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Comments: Dear Supervisor Kuhnel,

RIO GRANDE NATIONAL FOREST Winter Travel Planning

At a time when we urgently need to be curtailing the use of fossil fuels and preserving our natural heritage, Rio Grande N.F. (R.G.N.F.) is considering opening 74% of its lands to snowmobiles. I do not believe this is in the best interest of the forest.

The expansion of snowmobile territory is not in the best interest of the forest, its animal population, those that travel in a more quiet manner and ultimately, not even in the interest of snowmobilers. It appears that snowmobilers are being put ahead of all others with this proposal.

The snowmobile has many negative effects including air, noise and water pollution, wildlife disturbance, soil and vegetation damage, as well as causing conflicts with other users.

The speed and movement of snowmobiles causes a great deal of stress and harassment to wildlife, causing disruption in movement patterns which, in turn, makes it harder for animals to find adequate food supplies. This then results in increased mortality in locations where snowmobiles are being used over those areas where the same species are left relatively undisturbed.

Snowmobiles do damage to vegetation by crushing roots and causing soil erosion, as well as the problems created by snow compaction which can particularly affect the ability of small mammals to dig out adequate food for the winter months.

The proposal allows snowmobiling on a base of one foot or more of snow. I find it inconceivable that a 12 inch cover of light fluffy Colorado snow will be adequate to protect the land. The movement of one snowmobile would compress this to a thin layer in a single pass. Perhaps this would be adequate in a maritime snowpack, but certainly not in our Continental snowpack.

Now let's turn to air pollution. Figures submitted to the California Air Resources Board by the snow machine industry show that one snowmobile emits the same volume of hydrocarbons and nitrous oxides as 1,000 cars, and as much carbon monoxide as 250-500 automobiles (Bama 1995). Levels of carbon monoxide (CO) and particulate matter (PM) are a primary concern. CO is noxious to humans and PM is a recently confirmed human carcinogen by the Environmental Protection Agency.

In addition, this proposal is not in compliance with the Over-Snow Vehicle Rule's "closed unless designated open" framework. All alternatives developed for this EIS must designate and analyze discrete, delineated OSV areas. Is this to be ignored? I hope not.

If I understand this proposal correctly, the R.G.N.F. is planning to open 1,376,400 acres to snowmobiling. Given the amount of miles a snowmobile can cover in a day, search and rescue may become an overwhelming task. What measures for safety will be implemented? How will rescues be carried out? Who'll come to the aid of a rider when he/she runs out of gas? Has a physical accident? Or has too much to drink? How will law enforcement be able to control this enormous area? In 2023, 3,000 Search and Rescue responses were recorded in Colorado. How many more rescues might be needed if over one million acres are open to the general snowmobiling public.

Is the average snowmobiler really able to handle his own rescue in an extremely remote area? How many are familiar with avalanche mitigation, avalanche rescue, CPR and first aid?

How will parking be dealt with? This could turn into a nightmare with trucks and trailers vying for space in limited parking areas. Will the Colorado Department of Transportation be plowing out more areas for snowmobilers? If so, who will foot the increased cost? Who will do the avalanche forecasting in this enormous area? The CAIC is already working hard to keep us all out of harms way? Will the Forest Service assist them?

I am strongly against opening more area to mechanized, polluting travel. It is time for us all to take into consideration the needs of the planet.

Thank you for your time and consideration.

Tom Mavilia