

Togwotee Backcountry Alliance

July 21st, 2016

Rob Robertson
Washakie District Office
333 East Main Street
Lander, WY 82520

Re: Shoshone National Forest Travel Management #48573

Cc: Joe Alexander, Olga Troxel, Rick Metzger, Sue Stresser, Steve Schacht

Dear Mr. Robertson,

Thank you for the opportunity to comment on the proposed action for the summer and winter travel management planning. My name is Charlie Manganiello, director of the Togwotee Backcountry Alliance (TBA). We are a group of 60 backcountry skiers, snowboarders, snowshoers interested in promoting and protecting non-motorized winter recreation on Togwotee Pass. Our hope is to create a shared space of balanced recreational use that is safe and free of conflict, envisioning future designations to maintain pristine backcountry opportunities. Non-motorized recreational user groups include nordic and backcountry skiers, snowboarders, and snowshoers who frequent Togwotee Pass.

After reviewing the proposed action, we are in support of the following:

- Winter motorized use season dates – these dates help minimize impacts to wildlife, eliminate conflict between motorized and non-motorized recreation on the Beartooth Plateau, and aligns with management on neighboring forests.
- Closing the areas around the Deception Creek and Pinnacles cross-country ski trails on Togwotee Pass.

After reviewing the proposed action, we oppose the following:

- Designating the Sublette Pass trail as a winter motorized route. This trail has traditionally been used by, and managed for, skiers.

After reviewing the proposed action, we would like to propose:

- The Shoshone winter travel plan 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.
- More education for both non-motorized users and motorized user groups. Both groups need to work together, find common ground, and respect the area we all like to recreate on. In recent years, Togwotee specifically, has seen an increase in both user groups and I have personally seen conflict. We propose an

informational kiosk at the Two Ocean parking lot with maps of designated areas of use, closures, and proper backcountry etiquette. It is our hope to someday have your approval to put up such a kiosk with the work of our organization and the motorized community.

Please refer to map attached for areas concerning the TBA's comments.

We recognize the Shoshone National Forest has beautiful winter recreation opportunities for both non-motorized and motorized user groups and we want to keep it that way for everyone. In the wake of new technology for ski equipment and snow machines, the winter recreation scene has changed drastically in the last 5-10 years. User group numbers are obviously up and growing each year. The proposed action is a great first step in managing the increase of users, but we need to do more to help protect the land and people's experience in the backcountry.

Just like snowmobilers have access to groomed trails free of skiers, skiers should have access to quiet backcountry places to recreate free of snowmobile tracks and noise. However, these don't have to be mutually exclusive - we also need to coexist in shared use areas. Although the Shoshone has designated Wilderness areas it's challenging to police those boundaries and it is also hard for skiers to get back to those areas in a one-day outing. Even worse, in past years nordic skiers have been negatively affected by snowmobilers who track up groomed trails specially designed for nordic skiers. It's not right when one user group's activity prevents another from enjoying the National Forest.

Snowmobilers are going further and deeper into the backcountry and the popularity of backcountry skiing is growing and while ski equipment gets lighter each year. Skiing used to be prohibited to expert skiers only on telemark skis and not too long ago snowmobilers were confined to stay on groomed trails or they would quickly find themselves buried for hours.

Togwotee pass is no doubt a hot spot for snowmobilers, but it's also a very popular place for backcountry skiing. It's the closest backcountry area for Fremont County residents and popular with Teton County residents as well. It is often during the early season months that Teton County resident's frequent Togwotee Pass because of the early snow at higher elevations when the Tetons haven't filled in yet. In short, there are a lot of people recreating on Togwotee at one time with little to no regulation or self-policing. I think that's what makes Togwotee Pass so great, but we are kidding ourselves if we think we can sustain that current plan with the increase in visitor numbers. In the past there were so few people it didn't really matter. Now it does.

Snowmobilers want to be able to cruise without worrying about skiers and skiers want to enjoy the slopes without any concern of being run over by a sled. The biggest problem area for skier-snowmobiler conflict is Two Ocean peak. It is our hope to get an informational kiosk installed at the parking area. We want the snowmobile community and the non-motorized community to know how to interact in the backcountry and treat their fellow backcountry users with respect and the land with respect. We feel both user

groups are guilty of poor behavior on Togwotee and education must be a priority in the proposed action. We would also propose a beacon check system at the kiosk, like the one Teton Pass has. This would help to promote safe practices in avalanche terrain.

I appreciate your time and consideration with my comments. Thank you for your hard work on the summer and winter travel management planning as well as your work on the proposal. This isn't easy work and you are appreciated. Please let me know if you have further questions or need any clarification.

Respectfully,

A handwritten signature in black ink, appearing to read 'Charlie Manganiello', with a long horizontal flourish extending to the right.

Togwotee Backcountry Alliance Director
Charlie Manganiello