

Data Submitted (UTC 11): 6/12/2024 6:50:30 PM

First name: Davey

Last name: Pitcher

Organization: Wolf Creek Ski Area

Title: CEO, President

Comments: This letter is regarding the Rio Grande National Forest's request for comment on the upcoming publishing of an Over the Snow Winter Travel Management Plan. WCSA welcomes the USFS attempt to address this important issue as with the continuing growth of over the snow motorized vehicles their increased capabilities, and the general population growth in the surrounding communities, having a current management plan is imperative. Being located on top of Wolf Creek Pass and what arguably would be considered the center of winter recreational opportunities for the following: Alpine Skiers/Snowboarders, Nordic Skiing, Backcountry Skiing, Snow Play, and a variety of motorized over the snow vehicles (OSV), it is very important to Wolf Creek Ski Area that this planning process be thorough and complete, as the outcome will affect WCSA and many of the different stakeholders for generations to come.

While the Rio Grande Forest is requesting comments specifically for the Rio Grande National Forest, WCSA is in an awkward position in that while its SUP lies entirely within the Rio Grande Forest, the ongoing planning processes that BOTH the Rio Grande and the San Juan Forest are undergoing are NOT FOLLOWING the same timeline. WCSA believes that given the fact that the over the snow stakeholders (participants) enjoy the benefits and potential concerns /conflicts on both sides of the pass regardless of the arbitrary Forest boundaries, administratively it would benefit all parties to have the winter travel management plans combined on Wolf Creek Pass. Until this administrative action is implemented, WCSA understands that it will have to submit separate scoping letters for each forest. This scoping letter is therefore specific to the Rio Grande Forest scoping due June 14, 2024.

\*During the last 85 years recreational skiing has taken place at WCSA on top of Wolf Creek Pass and during the last forty-nine years the management of WCSA has fallen under the guidance of the Pitcher family. During that time the management goals of the Pitchers has remained consistent, in acknowledging that WCSA is a community-based ski area and to embrace the values that bring private enterprise, public use and enjoyment of National Forest lands together. We have continually worked within the NEPA framework and have supported the notion that a business operating on public lands should make allowances for all user groups to enjoy their preferred type of recreation. For example, we have provided free Nordic groomed skiing for many decades. WCSA was very quick to acknowledge that the backcountry skiing could be accessed from our permit and that uphill skiing should not be a profit center for our operation. Management purchased a snowmobiling permit from the USFS and then worked with a local outfitter in upgrading all the rental snowmobiles to four stroke machines. This was done with the intent to show the snowmobile community that lowering emissions and providing a quieter machine would not reduce the ability for participants to enjoy their recreational experience. WCSA then sold the permit and new machines to 3G Outfitters with the idea that they would be better suited (being avid snowmobilers) at running a business giving the traveling public access to forest lands through responsible snowmobile tours. We have worked with the same outfitter in identifying several areas of the surrounding forest that would provide additional high quality recreational skiing opportunities, and over the past several decades been able to get these areas included as MA-4.8 in the San Juan Forests current Forest Plan, also both the Rio Grande and the San Juan Forest have accepted our current MDP in which WCSA contemplates the future development of these areas. The point of giving this background is to emphasize that WCSA has been and will continue to be an integral part of the winter recreational scene for generations to come, and that we believe that the USFS should consider this when developing the winter travel management plan.

Attached is a map depicting WCSA's existing SUP along with the private three hundred acres owned by LMJV, the 85 areas of potential recreational skiing opportunity known as the Lake Chutes, Pass Pod, the Matchless Pod, and a proposed Non-Motorized Buffer of 1,739 acres which would surround the entire WCSA (both the existing and the proposed expansions.) Each of these areas deserves the attention of the forest planners as they work towards a final winter travel management plan.

#### AREAS ON THE RIO GRANDE NATIONAL FOREST:

1.WCSA SUP: this area is comprised of 1,591 acres permitted for the use and enjoyment of recreational skiers. This area has been designated as high-quality skiing opportunities (MA 4.8) and delineated as a non-motorized area consistent with the Rio Grande Forest Plan, and the objectives as set forth in the May of 2024 purpose and need/ proposed action doc. The relevant section of the OSV management project states the following.

PROVIDE HIGH QUALITY OVERSNOW ACCESS AND EXPERIENCES: In partnership with the Rio Grande Forest and the Divide Ranger District WCSA has created a highly sought after niche skiing experience that comprises low density pseudo backcountry skiing along with a wide variety of beginner intermediate skiing opportunities. WCSA also grooms a Nordic/Snowshoeing track both within the SUP and the private land which we operate at no charge to the public.

The Rio Grande Forest has a permanent closure to all recreational motorized vehicles within the SUP. WCSA has typically closed on Easter weekend, but on occasion it has reopened for spring skiing as late as Memorial Day weekend. It is imperative that recreational OSV participants not be allowed within the SUP any time there is still snow on the ground, as the impacts to the terrain for skiers is irreparable and poses a considerable safety concern (the ruts left by OSV machines), economic losses to WCSA could also ensue.

2.THE ALBERTA LAKE CHUTES: It appears that in the 2020 Winter Travel Management Plan that this 85 Acre area that borders WCSA's eastern portion of the SUP was included as MA 4.8. This would be consistent with the acreages given on page 66 as 1,632 acres. It would also be consistent with the ROS mapping that was presented by the USFS during the spring of 2024.

WCSA requests that the Lake Chutes area be designated as non-motorized as this would be consistent with the 2020 Winter Travel Management Plan in which this area was designated as MA 4.8 and included as such on the ROS map, produced during the winter of 2024. It should be noted that a small acreage discrepancy appears in different USFS documents this should be addressed in the final DEIS.

3.THE RGNF PROPOSED NON-MOTORIZED BUFFER: On the Northeast side of the WCSA SUP it appears that the ROS map proposes a non-motorized buffer zone that would extend towards the Pass Creek Yurt.

The ROS map shows this as being the desired outcome of the upcoming DEIS. WCSA supports this 495-acre buffer zone as being designated as non-motorized and it should be noted that historically this area as portrayed on our map provided has not been of interest to motorized users. WCSA would like to see this closure connect with Highway 160 adjacent to the Snowshed Parking Lot.

4.WCSA NORTHWEST SUP BOUNDARY: On the northwest corner of WCSA's permit boundary lies a small area between the Continental Divide and the ski area. It runs along the highway. This area also abuts a very popular beginner run and has been an area of great concern to both the WCSA Ski Patrol staff and the USFS Permit Administrator as it is very easy for motorized vehicles to enter the beginner trails. The USFS administrator used USFS funds and purchased signage for this area, and while it has helped, it is almost daily that snowmachines are either right on the permit boundary or inside it.

WCSA would like to formally request that the USFS close this area to machine powered over the snow vehicles and designate it as an area for snow play and non-motorized snow toys (sleds, inner tubes, skis, snowshoes etc.).

The USFS and the staff of the Rio Grande Forest should be commended for tackling this important management project. With the exponential growth of popularity in Southwest Colorado, and the additional pressure on the

forest and in particular Wolf Creek Pass it is imperative that the following general impacts be considered in this plan.

A. There should be consideration given to the different types of OSV vehicles. With the advent of the motorcycle like machines (timber sleds) a completely new type of travel impact has been established, in that these machines can and do traverse through wooded areas unattainable to snowmobiles. They have a much greater impact to the snow by leaving HARD DEEP RUTS that can be very dangerous to backcountry skiers. These machines also destroy the groomed snowmobile trails that are maintained by special grants and funding from the state.

B. With the heightened awareness about air quality on this planet, and the technological advances in engine design banning two stroke engines for recreational use should be considered. Four stroke engines are considerably lighter and there are now viable electric snowmobiles that will continue to become more and more practical. If not banned certain emissions should have to be met.

C. Noise is another issue that MUST be considered during this process. Even with the manufactures striving to reduce noise impacts in the modern OSV fleet there remains many aftermarket modifications to these machines that exponentially increase the noise level of the OSV machines. Given the power that is available on the OEM machines and the impact to all other participants and the wildlife these modifications should be banned for OSV that are not in a competitive arena (sanctioned race events). These machines when modified can be heard up to four miles away impacting even the designated wilderness areas.

D. Impacts to wildlife, all the diverse and wonderful species of animals that manage to live in the high alpine environment, and the impacts of ALL participants including OSV should be investigated, and if deemed necessary allowances made in the final Winter Travel Management Plan that protect these valuable animals of the forest. (Not just threatened and endangered but all species)

E. There are some discrepancies in different USFS documents for the acreage of WCSA's SUP. We request that these be altered to reflect the SUP as being 1,591 acres, as shown in the signed SUP.

WCSA certainly understands that given the acreage of the Rio Grande Forest that in attempting to provide one ROS map some detail be lost given the scale of the map. There are certain discrepancies and omissions in the ROS map that are problematic. The ROS map shows acreage in the San Juan Forest, this is confusing given that stakeholders are only meant to comment on activities taking place in the Rio Grande Forest. As an example, WCSA and the San Juan Forest worked together, and with the public meetings held by WCSA in the surrounding communities was able to gather the public input needed to change the designation of these areas (the Pass pod and the Matchless pod) to be MA 4.8 in the current forest plan. The ROS map does not show this important designation.

It is probable that other stakeholders have noticed similar discrepancies, it would be in the best interest of all user groups to have a revised map that is accurate and of a scale that it can properly be interpolated by the public.

As stated, our actions have shown in the operation of WCSA, we firmly believe that there is room for all winter sports enthusiasts on the Rio Grande National Forest to have areas to participate in the activities mean so much to them. This use can be mixed with the right protocols, but it is also imperative that all nonmotorized uses also have areas that are set aside for them, and that they have a fair chance of obtaining this experience without having to travel into the surrounding wilderness areas. This can be obtained without having a conflict orientated plan, and the USFS should be commended for highlighting the fact that 1,382,276 acres of land within the Rio Grande Forest allows OSV USE. This valuable information shared during the scoping period, highlights the fact that with the drastic advances in OSV technology a far greater part of the forest will remain obtainable to this participant group, compared to the other groups (backcountry, Nordic, snow play, and ski area recreationist).

For example, even with the requests for the designated buffer zones and allocations for potential expansion of the SUP, totaling a combined acreage of 585 acres, this represents less than .04% of the total motorized terrain.

In closing, please include these comments as part of the scoping record for the Rio Grande Forest Winter Travel Management Project, comments due by June 14, 2024. If any Forest Service staff or Decision Officer has any questions I can be reached by email or phone.