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Comments: Shoshone NF Travel Management Planning Project

Dear Planning Team:

I am a relatively new out of state snowmobiler who dreams of riding areas like Shoshone National Forest!! Alternative 2 seems to be generally supportable, however, I write separately to call out the following:

The High Lakes Wilderness Study Area SHOULD be OPEN to snowmobiling as proposed by Alternative 2. The closing of the north/east High Lakes is NOT permissible. Congress made it clear that snowmobiling should continue in this area.

The proposed 12-inch minimum snow depth is overreaching without a nuanced understanding. The 2015 OSV travel rule only requires that there be "adequate" snow depth for OSV use. It does not require that any numerical minimum depth be set. Snow depth is far too variable depending on wind and weather conditions (i.e. snow morphology). Light powder of 12 inches may be insufficient, but a few hour window could cycle it into rideable material. Snowmobile usage in this regard has been recognized in other federal plans as self-regulating. The machines need snow to keep the engine cool to prevent damage. These are not cheap machines. They cost thousands of dollars to purchase most modern/popular sleds.

Additional new trails should be developed, for example, the ungroomed Ghost Creek trail to Painter's Store in the Beartooths. Also, the Sublette Pass area near Togwotee Pass should be added to your mapped trail system since they've actually existed and been labelled with signage in the area for decades.

Access to rideable snow should allow 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 during shoulder seasons when snow is too deep for trucks, ATVs and UTVs.

Your own assessment shows that there is NO significant damage to the Shoshone National Forest from snowmobiling. Current approaches are working.

Sincerely,

Rob Behrens

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