



Colorado Snowmobile Association, Inc.

Advance, Promote, Preserve the Sport of Snowmobiling
PO Box 395
Walden, Colorado 80480

January 14, 2013

Anthony Koch, Environmental Coordinator
USFS
100 Main, PO Box 158
Walden, CO 80487

RE: Rabbit Ears Winter Parking Project

Dear Mr. Koch;

Please accept this correspondence as the comments of the Colorado Snowmobile Association ("CSA") vigorously in favor of expanded parking opportunities for the motorized community in the vicinity of Rabbit Ears Pass. Prior to addressing the specific reasoning for this support, CSA believes a brief discussion of the Organizations history and mission will substantiate the specific issues addressed in these comments. CSA was founded in 1970 to unite winter motorized recreationists across the state to enjoy their passion. CSA currently has 2,500 members. CSA is the voice of organized snowmobiling seeking to **advance, promote and preserve the sport of snowmobiling** by working with Federal and state land management agencies and local, state and federal legislators.

Safety

CSA believes that expanding parking resources for winter users in the Rabbit Ears areas is a critically important issue, as the capacity of the current motorized parking opportunities are frequently exceeded resulting in users being forced to park adjacent to US 40 going over Rabbit Ears Pass. The Organization believe this situation creates safety concerns for those traveling on US 40, those users trying to park and those users who have parked and are trying to access trailheads in the area. CSA believes with the current parking arrangements it is only a matter of time before users are seriously injured or killed. These situations should be avoided at all costs.

CSA further believes that safety concerns are significantly higher on the motorized portions of Rabbit Ears Pass, given the frequent overflow of existing parking facilities, when compared to non-motorized parking facilities. CSA believes any expansions of parking must occur on the motorized portions of Rabbit Ears Pass prior to addressing non-motorized issues. CSA also vigorously believes that no existing parking facilities should be closed until replacement capacity has been fully developed and made available to the public.

CSA welcomes the addition of acceleration and deceleration lanes on Route 40 in the vicinity of the motorized parking area. The addition of these lanes would allow safe access to parking facilities for all

users, as entering or exiting parking areas is a primary activity that results in safety concerns for all users.

Signage

CSA believes that roadside signage to inform all users of Route 40 of current parking and snowmobile usage in the Rabbit Ears area is a critical component of the safe usage of the area for all users. CSA believes additional signage in and around Rabbit Ears Pass would be a cost effective and immediate manner to address safety concerns associated with recreational usage of the Pass. If funding of such signage is not available through more traditional CDOT channels, CSA encourages the Forest Service to contact CPW trails program representatives regarding funding for signage as monies are normally available for purchase of signs without the necessity of formal grant requests. While highway signs are traditionally beyond the scope of usage for these monies, CSA believes the concerns on Rabbit Ears Pass are of sufficient magnitude to allow for some flexibility in these standards.

Economics

CSA believes there are many factors that have contributed to the current parking situation for motorized users. Rabbit Ears is nationally known as a premier riding location, resulting in users traveling long distances to use the Rabbit Ears area. Frequently Rabbit Ears parking lots have license plates from all over the snow belt states, including Illinois, Indiana and Pennsylvania after a significant snowfall. The willingness of the public to seek out the exceptional motorized opportunities provided by the Rabbit Ears area provides a significant economic contribution to all local communities, including Steamboat Springs, Walden and Kremmling, which weighs heavily in favor of expanding motorized access to the area. These contributions are in addition to the large number of Colorado snowmobilers who make a weekly voyage to the Rabbit Ears Pass area to utilize the exceptional backcountry motorized opportunities the area provides.

CSA believes the economic contribution of motorized recreation on Rabbit Ears pass is immediately seen as existing parking facilities frequently have several multimillion dollar haulers and campers utilizing the parking lots to access riding opportunities on Rabbit Ears. While the size of these haulers and campers is impressive, the increased size of these pieces of equipment must be taken into account in the design and development of any new parking facilities to allow for maintenance of new parking facilities around this equipment and allowing reasonable ingress and egress to parking locations with equipment of this size.

While there are non-motorized recreational opportunities in the Rabbit Ears area, parking for these opportunities rarely if ever exceeds parking capacity on the Pass. If a certain parking lot is at capacity, which occurs rarely in CSA's experience, other adjacent parking lots are able to absorb this overflow.

Fees for parking and services.

CSA is aware significant Forest Service resources are directed to the Rabbit Ears area for winter recreational issues and given the exceptional snowfall, plowing and general maintenance of any parking area is expensive. As part of this proposal, user fees have been included in the scoping document. CSA must note that user fees may be a sensitive subject for motorized users. Motorized users already pay registration fees in the Colorado Parks and Wildlife Snowmobile registration program which funds the purchase of groomers and operating expenses which are combined with the strong partnership with the Rout Powder Riders Snowmobile Club to provide significant resources for public access to the Rabbit Ears area. As motorized users are the only user group that pays to play on the Pass, CSA believes this must be taken into account. In addition, CSA must note discussions regarding user fees have not been well received by users previously.

If fee for service plans are seriously reviewed as the only option for a service or parking resource, CSA believes these fees **must** be:

1. Uniformly applied to all users on Rabbit Ears Pass;
2. Reasonable to usage (ie overnight camping fees are more than day parking); and
3. Returned for the benefit of the user group that was the source of the fee.

Alternative parking locations not addressed.

In our discussions with members on this issue, several other locations for possible parking lot expansions have been discussed. We are noting these locations in these comments to allow for future targeted analysis and discussion.

1. Dumont Lake- develop a parking facility north of existing parking opportunities and adjacent to FSR 315 beyond existing wetlands and historical site. CSA believes there is summer motorized parking facilities in that area. CSA is aware that maintenance of an access road into this area could be problematic in the past but with new maintenance resources available to CDOT on the pass, this option maybe reasonable.
2. Old Columbine area- develop a parking facility across the road from the current small parking lot. The MVUM for this area identifies there is a summer motorized route in this area and several locations in that area that could provide opportunities for parking on the generally northern side of Route 40. These lots are reasonably close to current groomed routes in that area.
3. Boundary Lot - CSA has had discussions with Forest Service officials regarding placement of a multiple use parking lot to the north of Route 40 in the general vicinity of Steamboat Lake Snowmobile Rentals. It is our understanding that this location would be suitable for a large

parking facility but user conflict would be a concern given the separation of uses on the Pass. CSA believes education of all users would have to be a significant component of any plan to develop this area as previously there have been significant issues with socially based user conflicts between user groups on the Rabbit Ears Pass.

4. Muddy Creek - CSA believes there maybe opportunities for expansion of the Muddy Creek parking lot in areas to the south of Route 40. These opportunities maybe limited by the proximity of wetlands to this area and concerns about access to Route 40 being from both sides of the roadway.

Wildlife Concerns

While there are no specific wildlife concerns raised in the scoping document for the proposal, CSA is aware that often numerous comments are received during public scoping process regarding the belief that there are significant impacts to wildlife from any expansion or change in motorized recreation. Often these comments are very successful at tugging on ones heart strings, but these concerns are not science based. The on going nature of these unwarranted concerns during commenting processes has led Forest Service researchers to clearly state:

“The debate regarding the effects of motorized recreation on wildlife is largely a social issue as opposed to a wildlife management issue.”¹

CSA is an active participant in numerous stakeholder process regarding the reintroduction of species in Colorado and is actively supporting lynx research projects in the state of Colorado. CSA wants to address and understand possible wildlife impacts from our sport and any mitigation efforts that might be necessary. Through this process, CSA representatives have had numerous conversations with researchers and these conversations uniformly support the position of the Forest Service articulated above. CSA believes that a healthy and well managed wildlife population is a key contributor to the quality experience provided all users of public lands in Colorado. CSA does not believe the proposal runs any risk to the wildlife populations in the proposal area.

Conclusion

CSA vigorously supports the proposal to expand parking along Route 40 on Rabbit Ears Pass, as there are significant safety concerns that result from the limited parking opportunities currently available in the Rabbit Ears Pass area. Motorized access to the Rabbit Ears area is a nationally known resource for the motorized community, use of which is a significant economic contributor to local communities.

¹ PJ White & Troy Davis. *Wildlife responses to motorized winter recreation in Yellowstone. USFS 2005 Annual Report* at Pg 1.

Please feel free to contact Scott Jones at 518-281-5810 if you should wish to discuss these matters further or if you should wish to have further information regarding these concerns.

Sincerely,

Randall Miller
President
Colorado Snowmobile Association

Scott Jones, Esq.
Vice President
Colorado Snowmobile Association