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BUREAU OF LAND
MANAGEMENT
CASPER FIELD OFFICE

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September 8, 2006

Casper RMP Revision
2987 Prospector Drive
Casper, WY 82604-2968

Dear Revision Team:

I am submitting the following comments regarding the Draft Casper Resource Management Plan and Environmental Impact Statement (EIS) on behalf of the Wyoming State Snowmobile Association (WSSA). While there are not large snowmobiling opportunities across the Casper Field Office Planning Area due to inconsistent snow conditions at lower elevations, there are, nonetheless, very key pieces of BLM property that provide important linkages between private, state, and county lands that comprise the 49-mile Casper Mountain/Muddy Mountain Snowmobile Trail System. Therefore, this planning process is important to our members.

After reviewing this Draft EIS, our observation is that snowmobiling has received very little, if any, substantive attention by this planning process. In the list of "Associations and Councils" and "Clubs/Alliances/Societies/Groups" in Appendix C - Public Involvement, Consultation, and Coordination, both the **WSSA** and the local Casper Snow Gypsies Snowmobile Club are noticeably absent from the list of those consulted by BLM thus far in this process. While we only recently became aware of this planning process, we are hopeful our participation from this point forward will help to ensure snowmobiling is properly recognized in the final plan.

Generally, snowmobiling appears to be generically buried within the context of off-highway vehicles (OHVs) throughout the draft document. We would suggest that this is inappropriate. Appendix R - Clarification of Off-Highway Vehicle Designations and Travel Management in the Bureau of Land Management Land Use Planning Process distinguishes snowmobiling use from that of other wheeled OHVs (III Planning for Snowmobile Use on Public Lands, page R-16). This planning document should make this distinction as well.

Additionally, obscured within the Glossary in Volume 2 [page Glossary 7 - Off-Highway Vehicle (OHV) Management Designations - which is very deep within the overall document (page 557 of 568 total pages)], it states, "The BLM recognizes the differences between ORVs and over-snow-vehicles [snowmobiles] in terms of use and impacts. Therefore, travel by over-snow vehicles will be permitted off existing routes and in all

open or limited areas (unless otherwise specifically limited or closed to over-snow vehicles) if they are operated in a responsible manner without damaging vegetation or harming wildlife.” This is important policy that should be noted earlier in the document: in discussions and descriptions about various management alternatives in Chapter 2 and the Affected Environment in Chapter 3, versus only in the Glossary

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Specifically, we request that clarification be made as follows in Table 2-3 on pages 2-72 through 2-74

- Record # 6068 Add language to each alternative to clarify that snowmobiles are permitted off existing roads and trails, unless otherwise specifically limited or closed
- Record # 6069 Add language to each alternative to clarify that snowmobiles are permitted off designated roads and trails, unless otherwise specifically limited or closed (only the Muddy Mountain EF.41 In Alternative E, please clarify that the bullet statement “new roads and trails would be approved on a case-by-case basis until completion of the Casper Field Office Transportation Plan” may also apply to additional new snowmobile trails
- Record # 6070 The “4 ½ miles of snowmobile trails” referenced in Alternative A are critical to the overall Casper Mountain/Muddy Mountain Snowmobile Trail System While 3 ½ miles may seem small and relatively insignificant to some, it represents nearly 10% of this popular trail system We would suggest reiterating this language in Alternative E to ensure proper emphasis is given to retention of these connector routes
- Record # 6071 Please clarify whether the Poison Spider OHV Park is open to snowmobiles since current language is somewhat conflicting [Alternative A states “open to OHV use (ATV, motorcycles, and 4x4 vehicles),” while Alternative E simply states “open to OHV use”] Additionally, we would suggest that the statement “An additional OHV Park would be considered The area would be open to all motor vehicles” should consider the need for open snowmobiling play areas, not just another park for only wheeled OHVs Since the policy in the Glossary which was mentioned above allows snowmobile travel in “open areas,” which the Poison Spider area is, we presume this includes snowmobiles whenever snow conditions might allow?

In the discussion of “OHV Use and Environmental Concerns” on pages 3-102 and 103, we would suggest adding a new paragraph that clarifies snowmobile use and the management differences/lack of restrictions as compared to wheeled OHVs While low or infrequent snowcover generally limits snowmobiling in much of the planning area, the trails on Muddy Mountain, as well as periods of time when there is sufficient snow cover elsewhere across the area, provide important recreation opportunities for snowmobilers that deserve to be properly noted

On page 3-110, under Poison Spider OHV Park, there is a laundry list of OHV use opportunities listed for the area that states, “ including motorcycle use, all-terrain vehicle use, enduro racing, jeep competition events, and trail events ” Again, please clarify that snowmobiling is (should be) allowed when snow conditions permit

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Thank you for this opportunity to comment on this important planning process. Please ensure that **WSSA** is added to your mailing and notification list for future steps in this process. Also, please add the local Casper Snow Gypsies snowmobile club to your distribution list. Their address is: Casper Snow Gypsies, P.O. Box 3301, Casper, WY 82602.

If you have any questions or need additional information, please feel free to contact me at (307) 259-1909

Sincerely,



Greg Hill, Vice President / Legislative Chairman
Wyoming State Snowmobile Association
P O Bo; 1858
Casper, WY 82602

cc: Casper Snow Gypsies
WSSA Board of Directors