



April 5, 2021

Kara Chadwick, Forest Supervisor,  
c/o Noel Ludwig,  
P.O. Box 439  
Bayfield, CO 81122

Re: Ice Creek Project

Dear Mr. Ludwig:

Please accept this correspondence as the comments of the Colorado Snowmobile Association ("CSA") regarding the Ice Creek area revisions ("The Proposal"). The Organizations are somewhat frustrated that despite the improvement of snowmobile access being improved as a goal of the project and our continued involvement in the public processes around this NEPA analysis no one has meaningfully engaged the snowmobile community to discuss our concerns. Prior to addressing our specific concerns on the Proposal, Colorado Snowmobile Association ("CSA") was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. CSA has become the voice of the more than 30,000 registered snowmobile users and the state and is the organized snowmobiling seeking to advance, promote and preserve the sport of snowmobiling by working with Federal and state land management agencies and local, state and federal legislators. These comments are submitted in conjunction with the comments of our local clubs and snowmobile interests regarding the projects.

**1. Exceptionally poor communication to date must be remedied.**

Our first concern is the complete lack of communication with the snowmobile community regarding the Proposal, as this area is an area and project with known concerns being voiced from the snowmobile community previously. This is surprising given the active role of the snowmobile community in so many efforts in and around the proposal area. This total silence on concerns is certainly not been the normal experience on most of the NEPA analysis we participate in throughout the country and as a result we are concerned. Many of the issues we have around the proposal could be addressed in a short onsite meeting.

This is somewhat frustrating given the easily created conflict between usages in the area and the concerns from the snowmobile community on this project. This simply needs to improve as we do not believe the intent is to create conflict in the area but rather to resolve conflict and improve recreational experiences. This does not happen

when one of the user groups allegedly benefitting from the project simply is not engaged. No matter how good the outcome for the project may be, there is distrust between interests that is created. This is an opportunity to avoid user conflicts and instead of mitigating conflicts it is creating them.

## **2. Location of rerouted snowmobile trail must be clarified.**

Our second concern involves the location of the snowmobile reroute. While we agree that the current route is difficult to ride, conflicting usages and often lacks snow due to the south facing nature of the current route, we are unsure of the exact location of the reroute as the proposed route is difficult to locate on the ground as it has not been flagged or otherwise created yet. We have significant concerns about the reroute remaining difficult to use for beginners as many of the corners remain tight for beginning riders in good weather conditions. In this area, a short distance of variation in route location can have significant impacts to the usability and quality of the snowmobile route. In poor weather conditions these corners could easily be a barrier to travel or a safety hazard, which we would like to avoid.

Being able to walk the general location of the reroute would be VERY helpful to our understanding of the Proposal. Our local representatives are most familiar with the area and the behavior of snow as it melts and is utilized for snowmobile recreation. As this is a groomed route, the possibility of moving snow on to the route to address possible melting issues is a viable option to maintain access. We simply are not able to understand where the snow may come from to move to the route, since we do not know where the new route is located. At this time, we are unable to support the location as we don't really understand where it is.

## **3. Parking impacts are a significant concern for the snowmobile community.**

Our third concern is the availability of parking in the Proposal area, as this is the single largest headache for the snowmobile community under the current management structure. While this is a major concern for the snowmobile community, the EA provides little discussion of the changes proposed for parking. The information on parking is very generalized and short making meaningful discussion of this issue impossible. We would like to expand from current levels of recreational parking in the area both during the project and at completion of the project. This area is generally difficult to find public access too and these parking opportunities are hugely valuable to all recreational users of the area.

## **4. Skidding of trees during project is a major concern**

Our final concern around the proposal is the fact the Proposal clearly identifies that winter skidding of logs is the primary removal process for trees that are removed. We are VERY concerned that this removal process is performed in a manner that does not impact public access to the area while removal is underway. We have commonly been able to avoid impacts between snowmobile access and winter skidding of trees in a timber sale in areas adjacent to groomed routes but this has also taken significant

discussions well ahead of time. We are not aware of any discussions on this issue and there is no mention of this type of a concern in the EA. As a result, we vigorously assert that this issue must be addressed as retaining public access to recreational opportunities must be a priority of the project as the project is moving forward.

### **5. Conclusion.**

We believe there could be significant benefit to all recreational users from the Proposal, but at this time we are unable to clearly identify these benefits with any specificity. From our perspective, the devil is in the details for projects such as this. The poor communication around this entire proposal, which has impaired our ability to resolve basic concerns simply must be addressed. We simply are not aware of any communication between anyone involved with the project and anyone in the snowmobile community despite our concerns around the project. We hope this is addressed in the near future as communication such as this is critical to the success of any project.

CSA would welcome a discussion of these opportunities and any other challenges that might be facing the Ice Creek Parking area moving forward at your convenience. Please feel free to contact Scott Jones, Esq. at 508 Ashford Drive, Longmont, CO 80504. His phone is (518)281-5810 and his email is [scott.jones46@yahoo.com](mailto:scott.jones46@yahoo.com).

Respectfully Submitted,

Scott Jones, Esq.  
CSA Executive Director