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Tanner Shuler

Wind River Ranger District

PO Box 186

Dubois, WY 82513-0186

RE: Green Union Project Draft Environmental Assessment

Dear Mr. Shuler:

I'm writing on behalf of the Wyoming State Snowmobile Association (WSSA) regarding the Green Union Project Draft Environmental Assessment on the Shoshone National Forest. This area is an extremely important snowmobiling area for our members, as well as to Wyoming's tourism industry and winter economy. We appreciate this opportunity to submit comments for your consideration as this project moves forward.

The WSSA is supportive of this project since we recognize its importance to future forest health in this area of the Shoshone National Forest. Additionally, opening up the forest canopy and removing understory helps snowfall reach the ground where its beneficial to our over-snow travel activities.

We are concerned about the Proposed Action's mention of decommissioning and rehabilitating unauthorized, user created routes. Oftentimes, our groomed snowmobile trails are located off-road, which sometimes means they follow what you refer to as user created routes. While we recognize that these routes are often not approved for wheeled vehicle travel, they are approved by the Forest for winter over-snow trails. Consequently, these routes should not be obliterated - which could potentially make winter trail grooming impossible.

Additionally, we are concerned about your proposal to decommission any user created routes before the Shoshone National Forest's motorized travel plan is finalized. Since the Travel Planning process has now been going on for over 9 years, such action would be out of line and premature. Many user- created routes have been

included as potential additions to authorized routes when the final Travel Plan is adopted - so none of these routes should be decommissioned until after that final decision has been made and released to the public, as well as cleared any objection period.

We appreciate the Project Design Feature outlined in Appendix B on page 107 in respect to '#33 Winter Recreation' that 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." However, this Design Feature doesn't go far enough since it doesn't address what will happen when the district does approve use of winter haul roads during the winter season - which has been the case quite often historically in this area. Unfortunately, past winter operations have typically resulted in winter haul routes being plowed down to dirt or gravel - even when it's been stipulated that several inches of snow cover should be left on the road when these haul routes have technically remained open for concurrent snowmobile travel. Consequently, we request that at least 4" of snow be required to be left upon concurrent use haul routes. We also want to be clear that we don't necessarily advocate for concurrent snowmobile use on winter haul routes - but there are definitely times when total closure of a route to snowmobiles would shut off over-snow access to significant portions of the forest if totally closed.

We noted in the discussion of Canada Lynx Direct Effects and Indirect Effects on pages 35 and 36 where the Draft EA states "While compacted snow routes do not appear to increase competition from other species to levels that adversely affect lynx populations, there is evidence that competing predators use packed trails, suggesting a potential adverse effect on individual lynx" and then references 'USDA 2007.' We believe this 'USDA 2007' reference tiers to the Northern Rockies Lynx Management Direction Record of Decision (2007). Therefore, it is important to point out that this document was followed by an updated guidance publication, the 2013 Canada Lynx Conservation Assessment and Strategy (<https://www.snowmobileinfo.org/snowmobile-access-docs/Canada-Lynx-Conservation-Assessment-Strategy-August-2013.pdf>) - which concluded that previous theorized concerns related to compaction and competition were over-stated in previous study publications. Consequently, previously stated concerns regarding potential adverse effects - and the stated "very low" potential adverse effects related to this project - are actually substantially lessened compared to the possibilities discussed as per the referenced 2007 publication.

We commented during this project's scoping period about the importance of advance planning and reiterate those comments once again. Since new snowmobile trail maps are printed each year in advance of our snowmobiling season, it will be important that there is advance notice and coordination so that we avoid conflict if there is going to be project operations during the winter season in any of the project's work units. Wyoming State Trails prints these maps and typically needs to know what trails and riding areas are going to be available by about September 1 of each year. Consequently, we ask that you work closely with State Trails as well as with our local Dubois snowmobile club to help avoid surprise closures in our historic riding areas - which includes not only designated-marked and/or groomed snowmobile trail routes as well as much of the Forest which is open to cross-country snowmobile travel.

Thank you for the opportunity to contribute these comments. Feel free to contact me at any time to further discuss details or to answer any questions you may have.

Sincerely,

Brenda Miller, President

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cc: Forrest Kamminga, Wyoming State Trails

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