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RE: Rio Grande National Forest Over Snow Travel Management Project

These are my official public comments regarding the scope of the environmental impact statement (EIS) that will inform a decision about the classes of vehicles and times of year for which motorized over-snow vehicle (OSV) use will be allowed on designated roads, trails, and areas.

Dear Rio Grande National Forest (RGNF) Officials:

Designations:

I understand that the new plan will use maps to designate the winter travel system, similar to the three categories used by the White River National Forest Travel Management plan for winter use, which is an excellent resource for RGNF EIS planners:

- 1) Open Areas are those areas where over-snow travel is permitted without restriction, as long as resources are not damaged.
- 2) Restricted Areas are those where over-snow travel is permitted only on designated routes.
- 3) In Closed Areas, over-snow motorized travel is not permitted.

Willy-nilly, unrestricted travel is not allowed in the forest in other seasons, so why should it be allowed in the winter, in Open Areas? I realize there is snow in the winter, and thus the ability to travel via OSV exists, but that does not mean unrestricted OSV travel should be widely allowed. There should be a few, well-defined and enforced Open Areas.

I was surprised to learn this overwhelming percentage at the public meeting at the Alamosa Recreation Center on May 29, 2024, that is, that the proposed action includes the following Open Areas: "Approximately 1,342,162 acres (73 percent) of the Rio Grande National Forest lands are proposed to be designated for public cross-country over-snow vehicle use."

Over-snow motorized use should be very limited; thus, the resulting OSV travel map should show mostly the Restricted or Closed Areas designations. I think the proposed action should be proactively flipped to include 73-75% as Restricted or Closed Areas, where public cross-country OSV use is largely not permitted. What would be the easily-enforceable borders to define these exclusion areas? Perhaps an exclusion area in the southwestern part of the RGNF could be defined by the bulk of the area between US Highway 160 in the north and Colorado State Highway 17 in the south, with allowances for the current roads that are used for OSV use now, and a few "play areas" near main roads and highways. Another community member at the May 29th meeting needs wintertime motorized road access to his family's inholding property near Trujillo Meadows, so this should be allowed, for instance. For many years the area north of Colorado State Highway 17 on Cumbres-La Manga

Passes has been designated as closed to cross-country OSV use, but this has not been enforced by the RGNF. On other parts of the forest other highly recognizable natural or man-made boundaries should be used, too, to define Restricted or Closed Areas. The new plan should rely on modeling studies and minimization criteria screening techniques to better define the minimum areas that need to be open to meet socio-economic needs of OSV travelers, with existing use as a limited part of the consideration in creating the plan, but not leaving the majority of the forest area open to OSV travel.

Precedent for planning on more exclusion areas, that is "Closed Unless Designated Open/Area Designations," are found in other national forests' OSV travel management plans, including: White River, Lassen, Tahoe and Stanislaus. Perhaps RGNF EIS planners could use these plans as resources.

In determining areas to allow motorized over-snow use, in Restricted Areas, the RGNF plan should protect animals, plants, soil, clean water and clean air. The forest maps presented at the May 29th meeting did include some, but very limited, Restricted Areas. That is a good start.

Note: Vehicles on wheels should be only allowed on plowed routes.

Wildlife:

Wildlife should be of primary concern in the EIS for the new OSV travel plan. Maintenance of quiet and peaceful areas for wildlife habitation and migration is an obligation that is of utmost importance. Some wording from a good resource noted above, the Stanislaus National Forest plan, states: "Effects on the Diversity of Terrestrial and Aquatic Wildlife may be worth considered for inclusion in the plan as it maintains that the proposed OSV-use designations and trail grooming have the potential to directly, indirectly, and cumulatively impact wildlife, including federally listed threatened and endangered species and their habitats."

Pollution:

It has been my experience that OSV travelers create a lot of exhaust (air pollution), they are often loud (noise pollution), and sometimes leave trails of leaking gas and/or oil (water pollution). To prevent high volumes of unwanted pollution the RGNF should limit all OSV use.

Socio-Economic Factors:

I understand the fun and excitement of OSV travel for some, and the utility it affords for some including owners of inholding properties as mentioned above, and for backcountry yurt/hut maintenance and trail grooming. Many OSV users travel to the RGNF and thus bring much needed economic resources to the area. But these benefits should be tempered by recognition of the forest's inherent value unto itself. The citizens and taxpayers have the privilege to visit the forest but they should not overwhelm the carrying capacity of the natural quiet area. The RGNF must budget for enforcement of the plan once it is in place. Well-defined "Closed Unless Designated Open Area Designations" will be easier and more economically prudent to enforce. There will likely be fewer risky and resource-intensive Search and Rescue operations needed in backcountry areas in the RGNF if there are fewer Open Areas.

Physical and Medical Health Benefit:

People need and enjoy outdoor activities in the winter, for fun, recreation, physical training and spending time with friends and family. Per psychiatry.org, there is growing medical evidence that immersing oneself in a forest environment can have significant physical and mental health benefits. According to the Global Wellness Institute, forest therapy (or forest bathing) broadly means taking in, through all of one's senses, the forest atmosphere. I would assert that quiet, non-OSV travel better allows one to take in nature through all of one's senses, so this is another reason to limit the Open Areas in the travel management plan.

Specific Places:

Places that are important to me for non-motorized winter recreation, quiet and solace include the following.

These areas should allow motorized over-snow travel only for grooming cross-country ski, snowshoe, fat-bike and walking trails and to service backcountry yurts sanctioned by the RGNF, and only on designated routes. Thus, as Restricted Areas.

Yurts and huts should have reasonable "quiet envelopes" surrounding them prohibiting public motorized snow machine use, same as those enacted on the White River National Forest. For instance, motorized vehicles, including snowmobiles, are prohibited within the 60-acre envelope designated by the US Forest Service near Janet's Cabin, a Tenth Mountain Division Hut. Most of these boundaries restrict motorized access around each hut from 1/8 to 1/2 mile, with some huts having larger zones.

-Rock Creek Archery area, southwest of Monte Vista

-Big Meadows campground, near Wolf Creek Pass

-Cumbres-La Manga Pass area, including areas surrounding the Spruce Hole yurt and all four Southwest Nordic yurts: Flat Mountain, Grouse Creek, Neff Mountain and Trujillo Meadows. Also including the area encompassing the Chama Chile Ski Classic course area. The RGNF should return to the past stipulation that all area north of the highway is off-limits to over-snow motorized travel and they should enforce this stipulation.

-Pass Creek Yurt, along the Continental Divide near Wolf Creek Pass

-Cross-country ski trails groomed by:

--San Juan Nordic Club, on the eastern side of the San Juans

--South Fork Nordic, near South Fork

--The Upper Rio Grande Nordic Club, near Creede

--The Pagosa Nordic Club, near Pagosa Springs and on the west side of the San Juans

Science:

I think it is important for the RGNF to consider scientific research when creating the plan. Per the Winter Wildlands Alliance, in a 2021 document entitled The environmental Impacts of Winter Recreation "The existing body of evidence indicates that winter recreation can have a substantial impact on wildlife and natural resources if not properly managed. Given our growing understanding of the catastrophic declines in biodiversity, along with fast-increasing pressures of habitat fragmentation from climate change, increased and expanding recreation use and development, we must incorporate this science into sound recreation management that errs on the side of conservation and protection of species and natural resources." This comprehensive survey is a compilation of the best available science on how undeveloped (non-resort) winter recreation affects wildlife, soundscapes, snowpack, air and water quality, and more, and it is an excellent resource for RGNF EIS planners.

Conclusion:

The Rio Grande National Forest is a unique place of outstanding natural and scenic value. Having skied, hiked, biked, backpacked and camped in the forest for many years I have a special respect for and connection to the area. Skiing on nearby RGNF roads is a highlight of every winter for me. I feel privileged to have had the opportunity to ski into and stay overnight at the yurts, enjoying an exciting winter "expedition" rated to my modest ability! I would encourage EIS planners to create a winter travel management plan with OSV and non-OSV users considered, but with the ultimate goals of protection and respect for the existing natural environment.

Thank you for your consideration of my comments.

Suzanne DeVore