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Comments: Comment: Shoshone Travel Mgmt #48573

Dear Mr. Foster:

I am providing comments on the Shoshone National Forest Travel Management #48573.

As a working botanist in Montana I am opposed to any changes that would allow a winter motorized use season within the Line Creek Research Natural Area (RNA). The network of RNAs are designated based on either their unique natural qualities, an assemblage of rare or sensitive plants and/or animals, or their representation of high-quality examples of widespread ecosystems. As a result, they are to preserve and protect the animals, plants, and plant communities within their boundaries and are of great scientific value at the forest, state, national, and international levels.

The Line Creek RNA protects at least 17 plant and habitat communities categorized as alpine grasslands, alpine wetlands, snowbed communities, dry and moist forests, and mountain big sagebrush/Idaho fescue shrubland. Two of the alpine plant communities in the RNA, Idaho fescue/Ross's avens (Festuca idahoensis/Geum rossii) and greenleaf willow/tufted hairgrass (Salix glauca/Deschampsia cespitosa), are not found elsewhere in Montana and are unique in Wyoming. This RNA is also home to about 24 species of vascular plants that are tracked by the Montana Natural Heritage Program (19 species) and Wyoming Natural Diversity Database (5 species). These include disjunct populations of arctic and circumboreal species such as Draba porsildii (Porsild's draba), Pedicularis oederi (Oeder's lousewort), and Eriophorum callitrix (beautiful cottongrass). The RNA also contains one of only two populations of Salix barrattiana (Barratt's willow) in the continental U.S. Approximately 531 vascular plant species have been recorded in the RNA.

In part because of its high elevations and protected habitats, the Line Creek RNA serves as the location for monitoring plots that are part of the GLORIA network - a system of long-term, global observation plots used to comparatively study climate change impacts on mountain biodiversity and plants. North America has 9 of the 42 global sites. The Line Creek RNA plots harbor long-term data on the plants and lichens which is invaluable for the scientific studies that use the data and for potential future research. Any disrupt to the integrity of the habitat, plants, and lichens threatens the use of these plots and the important scientific work that comes from these sites.

It is imperative that the USFS does not compromise the integrity of the Line Creek RNA by allowing a snowmobile season that extends from November 1 through May 31 (Alternative 2). There are few places within this world where GLORIA monitoring can occur. Snowmobiles should not be allowed within the RNA nor should the RNA be shrunk to accommodate motorized winter recreation. Snowmobiles can have a huge negative impact on air pollution, soil compaction (particularly early and late in the season that is proposed), and increasing human

disturbance to fragile habitats. I support keeping snowmobiles out of the RNA. I am against alternative that would shrink the RNA boundary. I'm against Alternative 2 and any other any alternatives that creates a long snowmobile season from Nov. 1 to May 31. The growing season for plants and lichens begins before snows have melted, potentially in April as soils slowly begin to warm.

In addition, areas designated for snowmobiling should be clearly marked as 'open'. It should be assumed that areas are closed to snowmobiling unless clearly marked 'open'. Otherwise, adventurous snowmobilers have no boundaries and more conflicts can arise. The USFS should make sign maintenance a top annual priority. I have seen many problems arise in other U.S. Forest Service lands because signs are not maintained, and areas are not patrolled enough by USFS wardens. These problems include rare plants becoming trampled and ground disturbance to the habitat of rare plants.

Thank you for your time to read and consider my points.

Andrea Pipp

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