

**Cody Country Snowmobile Association**

**PO Box 1745**

**Cody, WY 82414**

September 10, 2020

Mark Foster, SNF Environmental Coordinator

Attention: Shoshone NF Travel Management Planning Project

Shoshone National Forest

808 Meadow Lane Avenue

Cody, Wyoming 82414

**Amended Comments**

Dear Travel Management Planning Staff,

The Cody Country Snowmobile Association (CCSA) was formed in 1968 to benefit snowmobilers, their families, and friends. We would like to thank the Shoshone National Forest (SNF) for the opportunity to participate in this motorized travel planning process. The High Lakes/Beartooth mountain range is a very special place to snowmobile and our club members are frequent recreationists in this area year-round. The CCSA was very glad to be able to help develop the Beartooth snowmobile trail system many years ago and we’ve remained a committed partner in its operation and maintenance for many decades. Our comments on the Preliminary Environmental Assessment EA include the following:

**General Support for Alternative 2:** We generally support many of the management concepts and actions proposed by your Proposed Action Alternative 2. Exceptions to that support are noted in our comments below.

**Class 2 Over-Snow Vehicles (OSVs):** We are absolutely opposed to allowing full-sized vehicles (trucks and SUVs) equipped with track conversions to use groomed and ungroomed OSV trails across the entire SNF, including the North Zone where our trails are located. We’ve seen how badly tracked vans and SUVs have severely rutted the groomed roads in Yellowstone Park and we don’t want that kind of damage on our local snowmobile trails. Full-size vehicles are too heavy, they do not belong on national forest snowmobile trails.

**Proposed North Zone OSV Season Dates of November 1 to May 31:**  As a club we recognize that reasonable start and end dates are required under the new OSV Travel Rule. However, these are the absolute minimum OSV season dates we are willing to accept – and we will fight any efforts by conservation and nonmotorized groups to shorten these proposed season dates.

Our support for Alternative 2’s proposed open and close dates is conditional since we have a lot of members who feel these proposed season dates are too short. A good number of our association members have ridden snowmobiles, on adequate snow, much earlier than November 1 as well as much later than May 31; not everywhere on the Forest, but certainly routinely in many high elevation areas in more years than not.

Also, there are years when October snow storms prevent hunters from accessing their backcountry hunting areas or camps since deep snow causes roads to become inaccessible by wheeled vehicles. Consequently, extending the opening date for OSV use on adequate snow to somewhere between October 1 and/or no later than October 15 should be considered. This would give those hunters a fair chance to access their hunting areas and so that desired wildlife harvest targets have a reasonable chance to be met in years with early, deep snow.

Additionally, at season’s end, there are a lot of dedicated snowmobilers who regularly continue to ride their snowmobiles until somewhere between June 15th and June 30th – in high elevation areas where adequate snow remains. It has been their tradition for decades and they don’t want their riding access restricted due to arbitrary dates on the calendar that really have nothing to do with when there typically is still more than adequate snow in many high-country areas. SNOTEL data shows there are many places on the SNF where snowfall is absolutely sufficient to be able to add 15 to 30 days to both the front-end and back-end of your final OSV season dates – so we request that you seriously consider that in a revised Alternative 2.

It is also our position that if there is sufficient snow depth in areas of the Forest zoned available for OSV use snowmobilers and other OSV users should be given priority allowing them continued access versus having our very limited motorized use zones closed on an early, random date – particularly if the reasoning to end OSV use early is to ‘provide exclusive use of that snow by nonmotorized recreationists.’

**High Lakes Wilderness Study Area:** 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 2 since it would keep the High Lakes WSA 100% open to continued OSV use. This is consistent with not only Congressional intent but is also supported by your EA analysis. Use patterns truly have not changed significantly since the 1970s, dating clear back to the early years of our club.

We’ve had to fight off attacks from environmental groups as well as nonmotorized groups who have continued to try to close this area to our use for about as long as anyone can remember. Nonmotorized and environmental groups already exclusive use of over 2 million acres of the SNF (that is 80%) for their exclusive nonmotorized use which we are entirely shut out of. Plus, they keep wanting to close more of our very limited area open to snowmobiling. We openly share our 20% of the Forest with them versus ever having exclusive use of it. Consequently, it would be inherently wrong to reward them for being unwilling to abide by the same multiple-use principles we operate under every day of the year (all motorized trails on the SNF are ALWAYS open to multiple use by nonmotorized recreationists, regardless of whether it is winter, spring, summer or fall).

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.

**Opposed to Proposed 12” Minimum Snow Depth:** We are strongly opposed to the SNF proposal to adopt a minimum of 12” of snow depth before any OSV use can occur. We are aware that the 2015 OSV Travel Rule states only that there be adequate snow depth. It does not require forests to set a specific minimum number of inches of snow on the ground rule. We know how varying snow depth can be, especially in areas like the Beartooth Mountains where wind can cause bare spots when snow right next to that bare spot can be several feet deep. By setting such a rule, you’re playing right into the hands of the anti-snowmobile groups who are looking for any opportunity to try to shut our riding down even more.

We believe that SNOTEL data, as you’ve presented in your preliminary EA, clearly shows there’s abundant snow in the Beartooth/High Lakes area from late fall into early summer. Setting arbitrary snow depth rules will do nothing but invite even more trouble from environmental and nonmotorized groups who want nothing more than to keep whittling away at our already limited access across the SNF.

**Support New Trail to Painter’s Store (Ghost Creek new route – NZ-04w):** We continue to support the proposed new trail from the Painter Store, travelling up to trail A at Highway 212. This will be a great addition to the current trail system and will benefit the Crandall area as well. The historic use of trail years ago by snowmobilers, low levels of potential wildlife disturbance, and no potential resource impacts indicate this is a good direction for the SNF to go. 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.

**OSV Operation on Snow-Covered Roads Outside the Designated OSV Season Dates:** We feel strongly thatOSV’s should be allowed to be operated on snow-covered designated routes (roads and trails open to wheeled vehicles as per Subpart B and the MVUM, and subject to all seasonal restrictions) outside the established OSV season (so between June 1 and October 31 for the North Zone). Allowing OSV use on designated wheeled routes in this manner will keep public access to open roads and trails during shoulder seasons when snow is often too deep for trucks in some locations of the SNF. We fully understand that OSV travel off designated routes during this time would be strictly prohibited. We know that this is the way the Medicine Bow forest is managed, so we feel it would also be appropriate for the SNF.

**Support Relocation of Ungroomed Trail Across the Sawtooth Peatbeds Special Interest Area (SIA):** We understand that the ungroomed OSV trail across this area needs to follow the road alignment. We will work with State Trails to make sure permanent markers are placed to help locate the correct route when our club marks Beartooth area trails each season.

Thank you for giving CCSA the opportunity to comment on this proposed action. Your EA t documents that there has been no significant resource damage in this area from snowmobiling, which we believe reflects that current management practices have in fact been 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,

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