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Organization:

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Comments: Shoshone NF Travel Management Planning Project

Hello,

Unfortunately I was unable to attend the North Zone meeting on Tuesday, 8/11 due to a work conflict. However, I have read through portions of the Preliminary Environmental Assessment and I believe I have a good understanding of the 3 proposed alternatives for the new Travel Management Plan. As a Billings, Montana resident who frequently enjoys the recreation opportunities provided by the Beartooth Mountains (both in Montana in the Custer Gallatin National Forest and in Wyoming in the Shoshone National Forest) I am strongly in favor of keeping the Beartooth High Lakes Wilderness Study Area open to snowmobiles. Therefore I am strongly in favor of Alternative 1 and possibly Alternative 2. I am strongly opposed to Alternative 3.

Section 3.7 of the Preliminary Environmental Assessment discusses the High Lakes Wilderness Study Area in detail and analyzes the three alternatives through the lens of "Generally applicable wilderness qualities" of Natural Integrity, Apparent Naturalness, Solitude, and Opportunities for Primitive Recreation Experience. The document then primarily focuses on the "opportunities for primitive recreation experience" quality, accurately noting that "The other qualities of this area will remain unaffected by OSV use, given the lack of effect to these qualities."

The Preliminary Environmental Assessment defines Opportunities for Primitive Recreation Experience: "The area provides opportunities for isolation from evidence of man, a vastness of scale, feeling a part of the natural environment, having a high degree of challenge and risk, and using outdoor skills characterized by meeting nature on its own terms without comfort or convenience of facilities." Snowmobiling in remote areas such as the High Lakes Wilderness Study Area is a unique way to experience all the character aspects of "Primitive Recreation Experience". There are few other places within our region that offer this opportunity on such a grand scale. As such, I am willing to drive 5-6 hours round trip to spend a few hours enjoying the area on my snowmobile during winter weekends. There are countless National Forest locations that provide for non-motorized winter recreation, including Wilderness areas that are much closer to home, but precious few locations that provide these opportunities for motorized users.

In Section 3.7.2.5.1 of the Preliminary EA the effects of Alternative 3 are examined with respect to "Whether and to what extent OSV use proposed under Alternative 3 affects the wilderness character of the High Lakes Wilderness Study Area consistent with its character and use as it existed in 1984." The document then states that Alternative 3 would increase opportunities for primitive recreation and solitude among the non-motorized recreation community but substantially decrease those same opportunities for the OSV recreation community. Additionally, Alternative 3 would contradict the statutory language and congressional intent of the High Lakes Wilderness Study Area.

Section 3.7.3 examines consistency of the alternatives with relevant laws, regulations, and policy. These include:

1. Continue to provide motorized winter recreation opportunities
2. Manage for an adopted recreation opportunity spectrum class of semi-primitive non-motorized in the summer and semi-primitive motorized in the winter
3. The Wyoming Wilderness Act of 1984 established the High Lakes Wilderness Study Area and allowed for

snowmobiling within the boundary of the area

In closing off part of the High Lakes Wilderness Study Area to snowmobiling, Alternative 3 would violate all three of these directives.

In conclusion, Alternative 3 would increase the "Primitive Recreation Experience" opportunities for non-motorized winter use and substantially decrease those same opportunities for the OSV recreation community. The Beartooth High Lakes area is possibly the only place I have accessed by snowmobile that truly exemplifies the "Primitive Recreation Experience". All other snowmobile-accessible areas in the region are less primitive, less wild, and see substantially higher use by snowmobiles. This makes it worth the long drive to ride my snowmobile in the Beartooth High Lakes area. For the non-motorized recreation community there are an abundance of recreation opportunities in our region where the primitive and solitary nature of wilderness can be experienced, while the High Lakes Wilderness Study Area is possibly the only area where this same experience can be enjoyed by snowmobilers. Alternative 3 does not fit the character of the legal directives set forth in the Shoshone National Forest Land and Resource Management Plan.

Please consider the facts and opinions that I presented above and select Alternative 1 or Alternative 2 for winter use policy for the High Lakes Wilderness Study Area.

Thank you.

Aaron Suderman