

Data Submitted (UTC 11): 7/7/2026 6:35:54 PM

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Comments: Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for the Rio Grande National Forest Over-Snow Travel Management Project.

As a concerned snowmobiler who has recreated in the South San Juans for nearly 20 years, I feel compelled offer my thoughts not only on the preferred alternative but on the DEIS as a whole.

I support Alternative 3 because it appears to provide the most balanced approach among the alternatives considered.

Alternative 3 achieves the objectives of the Travel Management Rule, fulfills the commitments established through the 2023 settlement agreement, protects identified wildlife resources, and maintains substantial traditional over-snow recreation opportunities that have existed on the Rio Grande National Forest for decades.

Alternative 3 Satisfies the Purpose and Need of the Project

The 2023 settlement agreement requires the Forest Service to complete an Over-Snow Vehicle (OSV) designation decision and complete the travel management planning process. The settlement does not require the agency to adopt the most restrictive alternative, nor does it require elimination of traditional cross-country snowmobile opportunities.

Alternative 3 establishes a designated OSV management framework while protecting identified resource concerns and preserving substantial recreational access. As such, Alternative 3 appears to satisfy both the regulatory objectives of the project and the practical needs of the recreating public.

Below I would like to identify some issues I have with the DEIS and why I do not believe Alternatives 2 or 4 should be adopted -

Recreation Conflict Analysis Lacks Quantified Data

The DEIS identifies recreation conflict as one of the primary issues evaluated during development of alternatives. However, the Rio Grande National Forest's own Recreation Assessment acknowledges:

"We have limited documentation regarding the location, type, or frequency of recreation user conflicts" and "We have limited winter use data."

These statements are important because the DEIS does not appear to present:

- *law-enforcement statistics,
- *complaint records,
- *conflict incident reports,
- *accident data,
- *citation records,
- *documented winter user-conflict databases,
- *or quantified measures of conflict specific to the Rio Grande National Forest.

Before imposing broader restrictions on motorized winter recreation opportunities, the Final EIS should clearly identify the empirical basis supporting conclusions regarding the frequency and severity of motorized and non-motorized conflicts on the forest.

Air Quality Analysis Does Not Demonstrate a Site-Specific Problem

Issue #5 identifies air quality as a concern associated with motorized over-snow vehicle use.

However, the DEIS states that air quality within and near the Rio Grande National Forest is currently "good to excellent."

I could not identify:

- *emissions inventories,
- *pollutant monitoring data,
- *dispersion modeling,
- *health impact assessments,
- *exceedances of air-quality standards,
- *or site-specific evidence demonstrating that over-snow vehicle use is causing measurable degradation of air quality.

The Final EIS should explain how air-quality concerns justify additional restrictions if no measurable impact has been identified.

Assessment 2 Does Not Appear to Provide OSV-Specific Evidence

The DEIS cites the 2015 Assessment 2 Air Quality, Soils and Geology, and Watersheds and Water Resources report as support for concerns regarding motorized recreation impacts.

However, the publicly available Assessment 2 Executive Summary does not discuss:

- *snowmobiles,
- *over-snow vehicles,
- *winter travel management,
- *snow compaction,
- *or winter recreation impacts.

Instead, its discussion of sediment concerns references ATV trails.

The DEIS itself acknowledges that Assessment 2 did not distinguish between summer and winter motorized recreation.

Because Assessment 2 was not an OSV-specific study, it should not be relied upon as direct evidence of impacts from cross-country over-snow vehicle use without additional supporting analysis.

Canada Lynx Analysis Would Benefit From Additional Explanation

The DEIS relies heavily on snow compaction as an indicator of potential effects to Canada lynx habitat.

However, the document does not clearly explain the biological mechanism connecting compacted snow to measurable effects on lynx populations or habitat conditions on the Rio Grande National Forest.

Alternative 3 already incorporates significant protections through designated routes and limited areas within sensitive habitats. Before expanding restrictions further under Alternative 4, the Final EIS should clearly identify the additional biological benefits expected from those additional restrictions.

Alternative 3 Provides Appropriate Big Game Protection

Alternative 3 restricts cross-country travel within severe winter range identified by Colorado Parks and Wildlife.

Alternative 4 expands restrictions into broader areas of general winter range.

The Final EIS should clearly explain why the protections provided under Alternative 3 are insufficient before adopting significantly larger route-only restrictions under Alternative 4.

Alternative 3 Best Balances Access and Resource Protection

Review of the DEIS maps indicates that Alternative 3 retains major groomed route systems and substantial open riding opportunities across the forest while establishing route-only travel within identified sensitive areas.

Alternative 4 maintains many designated routes but appears to substantially expand route-only acreage and reduce traditional cross-country riding opportunities across larger portions of the forest.

As a result, Alternative 3 appears to provide a more balanced outcome by preserving historic recreational opportunities while still implementing meaningful resource protections.

Consistency with Executive Order 14313 (Make America Beautiful Again Commission):

Executive Order 14313 establishes a policy of expanding access to public lands while promoting responsible stewardship of natural resources. The Order specifically directs federal land-management agencies to expand

access to public lands and promote recreational opportunities including hunting, fishing, hiking, biking, skiing, climbing, boating, off-roading, and wildlife viewing. It also emphasizes responsible conservation and recovery of fish and wildlife populations through collaborative conservation efforts.

Viewed through that framework:

Alternative 1

Alternative 1 most strongly preserves recreational access but does not establish the designated management framework that is the purpose of this planning effort.

Alternative 2

Alternative 2 advances designated management objectives, but as a whole is far too restrictive to cross-country OSV travel. It does not appear to comply with the spirit of EO 14313 in any way.

Alternative 3

Alternative 3 appears to best balance the Executive Order's dual objectives by:

- *implementing Travel Management Rule compliance,
- *protecting severe winter range,
- *retaining major groomed route systems,
- *and preserving substantial traditional cross-country over-snow recreation opportunities.

Alternative 4

Alternative 4 provides far too many route-only restrictions and appears to reduce traditional cross-country riding opportunity beyond the protections already included in Alternative 3. Because Executive Order 14313 specifically promotes expanding public access and supporting "off-roading" opportunities on public lands, the Final EIS should clearly identify the measurable environmental benefits expected from Alternative 4 and explain why those benefits justify the corresponding reduction in cross-country over the snow access. I am taking the language in the EO of "off-roading" to bilaterally include "cross country snowmobiling".

Conclusion:

Alternative 3 appears to provide the most balanced and supportable outcome among the alternatives considered.

Alternative 3:

- *Complies with the Travel Management Rule.
- *Satisfies the settlement obligations that initiated this planning process.
- *Protects severe winter range and other identified resources.
- *Preserves major access routes and substantial traditional cross-country riding opportunity.
- *Aligns with the principles of responsible conservation and recreational access emphasized in Executive Order 14313.

For these reasons, I respectfully encourage the Forest Service to select Alternative 3 and ensure that any future restrictions adopted beyond those contained in Alternative 3 are supported by clear, site-specific evidence demonstrating measurable environmental benefit that do not come at the detriment to the snowmobiling experience we have all come to love and enjoy on Wolf Creek Pass.

Thank you for your consideration of these comments.

Respectfully,

Aaron Holten