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First name: Janelle
Last name: Kukuk
Organization: Mineral County
Title: County Administrator
Comments: To Whom It May Concern:

Please accept that attached files that include a signed letter by the Mineral County BOCC and referenced studies as Mineral County Board of County Commissioners comment on the OSV Travel Management Planning Project. I look forward to continued dialogue. Thank you for this opportunity.

Janelle Kukuk

County Administrator

Mineral County

Thank you for the opportunity to comment on the proposed OSV Travel Management Planning Project. Mineral County has a land mass of 876 square miles and 96% of that is Public Land, with the vast majority of that 96% being the Rio Grande National Forest (less than 1% is State Wildlife Lands). It is with pleasure that we make these comments as the health, use and economy of this forest is paramount to the success and viability of our residents and pleasure of our visitors.

When the mining activity that sustained Mineral County for nearly 100 years closed in 1985 Mineral County was forced into completely resetting its economic base. Sitting at the Headwaters of the Rio Grande and surrounded by the Forest, it was easy to create a tourism base around our natural resources. Of course, at the time we had beautiful, green trees, well-maintained trails and fewer people. As the health of the forest has diminished because of bugs and the trails have been clogged by dead and dying trees the number of people has increased exponentially. So, even though our forest isn't what it used to be, the economy of Mineral County is still firmly rooted in the Rio Grande Forest.

Although it has taken many years for us to fully realize a winter outdoor economy that includes an outstanding ski area and thousands of acres of winter motorized and human powered recreation opportunities, it is now a part of the fiber of our bustling winter economic base. We are very concerned that any attempt to silo uses beyond the restrictions of Wilderness, Roadless areas and Big Game Winter Range, that are already placed on motorized travel, will have negative effects on that growing winter economy. Of the 876 square miles of Mineral County, 28% (244 square miles) is Roadless and is always susceptible to restrictions on motorized travel. Designated Wilderness that absolutely prohibits motorized recreation is 160 square miles of that Roadless number. Accounting for private land and unrideable terrain the amount of multi-use area for motorized dwindles quickly.

Creating additional exclusive use areas for non-motorized recreation seems to violate the Multi-Use Policy of

National Forest Lands as well as compromising the local economy. In the Spending Patterns of Outdoor Recreation Visitors to National Forests, by Eric M. White, published in October of 2017 (attached) the spending habits of winter motorized recreation clearly surpass those of human powered recreation (Tables 35, 37a and b). Again, in the Economic Contribution of Off[shy] Highway Vehicle Recreation in Colorado, published by Abt Global, LLC for Fiscal Year 2022-23 (attached), the spending of winter motorized recreation is clearly an economic boon to this part of the state, with direct spending in the $26M range for South Central Colorado. The correlation

between the spending habits of winter motorized recreationists and a healthy winter economy appears to be obvious. Cutting the quality and quantity of riding areas and/or creating exclusive use areas for non-motorized users WILL negatively impact Mineral County's economy.

One of the premises of the National Forest Service Mission, Ga.ring for the Land an_a Serving People, is "Protecting and managing the National Forests and Grasslands so they best demonstrate the sustainable multiple-use management concept." (emphasis added) The appeal of the Rio Grande National Forest and specifically the Divide Ranger District is its Multi-Use Nature. Doing anything to diminish that fact and perception will detract from the Forest in general. Once again, limiting who can recreate where, will lead, at minimum, to the perception that the Forest only caters to a select few and not the general population. In our understanding of the requirements of the Travel Management Rule, areas defined for OSVtravel have to be defined. To maintain this age-old mandate to keep the Forest open to multiple uses we strongly encourage you to define these areas with broad strokes that give OSV users the best quality and quantity for their riding pleasure. There will still be several thousand acres for everyone to recreate in and enjoy their preferred experience without compromising someone else's. Making the playground smaller isn't the answer.

Finally, as partners of the Rio Grande National Forest, particularly in Law Enforcement and Search and Rescue operations, we are gravely concerned about the impact on setting aside areas that prohibit motorized traffic. Although, we recognize your intentions in allowing administrative and emergency access to these areas that would accommodate these kinds of activities, winter offers a very unique challenge to that premise. One snowmobile/snow bike track equals fifty tracks! It is truly human nature to follow a track into virgin powder. We all are aware that when Wilderness Boundaries are properly signed, it is a no brainer to assume non-compliance when a track is visible. But when there are other areas that are defined non-motorized (appreciating your desire to use existing physical boundaries to define them) chaos will reign when a human powered recreationist needs rescued because of injury and now there are dozens of snowmobile track legitimately allowed into the area and 5 days later there are dozens more because a there were already tracks!!! Our resources are limited and putting undue pressure on our people defeats the partnership we have worked hard to foster.

In closing, Mineral County respectfully requests long consideration of any new restrictions on OSV travel on the Rio Grande National Forest. Designated Wilderness, Roadless Areas, Big Game Winter Range, Private Land, all exist and restrict OSV travel. We ask that you consider the economic downside of minimizing motorized use across the Forest. We ask that you remember and recognize the Multi-Use mandate of the Forest Service in general and keep this Forest as close to that mandate as possible. And we ask that you understand the limited resources of our law enforcement and search and rescue units. We want to be good partners and designated non-motorized areas in what is now considered open riding areas would really tax and challenge these resources.

Again, thank you for the opportunity to comment and we are looking forward to continued conversations.