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Mark Foster

Environmental Coordinator, Shoshone National Forest

November 18, 2021

Dear Mr. Foster,

Thank you for this opportunity to comment on Travel Planning on the Shoshone National Forest. The Shoshone was the nation's first national forest and is still one of the most special. As part of the Greater Yellowstone Ecosystem the Shoshone has immense importance both nationally and globally for its wilderness, wildlife, scenic and recreational values. Your decision here will echo down through many decades. Will you choose a light touch on the land or a heavy-handed approach?

I've been to some spectacular places on the Shoshone such as the summit of Francs Peak from where I watched 7 grizzly bears flipping rocks to get moths. I camped at Buffalo Bill's old hunting camp, Camp Monaco, and backpacked the long high ridge of the Absaroka Range on the border of Yellowstone and the Shoshone. My wife and I backpacked from Brooks Lake to Younts Peak and the headwaters of the Yellowstone River then onward over Eagle Pass. I've been to the top of Gannett Peak and climbed the spires of the Cirque of the Towers.

I've also been enjoying winter recreation in the Greater Yellowstone region since 1986. I am a self-powered recreationist who likes to earn my turns. Snowmobiles to me are transportation, not recreation. High-powered machines should be limited to a few groomed trails and roads, not allowed free rein since they have a high impact on the winter landscape.

Since I have not skied the Beartooth Pass in a number of years I was not aware until now of the proliferation of snowmobile use in the spring and summer up there. Some places just make zero sense for allowing snowmobiles and timber sleds and other machines. Beartooth Pass is one of them. I have skied Beartooth Pass several times in the spring and it was a quiet experience with only skiers out and about. I reckon that is no longer true.

Please close the snowmobile season on Beartooth Pass on April 30 instead of the proposed June 15 to eliminate the conflict between skiers and snowmobilers and minimize impacts to wildlife and landscape in the spring. There is plenty of access to good skiing from Beartooth Pass without needing a snowmobile. In addition, last spring's opening weekend at Beartooth Pass was a massive mess with hundreds of vehicles disgorging hordes of skiers and riders. There were so many rigs people were driving out into the tundra to park, damaging the alpine plants and soils. People were kite skiing and snowmobiling all over the place. Clearly some limits to use are needed as well as enforcement.

Snowmobiles have become extremely fast and maneuverable. Riders are going into areas that were once the domain of extreme skiers and wolverines. They are dropping off cornices and going down steep chutes. They are hucking cliffs and riding through steep trees. And with the advent of snow bikes or "timber sleds" these riders can go nearly anywhere. Check this Red Bull video and others to see what timber sled riders are doing and how they boast about getting to fresh snow before anyone else.

https://www.youtube.com/watch?v=D1c6W8xbF_s

In the 1990s I worked on a project to document snowmobile trespass into wilderness and other closed areas. We found that snowmobiler trespass was pretty common in places like the Absaroka Beartooth Wilderness, Gospel Hump Wilderness and the backcountry of Yellowstone Park. No doubt it has gotten even more common with so many riders, more nimble machines and minimal or no enforcement by the Forest Service.

All these machines going everywhere mean more competition for a valuable resource - untracked snow. This is what backcountry skiers and snowboarders work so hard for and often compete with one another for - first tracks in powder snow. People on machines are going to get there first, pushing skiers into other areas or ruining their experience altogether.

In the 1980s and 1990s I did a lot of backcountry skiing out of Cooke City Montana into the Beartooth Mountains. We had lot of muscle-powered access to some fantastic, fairly safe terrain with tons of snow. Now all of that area is tracked out by snowmobiles so none of the terrain we used to enjoy is the least bit inviting for skiers or snowboarders. Now you have to go south of Cooke City into the North Absaroka Wilderness, which is still great terrain but it is more difficult to access and more dangerous from an avalanche perspective.

All this riding and skiing everywhere also means that any wildlife still hanging on in those remote areas will be

pressed for space and pushed into yet more remote habitat. Canada lynx, wolverines, mountain goats, bighorn sheep, even hibernating grizzly bears can all be stressed and even driven out of an area by recreation pressure. In British Columbia last winter, some backcountry skiers mistakenly woke a hibernating grizzly bear, which emerged and severely mauled one of the skiers. In Grand Teton National Park, managers are considering closing parts of the park to backcountry skiing to protect the wintering bighorn sheep.

Climate change is another major factor affecting winter recreation, snowpack and wildlife. As snowpacks shrink and the length of snow season shortens, snow-dependent wildlife like lynx and wolverine are pressed into less habitat, at the same time that recreationists are scrambling to find snow in some of those same places.

As I look out my window here in Bozeman Montana there is almost no snow on the mountains in mid November, nor is there any snow in the forecast. Much of the West is in severe drought especially the Rocky Mountains. So when the snow does finally come people will swarm all over the mountains with their toys.

Snow is also melting off earlier leaving soils and plants exposed to damage by human travel on skis, snowmobiles and other machines. High elevation plants like those found at and above treeline grow very slowly and one timber sled riding over a tiny tree can set its growth back decades.

Please note that grizzly bears are expanding their range in Wyoming east and south of Yellowstone. More bears plus more people on the landscape are a dangerous mix. Motorized and mechanized recreationists move faster and while they do not spend as much time in one area they are more likely to encounter a wild animal like a grizzly bear due to their speed and their attention being focused on the trail instead of their surroundings. In Montana in recent years, mountain bikers have been mauled and even killed in surprise encounters with grizzlies.

The High Lakes Wilderness Study Area should be managed as a possible future wilderness to protect its wilderness character and allow people and wildlife a serene place to go. The Wyoming Wilderness Act should be adhered to and snowmobile use in High Lakes should be reduced rather than increased as proposed.

Overall I am extremely concerned about the Shoshone proposing to add new motorized routes. Motorized recreation has an oversized impact on the land and should be limited wherever possible. Please do not add any new motorized routes especially near the Fitzpatrick Wilderness, across Wild and Scenic rivers and in Inventoried Roadless Areas. I fail to see the wisdom in adding 23 miles of motorized routes and 4 new OHV loops when the proposed plan includes no additional resources for enforcement or maintenance. This is just a set up for major resource damage and unsafe conditions for forest visitors.

Please provide some nonmotorized areas for backcountry and Nordic skiing along Togwotee Pass as well as in

the Falls/Deception area and Pinnacles area of the Wind River Ranger District. Please also set aside the Clark Fork River Wild and Scenic river corridor from all mechanical and motorized access and protect the roadless Dunoir area from any expansion of mechanized or motorized rails. The Union Pass area needs some special management to eliminate the proliferation of motorized trails there.

Once your travel plan is done please make sure you publish easy to read travel plan maps and make them readily available both online and in print form. Get these maps out far and wide and make sure people can read them.

Decommissioning of unneeded roads and user created trails should be the focus of this travel plan. Unfortunately the overall tone seems to be to ramp up the fun factor and expand motorized use and mountain bike access. This type of go-crazy management will have long term and lasting impacts on the land. I implore you to switch gears and focus on protecting the immense wildlife and wilderness values of our public lands on the Shoshone National Forest and recognize its essential role as part of the Greater Yellowstone Ecosystem.

The travel planning means little without signage, enforcement, maintenance and education. Stealing of signs from public land has become an epidemic problem across the country. So has use and abuse of public land as the Pandemic has pushed so many people out onto the land. It's a different world from when you started your travel planning project years ago and it will only get more strange. This is the time to set intelligent limits on high impact industrial recreation and to realize that public lands like the Shoshone are extremely important to the well being of all Americans and to the wildlife that depend on these lands as their home.

Philip R. Knight

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