Shoshone National Forest Travel Management Planning Staff

9/1/20

Dear Planning Team:

I would like to thank you for allowing the public to comment on the Shoshone Forest Travel Management planning process.

I have personally been involved in the High Lakes Beartooth mountain range and the Shoshone Forest personnel for about 20 years. I have also been riding snowmobiles in this area for about 30 years. My comments on your Preliminary Environmental Assessment (EA) are as follows:

I generally support parts of Alternative 2: my exceptions to this alternative are listed below.

While I believe that the season dates should be flexible depending on adequate snow per season I could get behind the dates of November 1st through May 31st for the North Zone (Beartooths) and the Wind River (Dubois) Districts. I can also support the dates of December 1 through May 31 for the Washakie (Lander) District. The dates are reasonable since there is always adequate snow for snowmobiling in these areas during these times, this is supported by the SNOTEL data presented in your EA.

I also oppose the proposed 12-inch minimum snow depth before snowmobile use or trail grooming is allowed. The 2015 OSV rule only requires that there be “adequate” snow depth for OSV use. Snow depth is too variable depending on wind and weather conditions. This is also supported by the SNOTEL data presented in your EA. This decision would create an unwelcome tool for environmental and nonmotorized groups to try to shut snowmobiling down when there is actually adequate snow to snowmobile.

I highly support keeping the High Lakes Wilderness Study Area open to snowmobiling as proposed in Alternative 2. Congress made it clear that snowmobiling should be allowed to continue in this area so that is how it should remain. This is also supported by your EA analysis. Use patterns truly have not changed significantly since the 1970s. I am very opposed to closing the northern and eastern portions of the High Lakes as proposed in Alternative 3. The environmental groups as well as nonmotorized groups already have 80% of the Shoshone Forest for their exclusive nonmotorized use and the keep wanting to close more of our very limited area that is open to snowmobiling.

I oppose allowing full-sized vehicles equipped with tracks to use the snowmobile trails. These vehicles are too heavy and too wide to use the trails. They will cause trail damage and create safety concerns.

I support adding the new ungroomed Ghost Creek trail from to the Painter Store in the Beartooths. This would be a great addition to our current trail system and would benefit the Crandall area as well. This could decrease the congestion at the junction parking area as well.

I also support adding the ungroomed trails in the Sublette Pass area near Togwotee Pass to your mapped trail system since they’ve actually existed and been signed on the ground for decades.

I support allowing OSV operation on snow-covered roads outside the designated OSV season dates. Allowing OSV use on designated wheeled routes will keep public access open to roads and trails for hunters and trappers during the shoulder seasons when snow is too deep for trucks, ATVs and UTVs.

Your assessment shows that there has not been any significant damage to the Shoshone Forest from snowmobiling. I believe this shows that snowmobiling is not hurting the forest and that the current management has worked well.

Again, thank you for the opportunity to comment. Please add me to your contact list.

Sincerely,

Bert Miller

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