Data Submitted (UTC 11): 2/20/2024 8:38:03 PM
First name: Norman
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Organization: Idaho State Snowmobile Association
Title: & Idaho Recreation Council
Comments: Dear Objection Reviewing Officer Leanne Marten:

This Interested Persons Request is submitted on behalf of the Idaho State Snowmobile Association and the Idaho Recreation Council, pursuant to 36 CFR 219 Subpart B, regarding the revised Nez Perce-Clearwater Forest Plan. Notice of the Objections filed to the revised Forest Plan was published in the Lewiston Tribune on February 8, 2024. This Interested Persons Request is timely submitted within the 10-day deadline from the time of publication.

1.Name, Address, Phone Number and Email Addresses.

The Interested Persons requesting participation in Forest Service Objection meetings are:

Idaho State Snowmobile Association ("ISSA")
P.O. Box 70001
Boise, ID 83707
Phone: 208-424-3870
Email: smitchel@alscott.com

Idaho Recreation Council ("IRC")
501 Baybrook Court
Boise, ID 83706
Phone: 208-424-3870
Email: smitchel@alscott.com

ISSA are IRC are represented by an attorney in this matter, and all correspondence or other communications regarding this request should be directed to the undersigned at the mailing and email addresses indicated on the letterhead above.

ISSA is a statewide organization representing 41 clubs, numerous individuals and many businesses throughout Idaho. ISSA members highly value the opportunity to ride snowmobiles in the national forests, including the Nez-Perce Clearwater Forests in particular. Winter snowmobiling, properly managed, has little impact on resources, even when utilizing both roaded and unroaded areas. It provides recreation for millions of Americans and is of particular importance to those of us who live in Idaho. Not only is it important to the quality of life of Idahoans and the thousands of visitors each year, but it is also important to the economic stability of many of our communities.

IRC is an Idaho nonprofit association representing Idaho mechanized and motorized recreation interests, which acts through committees comprised of representatives from numerous recreation organizations, individuals and businesses. IRC members use motorized and non-motorized means, including off-highway vehicles (motorcycles, all-terrain vehicles, utility type vehicles, Jeeps/4-wheel drives), snowmobiles, horses, llama and mules, mountain bikes, jetboats and rafts, all forms of winter recreation (both motorized and non-motorized), airplanes, small suction dredge mining, and hiking to access state and federally-managed lands through the United States and especially in Idaho. This includes the U.S. Forest Service lands in the Nez Perce-Clearwater National Forests.

ISSA and IRC submitted a timely Objection in this matter and have participated in consideration of revisions to the Forest Plan, including submittal of comments and meetings with Forest Service officials. ISSA and IRC

hereby incorporate the entirety of their Objection and all of their previously submitted comments on the Forest Plan into this request by reference, as well as by the specific references below. See e.g., "Forest Plan Revision Salmon Nez Perce-Clearwater National Forest Idaho State Snowmobile Association Comments" and IRC's Forest Plan revision comments (also adopting by reference the Forest Plan revision comments of Idaho County, ISSA and others) (Feb. 14, 2018).

2.Names of Objectors whose Objections ISSA and IRC have an Interest in and Explanation of Interest in Objections, including Support or Opposition.

ISSA and IRC have an interest in all Objections that have been filed regarding the revisions to the Forest Plan, as available in the Public Comment/Objection Reading Room on the project website https://www.fs.usda.gov/project/?project=44089. ISSA and IRC have a particular interest in the designation and management of Recommended Wilderness Areas ("RWAs"), as expressed in their Objection and previously submitted comments. ISSA and IRC support all Objections that seek to reduce or eliminate the designation of RWAs and oppose all Objections that support or seek to increase the designation of RWAs (and therefore limit existing motorized recreation).

Significant portions of the RWAs in the revised Forest Plan do not meet the statutory criteria under the Wilderness Act. In addition, the RWAs will be managed as Wilderness (with some limited exceptions) prior to any designation as Wilderness by Congress, with no allowance for existing motorized recreation, including snowmobiling. This is contrary to law. Only Congress can make Wilderness designations, and existing uses can only be discontinued - if at all - through a Congressional Wilderness designation. The determinations made by the Forest Service also fail to comply with the National Forest Management Act, NEPA and the APA. ISSA and its partners will continue to scrutinize the treatment of motorized recreation, including snowmobiling, in RWAs and bring litigation to enforce the law and protect their interests as needed, just as they did in ISSA v. U.S. Forest Service, Case No. 3:12-CV-447-BLW (D. Idaho).

The concerns of ISSA and IRC could be resolved by removing RWAs that do not meet the statutory criteria under the Wilderness Act and instead providing for Special Management Areas that allow for snowmobiling. For any remaining RWAs, the concerns could be resolved by allowing existing motorized recreation, including snowmobiling in historic riding areas, to continue in the RWAs prior to any designation as Wilderness by Congress.

3.Identification of Substantive Formal Comments by ISSA and IRC.

ISSA and IRC previously submitted specific written comments regarding revisions to the Forest Plan. The issues of interest described above are based on previously submitted timely specific written comments regarding revisions to the Forest Plan. Those comments, including those referenced above, are directly linked to the issues raised in the Objections of interest. For example, the previously submitted written comments included opposition to RWAs; they also included opposition to management of RWAs as Wilderness, which would exclude existing motorized recreation, including snowmobile use in historic riding areas - prior to any Wilderness designation by Congress.

4.Participation Request.

As interested parties, ISSA and IRC respectfully request that they be included in any Objection meeting(s) held by the Forest Service regarding Objections submitted in this matter, pursuant to 36 CFR 219.56(f).