

March 14, 2014

From:

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To:

Thomas Tidwell, Chief, USDA Forest Service,
Attn: EMC – Administrative Reviews
1400 Independence Ave. SW, Mailstop 1104
Washington, DC 20250-1104
objections-chief@fs.fed.us

Thank you for the opportunity to file an Objection to the proposed increase in motorized use in the Francs Peak and Wood River designated roadless areas of the Shoshone National Forest (SNF), as shown on the following page with the map for the new Alternative G in the Final Forest Plan (Land Management Plan 2014 Revision Shoshone National Forest).

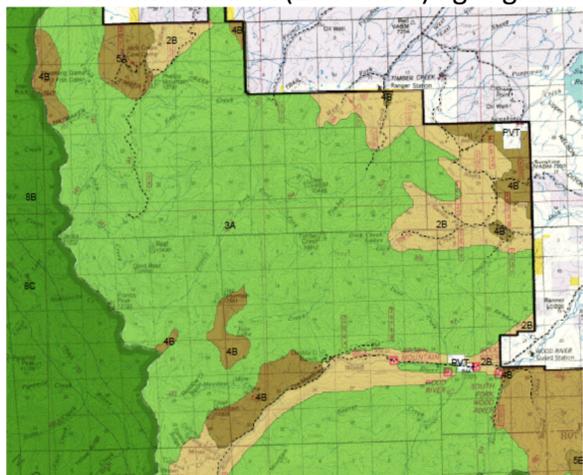
I filed substantive written Draft comments (Ltr#0705BurkeD) (see attached) and participated in several public Forest meetings in the years 2009 through 2012 as an elected official (former Park County Commissioner), and member of the Shoshone Cooperating Agency Coalition, which is recognized as a Cooperating Agent for the Shoshone Forest Plan.

At the outset, I will say that Shoshone Forest personnel have done an excellent job of attempting to accommodate Forest user preferences with the Shoshone Forest uniquely wild and back country character. Throughout the planning process, and the publically vetted SNF Final Draft Plan alternatives A, B, C, D, E and F, public participation was invited and utilized in decision making by Forest personnel.

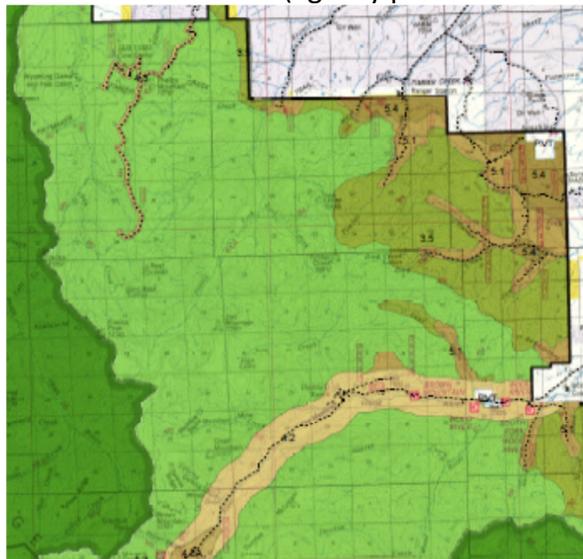
However, with the recommended adoption of Alternative G in the proposed Final Plan, announced only after public comment was closed and the Final Draft Plan was put to bed, I believe there are significant management area changes in the Francs Peak and Wood River roadless areas that go beyond the scope of alternatives A, B, C, D, E and F. It is unfortunate that the public participants, including myself, did not have the opportunity to review these proposed changes.

The SNF Final Plan Map A (pg 5of 8) Managements areas Greybull – is for the new Alternative G that I will be referring to, and has been sent as an attachment along with this objection letter. It has also been reprinted on this attachment letter.

Frans Peak IRA Alt A (1986 Plan) light green = 3A semi-primitive backcountry nonmotorized

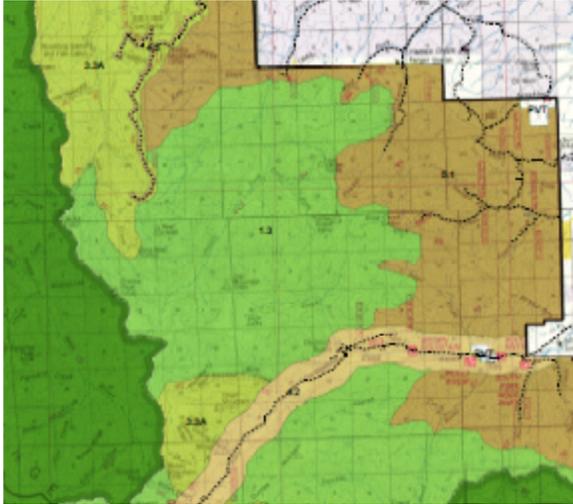


Frans Peak IRA Alt B (agency preferred 2012)

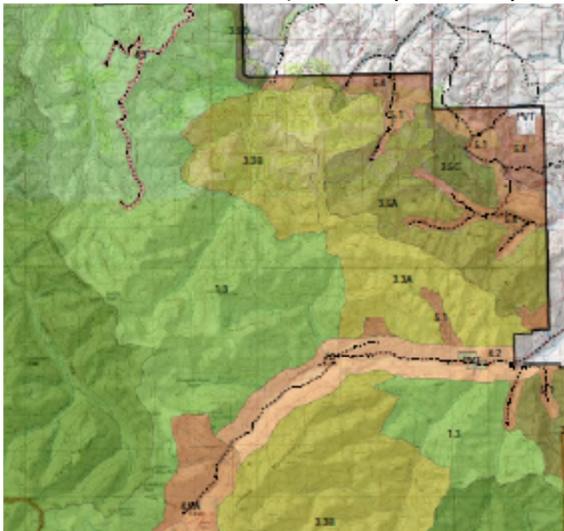


(maps continued)

Francs Peak IRA Alt F (high motorized bookend)



Francs Peak IRA Alt G (revised plan – expanded motorized in yellow & brown)



On page 8 of the Shoshone National Forest (SNF) Draft Plan, December 2011, it states --

The Shoshone National Forest is part of the Greater Yellowstone Area. The Greater Yellowstone Area is one of the last remaining large, nearly intact ecosystems in the northern temperate zone of the earth. The Shoshone plays an integral role in this ecosystem, providing habitat for wide-ranging wildlife including grizzly bear, elk, bison, and wolf; providing a huge expanse of natural landscapes; providing a breathtaking backdrop of natural resources; and providing outdoor lifestyles for local communities.

(The alternative G map for the proposed management area change to potential or increased motorized use in the Francs Peak and Wood River designated roadless and back country areas of the Shoshone National Forest did not exist during the public review of the Draft Plan.)

The Vision statement on page 13 of the Land Management Plan 2014 revision for the Shoshone National Forest (SNF) states:

The undeveloped character and important values of back country areas are maintained.

(The alternative G map for the proposed management area change to potential or increased motorized use in the Francs Peak and Wood River designated roadless and back country areas of the SNF did not exist during the public review of the Vision statement.)

In the Draft Analysis of the Management Situation SNF, June 2011, page 13, it was stated:

The Recreation Opportunity Spectrum would stay consistent with existing mapping and would not be updated. Current recreation opportunities provided by the Shoshone would continue. Expectations of dispersed recreation users are not likely to be met, such as increased motorized loop routes, short loop non-motorized opportunities, and increased opportunities for day use activities. In some dispersed areas adjacent to streams and rivers, and in some high use wilderness destinations, overuse and resource degradation will continue and expand as use expands.

(The alternative G map for the proposed management area change to potential or increased motorized use in the Francs Peak and Wood River designated roadless and back country areas of the SNF did not exist during the public review of the Draft Analysis of the Management Situation.)

In the Analysis of the Management Situation SNF, January 2012, page 15:

Marked increase in illegal use off designated routes, resulting in increased wildlife disturbance, soil erosion, and sedimentation in streams

Also, page 15:

With increasing use of off-highway vehicles, more funding and personnel to enforce off-highway vehicle regulations and manage resource damage will be needed.

(The alternative G map for the proposed management area change to potential or increased motorized use in the Francs Peak and Wood River designated roadless and back country areas of the SNF did not exist during the public review of the Analysis of the Management Situation.)

Nowhere in Alternatives B, C, D, E or F will you find reference to the proposed management area change for any potential or increase in motorized use in the Francs Peak and Wood River designated roadless and back country areas of the Shoshone National Forest, as shown on the

previous page with the map for the new Alternative G in the Final Forest Plan (Land Management Plan 2014 Revision Shoshone National Forest).

As I was personally very involved in the public meetings as an elected official and Cooperator, I certainly would have noticed the inclusion of alternative G map. This new recommendation of changing from several management areas of 1.3 (3A) in alternative A (current management) and Alternative B (previously SNF preferred Alternative), to 3.3A (back country recreation year round motorized) and 3.3B (back country recreation summer non-motorized with winter motorized) in Alternative G was created after all public input for the Draft Plan was closed. 1065 substantive comments from the public were acknowledged by SNF for Alternatives A, B, C, D, E, and F. Therefore, the public did not have the opportunity to review Alternative G recommendation of these significant changes in Francs Peak and Wood River roadless areas from non-motorized (1.3 [3A]) to motorized (3.3A and 3.3B). SNF does not have a single written comment referencing alternative G recommended changes, because alternative G did not exist during the entire public process when public meetings were being held and public comments were being solicited. There may be generalized comments, pro or con, that were given during the comment period, or specific comments that were received behind closed doors after the public opportunity had expired.

Although, I do not have a law degree, I believe this last minute inclusion of Alternative G will not comply with NEPA requirements, since the significant change of management areas in Alternative G was developed after the public input public planning process that helped develop alternatives A, B, C, D, E, and F. In essence, the bookends have been moved, after all public participation in the Draft analysis was closed.

My recommended solutions are:

1. Open the public written comment period again, with adequate public meetings, to educate the public on the significant changes in the new alternative G, and solicit new comments on these changes moving to alternative G.
2. OR, remove Alternative G, in its entirety, and publish a revised SNF Final Plan.

Either of these solutions would involve the public, as they rightfully deserve, and would result in a Final Forest Plan that would withstand scrutiny.

Thank you all for your consideration, and diligence.

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