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First name: Gary

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Organization: Ten Lakes Snowmobile Club Inc

Title: Safety Officer

Comments: To whom it may concern,

As a resident of Lincoln County, Montana, and long-time back country recreation enthusiast, I strongly object to the proposed changes to the Travel Management Rule for over-snow vehicle use in 36 CFR 212, Subpart C and subsequent new over-snow vehicle use map (OSVUM).

Personally, I have been a snowmobiler for over 38 years and have a true passion for the sport. Friends and I ride throughout the snowmobile season every chance we get. We especially enjoy spring riding when temperatures are warmer and longer days of sunlight which allow for great days enjoying the snow-covered forest lands. In this area of Montana, our Spring riding is only made possible by being able to access high elevation terrain that continues to maintain a strong and consistent snowpack. Even last year with our very below average snowpack and early melt, we still rode snowmobiles in the high elevation terrain until May 16th. If these areas of high elevation terrain as noted in the proposed Over-snow Motorized Use Travel Plan are closed off, the snowmobile season will be effectively over on March 31st as there is essentially no riding areas available with a deep enough and stable snowpack at lower elevations after this date, even in the best snow years.

The proposed action of closing off high elevation terrain throughout the Kootenai National Forest on March 31st would create a loss of 2 plus months of the snowmobile season. New snowmobiles, like many things, have now become very expensive as of late. So, making a large purchase for new equipment is even harder to justify if your overall time of use is cut short. It would be like buying a boat and having to put it away for the season on August 15th. Additionally, one of the main reasons why snowmobiles have become more expensive is they are manufactured to be much more efficient and cleaner than ever before due to emission regulations. These efficiency improvements are great for both our environment and performance, but effectively closing the season early with this proposed action and re-mapping, further delays the opportunity to take older, less efficient models out of service as people are less likely to upgrade their snowmobiles for a shorter season.

As for the Grizzly bear denning habitat mentioned as one of the main reasons for the proposed changes, in all my years of riding, literally tens of thousands of miles over the snow, I have never seen a bear or seen proof a bear in the high elevation zones being targeted during the snow season. Granted, we know they are probably present, but they are certainly not out of hibernation when there is still a significant snowpack on the ground. If anything, it is in the lower elevation zones that are targeted to be left open to over the snow travel that the bears are emerging from hibernation. As noted in Kootenai National Forest Over-snow Motorized Use Travel Plan, Draft Minimization Criteria Screening, I quote "the responsible official shall consider the effects on the following, with the objective of minimizing; 1. Damage to soil, watershed, vegetation, and other forest resources. 2. Harassment of wildlife and significant disruption of wildlife habitats". I welcome the opportunity to personally snowmobile with any deciding officials after March 31st or anytime during the year to prove the snowmobile community is having a zero impact on both points listed while there is a sufficient snowpack on the ground. Please involve the local snowmobile clubs and veteran riders in your travel plan criteria definition process specifically in "Step 2: Conduct Over-snow Motorized Area Screening Exercise The interdisciplinary team used existing data and Forest Service expertise and professional judgement to screen each area and trail proposed for over-snow vehicle use designation," In order to witness what we experience on every snowmobile ride we take no matter the time of year but especially after March 31st.

The vast economic and socially positive impacts of snowmobiling are widely documented with some key facts being accessible here: <https://www.snowmobile.org/docs/isma-snowmobiling-fact-book.pdf>. The key component for the continuing benefits of snowmobiling for any community is to have access to the shared national public lands that we all enjoy. Contesting the efforts to further limit access to our public recreation lands for over the

snow motorized vehicle use has always been a mission statement for the snowmobile community. However, with this proposed Travel Management Rule for over-snow vehicle use in 36 CFR 212, Subpart C and subsequent new over-snow vehicle use map (OSVUM), we are now at risk of having to fight for not only just the loss of land to snowmobile on but the actual timing for which we can enjoy those snow-covered public lands.

Sincerely,

Gary Coblentz

Ten Lakes Snowmobile Club - Safety Officer

Rexford, Montana Resident