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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).

Hello,

I live in Powell and heavily use the Shoshone Forest areas. Please consider my comments on the EA. Firstly, the SNF does not need more roads! I strongly disagree that the forest needs "additional motorized loop opportunities". Also, 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. Planners also should analyze impacts of all motor vehicle use. I am particularly concerned that Closed Roads Not Closed (CRNC) will not be addressed in the TMP. 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.

How will the Forest Service enforce and monitor the roads already in place? Can they monitor and maintain more? It is better to keep what we have and actually improve, maintain, and patrol the roads already in existence. We do not need more. The forest service cannot maintain and police the roads we already have. The SNF must adhere to the OSV Rule and designate appropriate, site-specific, terrain for OSV use. Finally, 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,

Miss Shaleas Harrison

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