

Data Submitted (UTC 11): 9/8/2020 12:00:00 PM

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Organization:

Title:

Comments: Shoshone Travel Management Plan

Dear Forest Supervisor Lisa Timchak,

Thank you for the opportunity to comment on the Shoshone National Forest (SNF) Travel Management Plan (TMP) Preliminary Environmental Assessment (EA). The SNF is our country's oldest National Forest and arguably one of the wildest. There are major shortcomings throughout the entire EA that reveal a lack of assessment and understanding on the part of the SNF. For the following six reasons, I argue that this EA is inadequate and the SNF must improve their analysis and instead complete an Environmental Impact Statement (EIS).

1. Misguided Purpose and Need: The "Consideration of additional motorized opportunities" is an essential component to designing and implementing a successful Travel Plan and is rightly included in the Purpose and Need of this project. However, I strongly contest the implication that "additional motorized loop opportunities" was the need identified for travel planning through the Forest Plan revision.

2. Ground truth the Motor Vehicle Use Map (MVUM): The use of electronic data - current as of February and March of 2020 - to evaluate the state of your current motorized system is inappropriate given snow cover on the SNF during data collection. The MVUM must be accurately ground-truthed.

3. Analyze impacts of all motor vehicle use: I am concerned that Closed Roads Not Closed (CRNC) will not be addressed in the TMP. NEPA requires the agency to analyze the impacts of illegal motorized use on forest resources and the likelihood of illegal use continuing under each alternative. The SNF should examine the direct and cumulative effects of its road system since Travel Planning must evaluate and address the environmental, social, and cultural impacts associated with user-created routes, non-system roads and currently designated roads, trails, and areas, as identified through Travel Analysis.

4. Inadequate enforcement of motorized use: I followed the good work of the Shoshone's Compliance Working Group (CWG) while it was operational. In response to public concerns and inquiries posed by the CWG, the SNF has pointed to limited infrastructure and a shortage of Law Enforcement Officers (LEO) as the primary limitation in managing the existing motorized system - resources which this EA shows no intention to increase. So, how will the new plan be upheld when the SNF has already demonstrated an inability to enforce the existing system with the resources that they have?

5. "Closed unless designated open": The SNF did not abide by the OSV Rule in drafting any of 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 justify why any part of the SNF is designated open for OSVs. This implies that the Forest Service drafted the Alternatives under an "open unless designated closed" filter, that conflicts with regulations and policy. The SNF must adhere to the OSV Rule and designate appropriate, site-specific, terrain for OSV use.

6. High Lakes Wilderness Study Area snowmobile use: The SNF is obligated to manage snowmobiling in the High Lakes WSA to the same "manner and degree" as required in the 1984 Travel Management Plan. A lack of data surrounding management of over-snow vehicle use in the High Lakes WSA must be addressed. Failure to acknowledge such data does not allow this plan to adhere to the 1984 law, or manage the WSA to the standard it was intended.

I believe that the EA does not sufficiently address significant issues such as impact of existing summer motorized use and the management of OSV use across the SNF. I urge you to review the scoping comments submitted by all constituents prior to the dormancy of this process and instead complete an EIS to ensure an adequate evaluation of the management alternatives being proposed, and so that the wildness of the Shoshone lives on for generations to come.

Sincerely,

Matthew Cuzzocreo

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