



## WYOMING GAME AND FISH DEPARTMENT

5400 Bishop Blvd. Cheyenne, WY 82006

Phone: (307) 777-4600 Fax: (307) 777-4699

[wgfd.wyo.gov](http://wgfd.wyo.gov)

GOVERNOR  
MATTHEW H. MEAD

DIRECTOR  
SCOTT TALBOTT

COMMISSIONERS  
T. CARRIE LITTLE – President  
KEITH CULVER – Vice President  
MARK ANSEMI  
PATRICK CRANK  
RICHARD KLOUDA  
CHARLES PRICE  
DAVID RAEI

---

December 16, 2016

WER 8303.00c  
Bridger-Teton National Forest  
Greys River Ranger District  
Star Valley Ridge Riders  
Phillips Canyon  
Snowmobile Hill Climb Event  
Teton County

Richard Raione  
District Ranger  
Greys River Ranger District  
671 N. Washington  
Afton, WY 83110

Dear Mr. Raione,

The staff of the Wyoming Game and Fish Department (WGFD) has reviewed the Phillips Canyon Snowmobile Hill Climb Event in Teton County. We offer the following comments for your consideration.

### **Terrestrial Considerations:**

We have provided written comments regarding the Phillips Canyon Snowmobile Hill Climb, as well as snowmobile travel on crucial wildlife winter ranges in the Star Valley area in letters dated December 7, 1993, June 13, 1994, January 30, 1996, May 23, 1996, November 4, 1996, December 2, 2008, November 23, 2009 and February 11, 2011. In previous discussions with Greys River Ranger District personnel we have expressed our concerns about the importance of maintaining the integrity of crucial big game winter ranges by restricting snowmobile travel in these areas, located in the Salt River watershed. We continue to encourage the BTNF to incorporate these recommendations as a precondition for issuance of the 2017 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. Please see our most recent comments below as they still pertain to our concerns with the proposed activity.

**Previous Comments (February 2011) with updated 2015 Amendment pages:**

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 suspected seasonal and parturition areas. 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.

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 is crucial. Due to the level of impacts and associated habitat fragmentation caused by human development in the Star Valley area, we believe it is time to offer a comprehensive level of protection to crucial wildlife winter ranges.

We have invested considerable resources in the development of the existing Forest Plan, which addresses motorized travel within important wildlife habitats. The original intent of WGFD and BTNF 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, and closure of crucial wildlife winter ranges to snowmobile travel as outlined in the Forest Plan. 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.

Therefore, we support the issuance of a special use permit only on a year-by-year basis for the proposed Star Valley Maverick Ridge Riders' Snowmobile Hill Climb request. We recommend that the following BTNF Standards and Guidelines be analyzed during the development of the Decision Document:

- Elk Security and Habitat Effectiveness Standard
- Big Game Winter Range Standard
- Identification of Mitigation Measures
- Big Game Habitat Guideline
- Analysis of Cumulative Impacts

- 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 319).
- 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. 310).
- 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. 322).
- 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. 322).

The WGFD would like to continue to be active participants and cooperators in the development of wildlife concerns associated with this permit.

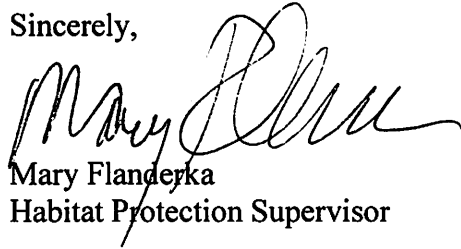
**Aquatic Considerations:**

We have no aquatic concerns pertaining to the snowmobile hill climb event.

Thank you for the opportunity to comment. If you have any questions or concerns, please contact Gary Fralick, Jackson Region Wildlife Biologist, at 307-883-2998 or Brad Hovinga, Jackson Region Wildlife Supervisor, at 307-733-2383.

Richard Raione  
December 16, 2016  
Page 4 of 4 - WER 8303.00c

Sincerely,

A handwritten signature in black ink, appearing to read "Mary Flanderka". The signature is fluid and cursive, with the first name "Mary" being more legible than the last name "Flanderka".

Mary Flanderka  
Habitat Protection Supervisor

MF/lc/ns

cc: USFWS  
Chris Wichmann, Wyoming Department of Agriculture, Cheyenne  
Rob Gipson, WGFD, Jackson Region  
Gary Fralick, WGFD, Jackson Region  
Brad Hovinga, WGFD, Jackson Region