

Data Submitted (UTC 11): 6/14/2024 6:00:00 AM

First name: Rocky

Last name: Smith

Organization:

Title:

Comments: Dear Forest Service,

Attached find my comments on proposed over-snow travel management for the Rio Grande National Forest.

Rocky Smith

The following are the comments of Rocky Smith on the Notice of Intent (NOI) for over-snow vehicle travel on the Rio Grande National Forest (RGNF), as described in the Federal Register notice of April 30, 2024 (89 Fed Reg 34197 et seq.). I incorporate my comments on the draft designation of recreational opportunity spectrum, dated December 19, 2023, by reference.

CLOSED UNLESS OPEN. All areas of the RGNF with enough snow cover to allow over-snow motor vehicles must be closed to motorized use unless specifically designated open. This is required by the Travel Management Rule (TMR) at 36 CFR 212 subpart C. The current proposed action does not appear to incorporate this requirement.

THE PROPOSED ACTION GREATLY OVER-EMPHASIZES MOTORIZED USE. According to the Purpose and Need/Proposed action (PNPA) document, almost 1.4 million acres, or 74 percent of the RGNF, would be open to "for public cross-country over-snow vehicle use". Id. at 2. Only four percent of the RGNF is semi-primitive non-motorized, while a whopping 64 percent is semi-primitive motorized. PNPA at 9.

This leaves few areas for quiet winter non-motorized recreation. The proposed action needs to be changed to have more areas designated non-motorized. Areas that must be winter non-motorized include but are not limited to: Big Meadows Ski Trail, Rock Creek Ski Trail, Lime Creek Trail, Neff Mountain near Cumbres Pass, Lobo Peak near Wolf Creek Pass, terrain surrounding the Spruce Hole Yurt, terrain surrounding the Pass Creek Yurt, the area adjacent to Wolf Creek Ski Area, and the Big Meadows Reservoir area.

PROTECT WILDLIFE. Winter is a time when animals need to conserve energy, not be forced to move because of motor vehicle use. With 76 percent of the RGNF open to winter motorized use as proposed, wildlife would have a difficult time finding refuges from the noise and physical danger of motor vehicles.

Species of considerable concern for this project include, but are not limited to: big game (primarily deer and elk); lynx; marten; wolverine; and ptarmigan. All of these species could suffer from the proposed OSV use.

No winter motorized use can be allowed on big game winter ranges. All lynx high probability habitat should be closed to motor vehicle use. Areas of willows near timberline need to be closed to motor use to protect ptarmigan. Areas of talus that could, now or in the future, host wolverine dens, should also have no motorized use.

The forthcoming EIS must discuss in detail the potential impacts to all wildlife. It must also propose mitigation measures to reduce impacts and evaluate their likely effectiveness.

KEEP MOTOR VEHICLES OUT OF RIPARIAN AREAS AND WETLANDS. Motor vehicles must be prohibited in areas adjacent to water to protect these important resources. Stream crossings should be allowed only on designated routes.

MINIMUM SNOW DEPTH. Given the very dry snow that falls on the RGNF, the proposed minimum snow depth for operation of motor vehicles of 12 inches (PNPA at 2) may be insufficient to protect soils and ground vegetation. The EIS should analyze this issue. In the absence of more detailed research specific to the RGNF, we recommend a minimum depth of 18 inches.

ENFORCEMENT. For all alternatives, the EIS must discuss how restriction on motor vehicle use will be enforced.

ALL IMPACTS MUST BE MINIMIZED. Numerous conflicts between motorized and non-motorized users and between users and wildlife will occur with any winter recreational use. The TMR requires the Forest Service to minimize these and other impacts. Changing the proposed action as discussed in these comments would help minimize these impacts.

Thank you for this opportunity to comment. Please inform me when the draft EIS is published and of any other opportunities for public input into this project.