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The Shoshone travel management plan has the following problems as respects the obligation of the Forest Service to determine in a fair manner where over-snow-vehicles (OSVs) may be operated:

1. The measure of recreation opportunity available to skiers and other non-motorized users seeking to recreate in an area free from the adverse impacts of OSVs, as measured by Table 58, is deficient and misleading. The reported measure - specifically "Acres Closed to OSV Use within 5 miles of Winter Trailheads/Parking Areas" -- has no particular relevance to actual desired recreation opportunity. Non-motorized travel across snow is relatively slow and laborious: few users can actually travel 5 miles (especially 5 air miles!) and, if they can, travelling such distance and back will take their entire time allotted to this recreation. Accordingly, hardly anyone will travel such distance in order to avoid OSV impacts when such impacts will be encountered en route. Indeed, most non-motorized users greatly prefer to recreate from non-motorized trailheads in areas free from the impacts of OSVs from the get-go. That is a more reasonable measure and easier to calculate. The deficient measure used by the Forest Service gross overestimates - perhaps by a factor of hundreds -- the actual recreation opportunity provided by the proposed plan.

2. For similar reasons, the measure of total acres closed to motorized use is basically irrelevant to winter nonmotorized recreation opportunity. Most of these acres are in Wilderness miles from a plowed access point or are other areas that for all practical purposes provide no nonmotorized winter recreation opportunity (e.g. many wild and scenic river corridors).

3. On information and belief, the calculation of the recreation opportunity using the above deficient measure is -- moreover -- inaccurate. No tables or other charts have been provided showing in any level of detail the calculation of such measure. On information and belief, the reported measure is grossly overstated by including areas and trailheads which actually provide little to no nonmotorized over-snow recreation opportunity.

4. The Forest Service would have achieved a far more realistic measure of nonmotorized recreation opportunity at far less effort and expense by using common sense and its extensive practical knowledge of where nonmotorized users like to recreate and where they can realistically obtain such recreation. For instance, as others have pointed out, the Forest Service would have realized that perhaps the recreation opportunity on the Shoshone most desired by nonmotorized users is closing to OSVs lands adjoining the Beartooth Highway as soon as the highway opens enough to provide access to high elevation terrain in the spring.

5. On information and belief, the Forest Service is well aware that the calculations of non-motorized recreation opportunity used in Table 58 greatly overstates actual nonmotorized recreation opportunity, and that a far better measure would be a common sense approach using (a) a calculation of the total nonmotorized acres adjoining plowed trailheads or other access points that provide reliable over snow recreation, and (b) the practical

knowledge of the Forest Service management as to where nonmotorized users actually recreate and want to recreate.

6. Supported by these deficient measures that purport to show significant nonmotorized recreation opportunity, the Forest Service has failed to make a reasonable effort to actually provide better nonmotorized recreation opportunity on the Shoshone.

7. The environmental analysis has failed to include a broad range of alternatives by failing to include for consideration an alternative that includes a broad and extensive range of nonmotorized winter recreation opportunity.

These problems render the over-snow-travel management plan deficient within the scope of the travel management rule, NEPA and other applicable rules and statutes.

Thank you.

Bob Rowen

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