

Data Submitted (UTC 11): 8/13/2020 12:00:00 PM

First name: Rochelle

Last name: Plocek

Organization:

Title:

Comments: Shoshone NF Travel Management Planning Project

Dear Mr. Foster,

Thank you for the opportunity to comment on the Shoshone Travel Management Planning Project Preliminary Environmental Assessment (EA). As an avid backcountry skier, fly fisher and hunter and a wildland firefighter I am familiar with and have enjoyed with the Shoshone NF. The Shoshone Travel Management Planning Project Preliminary Environmental Assessment (EA) raises some concerns for me as a recreational user.

While I know it is a big forest with lots of Wilderness that can provide non-motorized opportunities, Togwotee and Beartooth Pass provide the highest quality snow and the best accessible, quality terrain. Without question these are the most popular areas on the forest for all types of winter recreation. As a backcountry skier, I am incredibly interested in winter travel management on the Shoshone National Forest. Management of over-snow vehicles (OSV) as OSV directly impact backcountry skier use, access, enjoyment and safety while recreating on the National Forest. Personally, I have experienced these impacts many times in all of the Region 2 forest, including the Shoshone, and know the very real threat that OSVs pose to my safety. I am severely disappointed that the EA does not acknowledge this connection, much less do more to minimize conflict between OSV use and other winter recreation uses. This is required by the OSV Rule.

While I am 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 I 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. Changing the date to end the OSV season on the Clarks Fork Ranger District to no later than May 15 would minimize the use conflict and improve the safety for non-motorized users.

The OSV season dates included in Alternative 2 are completely different from what was proposed at scoping which were listed last day in the "high elevation" zone ending on 4/30 and a "low elevation" zone ending on 4/1. With most of the conflict centered around Memorial Day weekend, this makes the May 31 date illogical. From a resource protection standpoint; by then there are large patches of melting or non-existent snow on the Pass which then poses a threat to the resources. I would request that if a date of April 30 can't be found to be compatible with user needs that a May 15 date be chosen instead.

Likewise, I 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 the Bridger-Teton side of Togwotee Pass (December 1-April 30). The OSV season should be the same on Togwotee Pass regardless of what forest you are on. This will be confusing to OSV users and will create situations where regular violations occur. This is inconsistent with the Purpose and Need for Action of the initial scoping document which states, "overall objective of the proposed action is to provide a manageable system of designated public motor vehicle access routes and areas."

I am also concerned because it does not appear that the Shoshone National Forest followed 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. While I recognize the increased time and cost that a full EIS incurs, I urge you to revisit the scoping comments submitted in 2016 and 2017 and redo your analysis with an Environmental Impact Statement.

I would urge that the Shoshone National Forest undertake a full Environmental Impact Statement so that all of the significant issues raised at scoping would be considered. The following issues should be added to the final plan.

* 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-Tetons 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,

Rochelle

Rochelle Plocek

[PII]