



WYOMING GAME AND FISH DEPARTMENT

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December 2, 2008

WER 8303
Forest Service
Greys River Ranger District
Star Valley Ridge Riders Annual Snowmobile
Hill Climb in Phillips Canyon
Lincoln County

Jay L. Dunbar
District Ranger
Greys River Ranger District
PO box 339
Afton, WY 83110

Dear Mr. Dunbar:

The staff of the Wyoming Game and Fish Department has reviewed the Star Valley Ridge Riders Annual Snowmobile Hill Climb, in Phillips Canyon, on the Greys River Ranger District. We offer the following comments.

We have worked closely with the Forest Service in the development of mitigation measures and a comprehensive motorized winter travel plan to provide snowmobile recreation while protecting crucial wildlife winter ranges in the Salt River Watershed. We have worked closely with the Forest Service and local snowmobile clubs to identify issues, formulate comments, and negotiate a final mitigation and travel management package regarding snowmobile use in the Salt River Watershed. As a result of these efforts, our concerns and the need for a comprehensive winter travel plan are summarized in our letters (see attached) dated December 7, 1993, June 13, 1994, January 30, 1996, May 23, 1996 and November 4, 1996. We encourage the Forest Service to incorporate these recommendations as a precondition for issuance of the 2009 special use permit and implement the comprehensive winter travel plan for the Salt River watershed which was approved by the responsible agencies and concerned parties in October 1996.

We support the issuance of a special use permit only on a year-by-year basis for the proposed Star Valley Maverick Challenge Hill Climb request. In addition to our previous letters we offer the following information regarding wildlife.

The proposed project area is designated as crucial winter/yearlong range for the Afton Elk Herd, Wyoming Range Mule Deer Herd, and Sublette Moose Herd. The project area is within an important daily and seasonal big game migration corridor and parturition area. In

addition, the area is utilized by black bears and mountain lions. Black bears are suspected to build winter dens on the steeper, heavily timbered, north exposures in the general vicinity of the project area. The area has been used as a travel corridor by wolverines.

We have invested considerable resources in the development of the existing Forest Plan, which addresses motorized travel within important wildlife habitats (i.e. DFC 10, 12). The original intent of WGFD and USFS efforts was to insure the integrity of such areas for the duration of the Forest Plan. Since the 1993 and 1996 environmental review process was initiated for the annual Afton snowmobile hill climb, we have advocated motorized winter travel planning that would provide protections for wildlife populations and crucial habitats throughout the entire Salt River watershed. These protections include, but are not limited to, adoption of the most current big game seasonal range designations, restricting motorized travel to designated routes, closure of crucial wildlife winter ranges to snowmobile travel as outlined in the Forest Plan (i.e. DFC 10 and 12; LRMP, p. 124). Lastly, incorporation of the comprehensive winter travel plan for the Salt River watershed, as outlined in the October 9, 1996 Environmental Assessment, would provide protection of crucial wildlife winter ranges for the long-term.

While much has changed in terms of the level of human development and increased snowmobile use in the Salt River watershed since the late 1980s, the importance of the west facing slopes of the Salt Mountain Range as big game winter range has not. The importance of winter ranges from Alpine to Smoot has likely increased, due to the inevitable fragmentation of the landscape by increased housing developments and other forms of human encroachment. Due to the current and projected impacts of human development in the Star Valley area, we believe it is time to offer a comprehensive level of protection to crucial wildlife winter ranges.

Big game herd unit objectives are vital to the maintenance of big game population levels for those herds that use USFS-administered lands. We want to continue to work cooperatively with the USFS to ensure that habitats are maintained to enable population objectives. We believe the issues identified in our 1993 and 1996 letters are vital to the conservation of wildlife populations and crucial habitats. Consequently, human use restrictions governing snowmobile activities should be applied to big game crucial winter ranges (November 15 – April 30). We recommend that all snowmobile activities be prohibited in areas designated as big game crucial winter ranges during the periods identified in the LRMP, except on the specified hill climb site in Phillips Creek, and on designated routes identified in the October 9, 1996 EA. We recommend prohibiting snowmobile travel on crucial big game winter ranges south of Swift Creek that are currently open to snowmobile travel.

The proposed project area lies within Management Areas 33 and 34 as identified in the LRMP. The designation of how this area should be managed is categorized as Desired Future Conditions (DFC) 10 and 12. The following BTNF Standards and Guidelines should be analyzed during the development of the Decision Document:

1. Elk Security and Habitat Effectiveness Standard

2. Big Game Winter Range Standard
3. Identification of Mitigation Measures
4. Big Game Habitat Guideline
5. Analysis of Cumulative Impacts
6. Desired Future Condition 12. Backcountry Big-Game Hunting, Dispersed Recreation, and Wildlife Security Areas – The general theme of areas designated DFC 12 in the LRMP are “managed for high quality wildlife habitat and escape cover, big game hunting opportunities, and dispersed recreation activities” (LRMP, page 241). Livestock grazing is permitted on other big-game ranges if it does not conflict wildlife needs.” (LRMP pgs. 241-242).
7. Desired Future Condition 10. The theme for areas designated as DFC 10 is “an area managed to allow for some resource development and roads while having no adverse and some beneficial effects on wildlife (LRMP, p. 233). The management emphasis for Management Prescription 10 is “to provide long term and short term habitat to meet the needs of wildlife managed in balance with timber harvest, grazing, and minerals development. All surface-disturbing activities are designed to have no effect or beneficial effects on wildlife...” (LRMP, p. 235).
8. Management Prescription 12. Management Emphasis - “Management emphasis is on providing such important habitat for big-game as winter ranges, feedgrounds, calving areas, and security areas. Management provides for habitat capability and escape cover, and maintained semi-primitive, non-motorized opportunities that emphasize big game opportunities ” (LRMP, p. 242).
9. Management Prescription 12. Fisheries and Wildlife Prescription – “Habitat will be managed to help meet the game populations, harvest levels, success, and recreational-day objectives, and to fully achieve the fish populations, harvest levels, success, and recreation-day objectives identified by the Wyoming Game and Fish Department and agreed to by the Forest Service.” (LRMP, p. 243).

We would like to be active participants and cooperators in the development of a final Decision Document. Our personnel stationed in the Jackson Regional office have the expertise to address wildlife and habitat related issues as they may pertain to this proposal. Please do not hesitate to contact Regional Supervisor Tim Fuchs to coordinate any requests for information.

Mr. Jay L. Dunbar
December 2, 2008
Page 4 - WER 8303.00

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Scott Gaur".

for JOHN EMMERICH
DEPUTY DIRECTOR

JE:SG:gfb

cc: USFWS