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Comments: Dear Supervisor Kuhnel,

I write in regards to winter travel planning on the Rio Grande National Forest. I am a frequent visitor to the forest. I urge you to take into account the importance of protecting wildlife habitat, both in winter, and from potential damage from OSV that could have year-round effects. In this era of global warming caused by greenhouse gas emissions, we should prioritize non-motorized travel. I am a backcountry skier, and I also encourage you to protect opportunities for skiing and snowshoeing in the absence of motor vehicles.

The Proposed Action is not in compliance with the OSV Rule's "closed unless designated open" framework, as it appears to simply mirror the winter ROS maps and show discrete OSV areas. This is a disappointing start to this process. 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. To comply with the minimization criteria, the Forest Service should be aware of and consider the following:

To minimize conflicts between OSV use and other winter recreation uses (skiing, snowshoeing, etc.), the Forest Service must consider how OSV use affects snow quality, noise impacts, air quality, and public safety. The final OSV plan should not designate high-value non-motorized recreation areas, such as Nordic ski trails, areas used for backcountry skiing, and terrain around backcountry huts or adjacent to ski areas, 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

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.

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. In some snow climates 12" may be appropriate, but our snow tends to be less dense so a deeper requirement may be needed.

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.

Best,

Benjamin Dozier