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First name: Harry

Last name: Jill Brownfield

Organization:

Title:

Comments: Shoshone Travel Management Planning Project

Dear Environmental Coordinator Mark Foster,

Thank you for the opportunity to comment on the Shoshone Travel Management Planning Project Preliminary Environmental Assessment (EA). Although the Shoshone is a big forest with lots of Wilderness, Togwotee and Beartooth Pass provide the highest quality snow and the easiest access, and therefore are the most popular areas on the forest for all types of winter recreation. As backcountry skiers, we have a strong interest in winter travel management on the Shoshone National Forest. Management of over-snow vehicles has a direct impact on backcountry skier use, access, and enjoyment of the National Forest and we are disappointed that the EA does not acknowledge this connection, much less minimize conflict between OSV use and other winter recreation uses as required by the OSV Rule.

While we are pleased to see that Alternatives 2 and 3 both protect the Deception Creek and Pinnacles cross-country ski trails on Togwotee Pass by not authorizing OSV use in the area surrounding these trails, the Alternatives do nothing else to minimize conflict between motorized and non-motorized winter recreation. For example, while we support the High Lakes Wilderness Study Area management in Alternative 3 for the protections it will provide for the WSA and adjacent Absaroka-Beartooth Wilderness, this will not minimize conflict between skiers and snowmobilers on the Beartooth Pass. The places where most skiers go are not included in the closure. The best way to minimize use conflict on the Beartooth Pass is to end the OSV season on the Clarks Fork Ranger District no later than May 15.

The OSV season dates included in Alternative 2 are completely different from what was proposed at scoping and do not make sense. For example, while ending the OSV season on the Clarks Fork district on May 31 will make some difference in reducing use conflict and protecting natural resources on the Beartooth Pass, most of the conflict is centered around Memorial Day weekend and even by then there are large patches of melting or non-existent snow on the Pass. Likewise, we do not understand why you would propose drastically different season dates for the Shoshone side of Togwotee Pass (November 1-May 31) as compared to how the season is managed on the Bridger-Teton side of Togwotee Pass (December 1-April 30). The OSV season should be the same on Togwotee Pass no matter which forest you are on.

We are also concerned because it appears that the Shoshone National Forest did not follow the OSV Rule in drafting the Alternatives in this EA. The OSV Rule requires the Forest Service to manage OSV use as "closed unless designated open", but this EA discusses closed areas and does not explain why any part of the forest is designated open for OSVs. This implies that the Forest Service drafted the Alternatives under an "open unless designated closed" paradigm, which is inconsistent with Forest Service regulations and policy.

There are many significant issues at stake in this travel plan - from backcountry skiing to endangered species to the High Lakes Wilderness Study Area - and an EA is not sufficient for addressing all of them. We urge you to revisit the scoping comments submitted in 2016 and 2017 and redo your analysis with an Environmental Impact Statement.

In addition to returning to the drawing board and write an Environmental Impact Statement so that the Forest Service truly considers all of the significant issues raised at scoping, the final plan should include the following elements:

*End the OSV season on the Clarks Fork ranger district no later than May 15 and match the season on the Wind River district to that of the Bridger-Teton's Blackrock district (Dec 1-April 30)

*Designate OSV use in the High Lakes WSA as described in Alternative 3

*Do not designate the area around the Deception and Palisades ski trails for OSV use

*Include an implementation plan to ensure compliance with the Travel Plan and reduce use conflicts.

Sincerely,

Harry and Jill Brownfield

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