

Data Submitted (UTC 11): 11/12/2021 11:00:00 AM

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Comments: [External Email]2021 EA Travel management plan comments

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Hello Shoshone National Forest

Please accept the following comments as they pertain to the United States Forest Service (USFS) Shoshone National Forest (SNF) Travel Management Project EA.

1. Section 3.16 Cultural Resource is woefully inadequate. In general this section details rote information that is generic and uninformative

- \* It does not provide the reader enough background information in regards to culture history, traditions, and prehistoric/historic land to understand the resource and how it is manifested with the USFS SNF boundary.

- \* It does not provide information on the range, timeframes, and extent of cultural resources within the USFS SNF boundary to allow the reader to understand the extent, diversity, uniqueness and sensitivity of the resource

- \* The limited information that there is focuses on prehistoric and tribal land use. Historic land use is not identified and interested parties appear to not have been consulted.

2. Section 3.16 ensures the reader that all appropriate studies will be conducted and then it contradicts its self in subsection 3.16.2 Methodology by pointing out no studies were conducted for this analysis in the form surveys, or predictive modeling. In fact the only baseline information used was limited to GIS information of the previously recorded resource and inventories.

- \* This study is in-adequate analysis and consequently it provides the reader extremely weak assurances that future studies will be adequate.

3. In order to meet basic NEPA requirements demonstrating a good faith effort was made in regards to cultural resource analyses the following needs to be completed.

\* A complete and thorough background research that accounts for and reviews all known cultural resources and previously conducted inventories.

o This means summarizing the file search information in a succinct and understandable form that reviews all potentially impacted cultural resources

\* Much more research needs to be conducted including a review and summary of pertinent published and gray literature references as well as basic historic records reviews such as GLO land patent surveys and plat maps, etc.

o A thorough summary of this research combined with the complete summation of the file search will provide the bases for developing a cultural context. This will then provide the reader the information to develop an understanding of prehistoric/historic land use within the SNF boundary.

\* A quick review of WyoTrack indicates there are vast portions of the forest that have not been inventoried. This represents a substantial data gap that makes the current EA document weak, incomplete and imprecise. To correct this the following needs to occur

o A statistically based predictive model needs to be developed. This model needs to account for a series of environmental attributes associated with the known cultural resources. The goal of the model is to identify areas based on environmental attributes that have high, medium and low site probabilities. The model then needs to be extended to those areas that have not been inventoried.

o Sample inventories of areas affected by the action alternatives need to be completed and incorporated into this study. These sample inventories need to focus on high and medium density areas identified by the predictive model. Additionally, some lesser amount of the low probability areas need to be inventoried as well to test and confirm the accuracy of the model.

4. As is this analysis is incomplete and inadequate and does not fulfill the good faith effort required in identifying and analyzing cultural resources.

Thank you

Colin R. Ferriman