



September 17, 2020

Mark Foster, Environmental Coordinator
Shoshone National Forest
808 Meadow Lane Avenue
Cody, Wyoming 82414

Attention: Shoshone NF Travel Management Planning Project

Dear Mr. Foster and Planning Team:

The following comments are submitted on behalf of the Wyoming State Snowmobile Association (WSSA) regarding the Shoshone National Forest (SNF) travel management plan's Preliminary Environmental Assessment (EA). Our comments are focused on winter over-snow vehicle (OSV) use and includes support for some of the proposed management concepts along with suggestions for changes that we believe will help improve your final travel plan's public acceptance and its overall manageability, while also providing proper resource management along with an acceptable range of over-snow recreation opportunities.

We incorporate by reference and reiterate our previous comments submitted in June 2016 and December 2017 regarding the Shoshone's travel planning process. The WSSA generally favors many concepts outlined for OSV management in Alternative 2, but with several requested changes. Our specific comments regarding the Preliminary EA include:

Opposed to full-sized vehicles (trucks and SUVs) equipped with tracks using OSV trails.

Full-sized vehicles equipped with tracks (your proposed new OSV Category 2) are too heavy and too wide to be used on designated snowmobile trails across the Shoshone National Forest. These vehicles can cause trail rutting/damage and create safety issues since many snowmobile trails are far too narrow for two-way traffic that would include these extremely wide tracked vehicles. They simply do not belong on any groomed or ungroomed snowmobile trails on the SNF because of weight and width issues.

Exceptions to our opposition to allowing full-sized tracked vehicle operation on the SNF would include tracked conversion vehicles operating with permission under a special use permit issued by the Forest (Brooks Lake Lodge vans, utility company vehicles, etc.). Otherwise, the use of these large tracked vehicles on the SNF should be limited to only designated roads which are not part of the State's groomed and ungroomed snowmobile trails system.

Support keeping the entire High Lakes Wilderness Study Area open to snowmobiling.

The WSSA supports Alternative 2 on this topic since it would keep the entire High Lakes WSA 100% open to continued OSV use. This is consistent not only with Congressional intent but is also supported by your EA analysis – which clearly shows that use patterns have not changed significantly since the 1970s. Since the area’s potential wilderness character has not been harmed by snowmobile use since the WSA’s establishment, OSV use must be allowed to continue.

We are opposed to closing the northern and eastern portions of High Lakes as is proposed by Alternative 3. Snowmobilers have had to fight off attacks from environmental and nonmotorized groups who continually try to close this area to our use. They already have 80% of the Forest for their exclusive nonmotorized use, plus they keep wanting to close more of the already very limited area open to OSVs and snowmobiling. Congress was very clear in its intent that this entire area is to remain open for continued snowmobile use – until such time that either use changes significantly to the point that the area’s character is threatened, or until Congress itself determines differently. And we know that our Wyoming Congressional Delegation continues to strongly support continued snowmobiling access within the entire HLWSA – so the entire area should remain open under your final travel plan.

OSV Season Dates.

The proposed dates of November 1 through May 31 for the North Zone (Beartooths) and Wind River (Dubois) District – and December 1 through May 31 for the Washakie (Lander) District – are very realistic since there is always adequate snow for snowmobiling in these areas during these times. However, these are the absolute minimum OSV season dates we are prepared to accept – and we will fight any efforts by conservation and nonmotorized groups to shorten these proposed season dates.

Our support for Alternative 2’s proposed open and close dates is conditional since we have a lot of members who feel these proposed season dates are too short – so they are quite upset. The vast majority of our membership has ridden snowmobiles, on adequate snow, much earlier than November 1 as well as much later than May 31; not everywhere on the Forest, but certainly routinely in many high elevation areas in more years than not. There very definitely are years when October snow storms prevent hunters from accessing their backcountry hunting areas or camps since deep snow causes roads to become inaccessible by wheeled vehicles. Consequently, extending the opening date for OSV use on adequate snow to somewhere between October 1 or no later than October 15 is what we request – so that hunters have a fair chance to access their hunting areas and so that desired wildlife harvest targets have a reasonable chance to be met in years with early, deep snow.

Additionally, at season’s end, there are a lot of dedicated snowmobilers who regularly continue to ride their snowmobiles until somewhere between June 15th and June 30th – in high elevation areas where adequate snow remains. It has been their tradition for decades and they don’t want their riding access restricted due to arbitrary dates on the calendar that really have nothing to do with when there typically is still more than adequate snow in many high-country areas. SNOTEL data shows there are many places on the SNF where snowfall is absolutely sufficient to be able to add 15 to 30 days to both the front-end and back-end of your final OSV season dates – so we request that you revise Alternative 2 accordingly.

It is also our position that – if there is sufficient snow depth in areas of the Forest zoned available for OSV use – snowmobilers and other OSV users should be given priority / continue to be able to access

it versus having our very limited motorized use zones closed on an early, random date – particularly if the reasoning to end OSV use early is to ‘provide exclusive use of that snow by nonmotorized recreationists.’ Those individuals and groups already have exclusive use of over 2 million acres of the SNF that we are entirely shut out of – while we openly share our 20% of the Forest with them versus ever having exclusive use of it. Consequently, it would be inherently wrong to reward them for being unwilling to abide by the same multiple-use principles we operate under every day of the year (all motorized trails on the SNF are ALWAYS open to multiple use by nonmotorized recreationists – regardless of whether it is winter, spring, summer or fall).

In a recent video post by the Winter Wildlands Alliance, (<https://winterwildlands.org/shoshone-national-forest/?emci=74244ebf-8be8-ea11-8b03-00155d0394bb&emdi=c9ce9411-dded-ea11-99c3-00155d039e74&ceid=3908240>) the speaker states that snowmobile use should be regulated so there aren’t conflicts with skiers during summer – well summer typically begins on about June 20 or 21, so they need to get educated that summer isn’t in late April, May or early June as they’re currently advocating for our OSV season to close. And their own video shows snowmobiles being used to pull or haul skiers up to the top during ‘summer’ – pretty contradictory as far as what they say versus what they do. Additionally, their August newsletter (<https://winterwildlands.org/shoshone-winter-travel-planning-is-underway/?emci=e43a20c4-ccdc-ea11-8b03-00155d0394bb&emdi=b79d694b-69dd-ea11-8b03-00155d0394bb&ceid=3908240>) proclaims that “for any backcountry skier, a Memorial Day weekend trip to Wyoming’s Beartooth Pass is a rite of passage. This time of year, skiing in shorts and a floppy sun-hat is encouraged. It’s a tradition for people all over Montana and northern Wyoming,” Why should snowmobilers be banished from the mountain simply so these folks can have exclusive access to snow – roadside in our designated motorized/multiple-use zone – simply so they can have their spring fling party in shorts and floppy sun hats, without having to share the snow?

New OSV Trails.

We support adding the new ungroomed Ghost Creek trail between Highway 212 Painter’s Store in the Beartooths. This new ungroomed trail route will provide connection to an on-trail business as well as help disperse parking and trail access from the Highway 212 corridor when snowfall is sufficient.

We also support adding the ungroomed trails in the Sublette Pass area near Togwotee Pass to your mapped trail system since they’ve actually existed and have been signed on the ground for decades.

OSV operation on snow-covered roads outside the designated OSV season dates.

We request that OSV use be allowed on designated wheeled routes (open roads and trails), when they are snow-covered, outside whatever the final OSV operating dates end up being in the final Travel Plan decision. This will help keep public access open to roads and trails on the SNF during shoulder seasons when snow is too deep for travel by wheeled trucks, ATVs and UTVs.

Cross-Country Ski Areas Closure to OSVs

We accept closure of the Falls/Deception and Pinnacles cross-country ski trail areas since there has been an informal ‘closure’ agreement between area snowmobilers and skiers for years.

Opposed to the proposed 12-inch Minimum Snow Depth for OSV use or trail grooming.

The 2015 OSV travel rule (Subpart C) lists only two potential criteria for the designation of OSV use on USFS lands: Class of Vehicle and Time of Year. It does not require that any numerical minimum depth be set, only that there be “adequate” snow depth for OSV use. Since snow depth can be extremely

variable depending on natural metamorphoses in the snowpack, wind, and other wide ranging weather conditions, this rule would be impossible to enforce and would also create an unwelcome tool for groups trying to shut snowmobiling down when snow is actually quite adequate for OSV operation across the majority of the Forest's landscape.

With the wind scour we have in Wyoming, there routinely will be bare ground in one spot when just beyond that particular spot there can be one, two, three or more feet of snow. There are also features like a 'snow shadow' where tree limbs prevent snow from reaching the ground – creating bare spots along the trail that may rarely have twelve inches of snow while the remainder of the trail will have tons of snow. And roads or trails along south-facing slopes are notorious for holding less snow due to sunshine causing snow to shrink quicker than snow on more shaded areas. There are countless other examples as to how snow depth will vary greatly from point to point to point – making it virtually impossible to have consistently deep snow pack even in the dead of winter. So, your setting a 12-inch minimum snow depth standard will absolutely, unnecessarily prevent trail grooming as well as OSV use across the forest if it is applied and enforced to the letter of the law – which environmental groups and other anti-motorized groups will absolutely insist you do.

Process wise, we strongly object to the SNF using a Winter Wildlands Alliance (WWA) publication, *Snowmobile Best Management Practices for Forest Service Travel Planning* (Switalski 2016), as a "foundation to understanding effects to water quality from a winter trail system" and subsequent justification for establishing a 12-inch minimum snow dept for OSV operation. This is a self-serving, very biased special interest document that has no place in a proper USFS planning process since it was funded, designed and produced 100% by WWA which works to restrict or prohibit OSV use.

We also find it bothersome that a 'study' (Fassnacht 2018) which was funded by the Colorado Mountain Club (also documented to be totally against OSV recreation) – and also used unsupported 'facts' from the WWA report mentioned above – was likewise used extensively as the foundation of your EA's discussion justifying a 12-inch minimum snow depth. Nevertheless, this study talks only about increased snow density from snowmobile use but didn't determine anything – absolutely nothing – about whether or not there are negative effects to soil, vegetation or water resources from snowmobile use. So, despite its extensive use as a reference – how does this study really equate to justifying a 12-inch minimum snow depth rule? We don't believe it does.

Your EA analysis has also improperly applied Best Management Practices intended for OSV operation in wetlands and riparian areas to the entire SNF – which the last we knew is not entirely made up of riparian areas and wetlands. The bottom line is that, by all appearances, your proposal to establish a 12-inch minimum snow depth rule for OSV use has been entirely pulled out of the air with absolutely zero scientific justification. Consequently, it should be eliminated from further consideration as an OSV use standard.

The WSSA belongs to the American Council of Snowmobile Associations (ACSA), which is a national organization committed to snowmobiling safety and proper snowmobiling management. ACSA operates a cooperative agreement funded by the Recreational Trails Program (RTP) administered by the U.S. Department of Transportation – Federal Highway Administration. The purpose of this cooperative agreement which is beginning its tenth year is to identify, produce and disseminate credible educational information related to snowmobile safety and access – all which is available at www.snowmobileinfo.org. One of ACSA's most recent projects has been to produce a report titled

**BEST MANAGEMENT PRACTICE RECOMMENDATIONS
RELATED TO
MINIMUM SNOW DEPTH REQUIREMENTS FOR OSVs**

1. **Avoid Generalized Numerical Snow Depth Standards:** Jurisdictions should resist establishing inflexible numerical snow depth measurements in order to provide the best adaptive management protocols for OSV travel management across a landscape. The development of numerical standards for OSV use is complicated by the fact that terrain and snow-cover are often extremely variable across a landscape. Snow is a complex material that changes constantly from the time it starts to develop high in the atmosphere, through all of the time it is on the ground, until it finally melts. Since snow is ever-changing and continually transformed by metamorphosis, wind, and other uncontrollable weather conditions, it can only be expected to be uniformly measured at a specific locality – and that measurement will be valid for only that particular, tiny, point in time. Consequently, any measured snow depth will rarely be consistent when applied to an entire landscape versus the locality where the measurement was performed. Additionally, snow depth is always subject to being a smaller or larger in a different location – which could be within sight distance of the snow measurement location – as well as be different an hour, hours, or day later depending upon atmospheric conditions. Consequently, numerical snow depth standards improperly invite unnecessary challenges to OSV use by those wishing to restrict their use in properly designated motorized use zones.
2. **Do Not Exceed Six Inches of Snow Depth If A Generalized Minimum Snow Depth Restriction Is Established:** While numerical minimum snow depths are not recommended as a best management practice, any minimum snow depth restrictions related to being able to start trail compaction / grooming should not exceed six (6) inches of uncompacted snow depth. The first snowfalls that are processed on a trail create the base for the remainder of the winter. An early solid, smooth base of snow will help keep the trail smoother throughout the rest of the winter. Consequently, vigorous smoothing and heavy compaction is important for early snows and should be done to the greatest extent possible, depending up equipment and budget availability. Trail compaction with a packer bar, roller or drag pan should begin early in the season, as soon as adequate snow begins to accumulate, so that snow layers no more than 6 inches in depth are consistently packed from the ground up. Newly fallen snow layers should ideally be cut to 6 inches or less before compacting to ensure full compaction throughout the layer. Early snow which is allowed to accumulate to thick deep layers, as well as thick layers of newly fallen snow during the season, typically do not compact well.
3. **Recognize the Armoring Benefits from Early Season Snowmobile Compaction:** Snow compaction from snowmobile traffic helps to armor soil and underlying vegetation. Consequently, OSV use should be allowed to begin early in the season, just as soon as adequate snow cover (generally 4 to 6 inches) begins to accumulate. An OSV's tracks and weight tend to increase the density of the trafficked snow layer. This densification makes the snow layer considerably stronger and works to 'armor' the underlying terrain. This is the essence of trail grooming practices, but even the weight of snowmobiles or other tracked OSVs being ridden prior to grooming can cause this effect and is a particularly important, beneficial contribution to best management practices early in the season.
4. **Twelve-Inch Minimum Rule Only Appropriate in Very Limited Circumstance:** There is a very limited circumstance when a minimum of 12-inches of snow cover is a recommended best management practice. Primarily, this is a recommended practice only related to allowing OSV operation in watersheds with 'severely burned soil and detrimentally compacted, eroded and displaced soil.' Outside this situation, any area-wide 12-inch minimum snow cover rule is generally considered unnecessarily restrictive.

Thank you for the opportunity to comment on this Preliminary EA which clearly shows that there has been no significant damage to the SNF from snowmobiling. We believe that past and current management has worked well – which should enable snowmobiling and OSV use to continue being a viable and important recreation activity on the SNF for Wyoming residents as well as our many visitors who help support the winter economy. We look forward to continuing to work with SNF staff as this process moves forward. Please add me to your contact list and feel free to contact me if you have any questions or need additional information.

Sincerely,

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