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TO: Flathead National Forest

RE: Proposed Action on the Flathead National Forest for the Over the Snow Travel Plan

The Flathead Snowmobile Association (FSA) is writing this document in response to the above proposed action. First, we would like to restate our opposition to the addition of the 190,000 acres of additional proposed wilderness that was described on the 2018 FNF plan. Many of these areas do not meet the specific requirements outlined for Wilderness designation in the 1974 Wilderness Act. Our comments were well documented (or at least should have been) during our involvement with the revision process that went into the 2018 FNF Plan. We understand that this current process is not intended to revisit the entire forest plan process, but we wanted to let our objection be known and be on the record.

We would like to take this opportunity to state for the record that since the completion of the 2018 FNF Plan, conditions in the Flathead and Northwest Montana have changed DRASTICALLY! We do not have exact numbers at this point, however, it appears that use of the forest (and state lands of the Stillwater Forest) have increased by 25% to 50% PER YEAR over the last three years and most dramatically in the last two years. Additional riding areas and the maintenance of those areas and current areas as suitable for snowmobile use will be critical for the forest to remain attractive to users and the generator of economic activity in the typically slower winter months.

With the above in mind, we are excited about the addition of the areas noted in the proposed action being added as suitable for snowmobile use. They are either areas that due to fires or other vegetation management are more appropriate for snowmobile use, or are small corridors that connect already open and accessible areas. We appreciate the acknowledgement that these areas make sense to allow the over the snow use designation. We would also like the Forest Service to acknowledge that the FSA needs that ability to periodically mechanically brush and clear designated trails that are in areas normally closed to motorized vehicle traffic. In addition to the trails, we would also like to have the approval (within the Over the Snow Plan) to mechanically treat (meaning brush or thin) off trail areas that are within areas designated as suitable for snowmobiles. This would include but not be limited to the Canyon Creek designated play areas, the McGinnis Creek drainage, the Desert Mountain and Emory Creek drainage, and smaller corridors that are newly designated as suitable. This would include behind the Kelley hump access on roads that are groomed or suitable for snowmobile use. Many of the areas that were previously logged or burned that used to be prime [ldquo]play areas[rdquo] have since grown over. We would like the ability to thin or clear these areas to return them to usable play areas.

In order to make a [ldquo]suitable for snowmobile use[rdquo] area accessible, more infrastructure is needed in the way of plowed access, parking and grooming. We would like to see that ANY area that is [ldquo]suitable[rdquo] also be deemed suitable to allow parking areas and groomed trails as part of the plan. This would include McGinnis, the South Fork areas, and the Red Meadow Road from the North Fork area to Red Meadow Lake. We would also like to see that if an area is suitable for snowmobile use that it should also be suitable for the development of access in the way of parking or connecting routes to/from other suitable areas. Specifically, we are thinking of parking at McGinnis, connecting McGinnis to the Canyon Creek / Kimmerly trails and plowing the South Fork road and the Doris Creek boat launch for use as a parking area. The original North

Fork Road plan included a 52 foot wide parking area at McGinnis that would allow for parking of rigs accessing McGinnis road. This area has been narrowed or is not maintained by the county in the winter for such parking. Other areas including the Fitzsimmons and Desert Mountain trailheads are woefully inadequate for the traffic they are now seeing resulting in frequent traffic jams, stuck vehicles or vehicles blocking the road for safe passage. These parking areas need to be re-evaluated and enlarged to accommodate the traffic we are now seeing. Finally, the area near the Hungry Horse Dam is also inadequate for the number of vehicles normally wishing to use the area causing users to park at/near the dam's visitor center and then having to drive on bare pavement across the dam which is extremely dangerous. As mentioned, we would like the coming plan to allow for plowing of the West Side road to Doris and clearing of some of the parking lot for winter use.

The Forest Service's opening of Anna Creek Cabin for winter use is another example and potential user of a quality parking lot and groomed trail. The trail from the dam, by mid-season (without grooming), typically is 5-7 miles of deep (3-5 foot) bumps or "whoops" which once formed cannot be easily fixed. Normal grooming would keep these bumps from forming and provide a safer trail for all users. In the past, the argument against grooming in this area has been that a groomed trail invites users that are not capable or ready for the type of riding that is typical in the South Fork. The FSA stands ready to educate and work with the USFS to provide the correct signage, training and messaging to alert people that this is "Expert Terrain". Our track record in recent years providing scholarships for all Avalanche training is just one example of how seriously we take this responsibility and we stand ready to have this included in our new Cost Share Agreement. One can equate access to "expert terrain" to a ski area which the USFS issues permits to Whitefish Mountain. There are areas where novices should not go within the boundaries of a ski area, but that does not stop the outfitter from providing ski lifts and access to those areas. In the same way, we should not be blocked from grooming a trail that provides access to an area that is not suitable for a novice rider.

We would also like to point out that while our group represents motorized users, we have an ever growing number of non-motorized users in our club. This includes cross-country skiers, fat-tire bikers, snow-shoers, and hikers. Many join our club to help our efforts and have access to our groomer trackers so they can see which areas have been recently groomed that provide the best trails to ride/ski/hike on. All of these users use our same parking areas and trails.

Safety is our primary concern as we ask to groom more trails. In the past, the USFS has said that in order to add additional grooming, we would have to give up some other areas or trails that are typically groomed citing "wildlife habitat concerns". All of our areas are receiving heavier and heavier use consistently. To take one area off our grooming schedule to groom another is counterproductive. If an area is to be deemed suitable for snowmobiling, then it should be allowed (and common sense) to have a safe, groomed trail to access that area. Further, the National Park Service just suspended their winter wildlife monitoring program in Yellowstone Park citing "They found that 95% of bison and 81% of trumpeter swans had either no response to nearby oversnow vehicles or a "look and resume" response, meaning the animals would look up and then resume what they had been doing." This is further indication that winter use in the areas suitable for snowmobiling has little to no effect on wildlife and that grooming a trail will only serve to make an area safer and more enjoyable to more people while reducing the pressure on those areas already being groomed.

We are grateful that a formal Over the Snow Plan is being developed. However, we believe the USFS needs to take a more holistic approach to planning the entire experience. It starts with having adequate parking, restroom facilities (where appropriate—many already have them), quality groomed trails, and areas that are open to off-trail play. We are excited that the USFS is undertaking "thinning" operations in many areas in the coming years. However, the areas that were once open in the 70's - 90's are now so overgrown that few play areas directly off-trail exist; therefore we are asking that further clearing and thinning be included within the plan either directly by the USFS or via partners like the FSA. The FSA has the ability to mechanically brush the trails with a brushing tractor, however our access to many trails has been blocked by decommissioning of the

roads by the use of kelley humps instead of standard gates. The FSA stands ready, willing and able to perform all the tasks listed above. However, we have been blocked by poor planning and/or a lack of [ldquo]teamwork[rdquo] with the USFS. As we write our new Cost Share Agreement for the next five years, we would ask that the Over the Snow Plan and our CSA be made to work hand in hand as partners to expand winter recreation opportunities across the entire system.

David Covill

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