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First name: Steven

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Organization:

Title:

Comments: Dear Supervisor Kuhnel,

I am writing to comment on the Rio Grande Over-Snow Vehicle Travel Management Plan for the Rio Grande National Forest in Colorado.

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 final OSV plan should not designate high-value non-motorized recreation areas, such as Nordic ski trails, back country ski terrain around backcountry huts, ski areas and areas adjacent to high mountain roadway passes, 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

I am an avid backcountry skier and snowboarder, who has visited the Wolf Creek pass area once or twice annually for the past 15 years. I am particularly interested in the continued non-motorized use of the Lobo Overlook area and the adjacent skiing down to Hwy 160. I am OK with continued motorized access to the Lobo Radio Towers as long as OSV's are restricted to the existing access road.

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.

I recommend the proposed Plan should follow the framework that forest lands should be closed to OVS unless specifically designated open. 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.

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 the opportunity to comment.