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Dear Shoshone NF,

I am writing to express my comments and concerns with efforts to revise travel management for the Shoshone NF. As a 15+ year resident of nearby Red Lodge, MT, I enjoy recreation on the Shoshone NF, including skiing, hiking, backpacking and mountain biking in the Beartooth Mountains and Clarks Fork Canyon areas. I particularly relish the chances to experience solitude, quiet, adrenaline-inducing experiences, and wildness in a high-elevation gorgeous environment. As an American citizen, I enjoy ownership of Federal public lands and expect the USFS to wisely steward these lands and efficiently care for natural resources and recreation amenities associated with Federal lands.

Minimal environmental analysis in an EA and a 30-day comment period and some video meetings disregard the complexity of travel planning and the importance of meaningful public comment. An Environmental Impact Statement and more public involvement would result in a better decision.

The proposed action in the Shoshone NF's Travel Management plan does not adequately protect wilderness characteristics in the High Mountain Lakes wilderness study area. While this wilderness study area was designated with acknowledgement of ongoing winter motorized recreation, this acknowledgement was focused on 1984 use levels. While it is demonstrated in the Environmental Assessment that the USFS has failed to accurately define or monitor High Mountain Lakes WSA snowmobile use levels from 1984 to present, it is a fact that snowmobiles manufactured in 1984 were unable to travel in the same areas that modern high-powered snowmobiles and timbersleds/snowbikes can travel today. Post-1984 changes in motorized technology has dramatically changed the areas and slopes that can be ridden by modern machines and is resulting in impacts to areas that were basically inaccessible in 1984. Changes in our regional population have also increased the number of motorized and non-motorized winter recreation users since 1984. Increased user numbers and increased motorized use in previously inaccessible areas has increased the potential for conflict and mixed motorized/non-motorized use safety concerns.

The Shoshone NF's proposal to allow ongoing unfettered motorized use in the High Mountain Lakes WSA will substantially alter the wilderness character of this potential wilderness area. As regional population continues to increase and motorized technology continues to evolve toward more powerful, lighter snow machines, this alteration will cumulatively increase and further detract from wilderness characteristics and result in increased impacts to wildlife and high elevation vegetation. Per 36 CFR 220.5(2), ongoing motorized use as is proposed to continue in the High Mountain Lakes WSA is a Class 2 proposal with potentially significant effects that should be analyzed and disclosed in an Environmental Impact Statement. Such use should be reduced to comply with the 1984 Wyoming Wilderness Act. Such effects of the proposed action to WSA wilderness characteristics and non-compliance with the 1984 Wyoming Wilderness Act should not be dismissed as insignificant in a DN/FONSI. A

DN/FONSI could be used to support a decision to implement another alternative that better protects wilderness characteristics of WSA's.

The Shoshone NF's proposal to allow ongoing mixed use of snowmobiles in areas frequented by non-motorized recreationists in spring months along Beartooth Highway poses a serious human health and safety concern. It is not safe to allow mixed motorized/non-motorized use on Gardiner headwall, Rock Creek headwall, 57 chevy chute, Reefer ridge or other popular ski routes from the annual spring Beartooth Highway opening until snow melt. It is particularly dangerous when snowmobiles are used to tow skiers up slopes that others are hiking or skiing on. While there hasn't been a documented fatality or serious injury, it will happen at some point in the future due to increased use and ongoing evolution of motorized technology. A good analogy is the current prohibition on shooting firearms in campgrounds - did this come about because someone on the Shoshone NF was inadvertently shot in a campground or is this just common sense? A high-powered snowmobile doesn't travel as fast as a bullet, but it does travel a lot faster than a skier or hiker and will also have a forceful impact when it hits a human. I urge you to close popular ski areas adjacent to Beartooth Highway to snowmobile use after April 30 each year (NOT extending to June 15 as proposed).

I have been up on Beartooth Pass skiing on a busy opening weekend and cringed as snowmobiles towing skiers race up and down the Gardiner Headwall and are loading and unloading in undersized, congested parking areas along the Beartooth Highway. I have not seen an instance after Beartooth Pass opens when "The Shoshone National Forest consistently monitors its routes open to public motor vehicles for appropriate use[hellip]" as is described in the EA on page 30. Instead, the opening of Beartooth Pass is a carnival/party scene along the highway corridor with alcohol and illegal drug consumption, congested parking areas, damage to tundra from poorly parked motor vehicles and snowmobile trailers, and snowmobiles tearing up the fragile tundra while travelling from unloading areas to snow patches. Given recent decreasing trends in the number of USFS law enforcement personnel, I don't have much faith in this type use along Beartooth Highway being better patrolled or regulated by Shoshone NF personnel. Closing areas adjacent to the highway to motorized use after April would reduce some of these impacts and conflicts. Reducing the number of snowmobile trailers and unloading operations in parking areas along the highway would increase the amount of parking available and reduce impacts to vegetation and soils caused by off-road and off-snow vehicle travel. The Travel Management alternative selected should better address parking along Beartooth highway by creating hardened surfaces and using educational signage and enforcement to deter off-road vehicle travel. If this can't be accomplished, the environmental analysis should consider and disclose effects of unmanaged parking along Beartooth Highway to soil and vegetation resources.

Potential effects on human health and public safety caused by mixed motorized and non-motorized use in popular ski areas along Beartooth Highway need to be specifically considered in determining the appropriate level of environmental analysis process per 40 CFR 1501.3. While the EA does acknowledge that "safety issues between motorized and non-motorized over-snow users could occur[hellip]" (page 173), there is no data or analysis to support this "recognition." The effects of such user conflict issues in the EA are focused wholly on effects to wilderness characteristics. If someone gets killed or run over, that individual and their family are not going to care about wilderness characteristics. They will instead wonder why the USFS has not adequately addressed real human health and public safety concerns. Again, you prohibit shooting a gun in a campground, which is infringing on the right to bear arms - why would you allow a 1000 pound snowmobile to travel at high speeds next to an area congested with non-motorized skiers and hikers?

One serious injury or fatality would be a significant effect to human health and public safety - no attempt is made in the EA to scientifically evaluate or assess the risk of potential effects to human health and safety of mixed motorized/non-motorized use in popular ski areas along Beartooth Highway. Standard risk assessment protocol could be utilized to disclose the differences in potential effects to human health and safety between the various alternatives. Here's a link to an example Forest Service analysis regarding recreational water activities https://www.fs.fed.us/pnw/pubs/pnw_gtr536.pdf. A similar formal risk assessment should be used to

disclose potential effects of mixed motorized/non-motorized use and also demonstrate which travel management alternatives would best provide for user safety per Shoshone Forest Plan RDTR-GOAL-01 and other Forest Plan Management Area specific guidelines regarding safety. An alternative that closes popular ski areas adjacent to Beartooth Highway to snowmobile use after April 30 each year (NOT extending to June 15 as proposed) would likely have the least risk of potential effects to human health and safety and best meet Forest Plan goals and guidelines, safety components of Executive Orders 11644 and 11989, and Travel Management Rules (EA page 6) related to public safety.

Please consider my comments and please do your duty to protect public resources and provide for human health and safety. Please continue to keep me informed of travel management efforts on the Shoshone NF by adding my e-mail to your electronic mailing lists.

Sincerely,

Dan Seifert

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