



March 20, 2024

Tanner Shuler
Wind River Ranger District
PO Box 186
Dubois, WY 82513-0186

RE: Green Union Project Draft Environmental Assessment

Dear Tanner:

The Wyoming State Trails Program (WSTP) administers the Wyoming Snowmobile Program and the Off-Road Recreational Vehicle (ORV) Program. We strive to be a good partner with federal agencies to help provide responsible management of motorized recreation and the enhancement of snowmobile and ORV/OHV use through our grant funding and on-the-ground trail construction and maintenance partnerships.

WSTP is supportive of this proposed project since it will certainly be beneficial to sustaining long-term forest health. However, we do continue to have some concerns about potential impacts to the operation of snowmobile and ORV trails within the project area which, hopefully, can be averted through close interagency coordination as this project progresses. Some of our specific concerns were previously shared during this project's scoping period last fall that include:

1. The Draft EA continues to discuss "**decommission and rehabilitate unauthorized user created routes.**" Since the Shoshone National Forest has yet to sign off on a Travel Management Plan decision – a planning process which has now been in-progress for well over nine years – we continue to believe that it would be premature and improper for the Forest to move forward with decommissioning any user-created routes until the Travel Plan is finally adopted – and any potential objections are cleared up. Many user routes have been proposed by WSTP and/or the public to be added to the motorized trail system. In particular and at a minimum, it is our position that absolutely no routes which have been proposed to become managed as 'open' motorized travel routes by either previous WSTP Travel Planning comments and/or have been proposed to be classified as 'open' within any of the previously proposed Travel Plan's alternatives should be permanently closed under the pretext of the Green Union project. Any future closures must coincide with the final Travel Plan decision.
2. There are many miles of both snowmobile trails and ORV trails located within this project area. WSTP works hard to provide credible trail maps for both activities on an annual basis.



Mark Gordon | Governor
Dave Glenn | Director
Sara Sheen | Deputy Director
Nick Neylon | Deputy Director



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Wyoming State Parks & Cultural Resources

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Our maps are available in both a printed and electronic format to help guide safe and responsible recreational use in open areas of the Forest. Consequently, it will be essential that project managers work closely with our Program well in advance of when treatments will actually occur within project units – so that annual trail maps show only trail routes which can be safely used during each applicable activity.

- For the ORV trails map, we need to know ‘open and available’ routes (as well as any new ‘closed’ areas) by **March 1** of each year – for trails and areas typically used by wheeled vehicle recreation through the end of fall.
- For the Snowmobile trails map, this means we need to know ‘open and available’ routes (as well as any new ‘closed’ areas) by **September 1** of each year – for trails and areas used by over-snow vehicles (OSVs) from December through April of the following year. So, if there will be any ‘winter operations’ within the overall project area, it is critically important that we know defined operating *boundaries and routes* since cross-country OSV is generally permitted across most areas of the Forest in the project’s vicinity.

Our other comments specific to the Draft Environment Assessment document include:

- A. While the proposed action does not include construction of new permanent roads, it will require the construction of approximately 43 miles of temporary roads – which are intended to be “rehabilitated and closed once the project has been completed” according to the Draft EA. While we recognize and accept that position in respect to permanent roadways, we nevertheless request that these temporary project road segments possibly be given consideration for use as potential new motorized trail connectors or reroutes – if they happen to be in locations where their use (and given their already existing disturbance from this project) make sense and may be beneficial to helping improve/solve issues at existing motorized trail locations – whether OSV or ORV/OHV.

While we understand this may require additional coordination and analysis for clearance prior to any final actions, we believe it would be in the best interest of responsible future recreation management to not summarily dismiss this potential possibility for future trail management. From our perspective, it simply makes sense to give this reasonable consideration – to take advantage of this project’s expenditures and ground disturbance done to further forest health to potentially also further responsible recreation management on the project’s coattails, if the local situation warrants it on a case-by-case basis.

- B. The Project Design Feature outlined in Appendix B on page 107 for ‘Winter Recreation’ states “Use of project and haul roads shall not occur on designated snowmobile trails from December 15 through April 1 unless otherwise approved by the district ranger.” While this is good and much appreciated, we would like to see additional language added to this statement so that we know what to expect in the event ‘winter operations are approved by the district ranger’ and any of our existing snowmobile routes must be used as haul routes.

Unfortunately, our past experience with winter logging operations has been quite varied. Sometimes we’ve been able to work around sale areas and other times we’ve had total areas become inaccessible due to winter operations. There have been times when operators have had stipulations in their contracts requiring them to leave several inches

of snow on the road so that snowmobile use could also co-exist in limited situations or distances. Sometimes operators have abided by such 'leave snow' requirement – while more often than not, we end up with roads plowed down to gravel or dirt.

Many of this project's units are located in the center of the area's snowmobile trail system – so close coordination with our program is critically essential. We therefore request the following considerations if any winter operations are considered for approval by the district ranger: 1) foremost, try to prevent or severely limit winter operations in core areas, 2) if winter operations are deemed to be essential in core areas, the Forest should work with State Trails to locate and provide a suitable snowmobile trail re-route(s) that totally avoids the impacted area, 3) if a suitable reroute cannot be accommodated, winter operators and their contractors must be **required** to leave no less than 4-inches of snow on any haul routes which are remain open as snowmobile trail segments.

We thank you for the opportunity to comment. Please feel free to contact me at 307-335-2671 or by e-mail at forrest.kamminga@wyo.gov if you have any questions.

Respectfully submitted by,



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Cc: District Ranger Jeff von Kienast