

From: [REDACTED] on behalf of Kyle Duba
[REDACTED]
Sent: Saturday, December 09, 2017 6:39 AM
To: FS-travel-comments-rocky-mountain-shoshone
Subject: Commenting on Shoshone National Forest travel management

Dear Rob Robertson,

Thank you for the opportunity to provide feedback on the proposed action that the Shoshone National Forest has developed for it's winter travel plan. As a backcountry skier, I am particularly interested in over-snow vehicle travel planning and that is the aspect of the proposed action that I am providing comment on here.

As the Shoshone develops it's winter travel plan I hope that the Forest Service will consider how non-motorized winter recreationists use the forest and draft a plan that will minimize conflict between non-motorized uses like skiing and motorized uses like snowmobiling. Although much of the Shoshone is mountainous, snowy, and wild there are actually only a couple of places on the forest that have the magic combination of snow, terrain, and accessibility that backcountry skiers seek for our everyday adventures. These areas are Togwotee Pass and the Beartooth Pass. Other areas of the forest provide excellent skiing as well, but those more remote places generally require more time and effort to access, or have less reliable snow, making them less popular with the majority of the backcountry ski community.

To minimize conflict between skiers and snowmobilers on Togwotee I support keeping the area around the cross-country ski trails that DART grooms non-motorized (while continuing to allow administrative OSV use for grooming purposes). These cross-country ski trails provide a quiet recreation opportunity that is valued by Dubois residents and not designating this area for OSV use will protect the grooming efforts. I also suggest that the Shoshone work with Togwotee Backcountry Alliance to develop educational materials to help minimize conflicts between different uses on Togwotee.

I support the Shoshone's proposal to set season dates for snowmobile use. However, the dates as proposed are variable and confusing. For consistency, I recommend that the OSV season across the forest start on December 1 and end April 30, with an extended spring season on the Beartooth plateau

that ends May 15. This longer Beartooth season allows snowmobilers to continue riding on the plateau for much of the spring yet respects the longstanding tradition of human-powered spring skiing in the Beartooths once the road opens and protects the fragile tundra on the plateau as the snow melts.

Speaking of the Beartooths, I am concerned about the Shoshone's proposal to designate the entire High Lakes Wilderness Study Area as open to over-snow vehicle use. The Forest Service is required to manage this area to maintain the wilderness character that existed when the area was designated as a WSA (in 1984) and can only allow snowmobile use in the "manner and extent" that occurred at that time. Snowmobiles are far more powerful machines today than they were in the early '80's and travel much further, in all conditions, than they did back then. To comply with the Wyoming Wilderness Act you should limit the spatial extent of where snowmobiles can go within the WSA - keeping use near the designated trail network.

I applaud the Shoshone for writing a winter travel plan. This is an opportunity to proactively manage winter recreation use on the forest - striking a balance between providing ample quality motorized recreation opportunities with those for non-motorized uses like skiing, and ensuring that forest resources are protected in the process.

Thank you,

Sincerely,
Kyle Duba

[REDACTED] [REDACTED]
[REDACTED]