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Supervisor Kuhnel
Rio Grande National Forest

Dear Supervisor Kuhnel,

I have been cross-country skiing and snowshoeing in the Rio Grande NF and San Juan NF for over 30 years. For many years, we came up from Texas for a winter vacation, but ultimately built our full-time home in Pagosa Springs. We continue to use the National Forest on both sides of the pass. Until now, there were few rules governing winter travel in the Forest, so I appreciate that you have begun winter travel planning on the Rio Grande National Forest.

Winter is a critical time for wildlife, and its important to plan modes of winter travel to protect their habitat. OSV machines disturb wildlife during the crucial season. Your planning for winter travel must mitigate this problem.

There is also a large population of winter recreation enthusiasts like myself who enjoy quiet recreation areas and a degree of solitude. Unfortunately, over the years since we began coming here in the winter, many of the areas we enjoyed have been overwhelmed by snowmobiles. In particular, many of the moderate terrain areas suitable for beginner and intermediate cross country skiers are now virtually unusable due snowmobiles trashing the snow. I get that these OSV folks have a legitimate right to use our public land, as much as I do. But the current situation is dramatically out of balance.

The present RGNF Proposed Action does not appear to be in compliance with the OSV Rule's “closed unless designated open” framework, as it just

reflects the current winter ROS maps with a series of OSV areas. This is not a promising start for this process. I would presume that each of the alternatives developed for the EIS should show discrete, well-defined OSV areas with site-specific analysis of how each proposed area (and route) complies with the minimization criteria. To comply with the minimization criteria, the Forest Service should be aware of and consider the following criteria:

1: Minimize conflicts between OSV use and non-motorized winter recreation uses (skiing, snowshoeing, etc.). Examine how OSV use affects snow quality, noise impacts, air quality, and public safety. Though most are responsible, I've nearly been knocked over by approaching snowmobiles! The final OSV plan should not designate high-value non-motorized recreation areas, such as Nordic ski trails and terrain around backcountry huts or adjacent to ski areas, for OSV use. Important non-motorized winter recreation zones which I use on the Rio Grande include, but are not limited to:

Big Meadows Ski Trail (a great area for XC skiing and snowmobiling that I use regularly)

Neff Mountain (A good place for either XC ski or snow-shoeing.

Terrain surrounding the Spruce Hole Yurt (another area that I use)

Terrain surrounding the Pass Creek Yurt

The "Matchless" area adjacent to the Wolf Creek Ski Area. The meadows near the highway below the ski area, on both sides of the pass, were once a favorite XC ski location, and one of the only good places to go during warm periods in the winter. Now they are dominated by snowmobiles.

Big Meadows Reservoir Area, south of Forest Road 410

2: To minimize impacts to wildlife, the Forest Service should follow recommendations from Colorado Parks and Wildlife pertaining to big game winter activity areas, winter wildlife areas, and riparian/wetland areas. The plan must also comply with the Southern Rockies Lynx Amendment.

3: The 12" minimum snow depth included in the Proposed Action as a means to minimize some impacts to natural resources is a good starting

point. However, I understand this is based on data from the Sierra Nevada with its “Sierra Cement”. Thus, the EIS should also analyze a deeper minimum snow depth in addition to the proposed 12” to determine if 12” of our drier snow is sufficient to protect subnivean habitat, soils, and vegetation. The EIS must also consider how OSV use will affect natural resources that may not be protected by a minimum snow depth, such as water quality and trees.

I know that this the beginning of the planning process, but it isn’t too early to think about how this plan will be implemented and enforced once it is complete. Designated OSV areas should have logical, enforceable boundaries following obvious features like plowed roads, ridge lines, and waterways and the EIS should describe how the Forest Service will implement and enforce the final plan in order to minimize conflicts between user groups.

Sincerely yours,

Andy Butler