March 22, 2014

Thomas Tidwell, Chief
USDA Forest Service
Attn: EMC – Administrative Services Reviews
1400 Independence Ave. SW, Mailstop 1104
Washington, DC 20250-1104

RE: Shoshone National Forest Land Management Plan Revision
Responsible Official: Daniel Jiron, Regional Forester (R2)

Dear Chief Tidwell:

I am writing on behalf of the Wyoming State Snowmobile Association (WSSA) to file an objection to a portion of the Shoshone National Forest's revised Land Management Plan. The WSSA was an active participant throughout this forest plan revision process. We submitted substantive formal comments all through this extended planning process, which culminated with our 16-page letter on the final DEIS and plan revision dated November 20, 2012. WSSA therefore qualifies as an 'objector.'

WSSA is, overall, appreciative of efforts put forth by the forest planning team throughout their process to listen to and pay attention to our concerns and suggestions related to our continued snowmobiling access on the Shoshone National Forest. While we are pleased overall that snowmobiling was treated fairly, we do have one objection, outlined as follows, which is related to general off-trail snowmobiling access on the northern zone of the forest:

WSSA's Objection: General off-trail snowmobiling access was unduly restricted on the north zone of the Shoshone National Forest in the Final LMP.

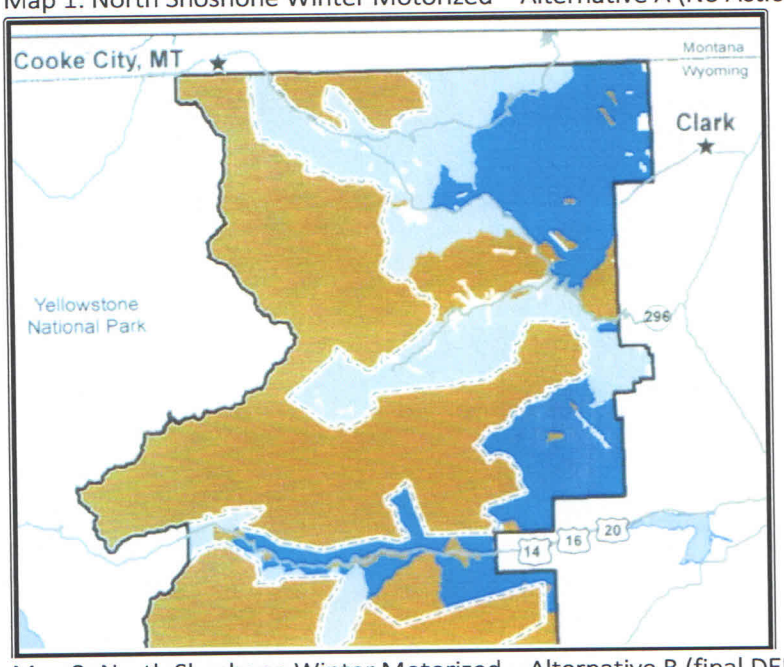
Background and details related to this objection are as follows: On page one of our November 2012 comments, we stated the following in respect to overall, general snowmobiling access:

We are quite concerned about reducing total snowmobiling opportunities on the Shoshone National Forest from 887,800 acres (36% of the forest) to only 480,000 acres (20% of the forest). The DEIS justifies this proposed change as only 'removing areas currently classified as open but not actually used for snowmobile recreation.' We don't accept that explanation. When we closely compare existing Alternative A's winter motorized maps to Alternative B's we find existing snowmobiling use in much of the forest area which would be closed under Alternative B. This blanket methodology which ignores the importance of off-trail snowmobiling opportunities on the Shoshone is objectionable and certainly not acceptable. While there are pockets where there may rarely be snow and therefore no real snowmobile use, this proposed management goes too far and would eliminate significant opportunities for dispersed off-trail snowmobiling.

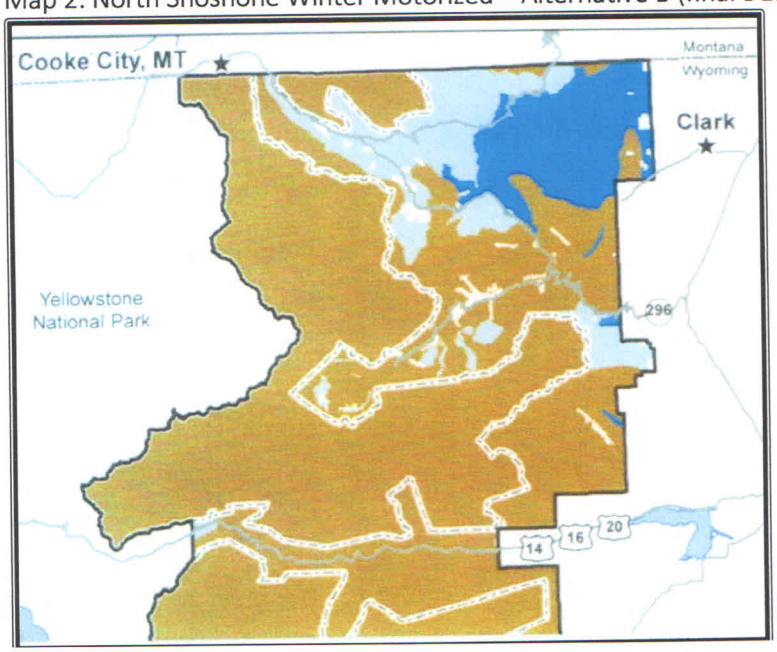
On page two of our November 2102 comments, we then stated the following in respect to the north end of the forest, along with including what we have now labeled as Maps 1 and 2 to demonstrate our point:

Comparing winter motorized maps for the north end of the forest side-by-side (below) provides an extremely graphic depiction of how much over-snow access would be lost under Alternative B on the northern end of the Shoshone. Most of the Sunlight Basin and North Fork areas would be changed from totally 'Available' (dark blue) or "Available with restrictions' (light blue) to completely 'Unavailable' (brown). Likewise a large area south of the Beartooth Plateau would be changed from totally 'Available' to totally 'Unavailable.' Even though there are no snowmobile trails in these areas, general off-trail snowmobile use does occur in portions of these areas which would be closed by proposed Alternative B. We are opposed to such an extreme management change in these areas.

Map 1: North Shoshone Winter Motorized – Alternative A (No Action)



Map 2: North Shoshone Winter Motorized – Alternative B (final DEIS Proposed Action)

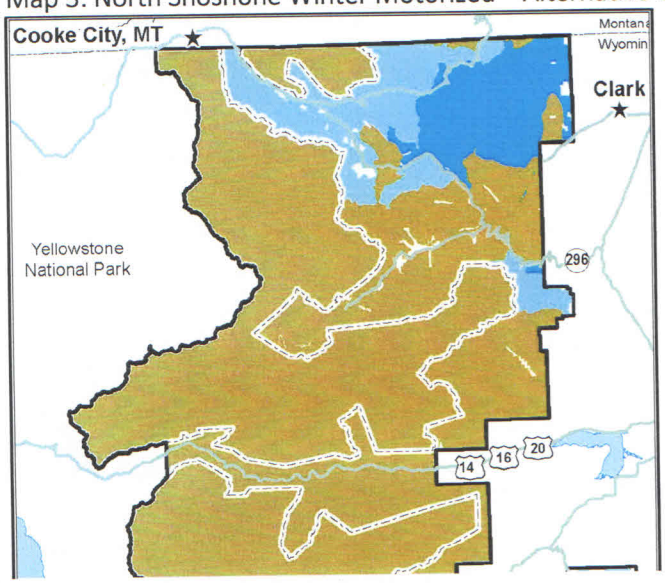


Our November 2012 comment letter also went on to make similar criticisms related to the central and southern portions of the forest, along with providing similar side-by-side comparison maps. We are pleased that the forest's final plan (Alternative G) made substantive, much appreciated changes which ultimately opened more areas of the forest to off-trail snowmobile access in the central and southern portions of the forest. However similar changes were not made in the north zone.

Viewing Map 3 for selected Alternative G below shows that, in fact, even less area than originally proposed in Alternative B – the initial proposed action – will ultimately be open to snowmobiling in the north zone. That is objectionable, since again as with the DEIS, no credible explanation is provided as to why this winter access has been summarily eliminated. Since there are many cabins located along the North Fork (Highway 14-16-20) corridor, as well as in the Sunlight Basin/Crandall area off Highway 296, this closure in particular eliminates historic recreational access whereby families could, up until now, take their children and grandchildren on short rides out their back doors on non-Wilderness and non-winter range lands. That is unfortunate, unnecessary for proper future management of these particular forest lands, and why we hereby object to that piece of the final Shoshone National Forest LMP.

Improvement Requested: Please consider opening more key areas within the north zone, particularly near cabin areas in the North Fork and Sunlight Basin/Crandall areas, to snowmobiling.

Map 3: North Shoshone Winter Motorized – Alternative G (Final Plan)



Thank you for consideration of our objection. We are available to answer any questions or to work with Forest staff toward reasonable resolutions.

Sincerely,

Bert Miller, President
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Cc: Joe Alexander, Shoshone Forest Supervisor
Daniel Jiron, Regional Forester