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Comments:

1. I want to clearly identify my support for the map of Alternative 3 of the Proposal and opposition to Alternatives 2&4. The EIS materials are inconsistent in identifying the preferred alternative. Snowmobilers must avoid using "preferred alternative" in comments. We vigorously oppose alternatives 2 and 4 provided but these are often identified as preferred or project alternatives in the proposal.

2. The Alternative 3 map represents the only viable management plan for snowmobile usage. The DEIS analysis does not reflect decision making provided in Alternative 3 of the Proposal. Snowmobile open areas are globally recognized opportunities on the Rio Grand. Open areas such as these have been recognized in the 2015 Winter Travel Management Rule.

3. You oppose any merged or modified Alternatives being developed given the inconsistencies in the DEIS. In the exceptionally limited engagement with the Forest on the Proposal, it is clear bad information about use and conflict has been systemically provided from sources that are not identified.

4. Alternative 2 proposes buffer zones around Wilderness, which are illegal under the Colorado Wilderness Act of 1980 (PL 96-560 §110). The DEIS must apply federal law.

5. Any Lynx analysis in the DEIS must be updated to align with current science, which clearly concludes lynx are not effected by dispersed recreation, which is clearly stated on the USFS webpage on lynx management. USFS researchers developed lynx research on the forest and have resolved any concerns about lynx impacts from dispersed recreation. These are works that CSA has partnered in the development of and are now the foundation of lynx management across the country. The 2025 National Lynx recovery strategy only requires populations of lynx to be monitored in response to recreation activity of all forms. This is not reflected in the Proposal at all.

6. The DEIS continues to apply the "no net gain" for snow compaction which has been superseded 4 times since its release in 2000. The LCAS 3rd recognized snow compaction as a natural process. This natural process is identified as sintering for avalanche forecasting, and there are decades of research recognizing these conclusions. These materials were addressed in CSA scoping comments on the effort but are not addressed in the DEIS. This must be corrected as best available science must be applied.

7. The DEIS spends significant time addressing the "minimization criteria" for motorized usage. The minimization criteria requirements were withdrawn by President Trump on May 29, 2026. Current federal law requires adequate access be provided for recreation under 16 USC §532. Adequate access must also specifically provide access for emergency response and other values under 16 USC §583a. The DEIS never mentions these legal requirements.

8. Economic impacts of any alternatives restricting access must be addressed as the communities in the planning area are heavily reliant on motorized access for winter revenue.

9. User conflicts must be accurately addressed in the DEIS. Nonmotorized users have more than 20% of the forest available for quiet opportunities. Those wanting different types of access must develop access to those areas rather than rely on motorized routes and areas to access these areas.

10. The 2024 Explore Act requires improved access and other new requirements but is never mentioned in the Proposal.

11. We are opposed to the implementation of any corridors or closures on or around the Continental Divide Trail for motorized usage. Motorized usage is permitted under federal law on the CDNST and this is reflected in the Rio Grand NF RMP. Any corridors should only be protecting trail users from non-trail related impacts rather than elevating certain users of the trail over other users.