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Dennis Kuhnel, Forest Supervisor
Rio Grande National Forest
1055 9th St.
Del Norte, CO 81132

Dear Supervisor Kuhnel,

I appreciate the opportunity to provide input on the Rio Grande National Forest's (RGNF) Over-Snow Travel Management Project. I am a frequent user of the RGNF. I participate in a variety of winter activities including cross-country skiing (on groomed trails), backcountry skiing (ungroomed, self-propelled skiing), wildlife tracking, observation of birds and wildlife, and motorized over-snow travel. I own a snowcat which I use for assisting local nordic clubs with trail grooming, and occasionally for recreation (access) on designated over-snow routes. I am a member of the San Juan Nordic Club (SJNC) and the Creede Nordic Club. I am currently on the Board of Directors of the SJNC and have helped groom nordic trails for the club for over 10 years therefore I have a significant interest in the formulation, implementation, and enforcement of the RGNF's Proposed Action. I reside in Rio Grande County, Colorado.

--The Outer Limits of "Motorized Over-Snow Vehicle (OSV)"--

As technology evolves it can be difficult to imagine what forms of motorized over-the-snow recreation may become popular during the life of the proposed OS Plan, and also difficult to envision the forms of motor transport that are possible in coming years. One general definition of vehicle is as follows:

vehicle (noun)

any means in or by which someone travels or something is carried or conveyed;

a means of conveyance or transport:

a motor vehicle; space vehicles.

a conveyance moving on wheels, runners, tracks, or the like, as a cart, sled, automobile, or tractor.

(From dictionary.com)

Please include emerging types of motor vehicles in your analysis such as motor assisted snowboards (See cyrusher.com) and motorized rope tows (products being sold by towprolifts.com and zoaeng.com for example.) Motorized snowboards might be appropriate in areas open for motorized vehicle use. If that is the case, the Forest Service should recognize and make clear to users of these devices that the boards are considered motor vehicles. Battery powered rope tows may also be a type of motor vehicle, depending on the interpretation of 36 CFR 212.1. Rope tows are a motorized means "of conveyance or transport" because a motor is providing the means of locomotion. Similarly, a skier being towed by a snowmobile is engaged in motorized activity, since the engine or motor of the snowmobile is providing the locomotion. Where these motorized tows are deployed there is usually a rope extended long distances under considerable tension. In places the rope may be hidden below the snow surface (at convex terrain) or suspended at neck level (over concave terrain.) Because these

systems are portable the ropes may be deployed in places riders or skiers may not expect, and they can be very difficult to see when weather conditions present low visibility. These tow lines present a significant risk to other backcountry users (including injury or death) and should be prohibited BOTH in motorized and non-motorized areas.

The motorized aspect of these devices could be addressed as part of this planning process. The overall safety problems could also be addressed in a different process, but either way these and other transport devices may quickly gain popularity and the potential risks to other Forest winter users cannot not be ignored. The use of new technology needs to be regulated on public lands.

-- Opportunities for Skiing on Groomed Trails--

There are several trail systems groomed for nordic/cross-country skiing on the Rio Grande National Forest. As you are aware, the SJNC grooms trails at Big Meadows and Rock Creek. These trails provide a great deal of winter recreational opportunity for the public free of charge. Big Meadows gets significantly more snow on average than Rock Creek, and is almost always available for skiing cross-country skiing before other locations with exception of trails provided by Wolf Creek Ski Area. Rock Creek has less snow, but is much closer to populated areas. The driving time from Monte Vista to Rock Creek is only 20 minutes, as an example. Both of these areas are popular with the public and have been groomed with the support of the Divide Ranger District for decades.

The areas surrounding the trails at Rock Creek and the Campground portion of Big Meadows, including the campground access road FR410 above the fork at FR430, should be closed to motorized use (other than grooming and associated maintenance such as sign and trail marker installation.) These motorized closures will help ensure that cross-country skiers (including children and pets) are safe and have a quiet, enjoyable winter experience on the RGNF. I also ski on the trails groomed by the Creede Nordic Club. These trails often provide very good skiing on the East Bench (Deep Creek), Six-Mile Flats, and at Ivy/Lime. There is community interest in grooming a winter trail for skiing from the winter parking area up to Seepage Lake via FR509.

I've skied to Seepage Lake a few times each of the recent winters. Likely in part because the water level is low (hence poor fishing), there have only been a few snowmachine tracks when I've visited. This past winter (2023/24) someone attempted to drive a 4WD vehicle to the Lake and left deep tire ruts that persisted for several weeks. The combination of humps from snow machines and tire ruts created conditions that would have been pretty difficult for novice skiers and for families with children. Grooming could enhance the experience for more people. If grooming for skiing is undesirable because of potential wildlife conflicts such as bighorn sheep, then the road should also be closed to motorized OS travel.

The groomed areas at Six-Mile Flats and at East Bench/Deep Creek are in open areas. Neither of these areas are particularly good for OSV motorized recreation. They should be closed to motorized use other than grooming.

There is quite a bit of demand for groomed trails for non-motorized recreation from residents of the San Luis Valley and visitors. The Forest Service could help meet this demand by identifying additional trails and/or areas that could be groomed for snowshoeing and cross-country skiing. Early season opportunities would be particularly valuable. An example of a place that holds good early season snow is FR28 (Rock Creek) from the winter gate down to the Rock Creek Campground, along with the old road through Camp Val Verde to the Forest Boundary which is

about a half mile to the east. These two roads could be groomed once or twice early in the season before the regular nordic trails at Rock Creek are ready. The total length of this proposed route is insignificant compared to the many miles of groomed snowmobile trails on the RGNF especially when combined with the many thousands of acres of snow that is compacted by off-trail OSV use.

--Snow Depth for Nordic Trail Grooming--

I recognize the need for some constraints on grooming to protect resources. However, the potential for road/trail surface damage decreases with OS vehicle weight. A wide-track snowmobile pulling a roller, which is essentially a piece of plastic culvert, does not require a lot of snow to create a packed surface with little or no ground disturbance. On the other hand, a snowcat with metal grousers and a tiller requires more snow which is probably the basis for the 18 inch snow depth discussed in the Proposed Action. The lightest snowcat I'm aware of that is capable of grooming trails for nordic skiing is the "Rabbit" manufactured by Favero (<https://www.faverosnowtech.com/en/snow-rabbit-3-3x/>). These small snowcats still weigh more than 4900 lbs. My Pistenbully PB130D, which is considerably smaller than the snowcats utilized by the snowmobile clubs, weighs 6900 lbs.

The San Juan Nordic Club proposes dividing grooming equipment into two classes with a breakpoint at 4000 lbs. This would enable nordic clubs to begin grooming with appropriate equipment including snowmobiles, tracked ATV's, and tracked UTV's with lower snow depths. Eight (8) inches of snow under normal conditions is generally enough to begin packing or grooming nordic trails. A reduced requirement for snow depth corresponds with the type of equipment and the lower elevations utilized by the Nordic Clubs. Rock Creek, South Fork, and Creede are all around 9000 ft, which is lower in elevation and snowfall than the areas available for groomed snowmobile trails. While there is value in having guidelines and requirements, this may be a place where adaptive management might be practical. Nordic clubs and Forest Service personnel should work together to ensure grooming begins as early as possible while protecting resources, in addition to any prescribed snow depth(s).

--Backcountry Skiing & Quiet Recreation--

One of the best places in our region for backcountry skiing on the RGNF is the Lobo area adjacent to Wolf Creek Pass. This area receives abundant high-quality snowfall and is easily accessed via US Hwy 160. Skiers at Lobo are able to hear motorized OS users across the highway almost every day, and in recent years there are even motorized recreational users transporting skiers and riders on FR402. The non-motorized recreational opportunity is diminished by the nearly continuous noise produced by the motorized users. There are at least three changes that could improve this situation: 1) The number of motorized users at Wolf Creek Pass should be limited. 2) The maximum noise level of individual machines should be regulated. 3) FR402 should be closed to OSV recreational use. Closing FR402 would have limited impact on motorized assisted skiing/riding since those machines have enough range to utilize routes such as FR390 (Tucker Ponds) and FR380 (Park Creek). Authorized access to the communication towers for maintenance could continue.

Advocates for motorized OSV use have recently stated publicly that backcountry skiers should utilize designated Wilderness Areas if we desire "Quiet Use". That is often not feasible due to avalanche risk (problematic terrain and/or snow conditions) and lengthy human-powered travel distances. Two remote areas that have good potential for non-motorized winter use are the east side of the Weminuche Wilderness accessed from FR430, and the southwest portion of the La

Garita Wilderness accessed by the Continental Divide Trail (CDT) at Spring Creek Pass. Unfortunately, both of these areas have significant motorized noise, particularly on weekends, and suffer occasional illegal incursions of motorized OSVs into the designated Wilderness Areas.

Quiet winter recreational use would be enhanced by either closing FR430 to motorized winter use beyond Shaw Lake, restricting OSV use to FR430, or prohibiting snowmobile use everywhere off the west (left) side of FR430 except the parking area on the northeast side of Big Meadows Reservoir. At Spring Creek Pass snowmobile use should be prohibited on Snow Mesa, or at minimum north of the CDT. Currently snowmobiles are permitted to the Wilderness boundary at Baldy Cinco, which takes that entire area off the table for users who desire a more primitive winter experience. A ski tour which has become popular in this area is described in *Light Tours of Colorado*, by Lou Dawson, Beacon Press.

The RGNF should identify, preserve and protect significant areas for quiet non-motorized use, an example of which is the area stretching from Heart Mountain to the Lobo winter trailhead and snowshed over US Hwy 160. Other significant areas that should be off-limits to OSV use include the area around Neff Mountain, as well as buffers around the Spruce Hole Yurt and the Pass Creek Yurt.

--Wildlife in Winter--

Low elevation areas suitable as winter habitat for ungulates such as elk, mule deer, and bighorn sheep should be protected from excessive motorized disturbance. A starting point would be to close the areas formerly shown as Winter Motorized Closures on the Saguache, Conejos and Divide Ranger District maps. These closures should include tracked ATV's, tracked UTV's, and other OSV uses except where there is a need for administrative or other authorized use. It should be clear that these closures DO NOT prevent or prohibit mountain lion hunting, but instead prevent motorized off-road access during winter and spring when ungulates are most vulnerable. Examples of concentrated winter ungulate use where closure to even low levels of motorized use (including for lion hunting) is crucial are the open slopes in the Farmers Creek area (between the Wason Ranch and La Garita Wilderness) and the southwest facing slopes of Long Ridge north of Hwy 149 near Freeman's store.

The three Ranger District maps published for the RGNF seem to illustrate that in the past, the Forest Service failed to adequately consider protection of natural resources when designating routes through areas that were restricted for winter OSV use. In fact almost every possible route was designated as Open through big-game winter range as shown in green on the Ranger District maps. One example of the scale of this issue is on the Saguache Ranger District at Hodding Creek, where County Rd 41G provides necessary public access but all other Forest Roads are designated winter travel routes including 720, 706, 707, 707.1A, 707.1B, 708, 710, 716, and 711.

Another example is the area south of Buffalo Pass Campground and west of Upper Guard Crossing, where County Rd NN14 and FR750 provide the main access. Every route in that area of the Forest was designated Open in winter including 750.2B, 796, 750.2C, 750.2D, 780, 780.1A, 783, 780.2B, and 770. The starting point under this Proposed Action for evaluating access must be an assumption that all routes will be closed, then carefully evaluating (with documentation) routes in an area to see which (if any) may be opened without unnecessary resource degradation, including wildlife disturbance.

At the public scoping meeting held June 5, 2024 in South Fork, a couple of meeting attendees maintained that "there is no wildlife where we snowmobile". That's obviously false. Where snow is abundant the RGNF provides habitat for a large number of wildlife species. High elevation species such as snowshoe hare and ptarmigan are deserving of functioning habitat with sufficient protection from human disturbance, both human-powered and motorized. Timbersleds, which can travel in forested terrain that was thought to be inaccessible until recently, may create the need for additional non-Wilderness forested areas to be closed to motorized use to provide security for forest interior species like marten and lynx. Wolverine will soon be reintroduced in Colorado. Modeling of persistent late season snowpack can identify potential denning areas. In addition to minimizing disturbance, it is important to limit the extent of snow compaction.

Snowcats used for recreation often have total width of 102 inches or less in order to avoid Wide Load trailer issues. This results in track widths that are a compromise in terms of floatation and creates the need to maintain compacted snow travel routes for snowcat use in the backcountry when the snowpack is deep and low density. As a snowcat owner/operator it seems reasonable to restrict snowcat use to designated OSV routes.

--Monitoring and Enforcement--

It is vital that the resources be available for monitoring to ensure the Proposed Action is effective, and that enforcement is sufficient to protect Forest resources. Conflict between various user groups is likely to increase unless mitigated by education, signage, and the presence of interpretive and law enforcement personnel.

New gates to limit road access should be considered where they can help reduce user conflict and/or protect resources. At the entrance of the Archery Range Road (FS265.1A) a bar gate would prevent wheeled vehicles from damaging the accumulating snow before and during the early skiing season, and would protect the road from damage during the spring mud season. Additionally, buffers where OSV use is prohibited are warranted around the perimeter of Wolf Creek Ski Area, along with enhanced enforcement.

Thank you for considering my comments. I look forward to participating in the remainder of the OSVTravel Planning Process.

Sincerely,
David C. Jones