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Organization:

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RE: Rio Grande National Forest, Winter Travel Management Plan

The following are comments concerning the Rio Grande National Forest's proposed Winter Over Snow Travel Management Plan/Project. First thank you for beginning to make a plan for Winter recreation and travel management. We have needed a plan for a long time.

My comments will focus on the southern areas of the RGNF, in particular the Cumbres and La Manga passes area, which is popular with non-motorized users such as cross-country skiers, snowshoers, overnight yurt users, families using sledding hills and backcountry/telemark/ alpine touring skiers, as well as motorized over snow users.

As one of the owners of the Spruce Hole Yurt since 1998, I am intimately familiar with this area and the people who seek out quiet winter use areas. I was also race director for the Chama Chile Ski Classic (special use permit on RGNF) for 9 years. In addition, I've been cross country skiing in the area for over 30 years.

I reviewed the RGNF's Over Snow Travel Management Project, Purpose and Need/Proposed Action (May 2024) and reviewed the Over Snow Vehicle Use Map. The following comments are in no particular order, but highlight my concerns and recommendations:

1. The current Winter Recreation Opportunity Spectrum ignores quiet use areas and provides little to no recreational opportunities for skiers, snowshoers and others seeking quiet winter use. The only reason there are any "Primitive" or "Semi-Primitive Non-motorized" winter areas are due to motorized closures, and wilderness and roadless areas. Wilderness and Roadless areas are not available to most skiers and snowshoers. Most skiers and snowshoers travel less than 3 to 5 miles into an area in one day, which makes most of the Wilderness and Roadless areas inaccessible. The RGNF needs more designated, non-motorized areas (motorized closures) in order to offer more Semi-primitive non-motorized recreational opportunities.

2. Please create a map of current use. The Winter Recreation Opportunity Spectrum map does not show the locations of 260 miles of existing and permitted, groomed snowmobile trails and 23 miles of groomed cross-country ski trails. It also doesn't show the Cumbres/La Manga Winter Recreation map of voluntary separation of ski and OSV use, or the location of yurts/huts. The public needs this information to be able to comment on the plan and alternatives that are presented.

3. There has been a voluntary separation of motorized and non-motorized winter recreation users in the Cumbres/La Manga area since the 1980s (see 4 attached documents showing the plan in place in the 1980s and 90's, and the more recent map and brochure for the current voluntary separation program). Instead of a voluntary separation program, the areas on the most recent, Cumbres/ La Manga Winter Recreation map which are for skiers, need to be protected permanently as non-motorized, and not open to OSV's. Management techniques, such as signing on some of the borders of the non-motorized area, signs at the trailheads, replacing maps that have been destroyed at the trailheads (at Apache Canyon parking area, for instance), etc.

4. There has been a slow deterioration and decline in the number of truly, non-motorized, quiet use winter recreation opportunities in the Cumbres/La Manga area. It is critical that two areas in particular be designated, non-motorized - they include Spruce Hole area and road (it's an ungroomed trail in the winter time), and Neff Mountain area. Many of my yurt customers, tell me the reason why they like Spruce Hole, is because it is quiet and seldom gets motorized use. Spruce Hole is popular with back country/telemark/alpine skiers (the slopes near the road and up towards Pinrealosa Mountain). The area also provides many opportunities for cross-

country skiers and snowshoers to explore in peace and quiet. All of Neff Mountain is popular with back country skiers, and in particular the Neff mountain bowl, near the yurt.

5. Buffer zones (most of which are depicted on the Cumbres/La Manga Winter Recreation map) need to be established around each of the 5 yurts in the area and around other yurts/huts on the RGNF.

6. Groomed cross-country ski/snowshoe trails on the entire RGNF should NOT be considered motorized trails.

The area around the groomed XC Ski trails should have a buffer zone, of non-motorized use in order to maintain quiet use.

7. I support the Forest Service's efforts to specify minimum snow depths for motorized use but 12 inches seems like too little for OSV use and trail grooming, especially when we have a large dump of dry, fluffy snow - snowmobiles just get mired in the stuff! The type of snow (dry/wet), and structure of the snow, need to be considered, when evaluating if OSV's cause damage to the environment and ecosystems within the RGNF.

Thank you for the opportunity to submit comments.

Sincerely,

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