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Comments: Thank you for the opportunity to comment. These comments are submitted on behalf of the New Mexico Cross-Country ski club. We have just over 300 members and our members visit the Rio Grande NF every winter, as individuals, in small groups, and on Club trips. Many of us stay overnight at the Cumbres Pass yurts.

While these comments are specifically on behalf of x-country skiers, I believe they apply to snowshoers as well. There is a great need for non-motorized, quiet areas that are accessible to human-powered recreation on the Rio Grande NF. The areas preferred by skiers are increasingly overrun with snow machines, detracting from the quality of our winter recreation experience.

Please note that the areas shown in the ROS maps as wilderness, particularly the South San Juan Wilderness shown on the Conejos Peak Ranger District, are generally not available to us for skiing because they are too far from trailheads for a day ski, even from a yurt.

The ROS maps have a fundamental flaw in that they are biased towards motorized use in accessible areas. Winter human powered recreation requires access, and when the mapping protocol dictates that areas near roads are designated for motorized use, that already removes almost all areas accessible for x-c skiing from consideration for non motorized designation. This bias needs to be challenged to provide for quiet recreation within 0.5-10 miles of roads.

Further, the ROS maps show designated groomed snowmobile trails but NOT skier trails; this further biases the narrative towards motorized use. Ski trails to the yurts and other trails used by skiers need to be mapped and given consideration for primitive, non-motorized designation.

Even many of the roads ("roaded natural" areas) are not plowed or maintained in winter, giving them a more primitive character than in summer. These roads are often excellent for skiing .

Please consider that the availability of terrain for skiing depends on several factors:

- \*Road access (people travel by motor vehicle to the trailhead)

- \*Terrain suitable for skiing. This varies by skier level of expertise and whether going cross country or up-and-downhill, but generally we are avoiding avalanche prone areas (slopes of over 30 or 35 degrees), and the majority of xc skiers are seeking gently rolling or climbing terrain such as valley floors, meadows, and rolling hills.

- \*Within a day's ski of a) a trailhead or b) a yurt or hut. Most people are not backpacking into winter recreation areas. The remote wilderness areas are therefore not accessible for skiing.

Since yurts are booked for a minimum of 2 nights, people staying at the yurts need places to day ski. There is a need for non motorized routes/trails extending up to 5-6 miles away from each yurt. There could be snowmobile routes going through these areas, but fundamentally we need to be able a) stay in yurts and b) ski tour out of the yurts without being subject to noise pollution and harassment.

Maps to yurts are good starting point for non motorized use areas and are available online. (I will attempt to attach).

-Southwest Nordic Yurt System:

<https://southwestnordiccenter.com/wp-content/uploads/2023/12/Cumbres-Pass-Yurts.pdf>

Other, zoomed-in detail maps available: <https://southwestnordiccenter.com/documents/>

The yurt to yurt trails should be designated as primitive, non-motorized with buffers to prevent noise pollution.

For Grouse Creek yurt, a non motorized trail to reach the South San Juan Wilderness is needed.

The area around Trujillo Meadows reservoir provides good skiing terrain and is the natural place to ski when staying at the Trujillo Meadows yurt, but almost impossible for skiers to use because of heavy snowmobile use. A separate ski trail is needed around Trujillo Meadows Reservoir and other areas frequented by both x-c skiers and snowmobiles for skier safety.

-Spruce Hole yurt <https://yurtsogood.com/pdf/SpruceHoleRegionalTopoMap.pdf>

Including the north half of Pinorealosa mountain and the meadows east, SE and NE of the yurt for day skiing. Pinorealosa Mountain is good for skiing up and down, while the meadows in the Spruce Hole area are perfect for easy "kick and glide" touring.

Currently the only area around Cumbres and La Manga passes that usually is quiet and free of snow machines is the trail to Spruce Hole, and even there we sometimes encounter motorized use. The proposed maps do not keep this quiet zone, which would ruin the experience of skiers/snowshoers going to spruce hole yurt.

Over-snow vehicles detract from the recreation experience for non-motorized users. The noise impact carries a long distance. Buffers are needed around ski trails to protect quiet recreation. OSVs also ruin ski trails by creating hard packed swaths that become icy and difficult for us to travel on or across.

We are also concerned about impacts of noise and fast moving machines on wildlife. If people recreating quietly are bothered by the noise, I can only imagine how stressful it is for wildlife. Please identify important wildlife areas on the maps and buffer them from OSV impacts.

Our Club members also visit the Wolf Creek Pass and Pagosa Springs areas to ski. While we have fewer specific comments on these areas, it is important to maintain areas free from OSVs for backcountry skiing, such as around Lobo overlook and other areas used for backcountry skiing near Wolf Creek Pass.

The Pagosa Nordic trails that are on the National Forest need to be mapped and suitable buffer zones around them need to be designated non motorized.

Finally, we are concerned with how the different use areas will be identifiable to people and enforced.

- use area maps need to be on topographic base maps so people clearly understand where the boundaries are between different designations

- provide map layers that people can use with gps apps like Gaia, AllTrails etc so people can see if they're in the appropriate zone

To conclude, our Club members enjoy cross country skiing for the good exercise, the quiet solitude and the winter experience of being in nature. This is severely compromised when there is a high level of snowmobile traffic. It can also be dangerous for a skier to go in and out of the deep snowmobile tracks when going steeply downhill. This can be one of the premier backcountry ski areas in the U.S. We believe there are plenty of areas not used by skiers where snowmobilers can enjoy their winter recreation. Please allow us places where we can enjoy ours.

Thank you,  
Dana Price