

June 10, 2021

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Submitted electronically to: Lisa Timchak, Mark Foster, Bart Lander

Dear Mr. Foster and Travel Planning team,

Thank you for your interest in making the Shoshone National Forest's (SNF) Travel Plan proposals and documents more accessible to the general public. In recent conversations with multiple organizations who have contributed to this process for several years, there was general consensus that many of us found the preliminary Environmental Assessment (EA) released in 2020 notably more difficult to interpret than previous draft analyses. This is of significant concern to our organizations, as the process should be getting better, not worse. Our group comments on the last draft of the EA (Greater Yellowstone Coalition et al., 2020, Attachment 1) clearly illustrated that we were unable to interpret or comment on many specific proposals due to incorrect, confusing or missing information. We are concerned that if there are not significant improvements, our groups and the general public will once again be hindered from providing meaningful input.

After reviewing the 2016 Proposed Action (PA) and 2017 Revised PA, we were able to identify a number of concrete examples of how past presentations previously facilitated our ability to interpret and meaningfully comment on proposals. We hope these specific examples and the requests below will be valuable in your efforts to provide quality, easily accessible data to the public in the next draft. It is surely a challenge to present such a wide variety of small-scale proposals across a very large forest, but incredibly important to a successful NEPA process and meaningful public engagement.

Below we outline requests for future travel planning documents to include summary statistics, improved maps, and illustrate some of the challenges encountered in interpreting the 2020 preliminary EA. We also provide suggestions for labeling and organizing proposals in a manner that might reduce recurring confusion and errors while facilitating meaningful public engagement going forward. Thank you for your consideration.

Request #1: Summary Comparison of Alternatives

As an example of the challenges encountered when reviewing the preliminary EA, we found it difficult to confirm basic critical information about what was being proposed in the preferred alternative, including how many new miles of routes were being proposed on the Wind River Ranger District (WRRD), and whether the three new WRD loop proposals presented in the 2016 PA were included in the preferred alternative of the preliminary EA. Given that several of us are very familiar with the existing route system on the SNF, NEPA documents, and four versions of

previous proposals, we can only imagine how much more difficult it must have been for the interested public to glean what significant changes were being proposed to the existing route system. A narrative or quantitative summary of proposed changes and across alternatives and districts would be especially helpful in this regard.

For example, the breakdown in the 2016 PA summary tables (below) are very helpful, showing forest-wide and district changes to the existing system. These summaries were especially important in understanding the 2016 PA and notably lacking in the preliminary EA. We found the summaries of **motorized loops** and **RARE II additions** and **new construction** especially important and also notably absent in the preliminary EA. Similarly, forest-wide and district summaries of miles of roads decommissioned, miles of trail converted to road, miles of road converted to trail, number of new seasonal restrictions, and miles of new route construction would be very helpful in future drafts.

		North Zone	Washakie	Wind River	Total Miles
Motorized Routes	Existing Roads and Motorized Trails	406	239	322	967
	Proposed Action Additions (26 proposals)	15	12	10	36
	Proposed Action Subtractions (10 proposals)	3	5	4	12
	Proposed Access to Dispersed Campsites	1	3	2	6
	Proposed Action Mileage Added	13	9	9	30
	New Total	419	248	331	997
Seasonal Restrictions	Existing	167	177*	43	387
	Proposed Action Additional Seasonal Restriction (9 proposals)	26	0	35	61
	New Total	193	177	78	448
Motorized Loops	Existing	7	83	162	252
	Proposed Action Additional Loops	12	44	51	106
	New Total	18	127	213	358
RARE II (Roadless)	Proposed Action Additions (3 proposals)	0.7	6.1	0.4	7.2
	Proposed Action Subtractions (3 proposals)	0.0	4.8	1.5	6.3
	Proposed Addition Motorized trail added	0.7	1.3	-1.1	0.9

Screenshot of portion of 2016 Proposed Action statistics - Excel sheet provided on your website: <https://www.fs.usda.gov/detail/shoshone/landmanagement/?cid=fseprd563810>

Breaking down alternative proposals and summaries by district is important and helpful for two reasons. First, the travel management needs and existing conditions of each district are different, and important to understand the impact or necessity of proposed changes. (These differences are outlined in all of our previous comments: existing route densities, existing motorized loop opportunities, differing enforcement challenges). Second, the general public typically is less interested in total mileage changes across the forest, and more immediately interested in whether routes are being closed or added in their backyard or in their favorite areas of the forest. This type of summary table is much more helpful in determining what exactly is being proposed where.

Since the above summaries and breakdown were presented in past proposals we strongly request your next draft include the same. In addition to information that allows the public to compare differences in proposals across districts, presenting information clearly, accurately, and succinctly so readers can easily compare the preferred alternative to other alternatives and/or to the existing condition is essential.

Request #2: Improved MAPS

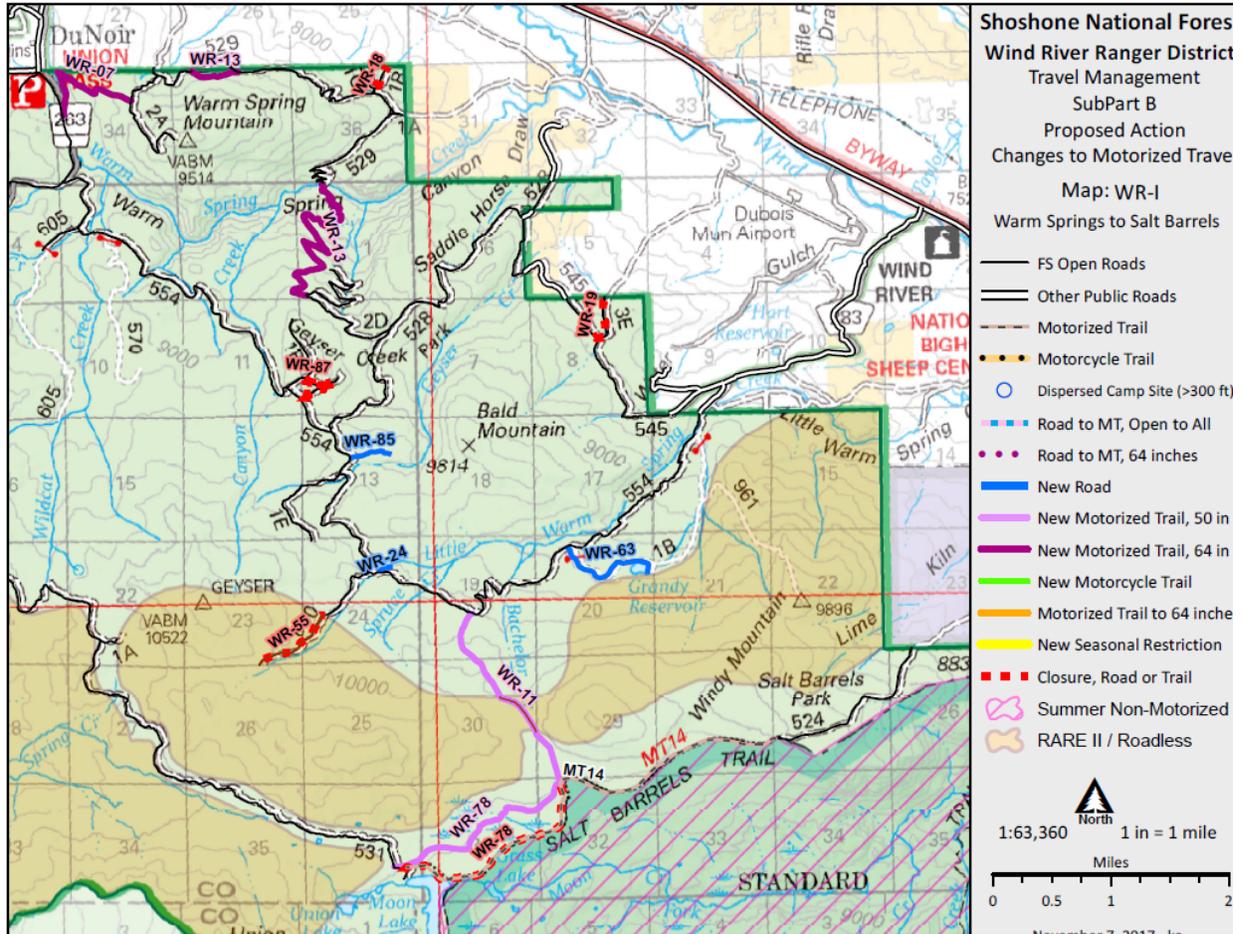
As we struggled to determine what the proposed changes were in the preliminary EA, we found the following advice: “The perhaps most efficient means of identifying changes between the current condition and the Alternative 2 proposed conditions would be to compare the Alt 1 subpt B map with the Alt 2 subpt B map. Tracking where roads on the Alt 2 map of a WR-## (proposal number) designation will help to illustrate where on that district the proposal is occurring.”

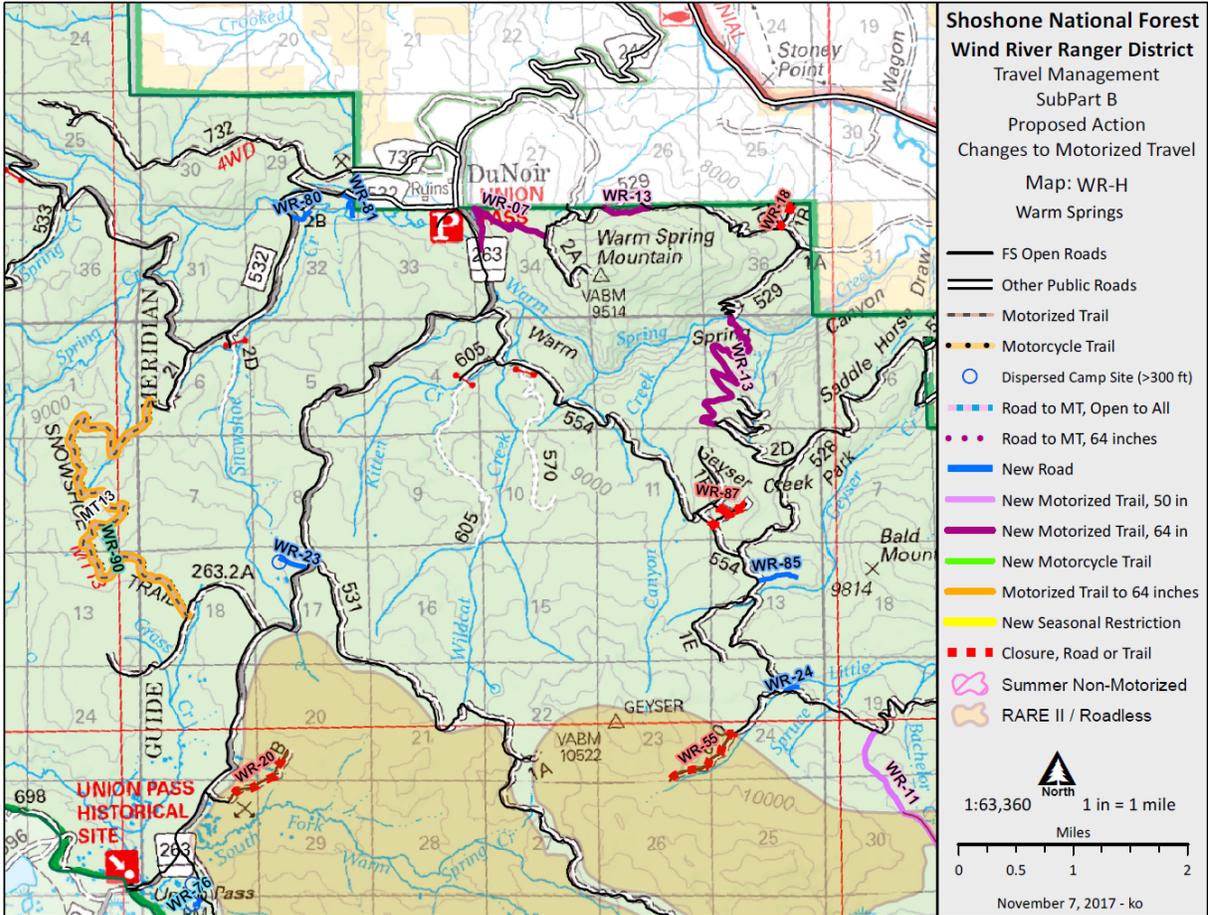
Given the public’s reliance on these maps to interpret proposed changes in different alternatives, the scale and quality of these maps is critical to the public’s ability to interpret and meaningfully comment on proposals. We found that the scale and quality of the maps provided in the preliminary EA failed entirely in this regard.

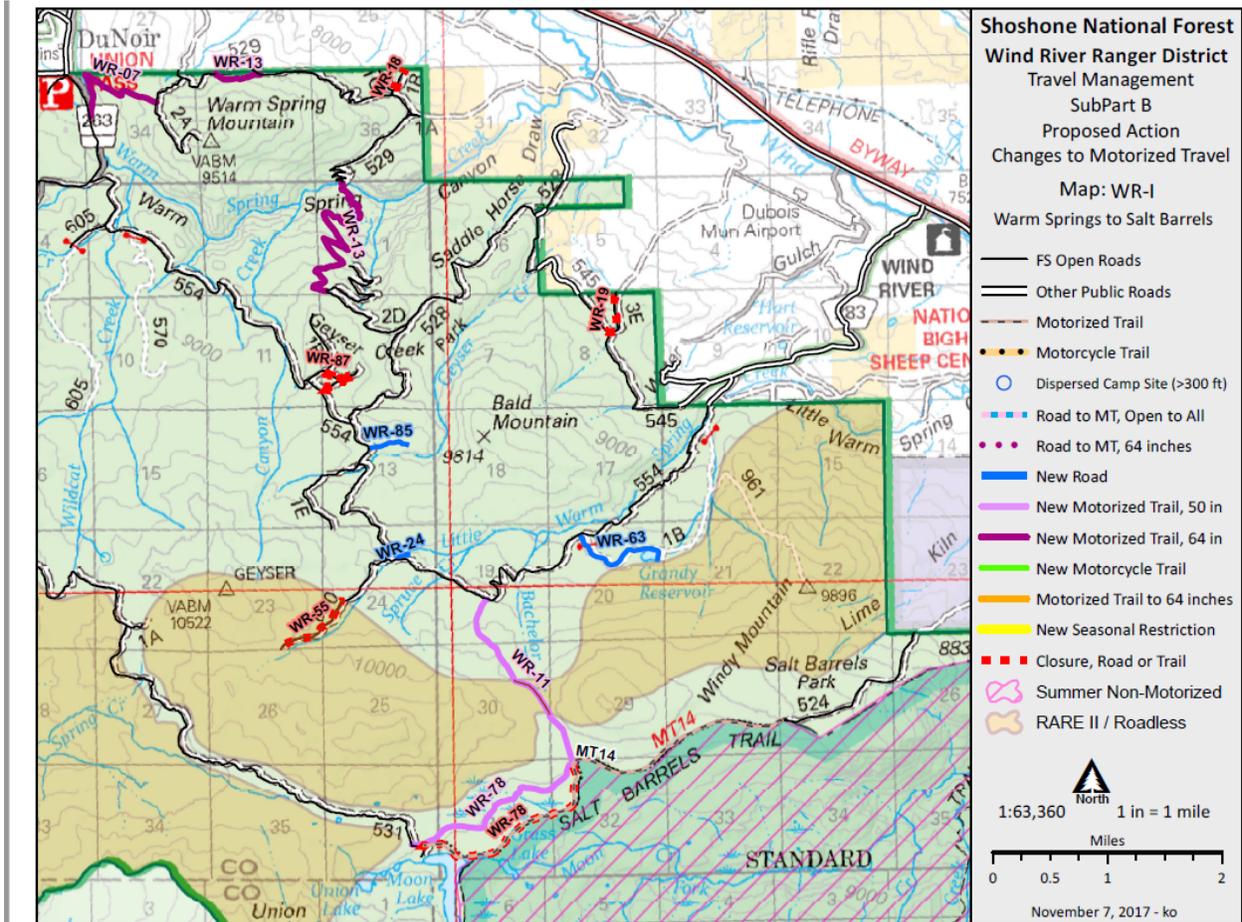
As just one example, to determine proposed changes on the WRRD, we attempted to compare Alt 1, 2 and 3 subpart B Wind River maps from the appendices. The map provided for the entire WRRD was so large that it was literally impossible to effectively compare any one area to another on a computer screen, given the amount of zooming required on each. When printing the three WRRD maps on a home printer - in hopes some differences might appear that would allow us to investigate those proposals in Appendix B - the text for the WRRD maps at the printed scale was too small to read. Looking back at the proposed action maps presented in 2016, there were several notable differences that could help us move forward more effectively:

- Proposed action maps (2016) illustrated proposed changes that differed from the existing system, so that the reader was not required to visually compare Alt 1 maps to Alt 2 maps to identify proposed changes. We request that the FS provide stand alone alternative maps that demonstrate proposed changes in each alternative compared to the existing system.
- Proposals for new trails and roads were denoted differently than existing trail and road width conversions in the PA. We request that this approach be incorporated in the next iteration of the draft plan.
- In the PA, seven different maps for the WRRD were presented instead of one. This scale was much more helpful for interpreting proposed actions on these stand alone maps, even when the reader was not tasked with comparing multiple alternative maps side by side. We request that the FS consider mapping configurations that illustrate proposed changes without requiring side by side comparisons, and that maps be provided at a legible and comprehensible scale compatible with either on screen viewing or home printer capabilities.

Below are examples of maps from the 2016 proposed action. New motorized trails, roads, seasonal closures and trail conversions are labeled and highlighted on maps. Map segments are at a scale where proposal labels are legible and easily referenced.

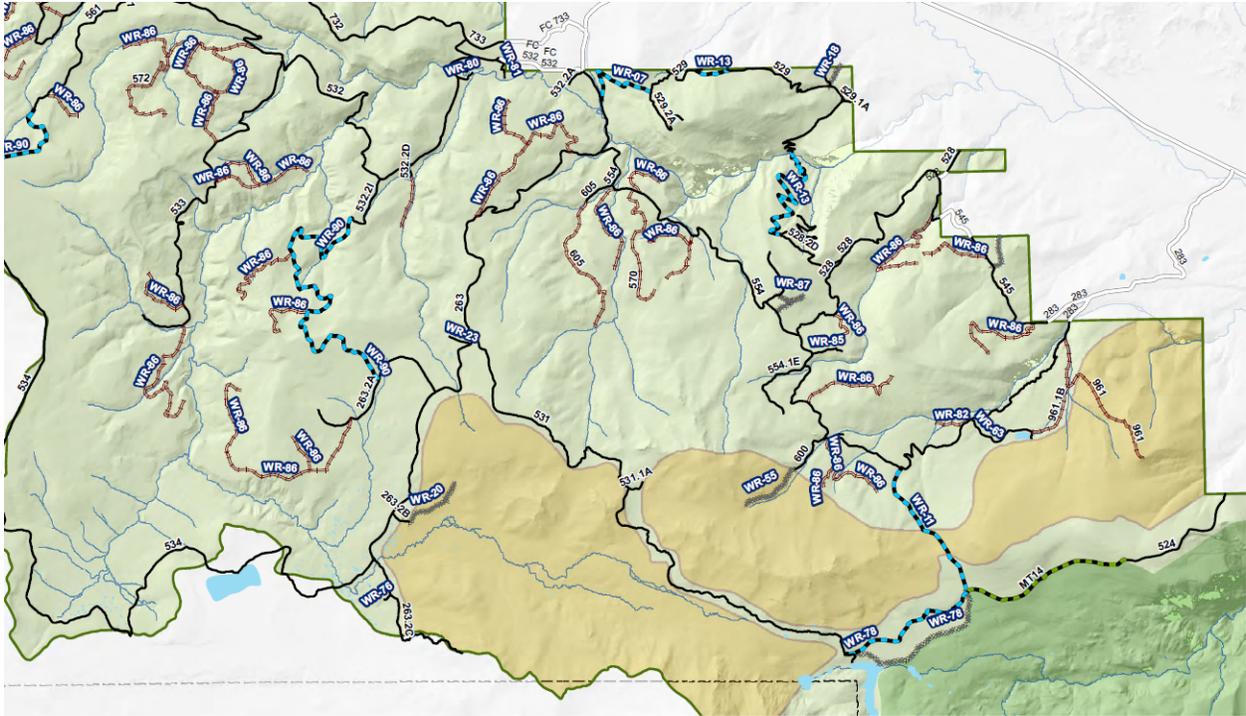






Note: New trail proposals WR7, WR11 and WR13 are clearly denoted in purple as new trails. WR90, a proposal to convert an existing trail to 65", is illustrated differently in orange. This is extremely helpful!

Below is an example of preliminary EA maps of the same area. The reader was required to zoom in 70% in order to read proposal labels in one small corner of the WRRD.



Above: 70% Zoom screenshot into one corner of the Alt B map for the Wind River Ranger District. New trail proposals WR7, WR13, WR11 and WR 78 appear identical to WR90, existing trail converted to 65". This makes it incredibly difficult for the reader to tell what is actually being proposed on the ground in the preferred alternative.



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|---|--------------------------------|---------------------------------|
| NFSR Open to Highway Legal Vehicles | NFST Open to All Vehicles | Seasonal Restriction |
| NFSR Open to 64 inch Highway Legal Vehicles | NFST Open to 64 inches or Less | Non Forest Service Lands |
| NFSR Open to Administrative Use Only | NFST Open to 50 inches or Less | Clarks Fork Wild River Boundary |
| NFSR Closed to All Vehicles | NFST Open to Motorcycles | RARE II / Roadless |
| NFSR Decommissioned | NFST Decommissioned | Wilderness |
| Other Public Roads | | |

NFSR – National Forest System Road that is defined as a forest road other than a road which has been authorized by a legally documented right-of-way held by a State, county or other local public road authority.

Above: Map key that can be referenced after zooming out 70% and then back in. Note how this legend does not offer the reader any ability to tell how this alternative is different from the existing system.

As one important example, In the preliminary EA map, there is no way to tell if MT14 is a new or existing ATV trail without comparing the same zoomed-in corner of the map to an Alt 1 map at the same scale and corner. The proposals to construct new greater than 65" trails where there is no existing road bed (WR7, WR13, WR11 and WR 78) appear identical to the proposal converting an existing trail to 65" (WR90). These are very different proposals with very different impacts and the concerned public would benefit from any differentiation. We request that the FS review these aspects of the 2016 PA maps and consider a similar approach to allow for more meaningful public interpretation and input. See suggestions below for labeling proposals as another solution to help the reader differentiate proposal types.

Request #3: Improved Presentation of Proposals and Appendix B

The draft preliminary EA references nearly 100 individual proposals in its maps and associated tables. Many of these proposal numbers and labels were initially generated from a list of ideas generated in pre-pre-scoping in 2015. Only some of these were carried forward for analysis. Since that time, there has been no effort to consolidate, organize or relabel proposals in a way that makes sense to the general public, decision-makers, planners or resource specialists.

We request that the FS recategorize, relabel and regroup the proposals that have been carried forward in this analysis and are now presented in alternatives for public comment. For example, the FS should identify and implement practical possibilities for grouping/labeling proposals to differentiate between proposal types, such as new trail construction (WRNT1), decommissioning (WRD1), route conversion or reclassification, dispersed camping additions, and seasonal closure proposals (WRSC1). This would greatly facilitate readers' ability to interpret proposed changes, especially on associated maps, and may reduce some of the errors, typos and inconsistencies noted between maps, proposal numbers and proposal table descriptions in the draft preliminary EA.

We request that the FS consider options for linking and relabeling related proposals so the public can meaningfully analyze and comment on them. For example, the reader has to reference table descriptions for WR7, WR13 and WR13 to determine that these three proposed segments create a "large effective loop" in Warm Springs Canyon. Since none of these seemingly unrelated individual proposals create a large loop (as described) without the other, it would be helpful to highlight their relationship by linking them for comment and for analysis. The FS could label all three of these sections WRNT1, or WRNT1a,b,and c to allow for tailored descriptions of each separate segment. Similarly, the proposals comprising the new large effective Bachelor Creek loop - WR11 and WR78 - could be relabeled WRNT2a and b.

For each district we request that the FS reorganize proposals in the Appendix B proposal table in a sensible manner and relabel proposals sequentially if possible. This would eliminate proposal numbers that are no longer being analyzed and are likely contributing to errors and confusion. There is no reason one should have to reference WR11 and WR78 to learn about or comment on the large effective loop proposed up Bachelor Creek, or reference WR 27, westernmost WR 29, WR 43,and WR 86 to comment on the Long Creek loop proposal. If for

some reason relabeling existing proposals is not an option, consider other opportunities to improve how proposal types can be grouped in Appendix B in a logical manner. Any effort by the FS at some user-friendliness here would be worthwhile and beneficial to everyone who is attempting in good faith to participate in this process.

We understand that this may sound like added work, but we also know the FS already has its work cut out to review and correct the many errors, typos and inconsistencies noted between maps, proposal numbers and proposal table descriptions in the draft preliminary EA (see below for comment examples). Revisiting proposals and determining a more meaningful and less error prone reference system is likely to help decision-makers and planners as much as it would help the public attempting to interpret and comment on them. Thank you for your consideration, and we look forward to seeing an improved next version of this draft plan.

Sarah Walker, Wyoming Wilderness Association

Connie Wilbert, Sierra Club Wyoming

Jenny DeSarro, Greater Yellowstone Coalition

Example 1. Wind River District Appendix B Proposal Table (page 16, preliminary EA) shows obvious errors referenced in several comments. As just one example, the public was unable to comment on these proposals with misinformation presented in the preliminary EA.

Ranger District	General Location	Proposal Number	Alternative 3 Proposal Type	Alternative 3 Proposal Explanation	Alternative 3 Proposal Rationale
Wind River	Bear Creek	WR-26	Decommission Road	Decommission road to address riparian and wetland issues.	Provides opportunities for youth operators and for looping opportunities throughout the District.
Wind River	Long Creek	WR-27	New NFST open to wheeled vehicles 50 inches wide or less	Add new NFST open to wheeled vehicles 50 inches wide or less to provide loop opportunity.	Current impacts to riparian and wetland areas, moving to lighter vehicles expected to reduce those impacts.
Wind River	Long Creek	WR-27a	Decommission Road	Decommission dead-end road (FSR 548.1D).	Provides a large effective loop, follows existing road template for large portion of route.
Wind River	Long Creek	WR-29	Seasonal Use Restriction	Applies seasonal restrictions to FSR 513, 548, 549, 551, 552 (open 7/1 to 3/30) to address protection for the native road surface during the wet spring months and wildlife requirements. Requires less gating than Alt 2.	With WR-27, no need for this short, dead end route that ends in meadow and would have compliance issues.
Wind River	Brent to Burroughs Creeks	WR-83a	Convert Road to NFST open to all wheeled vehicles	Convert sections of FSR 285, 510, 511, and 512 to NFST open to all wheeled vehicles subject to seasonal closure (open 7/1 to 3/30) (19.11 miles).	Closure dates will provide protection for the native road surface during the wet spring months.
Wind River	Fish Lake	WR-89a	New Road	Build new section of FSR 534 to address riparian issues (0.25 miles).	Provides youth opportunities and looping opportunities.
Wind River	Fish Lake	WR-89b	Decommission Road	Decommission section of FSR 534 to address riparian issues (0.25 miles).	Proposal would address riparian issues associated with current use.

Example 2. Our group comments submitted on the preliminary EA (Attachment 1) includes multiple examples of organizations being unable to comment on proposals presented in the preferred alternative:

“Once again, we encountered serious disconnects between Appendix B maps and Tables 1 and 3 (more cut and paste haste?) that, when coupled with the difficulty to use the maps and the minimal information provided in the tables, make it nearly impossible for the public to interpret ...and provide meaningful comments.” - (GYC et al. 9/25/2020, Page 39)

“WK-27 - Pete Lake to mid NFST01. Information in Table 2 (p. 4) does not match the map for Alternative 2, which proposes decommissioning of WK-27 along the boundary of the Washakie Wilderness Area and reconstruction of a new trail away from the wilderness boundary and which, on the map, is labelled WK-23. WK-23, according to Table 1, is in the vicinity of the Blue Ridge Road but in reality is a district wide proposal to adopt seasonal use restrictions. Table 1 does not contain any entry that describes the permanent closure and decommissioning of the existing trail along the wilderness boundary, whatever number it may be assigned (which is anybody’s guess).” (GYC et al. 9/25/2020, Page 39)

Example 3: Excerpted comments from Riverton resident, Kim Wilbert. (Attachment 2).

“Following are my comments on specific Alternative 2 proposals on Washakie (WK) and Wind River (WR) districts. I will preface these specific proposal comments by noting that there were so many errors between Appendix A (Maps) and Appendix B (Tables) that it was impossible to even keep track of them all. In the tables, the proposal type, explanation, and rationale were disconnected and incomprehensible for many proposals. Some roads or trails identified in the tables didn’t exist on the maps. Proposal numbering made no logical sense on the maps, making it nearly impossible to even find the road or trail being described. This is a really shoddy way to treat members of the public who care deeply about their public lands and who are trying in good faith to participate in this public process.”

....

- *WK-27 Description of WK27 on page four Appendix B does not correlate with the graphic representation of WK27 on the map in Appendix A for Washakie District Subpart B Alt 2. The map shows a four mile section MT01 as decommissioned. The map also shows a road that is not on the 2020 MVUM and is labeled WK23 going from Pete Lake to intersect with MT01 just south of Shoshone Lake. If WK 27 includes decommissioning the section shown on the map and construction of a new NFST I believe there is no existing footprint for most of that new road, which is contrary to the information in the rationale. According to the Alt 2 rationale, WK 23 only refers to seasonal closure on several routes. There is no way for anyone to effectively comment on WK 23 or WK 27 because of conflicting and/or incomplete information on the maps and the table on page 4, Appendix B.*

....

- *WR - 12 Not shown on map, and therefore, without any knowledge of where this “New NFST” is to be located, I have to stand opposed to it. How can any impact analysis be validated if the location proposed road is not charted? Reject this proposal because it doesn’t really exist. Jeez.*

....

- *WR - 14 - Not shown on map.... Please see the comment on WR 12. It is very frustrating to have to comb the maps for stuff that is not there!!*