

March 24, 2014

Thomas Tidwell, Chief of the U.S. Forest Service  
Attn: EMC—Administrative Reviews  
1400 Independence Avenue SW, Mailstop 1104  
Washington, DC 20250-1104

Submitted electronically at: [objections-chief@fs.fed.us](mailto:objections-chief@fs.fed.us)

Objector:

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Subject: Shoshone National Forest Land Management Plan, 2014 Revision

Responsible official: Daniel Jiron, Rocky Mountain Regional Forester

Dear Chief Tidwell;

I am submitting this objection to the Land Management Plan 2014 Revision and Draft Record of Decision for the Shoshone National Forest as a member of the public. I have hiked, backpacked, hunted and fished on the Shoshone Forest for over 60 years. I have standing to have my objections heard having submitted written comments and verbal comments on numerous occasions at cooperator meetings and public meetings.

In my review of the revised Land Management Plan, I am tremendously concerned about the erosion of the wild character of the Shoshone National Forest that the new plan as proposed will cause. Many of the changes that have been incorporated into the final plan since the DEIS and draft plan phase of the planning process allow more motorized allocation on the forest and reduce protection for wildlife and wild lands on the forest. My own review of the public comments does not reveal the source of this drift toward more motorized access of the forest. On the contrary, the vast majority of comments support management that will maintain or increase protections to preserve the wild character of the Shoshone Forest.

I will try to make objections only to issues that are not covered in the objections that I know are being filed by organizations that I am a member of, like the Wyoming Chapter of the Sierra Club, the Wyoming Wilderness Association, the Wyoming Outdoor Council, and The Wilderness Society. I totally agree with the points of objection raised by these aforementioned groups.

Summary of Objection Issues

**1. The Forest Service should not apply winter motorized land use allocations (Management Areas 3.3A, 3.3B, 3.5A, 3.5B, & 5.1) to areas the FEIS designates as “Crucial Winter Range”,**

**“Bighorn Sheep crucial winter range”, “Elk calving and crucial winter range”, or “Within lynx critical habitat”.**

**2. The Forest Service should not allow summer motorized use allocations (Management Areas 3.3A, 3.3C, 3.5A, 3.5C, & 5.1) to areas the FEIS designates as “Elk calving and crucial winter range”.**

**3. The Forest Service should reinstate the boundaries of the Sawtooth Peatbeds Special Interest Area as proposed in the DEIS and Draft Plan in preferred Alternative B.**

Objection issue #1: The Forest Service should not apply winter motorized land use allocations (Management Areas 3.3A, 3.3B, 3.5A, 3.5B, & 5.1) to areas the FEIS designates as “Crucial Winter Range”, “Bighorn Sheep crucial winter range”, “Elk calving and crucial winter range”, or “Within lynx critical habitat”.

On January 24, 2014, the Shoshone National Forest issued a revised Land Management Plan (hereafter referred to as the final forest plan), final Environmental Impact Statement, and draft Record of Decision. The final forest plan proposes “snowmobile area exemptions” to crucial winter range areas on all of the identified crucial winter range areas in the Washakie District and on most of the non-Wilderness crucial winter range areas in the Wind River District. Please see Maps 73, 77, and 79 in the final forest plan. I strenuously object to allowing this expansion of winter motorized use to impact our valuable wildlife resources. All of these areas are heavily used by elk, deer, moose, or bighorn sheep. When I asked about these problems at the Forest Planning meeting in Lander, March 11, 2014, I was told that crucial does not mean *really crucial* and that if the snow is deep enough for snowmobiles it is too deep for wintering game. I have a hard time even dignifying those ridiculous responses with a rebuttal, but here goes: First, the Wyoming Game and Fish and Forest Service biologists identified these exact areas as crucial winter range. After ten years of working on this plan, what can possibly be the justification for a reversal in that designation in the last three months? To the second point, that enough snow for snowmobiles is too much for wintering game, I have several problems. One, our beleaguered moose population has absolutely no problem living with plenty of snow for snowmobile use. One area on Horse Creek in the Wind River District that is designated with this snowmobile exemption is heavily used in the winter by moose, elk, and deer. While it is designated (map 79) as MA 5.4 (crucial winter range), it is open for snow mobile use per map 77. In that same general area of the Wind River District, motorized winter use is allowed in areas designated “Bighorn Sheep crucial winter range” (map 13), and “Critical Canada Lynx habitat” (map 7). In all areas of crucial winter range, it is common for there to be plenty of snow for snow machine travel on all aspects of a given slope except the open south or west where all types of game may be utilizing forage. It is extremely damaging to these animals to be impacted by approaching machines, whether those machines go onto the open areas or not. There are no acres of designated crucial winter range where off trail snowmobile use should be allowed.

The final forest plan should be changed to entirely eliminate snowmobile use off designated routes in the winter.

Objection issue #2: The Forest Service should not allow summer motorized use allocations (Management Areas 3.3A, 3.3C, 3.5A, 3.5C, & 5.1) to areas the FEIS designates as “Elk calving and crucial winter range”. Comparison of maps 15 and 79 shows considerable overlap of these uses in the Wind River District. I suspect such overlap also exists on other districts of the Forest, and my objection extends to all such areas but, as my experience is primarily in the Wind River District, that is where I will specifically address this problem. Maps 15, 76, and 79 show areas in the Lean to Creek, East Fork, Bear Creek, Wiggins Fork, Horse Creek, Brent Creek, Burroughs Creek, and Five Mile creek drainages where the allocation allows unrestricted summer motorized use. Whenever I have expressed concerns about this expansion of summer motorized allocation to Forest officials at plan meetings, I hear that the motorized allocation is okay in sensitive areas because the upcoming Travel Management Plan will settle where any new trails will be allowed. I find this rationale to be disingenuous because of the overall size of new summer motorized allocations in the Wind River District (at least 40,000 acres that are currently managed backcountry non-motorized are converted to summer motorized in the final forest plan), and the fact that almost all of those 40,000 acres are secure wildlife habitat. Those values will be lost forever if there are any more roads in these areas. So what is the reason to put these wild lands on the table for consideration for new trails if Forest Service and Wyoming Game and Fish officials all agree this is all great wildlife habitat, summer and winter? It seems the Forest Service needed more acres to allocate as summer motorized to reduce the loss of motorized acres forest-wide in the final forest plan, so the Wind River District was basically opened up in its entirety (except the designated wilderness portions). None of these lands should be considered for summer motorized use, especially not the known elk calving grounds. The final forest plan must be changed to manage these wild lands like they are in the current forest plan, as backcountry non-motorized recreation, or management area 1.3.

Objection issue #3: The Forest Service should reinstate the boundaries of the Sawtooth Peatbeds Special Interest Area as proposed in the DEIS and Draft Plan in Alternative B. The final forest plan reduced the size the Sawtooth Peatbeds Special Interest Area. These areas were reduced from the boundaries proposed in the draft plan after the public had any chance to comment on these changes. At the cooperators meeting in Cody on May 9, 2014, one cooperator expressed a paranoid concern that because a jeep trail went through this Special Interest Area, maybe sometime in the future the surrounding SIA designation would cause the road to be closed. The road is protected by the backcountry access corridor management prescription MA 4.3 and as such was solidly set in the plan as a road. But, because of one cooperator’s worry about what might happen, about 30% of the proposed Sawtooth Peatbeds Special Interest Area lost that designation and protection in the final forest plan. This area was described and proposed for special designation by Forest Service biologists, but was reduced by 30% because of an unfounded concern about a future threat that no one else than one cooperator seemed to fear. I would like the plan to be changed so that the Sawtooth Peatbeds Special Interest Area is increased to the size it was in alternative B of the draft plan.

Kim Wilbert

