lake Lodge while also providing important marked access to an extremely popular off-trail snowmobiling area (see Map 1 below).

Map 1: Sublette Pass snowmobile trail route (shown in blue) from Togwotee Pass to Brooks Lake



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This long-standing snowmobile trail route traverses a bit of the Bridger-Teton National Forest on its western end, with the vast majority of it being located on the Wind River District of the Shoshone National Forest. Since this existing snowmobile trail route is not included on the current State snowmobile trails map, it should be added to the winter motorized travel map as an ungroomed snowmobile trail route.

Thank you for this opportunity to contribute these comments for consideration. We look forward to working closely with you and other Shoshone forest staff as this planning process proceeds. Please feel free to contact me at [REDACTED] or by e-mail at [REDACTED] if you have any questions.

Respectfully submitted by,

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