



June 14, 2024

Dennis Kuhnel, Forest Supervisor
Rio Grande National Forest
1055 9th St.
Del Norte, CO 81132

Submitted online at <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65529>

Dear Supervisor Kuhnel,

Thank you for initiating winter travel planning on the Rio Grande National Forest. This process is as important for protecting winter wildlife habitat and quiet recreation areas as it is for establishing where OSV use can occur on the forest, as areas not designated by OSV use can provide refuge for wildlife or opportunities for skiing and snowshoeing in the absence of motor vehicles. The Proposed Action is not in compliance with the OSV Rule's "closed unless designated open" framework, as it appears to simply mirror the winter ROS maps and show discrete OSV areas. This is a disappointing start to this process. I expect each of the alternatives developed in the EIS to show discrete, delineated 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:

- To minimize conflicts between OSV use and other winter recreation uses (skiing, snowshoeing, etc.), the Forest Service must consider how OSV use affects snow quality, noise impacts, air quality, and public safety. 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 on the Rio Grande include, but are not limited to:
 - Big Meadows Ski Trail
 - Rock Creek Ski Trail
 - Lime Creek Trail
 - Neff Mountain
 - Lobo Peak
 - Terrain surrounding the Spruce Hole Yurt
 - Terrain surrounding the Pass Creek Yurt
 - The "Matchless" area adjacent to the Wolf Creek Ski Area
 - Big Meadows Reservoir Area, south of Forest Road 410
- 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.
- I support the 12" minimum snow depth included in the Proposed Action as a means to minimize some impacts to natural resources, but 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. The EIS should also analyze a deeper minimum snow depth in addition to the



proposed 12” to determine if 12” is sufficient to protect subnivean habitat, soils, and vegetation.

Although it is just the start of the planning process, it is important 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, ridgelines, and waterways and the EIS should describe how the Forest Service will implement and enforce the final plan.

Thank you for considering these comments on behalf of the following Winter Wildlands Alliance members and supporters:

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