

**From:** [Dan and Erinn](#)  
**To:** [FS-travel-comments-rocky-mountain-shoshone](#)  
**Subject:** shoshone travel plan  
**Date:** Monday, June 20, 2016 9:56:53 PM

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Dear Sir or Madam,

I am writing to express support of the proposed winter motorized use season dates - these dates help minimize impacts to wildlife, eliminate conflict between motorized and non-motorized recreation on the Beartooth Pass, and align with management on neighboring forests. As a human-powered skier that frequents Beartooth Pass, I have experienced busy days in late May or early June when there can be a hundred or more backcountry skiers and snowboarders enjoying the area. Use is concentrated where skiers and snowboarders access the Gardner Lake Basin, High Lakes WSA, and the Rock Creek Headwall in Montana. Until the snow melts in July there is also snowmobile use. Snowmobiles travelling up or down on the same slopes as skiers and snowboarders create a serious safety hazard, particularly in the Gardner Lake Basin. This includes snowmobiles used to tow or haul skiers up the slopes. Snowmobiles travelling above skiers can start sloughs or avalanches that could harm/kill downslope skiers, particularly in summer months when snow and cornices become wet and heavy. Human-powered skiers disproportionately bear the brunt of noise, exhaust, potential for harmful/fatal collisions, and user conflict when compared to snowmobile users that travel through a shared use zone at a higher rate of speed. Snowmobiles should not be allowed to operate during spring/summer months in popular ski areas along and near Beartooth Highway.

The Shoshone NF should review mapped ski routes on the following website <https://www.powderproject.com/directory/7000062> and evaluate potential safety issues and user conflicts that could occur by allowing snowmobile operations in areas frequented by skiers or other non-motorized uses. Such conflicts should be avoided whenever possible. For the most part, the Proposed Action does a good job of avoiding conflict through the winter motorized use season dates. Any additional alternatives should take a similar approach.

One other Beartooth Highway safety issue during summer months is a lack of parking near popular ski areas, particularly near Long Lake and the top of Gardner headwall. The Shoshone NF should work with the National Park Service and Federal Highway Administration to get more paved pullouts constructed/established along Beartooth highway and to ensure they are plowed out to accommodate parking in May and June. Without adequate parking areas, people tend to park off the side of the highway and vehicle tires damage soils and vegetation. Vehicles also get stuck in unplowed parking spots, often creating a hazard for others travelling the highway.

I support ongoing operations at Beartooth Basin and Sleeping Giant ski areas. These are small area that offers a unique recreation experience amidst majestic settings. Beartooth Basin and Sleeping Giant ski areas offer a historic glimpse into the past of local ski history and are probably eligible for listing on the National Historic Register. Please ensure that the Proposed Action and any alternatives allow/encourage continued operations at and motorized access to Beartooth Basin and Sleeping Giant ski areas needed to continue such operations.

I support the proposal to prohibit motorized use, with the exception of grooming equipment, on and around the Deception Creek and Pinnacles cross-country ski trails on Togwotee Pass.

I oppose designating the Sublette Pass trail as a winter motorized route. This trail has traditionally been used by, and managed for, skiers. Mixing skiers with high-speed

snowmobile travel is a safety issue. Skiers disproportionately bear the brunt of noise, exhaust and user conflict when compared to snowmobile users that travel through a conflict zone at a higher rate of speed.

Overall, the Shoshone should include a minimum snow depth restriction of 18 inches to ensure that over-snow vehicle use is only occurring when there's enough snow to protect the underlying vegetation. This is particularly important in alpine areas where there are fragile tundra plants or rare/sensitive high elevation plant species and plant communities. Many of these areas become scoured of snow during winter and can be damaged by snowmobile travel across sections of open ground during all seasons of the year. Generally low moisture snow that accumulates on the Shoshone NF does not pack as well as higher moisture snow, thus making an 18 inch minimum more critical to prevent tree tops from being sheared off by snowmobile travel and damage to other vegetation and to soils.

Wilderness trespass by over-snow vehicles is a common and persistent occurrence on the Shoshone National Forest and has been documented in the Absaroka-Beartooth, Teton, Washakie, and Fitzpatrick Wilderness Areas. Wilderness trespass is obvious violation of the 1964 Wilderness Act and the Shoshone Travel Plan should include strategies to eliminate this persistent problem affecting the experience of other forest users. Signs along the Beartooth Highway (US 212) near the Montana/Wyoming border should be better placed and better maintained where the highway is adjacent to designated wilderness. Due to sections of the highway being scoured free of snow, snowmobile trespass into the edges of the Absaroka-Beartooth Wilderness near the Montana/Wyoming border is fairly common as snowmobiles attempt to bypass snow-free sections of the highway. There is also a section of the Absaroka-Beartooth Wilderness where snowmobiles sometimes travel between Glacier Lake Road in Montana, through the Wilderness and High Lakes Wilderness Study Area, to Highway 212. This area needs signs and/or increased law enforcement patrol.

The Wyoming Wilderness Act of 1984 (sponsored by Congressman Dick Cheney) designated the 147,000-acre High Lakes Wilderness Study Area. The Act states “*snowmobiling can continue to be allowed in the same manner and degree.*” However, in the last twenty-five years snowmobile technology has advanced dramatically and the sport’s popularity has grown. Today, snowmobile activity within the High Lakes WSA far exceeds the “*manner and degree*” of the snowmobile activity occurring in 1984 resulting in the area’s wilderness character being seriously degraded and its Wilderness eligibility jeopardized. The Shoshone Travel plan should protect the wilderness character of the High Lakes WSA (as mandated by the United States Congress) and reduce impacts to the wildlife populations (wolverine, lynx, etc.) by limiting snowmobile activity within the Wilderness Study Area to the level and degree of 1984. If alternatives to the proposed action are devised, they should all ensure compliance with the wilderness act and ensure protection of wilderness characteristics of Wilderness Study areas.

Please keep me apprised of future progress and project updates associated with the Shoshone Travel Plan.

Sincerely,

Dan Seifert





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