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Comments: [External Email]Shoshone NF Travel Management Planning Project

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Dear Supervisor Timchak,

I'm writing to comment on the Shoshone National Forest (SNF) Travel Management Plan. I grew up in eastern NE, have family ties to Wyoming, and we vacationed there annually when I was a child. Living in Billings for the past 40 years, I appreciate Billings' location as it allows me easy access to wild lands in both Montana and Wyoming.

I start with this: while I found this email address on the SNF website, what looked like a link for commenting was either broken, disabled or lit up like a link in error. I have commented on other plans through the BLM and USFS. I've never seen an email address lit like a link and yet not be a link. The blue lit email address that appeared to be a link was SM.FS.shonfcomment.usda.gov. This type of error could be interpreted as disingenuous. If someone is going to comment and tries to expedite the process by using the address as a link (due to its blue color, all other blue lettered words on the page are links), they will find it is not a link and they will need to enter the address manually. This small inconvenience may prevent people from commenting.

First, I'd like to comment on OSV/ORV and auto use on the Beartooth Highway. An annual ritual for my family has been to drive over Beartooth Pass as soon as it is reopened in the Spring. This has historically been around Memorial Day Weekend. Since my children were infants, we'd pack a picnic lunch and drive up to view the beautiful landscapes, the snowpack, and all the early season sights that travel across the Beartooth Pass offers. The children would get out and marvel at the snow depth in certain places, we'd watch for wildlife, and we'd all enjoy seeing skiers brave the headwalls. Many times, we'd pick up skiers needing a lift from the Gardner Headwall parking area and ferry them up the switchbacks to the pull-out where they could hike to the top of the headwall for another run. My children have all grown and flown but I still go up the first weekend the pass is opened. Some years are busier than others however this year, 2021, I was appalled at the number of vehicles and their disregard for the landscapes where they parked. I was also very troubled by the ORV and OSV use at the Gardner Headwall parking area and across the road where there is no designated parking. There were OSVs driving from the base of the headwall to the parking area and from the parking area to an area close to the top of the headwall. Occasionally they would ferry skiers up. While there was snow on the headwall itself, the snow was melting off and spotty along the sides of the highway. The soil was wet from the melted snow. I took numerous photos to document this problem and posted them on social media. I returned at dawn the first business day following the holiday weekend and took more photos of the tracks, gouges, and trash left by the weekend crowd. I was contacted by a regional journalist and sent him the photos. I contacted the USFS office in Red Lodge but was told that this was a WY problem as the Gardner Headwall is in WY, thus under the jurisdiction of Shoshone National Forest. I was also instructed by retired USFS friends to send my photos to Mark Foster with Shoshone National Forest. I talked to Mark on the phone, then sent him photos. He said they'd be used for 'education'. I asked why no one from the USFS was up there monitoring the situation, perhaps directing traffic. I was told there

was someone up there from SNF over the weekend. I did not see them. I have attached 6 photos for your perusal. I have more if you would care to see them.

I've been told this has happened before. I've also been told there's nothing that can be done. At the commenting Zoom meeting, I was told that it was skiers driving the snowmobiles and ORVs. That was not my observation. I saw no drivers of any of the OSVs or ORVs stop to ski.

I realize that this was a holiday weekend that marked the beginning of the summer, following a year of people being isolated due to COVID. I have been told that overcrowding at this site has been a problem in the past. While the lot is usually full, I have never seen vehicles parked off the side of the road on the north or so blatantly parked off the parking lot area. If this is a common problem, and the USFS doesn't have the personnel for monitoring the site, why was not the WY Highway Patrol notified and asked for assistance?

On my trip over the Pass, I also saw people camping near a pullout on the southeast corner of Long Lake. It was not a designated campsite, yet there was a camper on the blacktop, along with a large trailer, with OSVs parked on the ground nearby. The lake appeared to still be frozen and had thinning ice.

It seems clear that the USFS is either too short-staffed or uncomfortable monitoring crowds, pointing out damage to the landscape, and limit-setting. The crowd on the Beartooth over Memorial Day weekend didn't appear to be interested in anything but their personal enjoyment. That said, how can USFS staff be supported in enforcing unpopular rules? And this begs the question, if this fragile landscape can't be protected, why should additional temptations be added?

It appears quite obvious that SNF has limited resources. I would urge the USFS to prioritize enforcement and maintenance of existing roads and trails, not add new ones when there will be no chance of protecting the landscape.

The High Lakes WSA is literally across the road from segments of the Beartooth Pass. If the current OSV season runs from November 1 to June 15, this needs to be shortened to reflect current and potential snowpack. I urge you to consider changing the SNF OSV season to run Dec 1 to April 30. While this is a shorter season, we can no longer count on heavy snows in November and late snows with cool temperatures in the spring. After viewing the Gardner Headwall, we can also not count on restraint on the part of OSV/ORV users. These landscapes and the wildlife they contain are stressed enough with temperature increases and moisture decreases. Predictions are they will continue and worsen. I do not think it unrealistic to be proactive in anticipating a shortening snowpack season, even in 'rock and ice' areas of the mountains. I refer you to the June 2021 Greater Yellowstone Coalition Climate Report www.gyclimate.org In addition to limiting the forest-wide OSV season, there is increasing OSV use in the High Lakes WSA. The questionable impact of this increasing use deserves ample scrutiny to meet the required 'wilderness character' described in the Wyoming Wilderness Act of 1984. Thus, I ask that you cap and enforce capping of the increasing OSV use in the High Lakes WSA.

Thanks are also in order for seasonal road closures. These not only provide wildlife with a seasonal buffer when conditions become harsh but also provide public safety benefits.

I appreciate being able to comment on this project. Thank you for your attention.

Linda K. Healow

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