

Cody Country Snowmobile Association  
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November 5, 2021

Mark Foster, Environmental Coordinator  
Attention: Shoshone NF Travel Management Planning Project  
Shoshone National Forest  
808 Meadow Lane Avenue  
Cody, Wyoming 82414

Dear Travel Management Planning Staff,

The Cody Country Snowmobile Association (CCSA) was formed in 1968 to help support snowmobiling activities and to help benefit snowmobilers, their families, and friends. For nearly 55 years, our members have found the High Lakes/Beartooth Mountains area to be an extremely special place for recreation, including snowmobiling – so our club members are frequent recreationists in this area year-round.

The CCSA was pleased to help the Forest Service and State of Wyoming develop the initial Beartooth snowmobile trail system many years ago and we've remained a committed partner in its operation and maintenance ever since. We would like to thank the Shoshone National Forest (SNF) for the opportunity to comment on this motorized travel planning process. Our comments on the Travel Management Planning Project's 2021 Environmental Assessment (EA) are as follows:

**GENERAL SUPPORT FOR ALTERNATIVE 4:** The CCSA generally supports most of the management concepts and actions proposed by your Proposed Action, Alternative 4. Our comments below outline our specific support and objections, as well as specific recommendations we believe will help improve some of the individual components of your Proposed Action:

**Support Proposed North Zone OSV Season Dates of November 1 to June 15:** We feel the proposed OSV season dates for the North Zone are fair and accurate. Your detailed SNOTEL data in the EA document clearly shows that there is typically more than adequate snow cover in the greater Beartooths area during this timeframe. Our members have snowmobiled in the Beartooths during this timeframe for decades and agree that there is typically more than adequate snow for snowmobiling in these areas from the beginning of November through mid-June.

While your analysis of historic SNOTEL data used a minimum snow depth screening range of 12 to 18 inches, other science-based publications suggest that a minimum of only 4 to 6 inches of snow cover is sufficient to help armour and protect the ground beneath it. Consequently, even though your screening threshold was three times greater than other

science-based suggested snow depth buffers, the SNOTEL analysis proved that – without doubt – lands will be properly protected with adequate snow cover during your proposed OSV season dates.

We also recognize and appreciate that OSVs can also be operated on roads and motorized trails designated as OPEN on the Motorized Vehicle Use Map (MVUM), outside of any seasonal closures or special orders. This can be important for hunters needing access to backcountry camp areas when early, deep snow covers access roads and trails prior to November 1, as just one example.

**Oppose Class 2 Over-Snow Vehicle (OSV) Operation on most Designated OSV Trails:** We remain absolutely opposed to allowing full-sized vehicles (trucks and SUVs) equipped with track conversions (Class 2 OSVs) on groomed and ungroomed OSV trails across the entire SNF, including within the North Zone where our trails are located. You have the ability to keep these large specialty vehicles off managed OSV trail areas through ‘class of vehicle’ provisions of Subpart C – and you need to do so. We are not opposed to Class 2 OSVs being operated on open motorized routes elsewhere during the winter season – but they do not belong on the managed OSV trail areas!

Full-size tracked vehicles are too heavy, too wide, and too tall; they do not belong on the managed national forest snowmobile trails. They would create a safety hazard due to their width and slower operational speeds, along with their much heavier weight and displacement compared to Class 1 OHVs, including trail groomers. Their heavier weight and displacement create great potential to cause trail rutting. Our trails are located in deep snow country and are not groomed frequently enough to create the same compacted snow density compared to what is found on snow roads in Yellowstone National Park – where (unlike our trails) their roads are groomed and compacted on pretty much a daily basis. Consequently, authorizing and thereby also encouraging increased Class 2 OSV use on designated OSV trails would most certainly create rougher trails and increased safety issues compared to our current situation.

We know from experience (our club was the State’s grooming contractor in this area for many years) that our own tracked snowmobile trail groomer in the Beartooths, which is lighter and has lower ground pressure displacement than Class 2 OSVs, can get stuck when just one of its tracks get off the compacted over-snow trail. Running off the packed roadways (OSV trails) and getting stuck would become a certain regular occurrence if all OSV trails are opened for Class 2 OSVs, particularly on ungroomed/unpacked trails. The greatest risk with this is that you don’t just call a tow truck when you get a tracked vehicle stuck in a remote location: you either need to have another large tracked vehicle trucked in (not timely and very expensive) or you have to dig down to bare ground, shovel out a very significant amount of snow to get it to where the vehicle is no longer high-centred. And then, once you’re on solid ground, you have to build a compacted snow ramp so that the vehicle can climb out of a very significant hole you’ve created in the snowpack. So, if you want to unnecessarily create adverse environmental impacts – encourage Class 2 OSV operation across all designated OSV trails. In our opinion, that would be a huge mistake.



In respect to all of the ungroomed OSV trails in the Beartooths area (as well as across the entire SNF), there is a reason why most ungroomed OSV trails are managed in an 'ungroomed' status: the entire route is not passable by a groomer due to insufficient width or height clearance, unmanageable snow depth, and/or challenging topography. Therefore, it's ludicrous to expect tracked, full sized 4WD SUVs and pickup trucks to be able to safely and responsibly traverse these same ungroomed routes during the OSV season.

Our recommendation is that the final TMP decision should designate all groomed and ungroomed OSV trails as CLOSED to Class 2 OSV use during the area's applicable winter OSV use season dates – unless a limited, very specific managed OSV trail route(s) is designated OPEN (by exception versus by normal rule) by the appropriate Ranger during publication of the annual OSV Use Map (OSVUM).

**Support Continued OSV Use in the High Lakes Wilderness Study Area (WSA):** The High Lakes WSA is near and dear to our hearts since our club members have been snowmobiling in this area since long before it was established as a WSA in 1984. Congress was very clear in their intent that this entire area is to remain open for continued snowmobile use until such time either use changes significantly or Congress determines differently. Therefore, we support Alternative 4 since it keeps the High Lakes WSA 100% open to continued OSV use. This is consistent with not only Congressional intent but is also supported by your updated EA analysis. Use patterns truly have not changed significantly since the 1970s, dating clear back to the early years of our club.

Consequently, we are opposed to Alternative 3 and its proposal to close the northern and eastern portions of the High Lakes area to OSV use. We will fight that closure to the end and feel we have strong Congressional backing to resist that effort. We've unfortunately had to fight off continual attacks from environmental and nonmotorized groups trying to close this area to our use for about as long as anyone can remember. Nonmotorized and environmental groups already have exclusive use of 83% of the SNF – plus they have full access to the remaining 17% of the Forest potentially open to limited motorized recreation. Consequently, it would be inherently wrong to reward them for their unwillingness to abide by the same multiple-use principles we operate under every day of the year (i.e., all motorized trails AND areas on the SNF are ALWAYS open to multiple use by nonmotorized recreationists, regardless of whether it is winter, spring, summer or fall).

**Support Continued OSV Use in the Line Creek Research Natural Area (RNA):** We support Alternative 4 since it keeps the Line Creek RNA open to continued OSV use. This area has provided important winter access for several decades and is an important companion to High Lakes WSA area winter access. The EA analysis shows adequate snow depths in this region and that OSV use can continue to be properly managed, justifying continued use.

**Support New Trail to Painter's Store (Ghost Creek new route – NZ-04w):** We continue to support the proposed new OSV trail from the Painter Store up to trail A at Highway 212. This will be a good addition to the current Beartooths trail system and will benefit the Crandall area as well. We feel that pre-existing historic use of this trail by snowmobilers years ago, analysis that shows low levels of potential wildlife disturbance, and no potential resource impacts prove that this is a good addition to the formal OSV trail system in this area. Other

potential benefits could include less congestion at the junction parking area, less use on the lower (Western) portion of trail A, and improved safety since this new trail will be marked to help guide riders.

**Opposed to the use of Minimum Snow Depths:** It appears the latest Proposed Action has backed away from outwardly establishing a 'minimum snow depth rule' on the SNF. However, we feel the current EA document is still back-dooring us on this subject since your analysis sections repeatedly use a '12- to 18-inch minimum' snow depth threshold in their OSV analysis deliberations. That is wrong. And it is contrary to Subpart C which sets 'season of use' and 'class of vehicle' as the only two criteria for Subpart C implementation; minimum snow depth is clearly not an intended regulatory factor.

Specifically, on page 338 in Section 3.13.3.4.1.2 Issue 2 regarding "whether the presence of OSV use may cause impacts to water resources or water quality as a result of inadequate winter snowpack conditions, trail locations, or over-snow use areas" the EA unjustifiably states: "Minimum snow depths required for protecting these areas range from 12 to 18 inches." We find this to be objectionable, particularly since it continues to tier to 'Switalski, 2016' – a purported set of 'Best Management Practices' developed by the Winter Wildlands Alliance, an anti OSV organization. That is shoddy and biased analysis work which needs to be removed from this process.

**Object to Buffer Zones used in Motorized Trail Analysis:** We find it objectionable that inappropriate/illegal '1/2-mile and 5-mile' buffer zones were used in your analysis of potential nonmotorized use and user conflict in this EA's analysis, especially in respect to Wilderness and Inventoried Roadless Areas (IRAs).

It seems that we must remind you that the Wyoming Wilderness Act specifically prohibits buffer zones adjacent to Wilderness Areas and expressly states: *"Congress does not intend that the designation of wilderness areas in the State of Wyoming lead to the creation of protective perimeters or buffer zones around each wilderness area. The fact that nonwilderness activities or uses can be seen or heard from within any wilderness area shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area."* Consequently, it is out of line to consider screening out adjacent motorized use due to potential use or user conflicts.

Additionally, motorized trails are expressly allowed, including new trail construction, within IRAs. Consequently, any manufactured buffer zone prescription should be irrelevant and not cause motorized trail routes and areas to be denied or diminished further than what already has occurred through implementation of the 2015 SNF LMP.

Thank you for giving CCSA the opportunity to comment on this proposed action. Your EA documents show there has been no significant resource damage from snowmobiling on the SNF, which we believe reflects that past and current management practices have been successful and working well. This is the result of good on-the-ground management combined with a good working relationship between SNF and local user groups like CCSA.



We feel we have been a good long-term partner with the Shoshone National Forest and Wyoming State Trails, as our club has worked over the years to help develop, build, maintain, sign and groom snowmobile trails in the North Zone of the forest. We look forward to continuing that partnership and working with you to successfully complete this planning process.


Respectfully Submitted by,

**Cody Country Snowmobile Association's Officers and Directors**

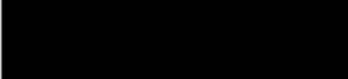
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